

# People and Equality Impact Assessment

This document fulfils the ICO's requirements to conduct Equality Impact Assessments, as a requirement to have due regard under the Equality Act. This document helps you to assess the equality relevance of a policy or procedure on one or more groups of people with protected characteristics. Guidance is also available for People and Equality Impact Assessments (PEIAs), which you can access [through this link](#), along with a glossary of issues to consider, which you can access [through this link](#). The purpose of PEIAs is to ensure that equality issues are identified and mitigated. The guidance and "issues to consider" documents are intended to assist with this, but they are not a substitute for consultation with people with lived experience of any of the protected characteristics. Therefore, you should, wherever appropriate, consult with the relevant EDI staff networks or other colleagues to discuss potential impacts.

You must read the guidance and glossary before completing the document.

Please tick here to confirm that you have read the [guidance](#).

Please tick here to confirm that you have read the [glossary of issues to consider](#).

Completed PEIAs will be published [on the ICO's website](#).

## Summary

Please provide your name.

*Answer:* People Services

What is the title of this piece of work? Please try to ensure that this is likely to be understandable to everyone in the ICO.

*Answer:* ICO25 – Organisational Design phase 1

Briefly describe the overall purpose of this work.

*Answer:* In response to our ICO25 plan, we have been thinking about the way we are organised. In particular, we need to make sure we are working in ways which support the strategic shifts of approach called for by ICO25. We also need to be able to respond flexibly to external pressures and events during the life of ICO25 and beyond.

The adjustments we are describing in phase 1 are things that we intend to do, subject to consultation. The consultation starts now and runs until 12 September. After the consultation ends, we will agree the organisation design changes for phase 1. Implementation plans including the timetable will then be developed with people responsible for the work.

Phase 1 proposes a redistribution of Directorates and departments across the Executive Team to ensure that we have the foundations in place to deliver ICO25.

## Initial screening questions

Q1. Does this work relate to an ICO policy, procedure, working practice or anything broadly similar? This includes both current policies and new policies under development.

Please answer Yes or No

*Answer:* Yes

*If you answer **No** to this question, you may not need to complete a PEIA. PEIAs are only required for policies, procedures and similar. However, with the ICO's commitment to equality, we would like PEIAs to be completed for as much of our work as possible. This should be beneficial in ensuring that you consider any potential equality issues while developing work.*

Q2. Is this work about the explanation of the laws which the ICO regulates, or about decisions to use or not use any of our regulatory powers (e.g. monetary penalties, enforcement notices, information notices etc)?

Please answer Yes or No

*Answer:* No

If you answer **Yes** to this question, you may not need to complete a PEIA. You do not need to do a PEIA in coming to a decision regarding regulatory action, or explaining how the law operates, as equality considerations are assumed to be part of the laws. However, in areas such as guidance or anything similar, you should definitely complete a PEIA.

If a PEIA is not required, the person with responsibility for this piece of work should decide whether a PEIA should be completed.

### Impact on people with protected characteristics

The issues to consider annex, [available through this link](#), sets out some issues that you should consider for each protected characteristic.

Q3. For each of the protected characteristics, you should consider whether there are any **positive impacts** for people with each characteristic and set those out in the table below. If you think there are any **negative impacts**, set those out in the table below **and explain how you will fully mitigate those impacts**. If you think there is no impact, please explain why you think that is the case.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
<b>Religion or belief</b>	<p>Neutral – there will be no detrimental impact on anyone due to religion or belief.</p> <p>While the restructure may generate some uncertainty for those who move to new teams and this may not foster an environment where people feel safe to talk about their beliefs immediately. However TWOWs will be</p>	Yes

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>reconsidered by leaders within the new structure to ensure that they are inclusive of and incorporating all the religions and beliefs within the team. Where adjustments are required for individuals due to religious reasons, such as flexible working or not attending meetings during prayer time, this will be accommodated as much as possible and factored into the ways of working.</p> <p>There will continue to be single sex spaces, as well as unisex options available, preserving the dignity of those who may feel uncomfortable.</p> <p>All staff are informed of and encouraged to join the staff networks within the ICO, enabling an open and inclusive environment.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p>	

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
<p><b>Race, nationality or cultural background</b></p>	<p>No impact – there will be no detrimental impact on anyone due to their race, nationality or cultural background.</p> <p>There will continue to be single sex spaces, as well as unisex options available, preserving the dignity of those who may feel uncomfortable.</p> <p>Flexibility will be considered in terms of working patterns where possible to ensure inclusivity for all groups.</p> <p>The ICO has a supportive and inclusive culture, sensitive to the terminology used which may cause offence and ensuring that people are able to identify as their appropriate race or cultural background. This is embedded across the organisation and so a change in reporting lines or Executive Directorate should not have a detrimental impact.</p> <p>If anyone did feel impacted, it would be investigated appropriately and in line with ICO policies and procedures.</p>	<p>No impact</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p>	
<p><b>Disabled people</b></p>	<p>Negative – the relocation of ‘office homes’ may cause some uncertainty and/or need for physical adjustments to be relocated to their new working space.</p> <p>In addition to physical adjustments, a review will be needed of other adjustments, such as flexible working, alongside TWOWs to ensure that there is consideration given to different requirements and what is reasonable for the teams.</p> <p>The Inclusion and Wellbeing team, as well as others in People Services, will work with Estates and the Department Heads, Directors and Executive Directors to ensure a smooth transition of adjustments for individuals. This will be supported by the Reasonable</p>	<p>Yes – the proactive mitigation will counter any potential negative impacts of the move on people with disabilities.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>Adjustment Passport process and logs of adjustments in place.</p> <p>There will also be proactive contact with the teams in their existing structure to ensure that any informal arrangements to support the requirements individuals may have are transferred smoothly. As well as proactive internal communications to ask people to keep their passports up to date.</p> <p>The leadership in new teams will be asked to review their communications to ensure that it is inclusive of anyone moving into their team, including use of different systems and documents.</p> <p>New office locations, or 'team homes' will be reviewed to ensure that accessibility is the primary consideration for all team members; guaranteeing that there is access to all facilities of all individuals.</p> <p>In addition, we will ensure a consistent flow of communication with the teams and individuals moving, as necessary, to ensure</p>	

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>that any issues or concerns with the moves are highlighted.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p>	
<b>Sexual orientation</b>	<p>Neutral – there will be no detrimental impact on anyone due their sexual orientation.</p> <p>The ICO has a supportive and inclusive culture. All staff are informed of and encouraged to join the staff networks within the ICO, enabling an open and inclusive environment.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p>	Yes



Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
<b>Sex (see note 1)</b>	<p>Neutral – there is equal application of all the changes to both men and women. There isn't the intent for any of the changes to impact either sex or gender more significantly than another.</p> <p>There will continue to be single sex and gender neutral spaces available, as well as the ability to self identify.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p> <p>The ICO has a supportive and inclusive culture. All staff are informed of and encouraged to join the staff networks within the ICO, enabling an open and inclusive environment.</p>	Yes
<b>Age</b>	Neutral – there will be no detrimental impact on any candidates due to their age.	Yes

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p> <p>The ICO has a supportive and inclusive culture. All staff are informed of and encouraged to join the staff networks within the ICO, enabling an open and inclusive environment.</p>	
<p><b>Gender reassignment (see note 2)</b></p>	<p>Neutral – there will be no detrimental impact to people going through gender reassignment.</p> <p>There will continue to be single sex and gender neutral spaces available, as well as the ability to self identify.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will</p>	<p>Yes</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>be followed, including the anonymisation of our applications.</p> <p>The ICO has a supportive and inclusive culture. All staff are informed of and encouraged to join the staff networks within the ICO, enabling an open and inclusive environment.</p>	
<b>Marital status</b>	<p>Neutral – there will be no detrimental impact on any candidates due to their marital status.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p>	Yes
<b>Pregnancy and maternity</b>	<p>Neutral – there will be no detrimental impact on any candidates due to pregnancy or maternity.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will</p>	Yes

<b>Protected characteristic</b>	<b>Is there likely to be a specific impact on people with this characteristic?</b>	<b>Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?</b>
	<p>be followed, including the anonymisation of our applications.</p> <p>Being pregnant or on maternity leave will not be a barrier to people contributing to the consultation. The consultation documents will be sent to everyone on long term absence, with the opportunity to engage. Managers will be reminded of this through internal communications.</p> <p>We will ensure that internal staff on maternity leave are informed of the vacancies in good time to apply for the posts.</p>	
<b>Political opinions</b>	<p>Neutral – there will be no detrimental impact on people due to their political opinions.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p>	Yes
<b>People with dependants</b>	Neutral – there will be no detrimental impact on people with dependants	Yes

<b>Protected characteristic</b>	<b>Is there likely to be a specific impact on people with this characteristic?</b>	<b>Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?</b>
	<p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p> <p>The consultation process has been extended beyond the required thirty days to ensure that people taking leave due to childcare and the summer holidays have the opportunity to engage in the process.</p>	
<b>People without dependants</b>	<p>Neutral – there will be no detrimental impact on people without dependants.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will be followed, including the anonymisation of our applications.</p>	Yes
<b>Socio-economic groups or social classes (see note 3)</b>	Neutral – there will be no detriment impact on candidates from socio-economic groups or social classes.	Yes

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>While the cost of living crisis will impact colleagues across the organisation at all levels, and there has been an acknowledgement that the changes may cause additional anxiety to people struggling already, the ICO are committed to supporting individuals. Financial advice and guidance is available through our employee assistance programme.</p> <p>There are no plans to change terms of conditions or for the structural changes to result in any redundancies.</p>	
<p><b>Multiple protected characteristics (see note 4)</b></p>	<p>Neutral – there will be no detrimental impact on anyone with multiple protected characteristics.</p> <p>Flexibility will be considered in terms of working patterns where possible to ensure inclusivity for all groups.</p> <p>If there are opportunities for career development they will be open to fair competition and our recruitment process will</p>	<p>Yes</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>be followed, including the anonymisation of our applications.</p> <p>The ICO has a supportive and inclusive culture. All staff are informed of and encouraged to join the staff networks within the ICO, enabling an open and inclusive environment.</p>	

*Note 1: you may also wish to consider gender while considering sex, although gender is not a protected characteristic under the Equality Act.*

*Note 2: you may wish to consider the impact on transgender people while considering people undergoing gender reassignment, although gender is not a protected characteristic under the Equality Act*

*Note 3: Socio-economic group or social class is not a protected characteristic, but we would still like to ensure that we consider the impact of our work in this area.*

*Note 4: Multiple protected characteristics is an opportunity to consider whether there are issues which affect people with most or all of the protected characteristics, or where there may be different impacts of the same issue on different characteristics (e.g. the same issue has a positive impact on people with one protected characteristic but a negative impact on people with another protected characteristic)*

**If you state that for any negative impact the mitigation you have identified will not be able to fully mitigate the negative impact, you will need to**

**contact HR to discuss next steps. Details are provided at the end of this document.**

Q4. The ICO's Welsh Regional Office has a statutory requirement to provide services through the medium of the Welsh language. Will there be a requirement for this work to include a Welsh-language element?

Please answer Yes, No or Don't Know

Answer: No

*If you answer **Yes or Don't Know** to this question, you will need to contact the Welsh Regional Office to discuss next steps.*

**Contributing towards the ICO's equality objectives**

Q5. How does this work contribute towards the ICO's equality objectives? For each of the objectives in the table below, please explain how the work you are doing will contribute to achieving this objective or state "no contribution". If there are ways that the contribution could be increased, please also mention them here.

Objective	Contribution to objective
Objective 1: <u>Spreading knowledge and taking action:</u> We will raise awareness of information rights across the community and take action to ensure that organisations fulfil their obligations. We will have particular focus on groups and sectors where knowledge gaps may cause information rights inequalities or vulnerabilities. We will ensure that in our actions as a regulator we do not create inequalities or discriminate.	An objective of ICO25 is to enable the organisation to work effectively and efficiently as a regulator, ensuring that we are taking forward the highest priority work.  The development of this structure at the ICO will ensure that we are able to consider inequalities and vulnerabilities in all of the work that we do, proactively, ensuring that we as a regulator do not contribute to these inequalities or discriminate.



Objective	Contribution to objective
	The ICO25 and our new strategic enduring objectives identifies improvements to the reach of the organisation, ensuring that we are reaching communities of unmet need.
Objective 2: <u>Accessible services</u> : Our services and information will be accessible for users and potential users of our services, and we will provide our staff with the skills and knowledge they need to provide high quality services for all. We will try to anticipate customer needs and we will take action to remove barriers to our services when possible.	<p>We will continue to work to ensure that we prioritise based on the societal need. Making information that hasn't been available previously accessible on our website and ensuring that there are no barriers to the service we provide. For example, we plan to continue to provide a telephone service as well as improve our digital offer.</p> <p>We'll ensure that our work is accessible, relevant and easy to understand for a full range of people and sectors with different levels of knowledge about our work.</p>
Objective 3: Encouraging others: We will use our status as a regulator, advisory body and purchaser of services to influence improvements in equality by other organisations and across society.	<p>Our objectives and values will continue to be woven into our procurement processes.</p> <p>We'll continue to use our work as an opportunity to further contribute to our equality objectives.</p>
Objective 4: Employer: Our workplaces and practices will be accessible, flexible, fair and inclusive. We will value the diversity, skills, backgrounds and experience of our people, enabling them to perform to their best in a welcoming and supportive environment.	ICO25 will not change our commitment to be inclusive and ensure that we have a fair, accessible and flexible working environment. We will work with departments to ensure that we are enabling managers to provide support to their teams.

## Monitoring and evaluation

Q6. What arrangements are in place, or will you put in place, to monitor and evaluate the impact of the work on equality?

*Answer:* We will review the success of any moves from phase one, document the process and ensure that lessons are learnt before phase two.

Q7. How long will these arrangements be in place?

*Answer:* Ongoing

Q8. When do you intend to review this monitoring to assess the impact of this work on equality? This should usually be done no later than a year after implementation and may need to be ongoing as part of regular review of the work.

*Answer:* Before we begin consideration for phase two

## Publication

Q9. As stated above and in the guidance, we intend to publish all completed PEIAs on the ICO's website. Are there any parts of your answers to the questions above which need to be redacted prior to publication? Should publication be delayed until a certain date? If so, please provide details for each of these questions in the box below.

You should also review the wording to ensure that it is likely to be as understandable as possible to any member of the public.

*Answer:*

## Conclusion and sign-off

Thank you for completing this PEIA.

You should ensure that the person with overall responsibility for the piece of work the PEIA refers to is content that all potential equality issues have been identified and considered, that appropriate monitoring will be in place and the publication issues have been considered. This might be you, your line manager or someone else in the ICO. Therefore, you may need to provide this PEIA form to that person for review prior to completing it.

Please tick here to confirm that you have consulted with the relevant EDI staff networks or other colleagues where appropriate.

Please state here who has signed off the PEIA.

*Signed off by:* Jen Green

At each of their meetings, the EDI Board will receive a summary of the PEIAs which have been completed over the previous six weeks. However, the role of the EDI Board is **not** review and approval of PEIAs, rather overall assurance that the PEIA process is operating effectively.

For the actions which you have identified, you must complete a PEIA action plan, which you can access at [this link](#).

If you have identified that there are any negative impacts to any protected characteristics that you cannot fully mitigate (so that despite your best efforts, there will still be a negative impact to people with that protected characteristic), you must contact HR for advice.

Please send your completed form to [corporategovernance@ico.org.uk](mailto:corporategovernance@ico.org.uk) for storage and publication.