

Equality Impact Assessment (EqIA)

This document fulfils the ICO's requirements to conduct Equality Impact Assessments, as a requirement to have due regard under the Equality Act 2010, S75 of the Northern Ireland Act 1998 and the public sector equality duty. 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 Equality Impact Assessments (EqIAs), along with a glossary of issues to consider. The purpose of an EqIA 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 employees networks or other colleagues to discuss potential impacts.

You must read the [guidance](#) and [glossary of issues to consider](#) before completing the document.

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

Summary

Prepared by: Jess Scragg, Early Talent Development Manager

What is the title of this piece of work? Workforce Strategy

Briefly describe the overall purpose of this work.

We are continuing to transform as a regulator to meet the needs of our customers and stakeholders. While ICO25 sets out how we are changing our regulatory approach in response to strategic drivers, this workforce strategy looks beyond that horizon at the next three to five years, ensuring that we have strong foundations in our capacity and capability to develop our productivity and effectiveness.

The strategy sets out our vision for the workforce and the objectives and measures to track our progress. It will guide our approach to attracting, recruiting, developing and retaining the people we need today and over the next three to five years, recognising the need to re-shape the capacity and capability of our workforce in response to our strategic priorities, and to ensure we are enabled to be agile and responsive as a regulator. By adopting this strategy our aim is to have the right people with the right skills in the right place at the right time.

Our Workforce Strategy aligns with ICO25, driving our ability to develop our productivity and effectiveness as set out in our High-Performance Strategy and Better Regulatory Interventions programme. Supported by our Transformation Portfolio, we are setting ourselves up to achieve our strategic enduring objectives and ambitious plans to deliver greater value to our people and our customers.

The implementation plan is now ready to move forward, and it is anticipated that it will consist of seven workstreams;

Workstream 1 – Culture

Workstream 2 – Productivity and Efficiency

Workstream 3 – Capability

Workstream 4 – Professions

Workstream 5 – Talent

Workstream 6 – Early Careers

Workstream 7 – Equality, Diversity and Inclusion (EDI)

This is the overarching EqIA for the Workforce Strategy. Each workstream of the implementation plan will have their own EqIA that will identify any risks and mitigations and will be developed by each workstream lead.

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

*If you answer **No** to this question, you may not need to complete a EqIA.*

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 (eg monetary penalties, enforcement notices, information notices etc)?

Please answer: No

*If you answer **No** to this question, you may not need to complete a EqIA.*

If you answered no to both Q1 and Q2, it is best practice to rationalise why there are no negative impacts to each protected characteristic in the table below.

Impact on people with protected characteristics

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. It is best practice to include three mitigations per negative impact. Sign off can only be done with a minimum of two mitigations. 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?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
<p>Religion or belief</p>	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of religion or belief. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>Building an agile, skills-based workforce that is flexibly deployed to meet priority, high impact resourcing needs may generate some uncertainty for those who may be deployed to new teams/projects, but this will create opportunities to learn new skills, and contribute to our most impactful work</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p> <p>Where there are development opportunities for upskilling employees with cross-cutting skills, we will ensure equal opportunity is</p>	<p>This is the overarching EqIA for the Workforce Strategy. Each workstream of the implementation plan will have their own EqIA that will identify any risks and mitigations.</p> <p>If our people are deployed to meet priority resourcing needs, our ways of working will be reviewed, to ensure that it is inclusive of, and incorporates, all the religions and beliefs in 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 TWOW.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	given to all employees irrespective their religion or belief.	
Race, nationality or cultural background	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of race, nationality or cultural background. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>Building an agile, skills-based workforce that is flexibly deployed to meet priority, high impact resourcing needs may generate some uncertainty for those who may be deployed to new teams/projects, but this will create opportunities to learn new skills and contribute to our most impactful work.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p>	<p>This is the overarching EqIA for the Workforce Strategy. Each workstream of the implementation plan will have their own EqIA that will identify any risks and mitigations.</p> <p>The organisation has a supportive and inclusive culture. This is embedded across the organisation and so a change in reporting lines or Executive Directorate should not have a detrimental impact. If anyone did feel impacted, it would be investigated appropriately and in line with organisations policies and procedures.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	<p>Where there are development opportunities for upskilling employees with cross-cutting skills, will ensure equal opportunity is given to employees irrespective their cultural background.</p> <p>WS5 (Talent) and WS7 (EDI) will focus on both increasing representation of colleagues from minority ethnic backgrounds, and ensuring succession plans are supportive in order to increase representation of existing minority groups within the organisations into our most senior grades</p>	
Disabled people	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of disability. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>Building an agile, skills-based workforce that is flexibly deployed to meet priority, high impact resourcing needs may generate some uncertainty for disabled people who may be</p>	<p>This is the overarching EqIA for the Workforce Strategy. Each workstream of the implementation plan will have their own EqIA that will identify any risks and mitigations.</p> <p>If employees are deployed to meet priority resourcing, where reasonable adjustments are required for individuals, this will be accommodated and factored into the ways of working.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	<p>deployed to new teams/projects, but this will create opportunities to learn new skills, and contribute to our most impactful work</p> <p>The development of automation and digital/tech solutions may generate accessibility issues. All automation and digital/tech solutions will have their own EqIA to highlight impact and ensure mitigations.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p> <p>Where there are development opportunities for upskilling employees with cross-cutting skills, will ensure equal opportunity is given to all employees.</p> <p>WS5 (Talent) and WS7 (EDI) will focus on both increasing representation of colleagues with disabilities.</p>	<p>Where internal training is required, we will ensure that we fully support all accessibility requirements.</p> <p>If external providers are required to deliver any aspects of the strategy (e.g. training delivery etc) as part of the procurement exercise to appoint the provider, we will obtain assurances from providers that they comply with our accessibility requirements.</p>
Sexual orientation	It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of	This is the overarching EqIA for the Workforce Strategy. Each workstream of the

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	<p>the organisation, irrespective of sexual orientation. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>Building an agile, skills-based workforce that is flexibly deployed to meet priority, high impact resourcing needs may generate some uncertainty for those who may be deployed to new teams/projects. but this will create opportunities to learn new skills, and contribute to our most impactful work</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p>	<p>implementation plan will have their own EqIA that will identify any risks and mitigations.</p> <p>The organisation has a supportive and inclusive culture. This is embedded across the organisation and so a change in reporting lines or Executive Directorate should not have a detrimental impact. If anyone did feel impacted, it would be investigated appropriately and in line with organisations policies and procedures.</p>
Sex (see note 1)	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of sex. We want our people to be equipped and enabled to deliver the highest priority work that is</p>	<p>This is the overarching EqIA for the Workforce Strategy. Each workstream of the implementation plan will have their own EqIA that will identify any risks and mitigations.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	<p>challenging and rewarding for them and delivers our purpose for our customers.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p>	
Age	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of age. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p> <p>WS6 (Early Careers) will focus on improving our ability to attract, develop and retain younger talent, where at present we are under-represented.</p>	<p>This is the overarching EqIA for the Workforce Strategy. Each workstream of the implementation plan will have their own EqIA that will identify any risks and mitigations.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
Gender reassignment (see note 2)	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of gender reassignment (proposed, undergoing or undergone). We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p>	No impact.
Marital status	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of marital status. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p>	No impact.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.	
Pregnancy and maternity	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of pregnancy and maternity. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p>	<p>This is the overarching EqIA for the Workforce Strategy. Each workstream of the implementation plan will have their own EqIA that will identify any risks and mitigations.</p> <p>People Services will ensure that employees on maternity leave are informed of any key office announcements including career development opportunities/vacancies.</p> <p>For employees on maternity leave, if there are any significant changes in their business area or if training opportunities arise, people managers will make contact to ensure they are kept up to date. At the same time those currently not working in the organisation will be kept up to date on any role opportunities arising</p>
Political opinions	It is anticipated that the work that we deliver in implementing the workforce strategy will	No impact.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	<p>have a positive impact for all colleagues of the organisation, irrespective of political opinion. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p>	
People with dependants	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of people with dependants. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p> <p>The Workforce Strategy will ensure equal opportunity is given to all employees</p>	No impact.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	irrespective their responsibilities to dependants.	
People without dependants	<p>It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of people without dependant. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p> <p>The Workforce Strategy will ensure equal opportunity is given to all employees irrespective their non dependant status.</p>	No impact.
Socio-economic groups or social classes (see note 3)	It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the organisation, irrespective of social-economic groups or social classes, and as part of our workforce strategy we will	No impact.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	<p>continue to hire on a national basis where possible should it support an increase in representation of our workforce, or enable us to broaden our reach for skills in high demand. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and rewarding for them and delivers our purpose for our customers.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p> <p>The Workforce Strategy will ensure equal opportunity is given to all employees irrespective of their socio-economic group or class.</p>	
Multiple protected characteristics (see note 4)	It is anticipated that the work that we deliver in implementing the workforce strategy will have a positive impact for all colleagues of the , irrespective of multiple protected characteristics. We want our people to be equipped and enabled to deliver the highest priority work that is challenging and	This is the overarching EqIA for the Workforce Strategy. Each workstream of the implementation plan will have their own EqIA that will identify any risks and mitigations.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
	<p>rewarding for them and delivers our purpose for our customers.</p> <p>If there are opportunities for career development, they will be open to fair competition and our recruitment process will be followed.</p> <p>The Workforce Strategy will ensure equal opportunity is given to all employees irrespective their having multiple protected characteristics.</p>	

Note 1: you may also wish to consider gender while considering sex, although gender is not a protected characteristic under the Equality Act or s75 of the Northern Ireland Act 1998.

Note 2: you may wish to consider the impact on transgender people while considering the protected characteristic of gender reassignment. This includes if the person is proposing to undergo, is undergoing or has undergone a process.

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 (eg the same issue has a positive impact on people with one protected characteristic but a negative impact on people with another protected characteristic).

4. The ICO has a number of legal obligations in relation to the provision of Welsh language services. Is this work being delivered in Wales, or to the people of Wales, and if so will there be a need to consider the impact on the Welsh language?

Please answer: No

*If you answer **Yes or Don't Know** to this question or would like further information, please contact the Welsh Regional office to discuss next steps via wales@ico.org.uk .*

Q5. In interests of best practice, you should consider whether this work may have a negative impact on or contravene any Human Rights. Click this link to find an overview of each of the human rights and further details about each. The Human Rights Act itself is available at this link. Please confirm that you have considered this and set out any actions you will take to mitigate any impacts.

Answer: Considered - no impact

Contributing towards the ICO's equality objectives

Q6. How does this work contribute towards the ICO's equality objectives? Please explain contributions, state ways contribution could be increased, or state 'no contribution'.

Objective	Contribution to objective
<p>Objective 1: We will represent the communities and societies we serve</p> <p>We believe that diverse teams make better decisions, boost creativity and innovation, enable greater professional growth and increase our understanding of the communities we regulate. As a workforce, we are the most effective and have the greatest impact when we are representative and consider different perspectives.</p>	<p>The Workforce Strategy will help build a strong talent pipeline for the future that continues to diversify our workforce and sustains capability and capacity.</p> <p>Our Workforce Strategy provides confidence to our customers and stakeholders that we have the workforce to deliver our strategic ambitions and priorities. We are committed to enabling our people to prioritise work that is the most complex and has the greatest impact on our customers – individuals and businesses.</p> <p>Historically, we most often have hired for specialist knowledge and experience, but we will need to shift our approach to look at wider, more diverse talent pools. We will explore approaches that will help us find and develop people with the right attitude, aptitude, strengths and behaviours to be successful in the organisation. This involves a change to the way we develop our job descriptions and recruitment practises.</p>
<p>Objective 2: Our culture will be inclusive</p> <p>We're at our best when we support and look out for one another, and when we trust and empower each other to be ourselves. That applies whether it's within the workplace or in the work that we do.</p> <p>We have measures in place to support our diverse workforce, such as reasonable adjustments. However, we will do more to remove the barriers that are</p>	<p>We will build an agile, skills-based workforce that is flexibly deployed to meet priority, high impact resourcing needs.</p> <p>We will work through the implementation of the strategy to ensure we create an environment where there are no barriers to people developing and progressing</p>

Objective	Contribution to objective
preventing people from developing and progressing.	
<p>Objective 3: We will better understand the needs of everyone to deliver services that are accessible to all</p> <p>We target our regulatory interventions on the areas of greatest harm and to make a real difference to people’s lives. Technological innovation by businesses means the landscape we regulate is constantly transforming. We know we’re at our best when we understand the needs of all our customers, including those who experience vulnerability and communities of unmet need.</p>	<p>The workforce strategy looks at the next three to five years, ensuring that we have strong foundations in our capacity and capability to develop our productivity and effectiveness.</p>

Monitoring and evaluation

Q7. What arrangements are in place, or will be put in place, to monitor and evaluate the impact of the work on equality?

Answer: EDI Measures and key performance indicators have been identified and articulated within the workforce strategy.

Q8. How long will these arrangements be in place?

Answer: For the lifespan of the Workforce Strategy, which looks at the next three-five years (2027-2029).

Q9. When do you intend to review this EqIA? This should usually be done upon any change that is made to the original piece of work that this EqIA is for.

Answer: The EqIA will be reviewed at each stage of the project and in the event of any significant change to the work proposed at the outset. Each workstream of the implementation plan will also be required to complete an EqIA.

Publication

Q10. As stated above and in the guidance, we intend to publish all completed EqIAs on the ICO's website. Please provide detail of any necessary redactions and the intended publication date.

You should also review the wording to ensure that it is as clear as possible for any employees or public to read.

Answer: No.

Governance and sign-off

The person who completes this document must be 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.

Please tick here to confirm that you have consulted with other colleagues and those it would largely impact where appropriate.

Please state here who has completed the EqIA:

Signed by: Jess Scragg

Date: 18/07/24

Approved by line manager:

Signed by: Bryan Smith, Head of Talent and Workforce Planning

Date: 21/07/24

You **must** send your completed form to corporategovernance@ico.org.uk for storage and publication.

The EDI Board provides overall assurance that the EqIA process is operating effectively, but it is not for them to review or approve EqIAs.

If you have identified any negative impacts to any protected characteristics that you cannot fully mitigate, please contact Inclusion and Wellbeing for advice via inclusionandwellbeingteam@ico.org.uk.

Section 75 The Northern Ireland Act

To meet the NI section 75 consultation requirement, we must incorporate the following into our EqIA process. Please read through the below and implement as appropriate whilst completing your EqIA

1. We will externally publish a list of all EqIA screenings we complete. We should publish these quarterly. The spreadsheet will be 'housed' on the ICO website [Equality and diversity | ICO](#) (these will include **all** EqIA screenings we complete)
2. Where an EqIA screen results in the need for a full EqIA on a policy, procedure or change that relates directly to the ICO carrying out its external statutory functions; we will consult with key stakeholders at the earliest opportunity for 12 weeks. By law we must consult with the Northern Ireland stakeholder list, but good practice would be to include other relevant stakeholders from across the UK. The author/approval manager will be best places to determine who these should be.
3. We have clarified that if we don't receive a response from these stakeholders to a consultation, that is fine. We record no response and move on with the policy, procedure or change.
4. We have clarified that we do not need to consult under s75 for policies that only impact our employees. Whilst its good practice to consult with employees, TU etc about changes that impact employees, ways of working etc, this type of internal change would not engage s75. We should of course complete an EqIA at

the earliest opportunity, it's just that the s75 consultation requirement is unlikely to be engaged.

- 5. We have agreed that it would be for the manager who approves the EqIA to determine if a s75 consultation is needed. The Inclusion and Wellbeing team can provide support, but the author and manager will know their business area and will be best placed to assess if a new/change to a policy impacts external customer and stakeholders as part of our statutory function and should therefore be consulted on.
- 6. We have agreed that it should be for the author/approving manager to send the EqIA screening form or full EQIA form to corporate governance.

EqIA version control (to be updated by the person completing the EqIA)

Version number	1.0
Status	Approved
Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	Jess Scragg
Approved by	Bryan Smith
Date of sign off	21/7/24
Review date	July 2026

Version	Changes made	Date	Made by

Template version control (to be updated by the person updating the EqIA template)

Version number	2.4
Status	Not approved
Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	EDI Board (EqIA sub group)
Approved by	Suzanne Gordon
Date of sign off	10 February 2023
Review date	February 2024

Version	Changes made	Date	Made by
0.1	Created new document.	June 2021	Chris Braithwaite
0.2	Amendment of title to EqIA and minor amendments	July 2021	Chris Braithwaite
0.2a	Amended to put protected characteristics and objectives into a table as an option to consider	July 2021	Chris Braithwaite
0.3	Added wording in relation to publishing the EqIA	August 2021	Chris Braithwaite
1.0	Links added and approved	September 2021	Chris Braithwaite
2.0	Reviewed form and process	8 August 2022	DOC, AT, JT, RS (IWT)
2.1	DOC added in sections and review of content	28 August	DOC
2.2	Amended changes after collaboration and feedback from the EDI Steering Group	30 August 2022	IWT
2.3	Updated to include best practice consideration of the Human Rights act	26 January 2023	Chris Braithwaite
2.4	Updated to include EDI objectives	6 September 2023	Roshini Mylvaganam