Annual Equality Information Publication

2023: A snap shot as at 31 December 2022

Contents

Part 1: Introduction to the ICO and this report

1.1 About the ICO

The Information Commissioner's Office (ICO) is the UK's independent public body set up to promote access to official information and protect personal information.

Our increasingly digital society and economy are built on trillions of uses and exchanges of personal and public information every day.

Information can drive everything in our lives: from our healthcare to our job opportunities, or the decisions made for and about us. Upholding our information rights and seizing the opportunities of innovative information use has therefore never been more important.

Information rights isn't about processing and protecting data. It's about people - relationships, trust, equality, democracy and dignity. Organisations play a crucial role in shaping our attitudes to information use. We need to trust that our information rights will be respected if we are to confidently use the products and services provided by organisations which power our economy and society.

The ICO exists to empower you through information:
- We empower you as a member of the public to confidently contribute to a thriving society and sustainable economy.
- We empower your organisation to confidently plan, invest, innovate and grow.
- We empower you by promoting openness and transparency by public bodies.
- We empower you to hold us to account for the difference we make when enforcing the laws we oversee.

A significant part of our role is to be responsible for the enforcement of the Data Protection Act, Freedom of Information Act, the Privacy and Electronic Communications Regulations and the Environmental Information Regulations.

The **Data Protection Act 2018** gives citizens important rights, including the right to know what information is held about them and the right to correct information that is wrong. It helps to protect the interests of individuals by obliging organisations to manage the information they hold securely, and gives the ICO the power to take enforcement action organisations who mismanage or abuse personal data.

The **Freedom of Information Act 2000** gives people a general right of access to information held by public authorities. Aimed at promoting a culture of openness and accountability across the public sector, it enables a better understanding of how public authorities carry out their duties, why they make the decisions they do and how they spend public money.

The **Environmental Information Regulations 2004** provide an additional means of access for people who want environmental information. The regulations cover more organisations than the Freedom of Information Act, including some private sector bodies.

The **Privacy and Electronic Communications Regulations 2003** support the Data Protection Act by regulating the use of electronic communications used for the purpose of marketing to individuals and organisations.

The ICO also has responsibilities for other regulations including aspects of the INSPIRE regulations, the Re-Use of Public Sector Information Regulations, and the Electronic Identification and Trust Services for Electronic Transactions Regulations.

The ICO is a UK wide organisation and we are committed to appropriately meeting the diverse needs of our many stakeholders and users of our services. We also wish to ensure that we provide an inclusive, diverse and fair working environment for our employees in England, Wales, Scotland and Northern Ireland.

1.2 About this report

The ICO is a public authority and is subject to the Public Sector Equality Duty. This means that the ICO is required to publish information to demonstrate what we have done to help eliminate unlawful discrimination, advance equality of opportunity and foster good relations between people. We are also obliged to publish equality data concerning our staffing.

These obligations are called 'specific duties' of the Equality Act 2010. This report is written to fulfil those duties and to help people and organisations assess the ICO's performance with a focus on equality matters during 2022. It should be noted that the ICO is reviewing its equality objectives and these will be reflected in the report published in 2024.

We want to continually improve our equality performance. We hope that the report demonstrates that equality is integral to our activities, decision making and the effective promotion of information rights.

1.3 Our Equality Objectives 2019-22

The ICO is committed to enhancing equality and diversity in all of our work. We want to be an effective and accessible regulator, service provider and employer.

To help focus our activities to achieve this, we have developed Equality Objectives. This is also part of our obligations as a public authority arising from the Equality Act 2010.

In the period from 2019 to 2022, the ICO commits to take actions to achieve the objectives outlined below:

Spreading knowledge and taking action
We will raise awareness of information rights across the community and take action to ensure that organisations fulfil their obligations. We will have 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 unlawfully discriminate.

Accessible services
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.

Encouraging others
We will use our status as a regulator, advisory body and purchaser of services to influence improvements in equality by other organisations and across society.

Our future Equality, Diversity and Inclusion Objectives are under consultation and due to be released in 2023.

1.4 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.

1.5 Equality, Diversity and Inclusion Board, Steering Group and EDI Network Groups

To help us monitor our progress towards fulfilling our Equality Objectives, we have an Equality, Diversity and Inclusion (EDI) Board and Steering Group.

The role is to support and advise the organisation in our efforts to achieve our objectives and help us to implement good equalities practice.

The EDI Board's overall purpose is to deliver SLT's purpose of strategic oversight and delivery of cross-office priorities and plans. The EDI Board is made of Executive and Senior Leadership members who are responsible for leading and developing the strategic direction of ICO's EDI intent. The Board is responsible for supporting ICO leadership to embed a mature, devolved model of inclusivity through our culture, values and practices. It is also responsible for delivering and championing our EDI objectives, as an employer, a regulator and as a service provider. The Board also supports and oversees the work of our EDI steering group.

The EDI Steering Group is made up of staff who lead internal networks which represent the interests, views and insights of various groups of people including those with protected characteristics. All staff are able to participate in a network if they wish, regardless of grade or their department. Alongside the network leads we have representatives from our TU's, Staff Forum and Comms team.

The EDI Steering Group and Staff Networks provide support and expertise, but it is important that they are not regarded as the main 'owner' for equality initiatives. We wish to embed equality and diversity in the operational work of the ICO with local accountability resting with relevant departmental and project / activity leads, with involvement from staff across the organisation.

We regularly review our Equality and Diversity governance structure, and conducted an EDI Audit in June 2022 to ensure this was fit for purpose.

This enables the network groups to feedback and help us to improve the connection of our diversity groups to strategic decision making.

1.6 Report structure

The next part of this report provides information about the ICO's staffing including the demographics of our staff and pay equality data.

We also provide information about the training provided to our staff which helps them to provide better services to the public.

The final part of this report provides more detailed information about actions which have impacted upon our performance on equalities, diversity and good relations.

Part 2 Data and Analysis

Equality Information and the duty

This part of this report provides statistical information about the characteristics of our staff.

Data therefore reflects information as at 31 December 2022.

2.1 Total Headcount and FTE (established staff)

The ICO had 1022 staff, which represents a full-time equivalent staffing of 987.7 posts.

Since March 2018 the ICO headcount has grown by 89% while the FTE has grown by 96%.

Staff numbers, FTE and growth since 2014

	31-Mar-14	31-Mar-15	31-Mar-16	31-Mar-17	31-Mar-18	31-Mar-19	31-Mar-20	31-Mar-21	31-Mar-22	31-Dec-22
Headcount	386	392	442	472	540	722	768	822	945	1022
FTE	354	363.5	408.6	439.4	504.8	679.7	720.3	774.4	892.9	970.2
FTE growth on previous year	-1%	3%	12%	8%	15%	35%	6%	8%	15%	11%

■ Headcount   ■ FTE   — FTE growth on previous year
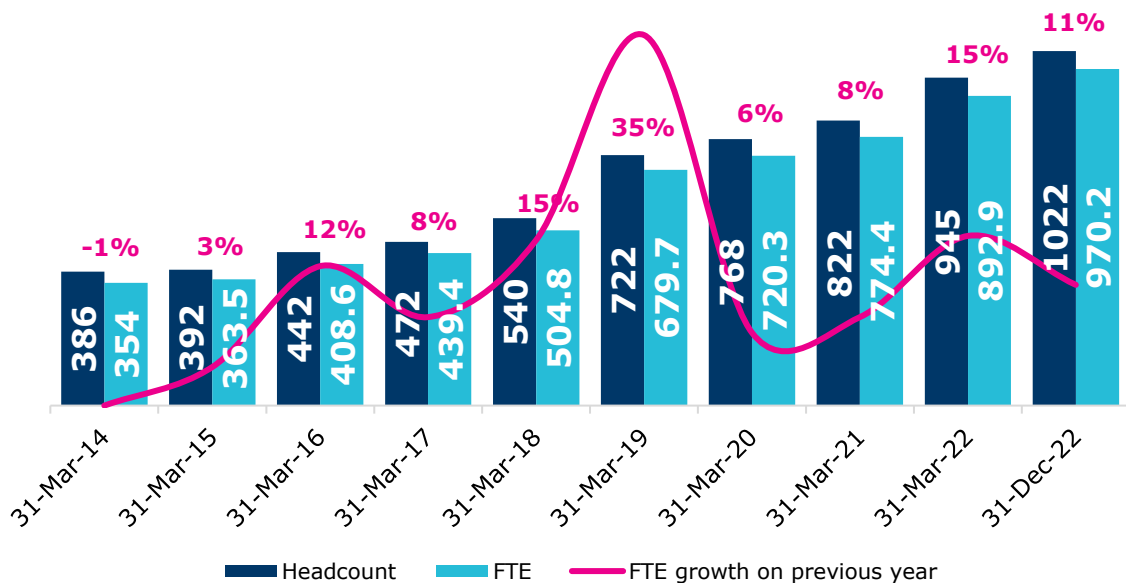
2.2 Gender Analysis

Breakdown of ICO Headcount by gender

Male 37%

Female 63%
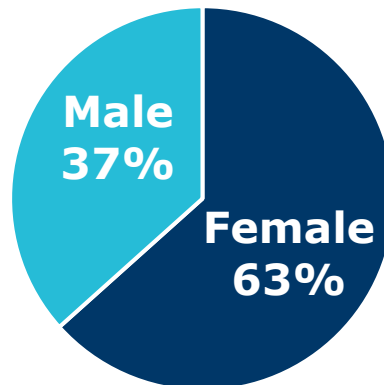
2.3 Staffing by grade

Grade	Headcount	% of ICO
Level B	26	3%
Level C	199	19%
Level D	264	26%
Level E	264	26%
Level F	185	18%
Level G	56	5%
Level G2	22	2%
Level H*	6	1%

Volume of staff at each grade and the & of the ICO each grade makes up
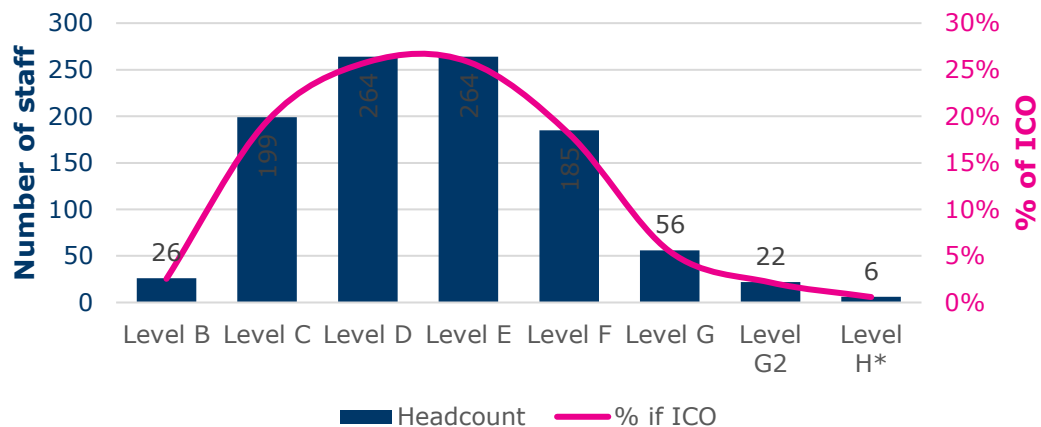
Number of staff

% of ICO

| | Headcount | —— % if ICO |

26   199   264   264   185   56   22   6

Level B Level C Level D Level E Level F Level G Level G2 Level H*

* Level H is the ICO's most senior grade. The data does not include the Commissioner as he is not an employee of the ICO.

2.4   Grade breakdown by gender

Grade	Female	Male
Level B	85%	15%
Level C	64%	36%
Level D	68%	32%
Level E	61%	39%
Level F	60%	40%
Level G	50%	50%
Level G2	59%	41%
Level H*	50%	50%
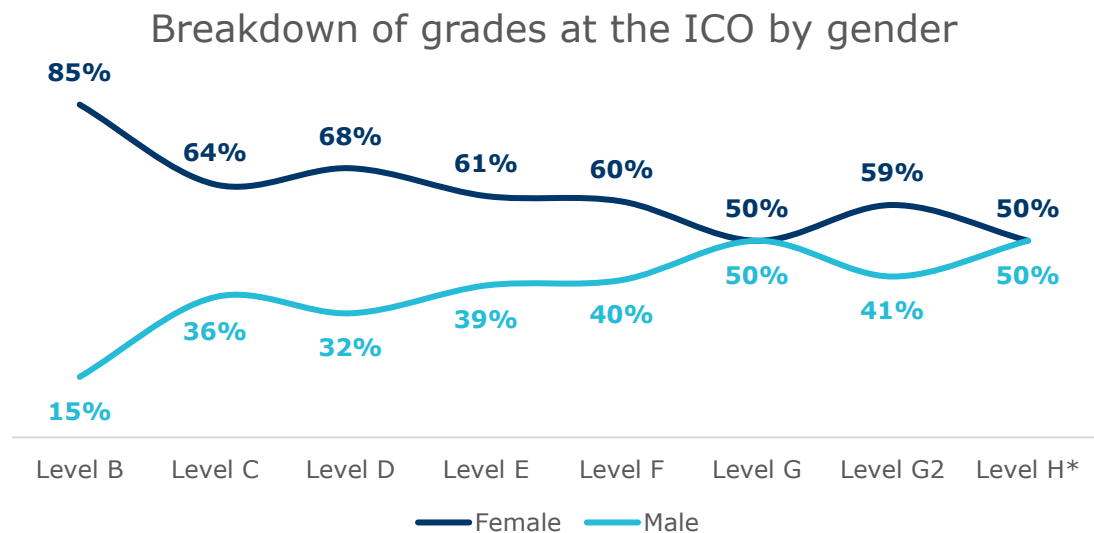
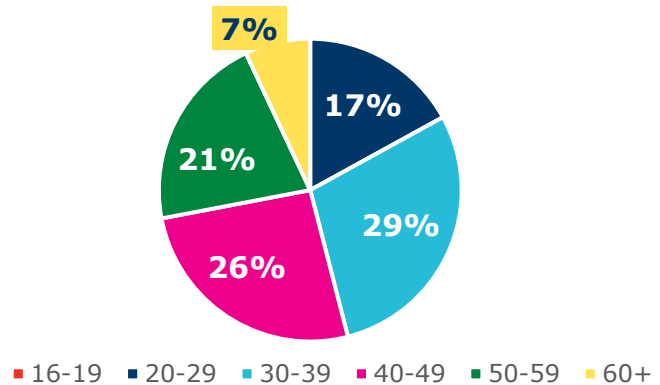Breakdown of grades at the ICO by gender

* Level H is the ICO's most senior grade. The data does not include the Commissioner as he is not an employee of the ICO.

2.5 Staff by age group

Age group	% of ICO
16-19	0%
20-29	17%
30-39	29%
40-49	26%
50-59	21%
60+	7%

% of staff in each age group

■ 16-19 ■ 20-29 ■ 30-39 ■ 40-49 ■ 50-59 ■ 60+

2.6 Staff by ethnic origin

The information in the table is based on information held on the HR database.

Ethnic background	Number of staff	% of ICO staff		% of Cheshire East population	2021 Census (England and Wales)
Asian & Asian British	39	3.8%		2.4%	9.3%
Black and Black British	23	2.3%		0.6%	4.0%
Chinese*	4	0.4%		-	-%
Mixed ethnicity	31	3.0%		1.8%	2.9%
Other ethnicity	1	0.1%		0.8%	2.1%
White (British, English, Irish, Scottish, Welsh)	844	82.7%		94.4%	74.4%
White (other white backgrounds)*	40	3.9%		-	6.2%
No data provided/ prefer not to say*	39	3.8%		-	-

* Current published census information provides 5 high level ethnicity categories. Some data will be included in other categories.

2.7 Staffing and disability

	% of staff based on HR database entries*
People with a disability	7.1%
No response	92.9%

*The HR database only records a positive declaration if a member of staff considers themselves to be disabled. The ICO is currently introducing a new HR system which will resolve this issue.

2.8 Other demographic information regarding protected characteristics

The ICO routinely gathers other demographic information from staff regarding characteristics, for example sexual orientation, gender identity and religion or belief.

We will continue to update our Equality Information and encourage staff to keep their information up to date.

2.9 Work patterns

The ICO operates a system of flexible working hours which allows people to start and finish at a time that suits them and their needs.
There are currently 182 staff at the ICO who work part time. This represents around 18% of the workforce.

There are 49 staff who work 'compressed hours' which allows them to work their contracted hours in fewer working days

e.g. 37 hours in 4 days, or 74 hours in 9 days. Of these staff 43 are full time and 6 are part time.

In total there are 34 different contractual work patterns worked by ICO staff.

Staff can apply to change their working hours for any reasons, including the care of children or dependents. The ICO has a procedure for dealing with such requests to ensure that they are handled fairly.

2.10 Career breaks

The ICO allows staff to apply for a career break once they have completed two years of service.

Career breaks can be taken for a number of reasons, including, personal development or study, travel, a break for the care and upbringing of children or the care of an adult dependent.

2.11 Home working

All ICO staff have an office base either at our Head Office in Wilmslow or in one of our regional offices around the UK. All ICO staff are able to combine working from home and in the office. Hybrid working is not compulsory, staff have the option to work in the office if they prefer.

All staff have access to a laptop which enables home working to be as flexible as possible and can suit any home environment.

Whilst staff are required to dedicate themselves to their work whilst they are at home, our homeworking provisions can help staff in a number of ways. For example, the removal of the need to commute every day may allow someone to be closer to child/dependent care provision and allow an earlier pick up.

2.12 Reasonable adjustments

We aim to ensure that our policies, procedures and work environment are inclusive by design. When developing new systems of work, we take due regard for equality considerations.

However, to ensure that we can make suitable arrangements if things are not suitable for the needs of all individuals, the ICO has 'reasonable adjustment' policies for customers and staff.

The Service Adjustment policy is designed to enable our customers, including customers with a disability, are to use the ICO's services if the standard processes prevent such access.

The staff Reasonable Adjustment policy states how the ICO will make reasonable adjustments to work content, hours or the work environment to allow a member of staff with a disability or impairment to work effectively, or to allow a member of staff who has or develops a disability to remain in work. The ICO also makes adjustments for people who have short term health conditions, to enable them to return to, or remain in, work.

The ICO regularly makes adjustments to work patterns, the work environment or equipment to allow staff to continue to work. The organisation uses the advice of occupational health whenever appropriate.

The People Services team have mapped the reasonable adjustments made for staff and held discussions with those who have adjustments to ensure that the support they have is suitable for them. Where further support needs have been identified, additional provisions have been put in place.

2.13 Equal Pay Analysis

The ICO has eight pay grades, from job Levels B through to H, with Level B being the most junior position.
Our pay system is designed to be fair and reflect the performance of individuals within their jobs.

Almost all new staff start on the Entry Rate for their pay grade, and pay awards are made each year in line with government policy and following discussions with our trade unions. Pay arrangements will also allow staff to progress their salary as their competence, contribution and impact develops.

Staff who are promoted receive an increase of a minimum increase in salary of 10%, so staff who have been in their previous grade for some time may start their new job part way up the pay range for the job into which they have been promoted.

The table below sets out the average salaries of men and women in each pay grade, along with the average time of each gender in each grade. These figures reflect the salaries paid to staff on 31 March 2022 and are those which will be reported under the gender pay gap reporting requirements.

The final column shows the percentage pay differential between the genders. A positive percentage indicates the average salary is higher for women than men, and a negative percentage shows that the average is higher for men than women.

Measure	%
1. Mean gender pay gap (Ordinary Pay)	7.9%
2. Median gender pay gap (Ordinary Pay)	7.9%
3. Mean gender pay gap (Bonus pay in the 12 months ending 31 March)	0%

4. Median pay gap (Bonus pay in the 12 months ending 31 March)		0%
5. Proportion of Male and Female employees paid a bonus in the 12 months ending 31 March	Female	98%
	Male	96%

6. Proportion of Male and Female employees in each pay quartile

Quartile	Female %	Male %
First (Lower) quartile	64.7%	35.3%
Second (Lower middle) quartile	66.9%	33.1%
Third (Upper middle) quartile	62.7%	37.3%
Fourth (Upper) quartile	53.8%	46.2%
Organisation	62.0%	38.0%

The average (mean) salary for women in the ICO is £39,147 (this equates to £20.35 per hour)

The average (mean) salary for men in the ICO is £42,495 (this equates to £22.09 per hour). This represents a gap of 7.9%.

The median salary for women is £34,948 (£18.16 per hour).

The median salary for men is £37,964 (£19.73 per hour). This represents a pay gap of 7.9%.

The ICO was able to pay non-consolidated payment to staff between April 2021 and March 2022. Only staff at grades B to G received the payment.

A further breakdown of salaries by grade and gender is provided below.

Job Level B

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	82.8%	4.8	£22,264	1.8%
Male	17.2%	4.4	£21,874	

Job Level C

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	60.9%	2.4	£24,725	2.1%
Male	39.1%	1.4	£24,218	

Job Level D

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	69.2%	2.7	£31,692	1.3%
Male	30.8%	2.0	£31,291	

Job Level E

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	59.7%	3.4	£42,063	0.4%
Male	40.3%	3.6	£41,884	

Job Level F

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	57.3%	3.3	£55,168	0.0%
Male	42.7%	2.6	£55,152	

Job Level G

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	50.0%	1.5	£68,182	-1.5%
Male	50.0%	2.1	£69,204	

Job Level G2

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	52.6%	1.8	£87,100	1.3%
Male	47.4%	2.1	£86,992	

Job Level H

	Proportion of staff	Average time in grade (years)	Average pay	Average female vs average male salary
Female	33.3%	1.1	£111,400	-16.3%
Male	66.7%	4.2	£133,043	

Part 3: Information on services, policies and other functions:

This section of the report is concerned with the services, policies and practices of the ICO and how, through the provision of those functions, we have endeavoured to meet our obligations under the Equality Act and enhance equality of opportunity in society.

It is not intended to provide an exhaustive list of every action or activity that we take which helps to further equality of opportunity. Rather, this section of the report will provide an overview of how the ICO contributes to a more equal society, particularly through our remit as the regulator of information rights.

Where helpful, we provide illustrative examples of the types of activity that are being delivered within key business areas.

3.1 Our strategic goals

In 2022, we launched our ICO25 Plan. The plan sets out:

- why our work is important;
- what we want to be known for and by whom; and
- how we intend to achieve this by 2025.

In doing so, it describes our purpose, objectives and values and the shift in approach we aim to achieve through the life of this plan.

Our purpose is to empower through information.

We have set ourselves four enduring objectives which explain what we will do to make sure our work is focused on delivering our purpose.

Our enduring objectives guide what we will do, as well as what we will not do. They also show how we will allocate our resources to support the delivery of each objective.

Objective one: Safeguard and empower people

Particularly the most vulnerable, by upholding our information rights and enabling us all to confidently contribute to a thriving society and sustainable economy.

- We will do more to understand the views and concerns of the diverse UK public and use these to guide our priorities. We will focus our interventions on areas of greatest harm and risk and take enforcement action where necessary to make a real difference to people's lives.
- We will help people to understand their information rights so they can confidently decide how best to use and trust the products and services in our daily lives that require our information.
- We will continue to tackle predatory marketing, in particular where it is focused on vulnerable people, using the anticipated increase in our powers to have a greater impact.
- We will do more to supervise the cyber security of relevant digital service providers and systems to protect people's information.
- We will be transparent in the decisions we take when using our legitimate discretion, recognising that we have finite resources and we are unable to look into every matter raised with us.

Objective two: Empower responsible innovation and sustainable economic growth

By providing regulatory certainty about what the law requires, reducing the cost of compliance and clarifying what we will do if things go wrong. This enables those we regulate to confidently plan, invest and innovate with confidence.

Objective three: Promote openness, transparency and accountability

Supporting the development of a modern Freedom of Information Act (FOIA) and Environmental Information Regulations (EIR) practice framework in the UK, inspiring confidence in public services and democracy.

Objective four: Driven by our values, we'll continuously develop the ICO's culture, capability and capacity

To deliver impactful regulatory outcomes, be recognised as an effective provider of public services, a knowledgeable and influential regulator and a great place to work and develop. To do this, we believe ICO25 calls for a shift of approach in five key elements of our work. They are:

· **Prioritising with simplicity and agility** ----– understanding what we are prioritising and why, what we aim to achieve and how to achieve it at pace. We must also understand when and how to move on to our next priority.
· **Being more inclusive and empathetic in our regulatory interventions** -----– improving our insight and understanding of the challenges and opportunities faced by those we regulate and the people we protect. We must reach new audiences, particularly the ones most in need of our support and protection, using language and

tone which demonstrates our understanding of the world we regulate and not just the laws we oversee.

- **Operating transparently to provide great customer service** – giving special focus to sharing our information, knowledge and insight routinely and extensively. We must do this in ways which support its reuse and through tools, products and services which provide practical outcomes as well as advice.

- **Improving regulatory certainty** – allowing our expectations to be understood, our actions to be predicted and our advice relied on. We do this to clearly prevent serious harm and reduce the cost of compliance. For instance, we will not tolerate organisations who are using people's information to exploit them or expose them to harm, and we will not take action against organisations who share data to safeguard vulnerable people. Regulatory certainty does not mean we will provide certainty about every aspect of the law in every individual case.

- **Maximising the technical capability of our people and systems** – transforming our workforce capability, realising the full benefits of digital tools and our data assets to increase our impact from the resources we invest. We must approach all that we do in ways which improve productivity, efficiency and the value we offer for the tax payers and fee payers who fund our work.

3.2 Our Values

Coupled with our new organisational values, which are part of our ICO25 Strategy, we aim to enhance the services we provide to the public and stakeholders, whilst continuing to be a supportive and inclusive employer.

We are a large organisation providing a diverse range of public services – but a common thread runs through all that

we do. Our four core values: curious, collaborative, impactful and inclusive are central to the way we work. They influence the way we plan, make decisions, how we behave towards one another and continually challenge ourselves to achieve our vision.

Collectively our values expect us to behave in a certain way:

Curious
We believe in continuous learning, empowering our teams to experiment and innovate and are eager for new or different perspectives to inform our work.

We are curious enough to consider new ideas and agile enough to explore them effectively.

We are curious, empathetic and actively interested in understanding all perspectives. We particularly use this to make our expectations of those we regulate as simple as possible to implement.

We regularly ask ourselves why, and why not, and seek creative opportunities and solutions to both recurring and new situations.

We challenge each other constructively, supporting each other to find the best outcome.

Collaborative
We work together in ways which enable us to prioritise, support our agility and our collective and individual high performance. This enables us to successfully execute our plans by responding to emerging risks and opportunities at pace but without sacrificing our high standards.

We move fast together so we can fix things in ways which are timely and relevant for our customers, stakeholders and colleagues.

We experiment together, learn and continuously improve. If it doesn't work, we learn from it quickly and make changes.

Impactful

We thrive on delivering at pace and with impact, by being selective to be effective. This will help us to ensure our important work makes a material difference. We take pride in our high performance.

We set clear objectives and make timely, informed decisions, using evidence and insight. We also measure and evaluate our work.

We achieve high performance by empowering people to take personal ownership and accountability. We learn from our mistakes, continuously develop and celebrate our successes.

The importance of working impartially and ethically should not be understated. The concepts of equality, diversity and inclusion are hard-wired into everything we do.

Inclusive

We want a truly equal, diverse workforce and inclusive culture. One where we respect each other and those we serve. We want diverse teams and leadership. We want stakeholder relationships that reflect our society so our organisation can thrive and perform at our very best.

We are curious to understand all perspectives, recognising the value that they bring. Our aim is for equality, diversity and inclusion to become fully embedded in all our working and thinking.

3.3 Mainstreaming EDI throughout the ICO supported through EDI Steering Group.

We are continuing to transform our governance of Equality and Diversity so that we can be inclusive of more people and more proactive in our work, which will reflect the extent to which the ICO has grown in the last three years and continues to grow and progress.

Our current Equality and Diversity Steering Group is made up of representatives from across the ICO. Members bring with them a range of experiences, as well as their insight into both operational and strategic matters. They help to advise upon equality issues and raise awareness throughout the organisation.

The Steering Group includes two members of our Senior Leadership Team, giving direct links to the most senior levels of management in the organisation. With the Chair feeding directly into the EDI Board which compromises of members of the Executive Leadership Team and wider ICO colleagues.

We have strengthened how the group works, during 2019 we formed network groups for staff who have a variety of protected characteristics. Those groups also welcome members who do not share the protected characteristic but are supportive and act as allies.

Our Staff Networks are fully representative and inclusive with the six below groups:
- Access and Inclusion – for people with a disability, long term health condition or access needs.
- Healthy Minds – to support and encourage positive mental wellbeing
- Menopause – a space of support for those experiencing menopause
- Pride – for members of the LGBTQ+ communities

- REACH – race, ethnicity, and cultural heritage
- Women's – to look at, discuss and raise awareness of women's issues.

Nominated chairs of each of these groups attend the EDI Steering group. The Steering Group receives feedback from the groups, seeks their input and views about the development of the ICO and feed this into the EDI Board.

As we continue to mainstream EDI into our wider ICO culture our staff networks also create and facilitate events around awareness days throughout the year. Whilst sharing stories through regular blog features and the introduction of guest speakers.

We intend this to continue to enable more people to contribute on issues which they feel really impact upon them and allow us to have a more inclusive and influential workforce. Allowing the continued growth and changes of the ICO to be viewed through the lenses of those colleagues with protected characteristics.

3.4 Ensuring staff are trained in equality issues

Training, both formal and informal, is a key contributor to the delivery of many aspects of the ICO Corporate and Business plan and fundamental to the delivery of the organisational equality objectives.

The ICO places considerable value in ensuring that staff receive the necessary training so that they can develop skills and understanding of their roles in line with the aims and objectives of the ICO.

There has been a significant amount of training and awareness sessions which have an equality dimension in recent years, including 'Dignity, Diversity and Inclusion' training, which is mandated for all new staff, 'Autism and Asperger's Awareness', 'Disability Awareness', 'Promoting Inclusion' 'Reasonable Adjustment', 'Equality Impact Assessments' and 'Building Equality into Business Planning'.

As well as these sessions we've included bespoke sessions for those who are People Managers including, Reasonable Adjustments for People Managers and Promoting Inclusion for Managers.

These sessions help to improve awareness of matters that affect our customers, as well as ensuring that staff are fully versed in the organisation's commitment to fairness, equality and dignity in our dealings with each other.

3.5 Monitoring and evaluating equality data.

Collecting information to help understand the needs and issues relating to the diversity of staff and customers is important when monitoring progress towards the ICO's overarching equality objectives.

The ICO collects a wide range of data from staff monitoring and surveys and some more limited data from customers.

Customer satisfaction surveys measure a range of issues to do with our performance and customer handling.

We continue to monitor recruitment processes to ensure that they are conducted fairly and encourage applications from across the whole community.

3.6 Ensuring that staff and customers can access information and services.

Our communications need to be accessible to as wide a range of people as possible.

We seek to comply with the principles of inclusiveness that incorporate the provisions of the Equality Act, Northern Ireland legislative requirements, and the Welsh language requirements.

The ICO website meets AAA accessibility standards wherever possible (the government requires AA status). This means, for example, that text size can be altered and a *browse aloud* facility is available. This functionality has been improved in the last twelve months with the roll out of new Microsoft devices.

All publications are produced to accessibility standards and the corporate "Style Guide" also incorporates this good practice. For example all ICO publications:
- use sans serif fonts for core text;

- use a font size of 12 point minimum and 14 points for important information;

- maximise white space

- use a dark out of white colour scheme

- use good quality matt paper to reduce glare and the text showing through from the other side.

The ICO also trains staff to write in plain English and has produced a "Style Guide". The ICO:

- limits sentences to between 15 – 20 words;

- avoids dense block text paragraphs;

- uses line spacing between paragraph breaks;

- keeps lines left justified with a ragged right edge;

- uses bullets or numbers rather than continuous prose;

- uses fact boxes to make main point clear;

- uses images where possible to support text; and

- seeks accreditation by the 'Plain Language Commission' for key leaflets and guidance.

We do not undertake translation of all publications as a matter of course, but we will respond to individual requests in line with our Translations Policy, which can be found on our website.

Our operational procedures establish approaches both for handling customers with particular needs and making 'reasonable adjustments' as defined within equality legislation.

In relation to learning and development, flexible options are built in covering timing of events, location, format of materials and method of delivery.

The ICO also ensures that work related events, and any refreshments served there, are inclusive as possible taking particular account of religion or belief.

In addition to these long standing arrangements, the ICO has introduced 'live chat' services which enable members of the public to interact with the organisation online. This has promoted accessibility for those who may feel anxious using the telephone helpline service, or perhaps have hearing impairments which could be a barrier to using the service.

Appendix 1: Objectives and measures within the ICO High Performance Strategy that guides the development of our culture, capability and capacity which have an equality dimension

People Goal	Description
Objective one	To ensure that all ICO team have clarity of purpose, effective leadership and harness diversity of thought and perspective to achieve their objectives.
	• **Embed our values, shifts in approach and behaviours** **Measures:** Increase in awareness and understanding of the values, shifts in approach and behavioural framework among our colleagues, as evidences through employee engagement survey scores. Workforce diversity demographics are representative of the society by sex, disability and ethnicity. • **Build the confidence and capability of all leaders and people managers to lead, develop and coach teams by adopting inclusive and adaptive lea** **Measure:** Increase in colleagues reporting that they:

	– feel supported by their line manager; - feel they receive clear direction from their leaders; – believe they are given the opportunities and support they need to develop, continuously learn and grow; – receive regular feedback on their performance; and – as leaders, have the right knowledge and tools to influence their teams and external stakeholders. • **Ensure that all our people feel psychologically safe to contribute openly to the work of the ICO. This includes understanding what it means to create psychological safety for others and being accountable for doing so.** **Measures:** Increase in colleagues reporting that they: – feel valued for the work they do; – are respected for individual differences, ideas and working styles; and – encouraged to come up with new and better ways of doing things. Increased awareness of psychological safety. • **Embed a culture of respect and deliver our equality, diversity and inclusion objectives**

	Measures: Increase in colleagues reporting that they:
	 - are treated with respect at work;
	 - treated equitably at work;
	
	   – are encouraged to share different views and perspectives; and
	   – provided with adjustments at work seamlessly
	
	Deliver the EDI action plan within the times frames set.
	
	Improvements in gender and ethnicity pay metrics.
	
	Sustain positive metrics on disability pay.
	
	Improved EqIA completion rates ahead of systems implementations and change initiatives.
	
	Improved awareness of reasonable adjustment requirements for colleagues.

Objective two	To continuously improve through experimentation, transforming the ICO to achieve our purpose whilst empowering our people to deliver and feel accountable in their roles.
	• **Encourage diverse views in our change initiatives, listening to one another as we make decisions on how we work and what we do whilst maintaining the important momentum behind our transformation.**
	Measure: Increase in colleagues reporting that they feel empowered to share their views, that those views are listed to, and agree that the ICO is a collaborative and inclusive place to work though employee engagement survey scores.

Appendix 2: Examples equality of actions and outputs in the last year

Summary of Action Taken	Business and E&D Impact	Groups most benefitting from the action
The ICO operates the 'Disability Confident' standard of guaranteed interviews for job applicants with a disability, who meet the minimum criteria for the job.	Encourages a diversity of experience in the workforce and improves accessibility of job opportunities to people with a disability.	People with a disability
We provide a wide range of adjustments for staff, and have implemented systems for anticipating the requirements of new joiners to our organisation.	Ensuring that people with a disability (including new starters), and those with shorter term health conditions, are able to work comfortably and have the equipment and work arrangements needed to work effectively.	Staff with a disability and staff with health conditions.
We have ensured that our office spaces are accessible and have adequate facilities for staff with a disability.	Providing equal access to building facilities and improving convenience for all staff.	Staff with a disability and those with difficulties accessing facilities elsewhere in the building.

We provide learning materials in a variety of formats to meet the needs of staff undertaking training.	Ensures that all staff are able to fully access training and equally able to benefit from the desired learning outcomes.	Staff with varying learning styles, neurodiversity's or people who have disabilities such as visual impairments
We have created bespoke know abouts around reasonable adjustments in response to service user feedback	Ensures all staff have an understanding of reasonable adjustments, what they include and managerial responsibility	Staff who require workplace adjustments, including those who are neuro diverse or people with a disability.
We provide learning and induction documents in the Welsh Language	Ensures that Welsh speaking colleagues can access documents in their first language. Supporting the Welsh Language Act	Welsh speaking colleagues and employees
We continue to use our Live Chat online service for our helpline. This enables customers to access our services in a new way, and is of potential benefit to hearing impaired customers.	Enables customers to contact via a wider range of methods and improves accessibility of our services.	All customers who have difficulties with, or prefer not to have, telephone interactions.
We make adjustments, using our Reasonable Adjustments policy, to the way we provide services	Improvements to the services to all customers and promotion of accessibility of information rights.	People with a disability and others for whom access to our services may be difficult.

to customers who are otherwise unable to access our services.		
We ensure any staff members who have /had reasonable adjustments in place at the office have access to the same facilities whilst working from home	Improvements to staff welfare and working environments	People with a disability, and others who may require working adjustments
We provide enhanced maternity, paternity, adoption and shared parental leave and pay provisions.	Supports parents with their caring responsibilities and encourages retention of experienced staff.	Parents and those with child care responsibilities.
We have delivered a variety of awareness sessions for staff, such as deaf/hearing impairment awareness; Asperger's; and autism awareness.	Improved appreciation of different disabilities and greater understanding of how the ICO can meet the needs of customers.	People with a disability
We have produced Equality and Diversity factsheets to support staff to develop their knowledge of equality and diversity issues.	There are four factsheets, called Doing the duty, 'What is a disability?', 'Useful Equality and Diversity websites' and 'Top tips on how to behave around people with a disability' . We also have produced a Dyslexia	Customers affected by the conditions covered by the factsheets.

	style guide – 'Communicating to someone with Dyslexia'	
We are continuing to develop, an Age Appropriate Design Code to protect children and young people by implementing standards for information society services e.g. apps, websites, games, programmes and online community environments.	Enhancing the protection of young people on line by implementing safeguards for their personal information to be enacted by service providers.	Children, young people and their parents.
We have investigated cases concerning the disclosure of information relating to gender reassignment, ethnicity, sexual orientation and disability amongst others. Our enforcement action emphasises the importance of ensuring the security of such sensitive data.	Providing protection for people who have very sensitive personal data held by organisations. Helping to improve compliance with the law.	A range of groups across society.

We have taken enforcement action against companies who have sent millions of nuisance texts and spam emails to the public and have targeted people for scam cold calling.	Protecting the general public, particularly those in the most vulnerable groups, for example the elderly.	All of the community, but with particular benefit for the most vulnerable people.
We continue to undertake a wide range of speaking engagements covering the public, private, charity and third sectors.	Cascading good information rights practise across society.	All of the community.