

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 staff 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: NH

What is the title of this piece of work? Recruitment and Selection policy amends December 2024

Briefly describe the overall purpose of this work.

The aim of the policy is to ensure the ICO has a fair and transparent process for the recruitment and selection of colleagues.

The policy has been reviewed and changes made to ensure it reflects hiring practices, supports applicants, and enables the ICO to attract a diverse talented workforce.

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.

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)?

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.
Religion or belief	The changes to the policy do not impact on a person's religion or belief.	Equality information is not made available to People Managers in the shortlisting and interviewing process.
Race, nationality or cultural background	The changes to the policy have potential to have a negative impact on a person's race, nationality, or cultural background. The changes also have potential to have a positive impact on a person's race, nationality or cultural background. As part of our ongoing commitment to improve representation of minority groups across the organisation, candidates who identify from an ethnic minority background who meet the minimum criteria (scoring a minimum of 3 in each essential element) will always be invited to interview, in the same way we approach candidates as part of the Disability Confident Scheme.	The policy now includes additional means of assessment when selecting candidates into post such as personality profiling for behavioural alignment, and psychometric testing to assess aptitude. To mitigate the risk posed by drawing comparison to potentially predominantly white sample groups: • This is a small part of a larger, overall process. The Talent team will ensure these are not used to make a decision. • Feedback from the assessment will be provided to the interview panel by a qualified member to ensure the ICO get the best out of the tool and results. This is already in practice and being monitored by the Talent Team. In addition to the mandatory recruitment and selection training for hiring managers, 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.
	Where diversity is being actively encouraged into teams, the changes to the policy have potential to have a positive impact.	Talent team are actively coach hiring managers on their interviewing skills. The Talent team will also host a series of 'know about' sessions to upskill hiring managers to make effective hiring decisions. The interview and selection training includes guidance on the Disability Confident Scheme as well as covering bias and equality, diversity and inclusion. People managers are required to complete our Promoting inclusion for people managers elearning covering their role in promoting workplace diversity, fostering an inclusive culture and making good judgements. All staff are required to attend our Dignity, diversity and inclusion workshop within 12 weeks of joining the organisation. There will be a minimum of 2 members on any assessment panel, and diversity of panel is encouraged.

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.
		Policy amendment to include our proactive work as part of the EDI action plan to ensure we have a workforce representative of the communities we serve. This includes steps such as the use of language decoding tools to remove any potential for bias in the language we use in job adverts. Equality information is not made available to People Managers in the shortlisting and interviewing process.
Disabled people	The changes to the policy have potential to have a positive impact for candidates with a disability.	Inclusivity, neurodiversity. Policy amendment to reflect the ICO will provide interview themes to candidates ahead of their interview. The ability for candidates to register their application under the Disability Confident Scheme (DCS) is not affected by the changes to the policy. Equality information is not made available to People Managers in the shortlisting and interviewing process.

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.
Sexual orientation	The changes to the policy do not impact on a person's sexual orientation.	Equality information is not made available to People Managers in the shortlisting and interviewing process.
Sex (see note 1)	Where diversity is being actively encouraged into teams, the changes to the policy have potential to have a positive impact.	Policy amendment to include our proactive work as part of the EDI action plan to ensure we have a workforce representative of the communities we serve. This includes steps such as the use of language decoding tools to remove any potential for gender bias in the language we use in job adverts. Equality information is not made available to People Managers in the shortlisting and interviewing process.
Age	The changes to the policy do not impact on a person's age.	In addition to the mandatory recruitment and selection training for hiring managers, the Talent team will now actively coach hiring managers on their interviewing skills. The Talent team will also host a series of 'know about' sessions to upskill hiring managers to make effective hiring decisions. Policy amendment to reflect the ICO will provide interview themes to candidates ahead

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.
		of their interview, which will support those candidates who may not have interview or previous work experience. Equality information is not made available to People Managers in the shortlisting and interviewing process.
Gender reassignment (see note 2)	The changes to the policy do not impact on a person who is in the process of, or has undertaken, gender reassignment.	
Marital status	The changes to the policy do not impact on a person's marital or civil partnership status.	
Pregnancy and maternity	The changes to the policy do not impact on expectant or new mothers.	
Political opinions	The changes to the policy do not impact on a person's political opinions.	
People with dependants	The changes to the policy do not impact on a people with dependants.	
People without dependants	The changes to the policy do not impact on a people without dependants.	

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.
Socio-economic groups or social classes (see note 3)	The changes to the policy have potential to have a negative impact on a person's socio-economic group or social class.	The policy now includes additional means of assessment when selecting candidates into post such as personality profiling for behavioural alignment, and psychometric testing to assess aptitude. To mitigate the risk posed by drawing comparison to potentially predominantly white sample groups: • This is a small part of a larger, overall process. The Talent team will ensure these are not used to make a decision. • Feedback from the assessment will be provided to the interview panel by a trained colleague to ensure the ICO get the best out of the tool and results. In addition to the mandatory recruitment and selection training for hiring managers, the Talent team will now actively coach hiring managers on their interviewing skills. The Talent team will also host a series of 'know about' sessions to upskill hiring managers to make effective hiring decisions. There is no requirement for candidates to have University degrees if not essential and

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.
	The changes also have potential to have a positive impact on a person's socio-economic group or social class. Where diversity is being actively encouraged into teams, the changes to the policy have potential to have a positive impact.	relevant to the role requirements. Experience can be gained through any combination of academic or vocational qualifications or experience. Policy amendment to include our proactive work as part of the EDI action plan to ensure we have a workforce representative of the communities we serve. Equality information is not made available to People Managers in the shortlisting and interviewing process.
Multiple protected characteristics (see note 4)	The changes to the policy do not impact additionally on people with multiple protected characteristics.	

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).

Q4. 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?

No – although ultimately all People Policies should be able to be made available in Welsh if needed, in which case a translation would be required.

*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.

Impact on human rights have been considered.

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
Objective 1: We will represent the communities and societies we serve 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.	As a Talent Team, we are working to increase the diversity of our teams to ensure better representation of the communities we serve, and to deliver on the ICO's EDI objectives. As outlined above, where diversity is being actively encouraged into teams, the change has potential to have a positive impact. Examples of this include work in our DDaT Directorate, where we are actively encouraging women into tech to improve the diversity of this male dominated team, and the introduction of a guaranteed interview scheme for candidates who identify from an ethnic minority background.
Objective 2: Our culture will be inclusive 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. 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 preventing people from developing and progressing.	Our reasonable adjustment process is not affected by the changes being made to the recruitment process. Candidates will still have the ability to apply using the Disability Confident Scheme, and also have access to request reasonable adjustments. The change removes barriers for those who may be neurodiverse by providing interview theme information prior to interview.
Objective 3: We will better understand the needs of everyone to deliver services that are accessible to all	No direct contribution.

Objective	Contribution to objective
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.	

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?

Team diversity by Directorate will be monitored as part of our overall EDI objectives.

Continual data/trend analysis post recruitment to remediate any risks should we identify them.

The guaranteed interview scheme for candidates identifying from an ethnic minority background will be reviewed 12 months after implementation.

Q8. How long will these arrangements be in place?

Ongoing and will run alongside our EDI objectives.

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.

This will be reviewed on a continual basis.

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 staff or public to read.

There is no issue with any part of the EqIA being published.

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: NH
Date: 20 December 2024

Approved by line manager:

Signed by: SM



Date: 14 October 2024

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 placed 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 staff. Whilst its good practice to consult with staff, 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	Published
Relevant or related policies	Equality Impact Assessment Guidance, Reasonable Adjustment Policy, Temporary Appointment and Secondment Policy, EDI Policy, Pay Policy, Accessibility and Reasonable Adjustments at Work Policy
Author/owner	NH
Approved by	
Date of sign off	14 October 2025
Review date	14 October 2026

Version	Changes made	Date	Made by