

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: Angela Donaldson

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: Finance Directorate Target Operating Model

Briefly describe the overall purpose of this work.

Answer: To strengthen the capacity and capability of the Finance Directorate in delivering corporate services to support, enable and safeguard the ICO in meeting its objectives.

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?
Religion or belief	<p>Neutral – there will be no detrimental impact on anyone due to religion or belief. Alternative dates will be provided to candidates unable to attend interviews, assessments due to religious reasons.</p> <p>While the act of recruiting to this directorate will not specifically foster an environment where people feel safe to talk about their beliefs, it will not discourage that, and applications will be encouraged from all members of the community. All staff are informed of and encouraged to join the groups within the ICO, enabling an open and inclusive environment.</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>Race, nationality or cultural background</p>	<p>Neutral – there will be no detrimental impact on anyone due to their race, nationality, or cultural background.</p> <p>We will ensure that all of our advertisements have our EDI wording included and that we advertise the roles internally and externally. The recruitment practices will be followed, including anonymised applications to eliminate bias. We will use candidate packs that promote the groups and inclusive culture of the ICO, and we will ensure that we advertise the roles broadly.</p> <p>Consideration will be given as to the location of the posts and whether flexibility is possible there and the previous performance of the agencies/job boards we use will be analysed to ensure that they are able to provide us with a diverse group of candidates.</p> <p>Flexibility will be considered in terms of working patterns where possible to ensure inclusivity for all groups.</p>	
<p>Disabled people</p>	<p>Positive – roles will be advertised internally and externally and will follow all of our</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>recruitment practices, including anonymisation and a commitment to provide adjustments to the process where possible.</p> <p>We will ensure that all of our advertisements have our EDI wording included and that we advertise the roles internally and externally.</p> <p>Data from previous campaigns will be used to understand the agencies and job boards who are most successful at providing people from all communities.</p> <p>The ICO operates a guaranteed interview scheme for all candidates who are short listable and have declared a disability.</p> <p>Reasonable adjustments will be supported throughout the recruitment process and also at during appointment in the roles.</p>	
Sexual orientation	Neutral – there will be no detrimental impact on anyone due their sexual orientation.	

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>We will ensure that all of our advertisements have our EDI wording included and that we advertise the roles internally and externally.</p> <p>The ICO's policies provides the same support to non-traditional families as it does 'traditional'. Promoting this along with the groups in the ICO will give candidates an accurate perception of the inclusive culture in the organisation.</p>	
<p>Sex (see note 1)</p>	<p>Neutral – there will be no detrimental impact on any candidates due to their sex.</p> <p>The recruitment practices will be followed, including anonymised applications to eliminate bias</p> <p>The policies and practices at the ICO that are more likely to attract women will be promoted, with flexibility considered where possible.</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?
	Data will be analysed to ensure that the agencies/job boards we use are able to provide a diverse range of candidates.	
Age	<p>Neutral – there will be no detrimental impact on any candidates due to their age.</p> <p>We will ensure that all of our advertisements have our EDI wording included and that we advertise the roles internally and externally.</p> <p>Data will be analysed to ensure that the agencies/job boards we use are able to provide a diverse range of candidates.</p> <p>Protected characteristics are not provided to panels at any point of the recruitment process, to avoid the potential for bias.</p>	
Gender reassignment (see note 2)	Neutral – there will be no detrimental impact on any candidates due to gender reassignment.	

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>We will ensure that all of our advertisements have our EDI wording included and that we advertise the roles internally and externally.</p> <p>Data will be analysed to ensure that the agencies/job boards we use are able to provide a diverse range of candidates</p> <p>We will use candidate packs that promote the groups and inclusive culture of the ICO, and we will ensure that we advertise the roles broadly.</p>	
Marital status	<p>Neutral – there will be no detrimental impact on any candidates due to their marital status.</p> <p>We will ensure that all of our advertisements have our EDI wording included and that we advertise the roles internally and externally.</p> <p>Data will be analysed to ensure that the agencies/job boards we use are able to provide a diverse range of candidates</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?
	Protected characteristics are not provided to panels at any point of the recruitment process, to avoid the potential for bias.	
Pregnancy and maternity	<p>Neutral – there will be no detrimental impact on any candidates due to pregnancy or maternity.</p> <p>We will ensure that all of our advertisements have our EDI wording included and that we advertise the roles internally and externally.</p> <p>Data will be analysed to ensure that the agencies/job boards we use are able to provide a diverse range of candidates</p> <p>Protected characteristics are not provided to panels at any point of the recruitment process, to avoid the potential for bias.</p> <p>Being pregnant or on maternity leave will not be a barrier to applying for or being offered these roles. Offers are made to the most suitable candidate based on the criteria, and temporary cover will be recruited if someone on maternity leave is appointed.</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?
	We will ensure that internal staff on maternity leave are informed of the vacancies in good time to apply for the posts.	
Political opinions	<p>Neutral – there will be no detrimental impact to candidates due to their political opinions. ICO Recruitment practices will be followed, which means that, if known, this would not be disclosable.</p> <p>If a candidate is appointed and engages in political activity, they will be asked to declare the potential conflict, at which point the impact of the conflict will be reviewed.</p>	
People with dependants	<p>Neutral – there will be no detriment impact on candidates with dependants.</p> <p>The policies that support people with dependants will be listed as a benefit within our advertisements, enhancing the supportive culture at the ICO.</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>The recruitment of these roles will follow our standard recruitment practices and we will aim to draw applications from all sections of the community.</p>	
<p>People without dependants</p>	<p>Neutral – there will be no detriment impact on candidates without dependants.</p> <p>The policies that support people with dependants will be listed as a benefit within our advertisements, enhancing the supportive culture at the ICO.</p> <p>The recruitment of these roles will follow our standard recruitment practices and we will aim to draw applications from all sections of the community.</p>	
<p>Socio-economic groups or social classes (see note 3)</p>	<p>Neutral – there will be no detriment impact on candidates from socio-economic groups or social classes.</p> <p>The policies that support people with dependants will be listed as a benefit within our advertisements, enhancing the supportive culture at the ICO.</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>The recruitment of these roles will follow our standard recruitment practices and we will aim to draw applications from all sections of the community.</p> <p>While there is evidence suggesting that requesting specific qualifications may limit applications, at the ICO there is policy in place to not require them to be from any particular establishment. Any particular route to becoming suitable qualified and experienced will be considered.</p>	
<p>Multiple protected characteristics (see note 4)</p>	<p>Neutral – there will be no detrimental impact on anyone with multiple protected characteristics.</p> <p>We will ensure that all of our advertisements have our EDI wording included and that we advertise the roles internally and externally. The recruitment practices will be followed, including anonymised applications to eliminate bias. We will use candidate packs that promote the groups and inclusive culture</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>of the ICO, and we will ensure that we advertise the roles broadly.</p> <p>Consideration will be given as to the location of the posts and whether flexibility is possible there and the previous performance of the agencies/job boards we use will be analysed to ensure that they are able to provide us with a diverse group of candidates.</p> <p>Flexibility will be considered in terms of working patterns where possible to ensure inclusivity for all groups.</p> <p>Adjustments are provided throughout our recruitment process to ensure equal opportunity is available for all candidates.</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	Indirect contribution – the Finance Directorate provide corporate services to the business who will be meeting this objective. The Finance Directorates role is to

Objective	Contribution to objective
<p>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.</p>	<p>enable, support and safeguard the business to meet their objectives.</p>
<p>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>	<p>Contribution – the Finance Directorate TOM strengthens the organisation structure, providing improved resilience and improved capacity and capability.</p> <p>There will be a customer service focus on delivering what the business needs to support, enable, and safeguard them in delivering their objectives.</p> <p>Recognising that the Finance Directorate delivers key corporate services to the ICO we will listen to our customers and adapt our service delivery approach to best suit the individual and business needs.</p> <p>We will look to strengthen our processes, ensuring these are efficient and deliver the required outcomes, we will improve our systems capability (this is being delivered by a separate initiative via the ERP Programme), we will work to strengthen our business relationships and business understanding through effective partnering of the business in the provision of advice, guidance and reporting to support, enable and safeguard the business in meeting their objectives.</p>
<p>Objective 3: Encouraging others: We will use our status as a regulator, advisory body, and purchaser of</p>	<p>Indirect contribution – the Finance Directorate provide corporate services to the business who will be meeting this objective. The Finance Directorates role is to</p>

Objective	Contribution to objective
<p>services to influence improvements in equality by other organisations and across society.</p>	<p>enable, support and safeguard the business to meet their objectives.</p>
<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.</p>	<p>Contribution – the Finance Directorate TOM strengthens the organisation structure, providing improved resilience and improved capacity and capability.</p> <p>Staff will receive both on the job training and access to professional development training (if individuals desire) and we will also look at career pathways whereby we support and enable staff development to help them progress in their careers (if individuals desire), setting out the key skills, competencies, qualifications, and experience needed for each role in the structure chart.</p> <p>We will put in place formal mentoring for staff who would like access to this, to help support our staff within the Finance Directorate to achieve their goals.</p> <p>We will ensure staff have regular 121s and performance development reviews on a timely basis to help them achieve their objectives, perform to the best of their ability, and deliver excellent customer service to the business.</p> <p>We will have various communication feedback communication forums to ensure that we are supporting staff to perform well including regular Team Meetings and Finance Directorate Meetings.</p> <p>We will focus on outcomes ensuring staff have the ability to work flexibly to meet their objectives, whilst ensuring that across the services we provide, there is</p>

Objective	Contribution to objective
	availability of staff to support the business needs during the business hours, recognising we deliver important corporate services to our customers.

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: Staff feedback through monthly whole of Directorate meetings, Team meetings and 121s (to their line manager). Feedback requested from the business regarding the service offering, with a focus on continuous improvement and recognising success, ensuring there is a good level of satisfaction with the services we deliver to all. Audit reports continue to provide satisfactory assurance on controls and processes.

Q7. How long will these arrangements be in place?

Answer: Minimum 2 years

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: Annual feedback loop from the business on services provided, ongoing engagement with staff across Finance Directorate to ensure regular feedback loop as we make the structural changes and recruit the vacancies, develop our career pathways, and focus on improving the learning and development opportunities within the directorate.

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: This can be published, however needs to await the conclusion of any formal consultation with our TUs and Staff

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: Angela Donaldson