

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: JS

What is the title of this piece of work? Graduate and Placement Schemes

Briefly describe the overall purpose of this work.

To launch a graduate and placement scheme at the ICO. Each scheme will recruit four graduates and four placement students to the new Manchester office, starting in September 2026.

The graduate scheme will be a two-year generalist programme, with separate rotations across four different departments/ directorates within the ICO. The placement scheme will place students in single specialist/technical directorates for the duration of their 12-month programme.

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	Positive impact. The schemes will offer positive opportunities to all regardless of religion.	During the planning and scheduling of the selection process, we will take into account key dates of religious and cultural observance to ensure candidates from all faith backgrounds are not disadvantaged.
Race, nationality or cultural background	Positive impact. The schemes are open to all eligible students and graduates, regardless of race, ethnicity, nationality, or cultural background.	We will use an anonymised screening process. Applications/CVs will be assessed and scored objectively against predefined criteria to ensure fairness and consistency. Partner with universities and student networks that support ethnically diverse communities. Which will open up applications to more diverse student communities, potentially increasing representation within the ICO.

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>Disabled people</p>	<p>Positive impact.</p> <p>The schemes are committed to being fully accessible and inclusive for candidates with disabilities.</p> <p>Candidates with disabilities may face barriers during application, interview, or placement stages if reasonable adjustments are not considered.</p>	<p>Reasonable adjustments will be offered proactively, and accessibility will be embedded throughout the recruitment and placement process. We will ensure all recruitment platforms and materials meet ICO accessibility standards.</p> <p>For the placement roles we will be using MMU to advertise – they have given assurance that they follow their ‘Inclusive Recruitment Policy’ and they have an ‘Inclusive Recruitment Checklist’ for all employers advertising roles to students. Further information can be found here.</p> <p>Reasonable adjustments offered at every stage of the process, including application, interview, onboarding and placement.</p> <p>We will ensure that as part of the onboarding process, any adjustment needs will be considered in line with our Reasonable Adjustments policy, and it would for any new starter.</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.
		Where rotations are involved (graduate scheme), we will ensure all reasonable adjustments and accessibility requirements are in place prior to the move across to the new department/directorate, utilising the workplace passport for a smooth transition of support for the colleagues.
Sexual orientation	No impact The schemes will offer positive opportunities to all.	
Sex (see note 1)	No impact The scheme is designed to be inclusive of all genders.	Proactive steps will be taken to ensure equal access and representation, particularly in disciplines where gender imbalance is common. Where specific academic or professional disciplines historically show gender imbalance, proactive measures will be used to encourage participation from all sexes. This includes: <ul style="list-style-type: none"> • Ensuring a wide range of outreach channels are used. • Maintaining neutral and inclusive role criteria.

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		<ul style="list-style-type: none"> Gender-neutral language to be used in all recruitment materials.
Age	<p>Positive and negative impact</p> <p>The graduate scheme supports young people entering the workforce and in line with the Workforce Strategy helps to build a strong talent pipeline for the future to diversify our workforce and sustain capability and capacity.</p> <p>The graduate scheme is primarily targeted at individuals who have recently completed higher education. While this focus aligns with the scheme’s purpose, it may unintentionally exclude older graduates or career changers who are also seeking entry-level opportunities.</p> <p>The placement scheme supports students in gaining early careers experience, helping bridge the gap between education and employment.</p> <p>The placement scheme is targeted at those who are required to complete a year</p>	<p>The scheme is designed to support early career development, which often correlates with younger age groups. However, for the graduate scheme, there is no limit on when a degree needs to have been completed which ensures that older applicants are not excluded or disadvantaged, and that the programme remains open to all who meet the graduate-level criteria.</p> <p>Ensure eligibility criteria are inclusive of all graduates, regardless of age. Working with the Universities involved to promote as open to applicants from all ages</p> <p>Use inclusive language in promotional materials to avoid implying a preferred age range.</p> <p>While the placement scheme naturally attracts younger students due to its academic structure, it remains open to all eligible candidates regardless of age. Measures will</p>

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	placement as part of their degree programme. It's important to ensure the scheme does not unintentionally exclude older or mature students who may be returning to education or studying part-time.	<p>be taken to ensure mature students are not disadvantaged and that the scheme promotes equal opportunity.</p> <p>Ensure eligibility criteria are inclusive of all students enrolled in qualifying degree programmes, regardless of age.</p> <p>Avoid age-related language or assumptions in promotional materials and communications.</p>
Gender reassignment (see note 2)	<p>No impact</p> <p>The schemes will offer positive opportunities to all.</p>	
Marital status	<p>No impact.</p> <p>The schemes will offer positive opportunities to all.</p>	
Pregnancy and maternity	<p>No impact.</p> <p>The scheme is open to all eligible candidates, including those who may be pregnant or on maternity leave.</p>	<p>For in-person interviews/assessment centres, facilities such as a private room for feeding, expressing, or resting will be made available on request.</p> <p>The programme structure will allow for pausing and re-entry at an appropriate stage,</p>

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		<p>ensuring graduates do not miss developmental opportunities due to maternity leave.</p> <p>We have keeping in touch (KIT) days which staff can use whilst on MAT leave which will help either attend work, or spend time doing work which will help prevent them from missing key dates or training sessions.</p> <p>The existing ICO flexi policy and parental policies would/could support anybody appointed who may be returning after pregnancy/maternity. This includes the Expectant and new mothers risk assessment which helps to provide a safe working environment for staff who are pregnant or new mothers.</p>
Political opinions	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.
	The schemes will offer positive opportunities to all.	
People with dependants	<p>No impact/positive impact</p> <p>The scheme will offer positive opportunities to all.</p> <p>The ICO's flexible working patterns will have a positive impact for any successful applicants which may have dependents..</p>	
People without dependants	<p>No impact.</p> <p>The schemes will offer positive opportunities to all.</p>	
Socio-economic groups or social classes (see note 3)	<p>The scheme will be designed to promote social mobility and ensure equitable access for candidates from all socio-economic backgrounds.</p> <p>Requiring a university degree may disproportionately affect applicants from lower socio-economic backgrounds, who statistically have reduced access to higher education due to financial barriers, systemic inequalities, and lower participation rates. There is therefore a potential indirect adverse</p>	<p>While a requirement for a university degree may potentially have a negative impact on some socio-economic groups, particularly those who face systemic barriers to accessing higher education, this is balanced against the strategic intent of developing an Early Careers proposition. The introduction of this scheme is not designed to disadvantage individuals from lower socio-economic backgrounds, nor does it detract from the organisation's broader commitment to</p>

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	<p>impact on this group. This is, however an issue beyond the scope of the ICOs ability to influence directly.</p>	<p>representation, social mobility, and equitable access across all Early Careers routes.</p> <p>The scheme will not require degrees from specific universities, nor mandate Russell Group or other prestige-based criteria. This reduces socio-economic disadvantage by ensuring equal opportunity regardless of the institution attended.</p> <p>As part of the placement scheme's commitment to promoting social mobility, we will work closely with MMU, a university with a strong widening-participation profile. MMU's student demographics demonstrate a significantly higher proportion of students from lower socio-economic backgrounds compared to the national average.</p> <p>Specifically:</p> <ul style="list-style-type: none"> • 43% of MMU students come from low-income backgrounds, compared to a national average of 7.8%. • 51% of MMU undergraduate entrants are first-generation university students, meaning they are the first in their family to attend university.

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		<p>The graduate and placement schemes are both pilot schemes which form part of our early careers proposition. As this develops there will be other opportunities for early careers roles without the requirement of a degree e.g. Apprenticeships.</p> <p>Degree requirements are only relevant to these programmes and are not required for any other roles at grade B or C.</p> <p>Ensuring travel for interview and interview locations are limited, being mindful that the students applying are more likely to be Manchester centre based appose to Wilmslow and that the expected start date will be contracted for the Circle Square office.</p>
Multiple protected characteristics (see note 4)	The schemes will offer positive opportunities to all.	

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

*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:

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	Objective five of the Workforce Strategy outlines an intent to build a strong talent pipeline for the future that continues to diversify our workforce and sustains capability and capacity. A visible graduate and placement offering will support the ICO in competing for top talent with in-demand

Objective	Contribution to objective
<p>the most effective and have the greatest impact when we are representative and consider different perspectives.</p>	<p>skills. This will help to enhance our employer brand amongst younger demographic groups. Early careers programmes are a proven way to attract talent from a broader range of backgrounds and experiences, supporting the ICO's commitment to equality, diversity and inclusion.</p>
<p>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.</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 preventing people from developing and progressing.</p>	<p>We will build an agile, skills-based workforce that is flexibly deployed to meet priority, high impact resourcing needs. Early careers talent e.g. graduates could be developed to work in multi-disciplinary teams and adapt to changing needs.</p>
<p>Objective 3: We will better understand the needs of everyone to deliver services that are accessible to all 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>	

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: We will monitor EDI during the selection process and for the period of the schemes. With evaluation of both placement schemes to take place after the first pilot year.

Q8. How long will these arrangements be in place?

Answer: The monitoring will continue throughout the schemes.

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: We will review the EqIA as the project develops and at key milestones

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.

Answer: n/a

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:

<i>Signed by:</i> JS – Early Talent Development Manager <i>Date:</i> 20/01/2026
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Approved by line manager:

<i>Signed by:</i> DA - Workforce Planning Business Partner <i>Date:</i> 21/01/2026

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 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	V1.0
Status	Published

Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	JS
Approved by	SM
Date of sign off	21/01/26
Review date	30/09/26

Version	Changes made	Date	Made by
V0.2	Reviewed and slight amends	9/12/2025	AT
V0.3	Reviewed and changes made following comments from VW	20/01/2026	JS