

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: JW

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: Culture Capability & Capacity Strategy Project 2022

Briefly describe the overall purpose of this work.

Answer:

Developing and consulting on the new High Performance Strategy (previously known as the Culture, Capability and Capacity strategy)

Having the right culture, capability and capacity is a key prerequisite for any effective regulator. It is the foundation of our high performance culture and how we deliver ICO25 together as one ICO.

This strategy enables us to translate the most significant risks and opportunities underpinning our culture, capability and capacity into clear and tangible plans and actions with equally clear accountability and responsibility for the work involved. These risks are kept under constant review and published on our website.

The strategy addresses how we ensure we have sufficient resources and the right people, data, systems, processes and places to achieve our purpose and objectives as an inclusive regulator and employer.

It will be informed by extensive external stakeholder consultation as well as with our own teams, Equality Diversity and Inclusion networks, Staff Forum and from our recognised Trade Unions. The consultation period will take place during January and February 2023 and feedback will be considered and incorporated into the final document.

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

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

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.

Strategy content and objectives - To deliver our purpose, we have set ourselves seven enduring objectives which explain what we will do to make sure our work is focused on delivering the changes we need to our culture, capability and capacity. These collaborative objectives have been informed by Directorate priorities across People and Leadership, Equality Diversity and Inclusion, Digital Data and Technology, Cyber Security and Information Management, Estates, Finance, Governance and Decision Making and Change and Transformation.

We will set our annual priorities against these objectives and report our progress. Our enduring objectives guide what we will do, as well as what we will not, and how we will allocate our resources to support the delivery of each objective. Each area including Equality, Diversity and Inclusion, has prioritised objectives, supported by performance measures which will help us evaluate the impact of our EDI work.

Consultation Process - The draft document will be shared with stakeholders across the office for consultation in December 2022/January 2023 These groups of stakeholders include the EDI Board, Trade Unions and our staff forum. Feedback will be captured and considered before the final strategy is completed and published by the end of Jan 2023.

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>It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO, irrespective of individual religion or belief.</p> <p>An individual of any religion or belief has the same access to all aspects of the CCC strategy.</p> <p>Through the work we deliver on empowering our leaders, we will ensure that our leaders operate with empathy at all times and are inclusive in their leadership style. There are risks that people may feel that the way in which they are being led by others may be impacted upon by potential discrimination (whether intentional or not), on the part of the leader. This risk is mitigated to a large extent by the ICO's policies and training on discrimination issues.</p> <p>Our leaders will ensure that our teams are inclusive and that we actively celebrate different perspectives, e.g. requiring our leaders to meaningfully engage and consult with their teams to create a safe space for people's views to be heard will enable all colleagues to share their perspectives, irrespective of religion or belief.</p>	<p>These impacts will be identified and any mitigation actions put in place following the consultation process built into this project.</p> <p>All leaders are subject to ICOs policies on discrimination and required to undertake training to increase knowledge, awareness and understanding of potential discrimination challenges.</p> <p>Individual PEIA's are completed on all people related policies, e.g. pay, career banding.</p> <p>When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.</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>All policies and frameworks with respect to Pay and Reward will be implemented to ensure fairness and no individual of a particular religion or belief will be at a detriment through its application.</p> <p>The work that we do in workforce planning to create a culture of agile working will consider the needs of those with particular religion or belief (e.g. we will not prohibit the requirement to pray during the day/take time out as required)</p> <p>Through our work on supporting individual development, learning and career progression, we will ensure that all colleagues are given the opportunity to continually learn and progress, and we will seek to understand and remove any barriers that may prevent them from doing so.</p>	
Race, nationality or cultural background	It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO, irrespective of individual race, nationality or cultural background. Setting out our inclusive culture will increase the chances of a positive impact for all.	These impacts will be identified and any mitigation actions put in place following the consultation process built into this project.

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>Through the work we deliver on empowering our leaders, we will ensure that our leaders operate with empathy at all times and are inclusive in their leadership style. There are risks that people may feel that the way in which they are being led by others may be impacted upon by potential discrimination (whether intentional or not), on the part of the leader. This risk is mitigated to a large extent by the ICO's policies and training on discrimination issues.</p> <p>Our leaders will ensure that our teams are inclusive and that we actively celebrate different perspectives, e.g. requiring our leaders to meaningfully engage and consult with their teams to create a safe space for people's views to be heard will enable all colleagues to share their perspectives, irrespective of race, nationality or cultural background.</p> <p>All policies and frameworks will ensure that no-one is at a detriment because they have a protected characteristic.</p> <p>Better understanding of our current demographics with respect to race, nationality and cultural</p>	<p>All leaders are subject to ICOs policies on discrimination and required to undertake training to increase knowledge, awareness and understanding of potential discrimination challenges.</p> <p>Individual PEIA's are completed on all people related policies, e.g. pay, career banding</p> <p>Rates of progression are monitored, as are average salary rates, both overall and by grade. Ethnicity pay gap is reported annually.</p> <p>Reports to the Pay Consistency Panel include data about the progression rates of staff who have an ethnic minority background.</p> <p>Recruitment practices place emphasis on achieving a diverse candidate pool with an ambition to achieve greater diversity</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?
	background will enable us to positively influence our recruitment practices.	<p>throughout the organisation, and particularly at senior grades.</p> <p>When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.</p>
People with a Disability (I thought this language was updated on the last form?)	<p>We have set out specific actions in the EDI audit action plan which is a measure to address and remove barriers for people with a disability.</p> <p>We will ensure that workplace adjustments are embedded at every stage of the employee lifecycle supported by an effective implementation process to support managers. We have a clearly defined process available for all colleagues.</p> <p>A schedule is developed for ongoing, cyclical training and coaching sessions for all people managers on the Reasonable Adjustment process and how to support colleagues for whom adjustments are agreed.</p>	<p>When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.</p> <p>Incorporating any lessons learned and feedback into the design. Estates will also consider all aspects of access and egress whilst assessing potential new premises.</p> <p>We will ensure that when assessing new technology for our office locations, such as hybrid meeting equipment, we define and highlight the positive and</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>We aim to build and communicate an EDI governance structure (incl. accountability) providing clarity of roles and responsibilities.</p> <p>There may be issues of accessibility for some systems or kit and equipment. We will complete a bespoke PEIA for all new systems, kit and equipment.</p>	<p>negative outcomes of the proposals along with any mitigating activity. Similarly, where we deploy digital services to our customers (internal and external) we will conduct the assessments detailed above. All the assessments will be signed off by the Project Sponsor. We will ensure that the bespoke accessibility requirements are addressed during the procurement and development / installation of any new digital systems, kit and equipment. This will be based on our knowledge of the accessibility requirements for known reasonable adjustments.</p> <p>Rates of progression and pay are monitored, as are average salary rates, both overall and by grade. Disability pay gap is reported annually.</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>Work on a disclosure campaign to increase declaration rates to allow for improved analysis.</p> <p>Individual PEIA's are completed on all people related policies, e.g. pay, career banding</p>
Sexual orientation	<p>It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO, irrespective of sexual orientation. Setting out our inclusive culture will increase the chances of a positive impact for all.</p> <p>Through the work we deliver on empowering our leaders, we will ensure that our leaders operate with empathy at all times and are inclusive in their leadership style. There are risks that people may feel that the way in which they are being led by others may be impacted upon by potential discrimination (whether intentional or not), on the part of the leader. This risk is mitigated to a large extent by the ICO's policies and training on discrimination issues.</p> <p>Our leaders will ensure that our teams are inclusive and that we actively celebrate different perspectives, e.g. requiring our leaders to meaningfully engage</p>	<p>These impacts will be identified and any mitigation actions put in place following the consultation process built into this project.</p> <p>All leaders are subject to ICOs policies on discrimination and required to undertake training to increase knowledge, awareness and understanding of potential discrimination challenges.</p> <p>Individual PEIA's are completed on all people related policies, e.g. pay, career banding</p> <p>When undertaking office reconfiguration or relocation projects Estates will complete a</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>and consult with their teams to create a safe space for people's views to be heard will enable all colleagues to share their perspectives, irrespective of sexual orientation.</p> <p>All policies and frameworks will ensure that no-one is at a detriment because they have a protected characteristic.</p> <p>Better understanding of our current demographics with respect to sexual orientation will enable us to positively influence our people practices.</p>	<p>project specific PEIA document in relation to the works.</p>
Sex (see note 1)	<p>It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO, irrespective of their sex. Setting out our inclusive culture will increase the chances of a positive impact for all.</p> <p>All policies and frameworks will ensure that no-one is at a detriment because they have a protected characteristic.</p> <p>We aim to reduce the gender and ethnicity pay gap through specific targeted campaigns through our work on recruitment and workforce planning.</p>	<p>These impacts will be identified and any mitigation actions put in place following the consultation process built into this project.</p> <p>All leaders are subject to ICOs policies on discrimination and required to undertake training to increase knowledge, awareness and understanding of potential discrimination challenges.</p> <p>Individual PEIA's are completed on all people related policies, e.g. pay, career banding</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>Through our work on creating agile teams and agile work spaces, we will enable more colleagues to work in a flexible, hybrid way, that may positively support those with family and childcare commitments.</p>	<p>Targeted recruitment campaigns based on demographic split of sex</p> <p>Rates of progression and pay are monitored, as are average salary rates, both overall and by grade. Gender pay gap is reported annually.</p> <p>When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.</p>
Age	<p>It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO, irrespective of age. Setting out our inclusive culture will increase the chances of a positive impact for all.</p> <p>Through the work we deliver on empowering our leaders, we will ensure that our leaders operate with empathy at all times and are inclusive in their leadership style. There are risks that people may feel that the way in which they are being led by</p>	<p>These impacts will be identified and any mitigation actions put in place following the consultation process built into this project.</p> <p>All leaders are subject to ICOs policies on discrimination and required to undertake training to increase knowledge, awareness and understanding of potential discrimination challenges.</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>others may be impacted upon by potential discrimination (whether intentional or not), on the part of the leader. This risk is mitigated to a large extent by the ICO's policies and training on discrimination issues.</p> <p>Our leaders will ensure that our teams are inclusive and that we actively celebrate different perspectives, e.g. requiring our leaders to meaningfully engage and consult with their teams to create a safe space for people's views to be heard will enable all colleagues to share their perspectives, irrespective of their age.</p> <p>All policies and frameworks will ensure that no-one is at a detriment because they have a protected characteristic.</p> <p>Better understanding of our current demographics with respect to age will enable us to positively influence our recruitment practices.</p> <p>Through the work we do on early in careers, we will increase external apprenticeships for ages 16-19 to positively increase our range of age groups within our demographics.</p>	<p>Individual PEIA's are completed on all people related policies, e.g. pay, career banding</p> <p>Targeted recruitment campaigns based on demographic split of age</p> <p>When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.</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?
Gender reassignment (see note 2)	<p>An individual undergoing, or has undergone, gender re-assignment is not expected to be negatively impacted by the implementation of the CCC strategy</p> <p>It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO. Setting out our inclusive culture will increase the chances of a positive impact for all.</p> <p>Through the work we deliver on empowering our leaders, we will ensure that our leaders operate with empathy at all times and are inclusive in their leadership style. There are risks that people may feel that the way in which they are being led by others may be impacted upon by potential discrimination (whether intentional or not), on the part of the leader. This risk is mitigated to a large extent by the ICO's policies and training on discrimination issues.</p> <p>All policies and frameworks will ensure that no-one is at a detriment because they have a protected characteristic.</p>	<p>These impacts will be identified and any mitigation actions put in place following the consultation process built into this project.</p> <p>All leaders are subject to ICOs policies on discrimination and required to undertake training to increase knowledge, awareness and understanding of potential discrimination challenges.</p> <p>Individual PEIA's are completed on all people related policies, e.g. pay, career banding</p> <p>When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.</p>
Marital status	There are no aspects of the CCC Strategy which create a detriment, or provide any enhancement, for	These impacts will be identified and any mitigation actions put in

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>people based on their marital or civil partnership status.</p> <p>It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO. Setting out our inclusive culture will increase the chances of a positive impact for all.</p> <p>Through the work we deliver on empowering our leaders, we will ensure that our leaders operate with empathy at all times and are inclusive in their leadership style. There are risks that people may feel that the way in which they are being led by others may be impacted upon by potential discrimination (whether intentional or not), on the part of the leader. This risk is mitigated to a large extent by the ICO's policies and training on discrimination issues.</p> <p>All policies and frameworks will ensure that no-one is at a detriment because they have a protected characteristic.</p>	<p>place following the consultation process built into this project.</p> <p>All leaders are subject to ICOs policies on discrimination and required to undertake training to increase knowledge, awareness and understanding of potential discrimination challenges.</p> <p>Individual PEIA's are completed on all people related policies, e.g. pay, career banding</p> <p>When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.</p>
Pregnancy and maternity	It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO, irrespective of	Individual PEIA's are completed on our maternity policy. When undertaking office reconfiguration or relocation

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	<p>age. Setting out our inclusive culture will increase the chances of a positive impact for all.</p> <p>Any new or expectant mother will be supported through our people policies and practices to identify at the earliest opportunity any additional risks arising for the person; increase communication between the manager and team member, and as a result help to deliver a better experience of working whilst pregnant or having recently given birth.</p>	projects Estates will complete a project specific PEIA document in relation to the works.
Political opinions	<p>A person's political opinion will not be impacted upon by the work we do in the implementation of the CCC strategy as it is not a factor in its effective operation.</p> <p>There is no advantage or disadvantage to be experienced by people of differing political opinions.</p> <p>It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO. Setting out our inclusive culture will increase the chances of a positive impact for all.</p>	Individual PEIA's are completed on all people related policies
People with dependants	It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO, irrespective of	Individual PEIA's are completed on all people related policies

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>age. Setting out our inclusive culture will increase the chances of a positive impact for all.</p> <p>All policies and frameworks will ensure that no-one is at a detriment because they have a protected characteristic.</p> <p>Through our work on creating agile teams and agile work spaces, we will enable more colleagues to work in a flexible, hybrid way, that may positively support those with family and childcare commitments.</p>	When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.
People without dependants	<p>It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO. Setting out our inclusive culture will increase the chances of a positive impact for all.</p> <p>All policies and frameworks will ensure that no-one is at a detriment because they have a protected characteristic.</p>	Individual PEIA's are completed on all people related policies
Socio-economic groups or social classes (see note 3)	It is anticipated that the work that we deliver in implementing the CCC strategy will have a positive impact for all colleagues of the ICO. Setting out our inclusive culture will increase the chances of a positive impact for all.	<p>Individual PEIA's are completed on all people related policies</p> <p>When undertaking office reconfiguration or relocation projects Estates will complete a</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?
		project specific PEIA document in relation to the works.
Multiple protected characteristics (see note 4)	The overall impact of the CCC strategy on protected groups is neutral, however, as stated in the review, there are aspects of the implementation which could, if not implemented fairly or correctly, have negative impacts. This could also have the potential to impact on people with multiple protected characteristics. These will all be mitigated through individual PEIAs on each practice.	Individual PEIA's are completed on all people related policies When undertaking office reconfiguration or relocation projects Estates will complete a project specific PEIA document in relation to the works.

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

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
<p>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 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>The CCC strategy is for internal purposes only, however in order to support and enable ICO25 shifts of approach a key objective is to empower an inclusive regulatory approach:-</p> <ul style="list-style-type: none"> • We will actively look for opportunities to engage with communities and groups previously unaware of our work. • Our public policies and guidance will be concise, understandable, and accessible to support economic growth and promote transparency. • We will improve our public consultation and outreach process to gather business and customer insight to implement Equality Impact Assessments to influence others.
<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>The CCC strategy clearly defines the EDI vision, as well as our approach to accessibility for IT and estates. Priority objectives and performance measures necessary to support ICO25 will be integral to the strategy document. These include building adaptive and inclusive leadership capabilities, so leaders at every level can influence our stakeholders and communities with empathy</p>
<p>Objective 3: 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.</p>	<p>The tender evaluation strategy will be to encourage organisations that we are purchasing services from to demonstrate that they are being fully inclusive in all areas of social value. Creating positive legacies in all aspects of social value through our procurement</p>

Objective	Contribution to objective
	activities such as positive social, environmental, and economic legacies.
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.	One of the key enduring objectives within the strategy is EDI, setting out our priorities together with performance measures and KPIs as outlined above.

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: EDI Measures and key performance indicators have been identified and articulated within the CCC strategy, particularly in relation to our own staff. The draft strategy will go out to consultation with the EDI Board, TUs and all staff as part of the consultation plan in January 2023.

Q7. How long will these arrangements be in place?

Answer: This strategy will remain in place until December 2025 over the lifespan of ICO25 at the earliest. There will be a continuation in terms of the next phase of our strategic work.

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: At least annually during the three year lifespan of ICO25 and in the first 12 months of the plan at the 6 month and 12 month anniversary

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: No

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. Consultation planned between early and late January 2023

Please state here who has signed off the PEIA.

Signed off by: Jen Green

At each of their meetings, the EDI Board will receive a summary of the PEIAs which have been completed over the previous six weeks. However, the role of the EDI Board is **not** review and approval of PEIAs, rather overall assurance that the PEIA process is operating effectively.

For the actions which you have identified, you must complete a PEIA action plan, which you can access at [this link](#).

If you have identified that there are any negative impacts to any protected characteristics that you cannot fully mitigate (so that despite your best efforts, there will still be a negative impact to people with that protected characteristic), you must contact HR for advice.

Please send your completed form to corporategovernance@ico.org.uk for storage and publication.

Version number	1.0
Status	Draft
Relevant or related policies	People and Equality Impact Assessment Guidance
Author/owner	JW
Approved by	Final approval by project sponsor – Jen Green/Paul Arnold
Consulted with	Sarah Lal, Mike Fitzgerald, Jen Green, Louise Byers, MB, VW, MW-S, Angela Donaldson.
Date of sign off	Before consultation period begins early Jan 2023
Review date	30/6/23

Version	Changes made	Date	Made by
1.01	Reviewed to include feedback from Louise Byers.	6/12/22	JW
1.02	Reviewed to include comments and input from VW, MW-S, Mike Fitzgerald and MB	20/12/22	JW

1.03	Reviewed to include input from Angela Donaldson	6/1/23	JW
1.04	Added input from Mike Fitzgerald	9/1/23	JW
1.05	Final comments from Sarah Lal and Jen Green, now agreed and signed off. Submitted to Corp Gov.	10/1/22	JW