

## Annex 2: EDI Action Plan

Goal	Action	Owner	Measures	Date for Completion
Enforce the ICO's commitment to promoting EDI in the workplace+	Draft and implement an EDI Policy	HR	EDI policy published	July 2021
	Annual monitoring of dignity at work complaints and grievances, to identify trends which may require remedial action.	HR	Publish annual equality report showing demographic data and other relevant information regarding progress and actions.	
	Identify and take remedial action where non-compliance with EDI related policies occurs.	HR, EDI board, Managers	EDI Board informed of areas of non-compliance and remedial action taken.	
	Reviewing our board attendance to ensure that we have a diversity of thought and background within our governance structures	Corporate Governance and SLT board chairs	Increased diversity within our governance structures.	September 21
Ensure all HR policies are EDI compliant	EDI Networks to review the EDI aspects of ICO policies and feedback	Head of HR and HR Group Manager	All HR policies reviewed, updated and published in consultation with EDI networks	By end of 2021
Positively promote the ICO's commitment to EDI	<ul style="list-style-type: none"> <li>Update EDI Statement for all job adverts and Job Boards to encourage a diverse candidate pool. EDI information published</li> </ul>	Amy Walthall	EDI statement live on ICO jobs webpage and job boards	May 2021
				July 2021

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	<p>as part of Hays' Recruitment Microsite.</p> <ul style="list-style-type: none"> <li>• Promotion of equality, diversity and inclusion in ICO blogs, 'a day in the life of', speeches, webinars, overall recruitment communications and other business communications as appropriate.</li> <li>• Inclusion of EDI information and messages in corporate updates of information to help mainstream EDI considerations.</li> <li>• Publication of demographic data about the ICO's staffing and equality ambitions.</li> <li>• Provision of regular training and Know Abouts covering EDI issues, and information about different groups.</li> <li>• Promote benefits of working with the ICO to help appeal to groups who are under</li> </ul>	<p>Claudia Hunt working with Hannah Smith</p>	<p>Comms strategy in place.</p> <p>EDI featuring as regular part of business communications.</p> <p>Improve ICO reviews on Glassdoor and Indeed to 4* or above from current standing of 3.9 for Glassdoor and 3.2 for Indeed.</p>	<p>By end 2021</p> <p>On-going</p>
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	<p>represented in different roles in the organisation such as women in senior roles, men in roles from Levels B-F, and disabled people and people with an ethnic minority background in the organisation as a whole.</p>			
<p>Improve inclusion and reach out to underrepresented groups during the recruitment process</p>	<ul style="list-style-type: none"> <li>• Conduct recruitment campaigns which are targeted to encourage diverse candidate pool and produce applications from currently under represented groups.</li> <li>• Improved networking with underrepresented groups</li> <li>• Introduce alternative recruitment processes which ensure equal opportunity in the application and assessment process.</li> <li>• Flex recruitment to allow for speculative CV's and grow a talent pool, monitoring for diversity of candidates recruited via this route.</li> <li>• We will explore opportunities through the Our Ways of Working project to assess</li> </ul>	<p>HR and relevant hiring managers</p>	<p>Year on year continue to improve levels of applications received from underrepresented groups and increase in number of candidates progressing through to job offer.</p>	<p>Ongoing</p>

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	<p>whether more flexible policies and procedures for recruiting and employing staff, might broaden the ICO recruitment pool and help us create a more diverse workforce</p>			
<p>Improve the diversity of sex in senior and technical grades</p>	<ul style="list-style-type: none"> <li>• Linked with new networks including, Women in Tech and Diversity in Tech</li> <li>• ICO company profile launched in partnership with Women in Tech</li> <li>• Make appropriate technical and management based training available to existing staff, increasing the capacity for staff to achieve internal promotion, ensuring that training is accessible to under represented groups.</li> <li>• Executive recruitment suppliers to be briefed to seek diverse candidate pool and are aware of our diversity ambitions.</li> <li>• Ensure tender documents cover EDI objectives and encourage agency to improve on diversity of candidates.</li> </ul>	<p>HR</p> <p>Claudia Hunt</p> <p>HR and hiring managers</p>	<p>50% of the top three grades filled by female staff</p> <p>Increase in number of women offered technical/specialist roles</p>	<p>By March 2024</p>

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<p>Improve ethnic diversity of ICO workforce including a higher proportion of senior roles filled by people with an ethnic minority background.</p>	<ul style="list-style-type: none"> <li>• Work with Comms to produce a day in the life video for ICO staff ensuring diverse participants</li> <li>• Analysis of EDI stats to identify stages in the recruitment process where candidates from ethnic minority backgrounds drop out, and take remedial steps if deficiencies in the process are found.</li> <li>• Engage with relevant jobs boards, and recruitment agencies to achieve a diverse candidate pool.</li> <li>• Ensure that promotion opportunities are available for all staff and monitor the proportion of promoted staff by protected characteristic.</li> <li>• Provide access to support for staff from under-represented ethnic minority backgrounds to help them undertake recruitment, promotion and career banding processes.</li> <li>• Encourage reporting of ethnic origin by employees on MINFO.</li> </ul>	<p>HR and Hannah Smith</p> <p>HR</p>	<p>10% of ICO staff are from an ethnic minority background.</p> <p>8% of staff in grades G-H are from an ethnic minority background.</p> <p>Improved retention rates of candidate from ethnic minority backgrounds through the various stages of recruitment.</p>	<p>By March 2024</p>
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<p>Increase the proportion of ICO staff who declare that they are disabled, including in senior roles.</p>	<ul style="list-style-type: none"> <li>• Increase from Level 1 of Disability Confident Scheme to Level 2.</li> <li>• Engage with disabled staff to ensure they are aware of the availability of support, and provide that support where identified.</li> <li>• Ensure our recruitment process is accessible to all users and reasonable adjustments are made where needed.</li> <li>• Ensure ICO jobs website includes information to encourage applications from disabled candidates, describing support that can be provided during employment.</li> <li>• Encourage reporting of disability status by employees on MINFO.</li> </ul>	<p>HR</p>	<p>8.5% of staff are reported as being disabled and replicate this percentage for grades G-H</p> <p>Achieve Level 2 status of disability confident scheme and be recognised as a Disability Confident Employer</p>	<p>By March 2024</p>
<p>Ensure service providers are committed to EDI during recruitment process</p>	<p>Review of EDI statements of recruitment agencies and ensure they are provided with a strong brief emphasising the ICO's commitment to EDI and desire to attract a diverse range of candidates.</p>	<p>HR</p>	<p>Service providers are aligned to our EDI ambitions and put forward a diverse candidate pool for selection.</p>	<p>Ongoing</p>

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<p>Improve diversity of recruitment panel members.</p>	<p>Recruitment policy to be updated in include EDI ambitions and our objective to have panel members with a diversity of characteristics.</p> <p>Ensure that recruitment panels are fully aware of their EDI obligations and have awareness of the ICO's diversity ambitions and policies.</p>	<p>HR</p>	<p>Recruitment policy published in consultation with TU's and EDI Networks.</p> <p>HR Audits show compliance with diverse panel members</p>	<p>July 2021</p> <p>Ongoing</p>
<p>Ensure recruiting managers have knowledge of EDI issues.</p>	<p>Recruiting managers obliged to attend recruitment training which includes the importance of equality, diversity and inclusion and how that is achieved through the process. Training to be done at least every three years.</p> <p>Additional training available to staff and managers to provide further information about different protected characteristics, with an aim to achieve greater understanding of matters affecting different protected groups.</p>	<p>HR and WDP</p>	<p>Managers aware of their obligations in the recruitment process.</p> <p>Diversity in appointments made to ICO jobs.</p>	<p>Ongoing</p>
<p>Promote the ICO Networks to potential and new employees.</p>	<p>Update BHSF booklet to include reference to ICO Networks</p>	<p>HR</p>	<p>2 pages added to BHSF booklet giving description of each</p>	<p>October 2021</p>

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	Add staff networks information to jobs pages on ICO website.		network.  Information about networks is available to potential job candidates.	
Developing staff	<p>Make training and coaching available for staff to develop their careers at the ICO to support a 'growing our own' approach to develop a diverse range of staff into more senior positions.</p> <p>Developing coaching and support for staff going on and returning from a period of extended leave (eg maternity, adoption or shared parental leave, long term sickness absence) to help to maintain momentum in their career development.</p> <p>Developing programmes such as "Get into Tech" and "First Degree" training to allow staff to access qualifications which they have not had opportunity to access before working at the ICO, and enhance their career prospects within the</p>	<p>HR and WDP</p> <p>WDP</p> <p>WDP</p> <p>WDP</p>	<p>Promotion opportunities are achieved by diverse range of staff, enabling greater diversity in higher grades.</p> <p>Staff who have been on extended leave achieving promotions/career banding enhancement</p> <p>Qualifications achieved by diverse range of staff.</p> <p>Promotion rates of staff who are from an ethnic minority background</p>	On-going

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	<p>ICO.</p> <p>WDP business plan includes aims to develop staff from ethnic minority backgrounds and disabled staff so they feel equally able to progress to more senior roles at the ICO.</p> <p>Support the personal and professional development of female staff in management roles to remove any actual or perceived barriers to progress to more senior roles.</p> <p>Apprenticeship programmes at various levels available to staff</p> <p>Development of a Legal services trainee programme</p>	<p>WDP</p> <p>WDP</p> <p>WDP</p> <p>Legal Services</p>	<p>increase the proportion of staff in more senior roles.</p> <p>Promotion rates of female staff increase the proportion of staff in more senior roles.</p> <p>A diverse range of employees have been able to access apprenticeship training.</p> <p>A diverse range of candidates are able to access development opportunities at the ICO</p>	<p>March 22.</p>
<p>Reviewing regulatory delivery with EDI considerations in mind</p>	<p>Development of an action plan to ensure that we include diversity of thinking and background in our regulatory activity.</p> <p>Including analytics and insight to further understand communities</p>	<p>RSS / RPO</p>	<p>Increased insight and understanding of our communities and evidence of this with our regulatory activities and outcomes</p>	<p>March 22.</p>

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	<p>with regard to our regulatory activities and inform the development of the above plan.</p> <p>Develop targeted communications to raise awareness of the role of the ICO within communities</p>	Communications		
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