

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: FB, JM, HR

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: Public Advice and Data Protection Complaints Service 'training school'

Briefly describe the overall purpose of this work.

Answer: Public Advice and Data Protection Complaints Service (PADPCS) is a large operational department with a high turnover of staff. To streamline the onboarding process, new starters are routinely trained collectively. Since January 2022, the training is carried out within a PADPCS 'training school'. The training approach remains in line with what has been done previously in that it is carried out by existing PADPCS staff, with the exception being that the managers overseeing the 'training school' do not have an established team to manage alongside this. This collective approach allows us to ensure that all new starters have a comparable onboarding process and the same high level of quality 'on the job' training. It also reduces the resource required amongst teams by having a few lead case officers focused on training.

All new members of staff to PADPCS are treated with fairness, dignity and respect. We follow all ICO guidelines and will make adjustments as necessary. We offer flexibility and are respectful of colleagues with EDI needs, making reasonable adjustments to account for specific requirements. This applies equally to both temporary and permanent staff members, of all grades.

Many new case officers will start PADPCS as an agency worker. The corporate decision to move to an overarching provider for agency workers will provide further confidence to the ICO that any EDI needs are considered and met, from the recruitment process and beyond. This company will provide the ICO with the details of declared EDI requirements and the information will be stored centrally by the EDI team. Managers within will then ensure that required reasonable adjustments are put in place. This is not unique to the training school and replicates the onboarding approach across the ICO.

Agency workers receive the same high level of training as required for the role as a permanent staff member. If someone starts in PADPCS as an agency worker, the day to day management will be carried out by the managers overseeing the training school. Many agency workers will have an opportunity to apply for a permanent position through an open and transparent temp to perm recruitment exercise. If successful, the temporary member may end up with a new line manager. Similarly when permanent staff members start, the day to day management will be carried out by the managers overseeing the training school. Once they have been trained then they will be moved to a group within the department and their line manager will change. If there is a change in line manager for any PADPCS staff member, any known EDI adjustments will be shared to ensure continuity.

Initial screening questions

Q1. Does this work relate to an ICO policy, procedure, working practice or anything broadly similar? This includes both current policies and new policies under development.

Please answer Yes or No

Answer: Yes

*If you answer **No** to this question, you may not need to complete a PEIA. PEIAs are only required for policies, procedures and similar. However, with the ICO's commitment to equality, we would like PEIAs to be completed for as much of our work as possible. This should be beneficial in ensuring that you consider any potential equality issues while developing work.*

Q2. Is this work about the explanation of the laws which the ICO regulates, or about decisions to use or not use any of our regulatory powers (e.g. monetary penalties, enforcement notices, information notices etc)?

Please answer Yes or No

Answer: No

*If you answer **Yes** to this question, you may not need to complete a PEIA. You do not need to do a PEIA in coming to a decision regarding regulatory action, or explaining how the law operates, as equality considerations are assumed to be part of the laws. However, in areas such as guidance or anything similar, you should definitely complete a PEIA.*

If a PEIA is not required, the person with responsibility for this piece of work should decide whether a PEIA should be completed.

Impact on people with protected characteristics

The issues to consider annex, [available through this link](#), sets out some issues that you should consider for each protected characteristic.

Q3. For each of the protected characteristics, you should consider whether there are any **positive impacts** for people with each characteristic and set those out in the table below. If you think there are any **negative impacts**, set those out in the table below **and** explain how you will fully mitigate those impacts. If you think there is no impact, please explain why you think that is the case.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
Religion or belief	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff, of all grades. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on their religion or beliefs. This applies equally to agency workers and permanent staff, of all grades.</p> <p>We can offer flexibility and are respectful of religions and beliefs.</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>New team members are expected to attend training sessions. However, we are flexible and will make reasonable adjustments to account for specific requirements, for example, we can consider the days and/or times for training to account for specific needs based on someone's religion or beliefs.</p> <p>Temporary and permanent staff members have access to prayer space in ICO office buildings.</p> <p>If a temporary, or permanent staff member, has a line management change we will ensure that any specific religious or belief requirements are shared to ensure continuity.</p>	
Race, nationality or cultural background	<p>No. The ICO and PADPCS welcomes a diverse workforce. We are respectful of different cultural backgrounds, races and nationalities.</p> <p>All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff.</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 follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person's race, nationality or cultural background. This applies equally to agency workers and permanent staff, of all grades. We will make reasonable adjustments to account for specific requirements.</p> <p>If a temporary, or permanent staff member, has a line management change we will ensure that any specific requirements are shared to ensure continuity.</p>	
Disabled people	<p>Probably, around online training however this is not unique to PADPCS.</p> <p>The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p>	<p>Yes – individual needs are considered, with reasonable adjustments made. Examples could be subtitled teams calls, large print materials, introductions at the start of the call for visually impaired people etc.</p> <p>If new starters can't attend online training at all, we will consider how we can move to office based training or provide tailored one to one support either remotely by telephone/video call or in person.</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	Will the mitigation you have identified fully mitigate all of the negative impacts, such that there is a positive impact or no impact?
	<p>The appointment of agency workers and any subsequent permanent recruitment exercises are open and transparent. There is no negative impact in relation to disability. Adjustments will be considered for recruitment purposes for agency and permanent staff alike. We will seek HR guidance around accessibility requirements for candidates.</p> <p>New starters who join PADPCS, either as an agency worker or permanent staff member are welcomed to the department. Managers have open conversations to provide opportunities to discuss any adjustment needs.</p> <p>If we are advised of an individual's specific needs prior to a new starter joining us, we will put steps in place. Where necessary we will seek support from HR and/or the EDI team.</p> <p>Being trained in the 'training school' does not negatively impact a person with a disability.</p>	<p>We recognise that experiences and needs are unique and will work with the staff member to put appropriate reasonable adjustments in place. If necessary we will seek support from HR and/or the EDI team.</p> <p>Managers have regular check-ins with a new starter so there are opportunities for an open dialogue to ensure that we are aware of any specific needs.</p> <p>If a staff members line management changes, we will ensure there is an appropriate handover of any adjustment to ensure continuity.</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>This applies equally to agency workers and permanent staff, of all grades.</p> <p>The onboarding process for new starters is the same for other new starters to the ICO – people should be treated with dignity and respect, with consideration given to individual needs.</p> <p>Since the covid-19 pandemic, most onboarding and training within PADPCS is done remotely, mirroring the approach taken elsewhere across the business.</p> <p>We recognise that this brings with it opportunities to provide a more inclusive environment for some staff members with disabilities, and challenges for others. This is the same for all areas of the ICO.</p> <p>When required we will consider alternative ways to deliver training, provide feedback and overall support to meet individual needs to ensure disabled colleagues have a positive and inclusive experience. If necessary we will seek support from HR and EDI colleagues.</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>If a temporary, or permanent staff member, has a line management change we will ensure that any specific accessibility requirements are shared to ensure continuity.</p>	
Sexual orientation	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on their sexual orientation. This applies equally to agency workers and permanent staff, of all grades.</p>	
Sex (see note 1)	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary 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>permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on their sex. This applies equally to agency workers and permanent staff, of all grades.</p>	
Age	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on their age. This applies equally to agency workers and permanent staff, of all grades.</p>	
Gender reassignment (see note 2)	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</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>Being trained in the 'training school' does not negatively impact a person based on gender reassignment. This applies equally to agency workers and permanent staff, of all grades.</p> <p>Managers will provide all staff members with support and make adjustments as appropriate. They will have open conversations to provide opportunities for a staff member to share information that they wish to. Staff members at any stage of a gender transition process will be provided with relevant support. This is not unique to the training school and forms part of the wider ICO approach to onboarding new staff and supporting them through the training process.</p> <p>If a temporary, or permanent staff member, has a line management change we will ensure that any specific accessibility requirements are shared to ensure continuity.</p>	
Marital status	No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are	

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	<p>treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on their marital status. This applies equally to agency workers and permanent staff, of all grades.</p>	
Pregnancy and maternity	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on pregnancy and / or maternity.</p> <p>However, we recognise that temporary staff members, and permanent staff who have been at the ICO for a short time, may not be eligible for maternity pay. This is based on</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>ICO policies and not unique to the training school.</p> <p>Irrespective of this, in PADPCS we are able to offer flexibility to accommodate different needs and working patterns. This is a positive approach for someone during pregnancy, maternity, and beyond.</p> <p>If a temporary, or permanent staff member, has a line management change we will ensure that any reasonable adjustments are shared to ensure continuity.</p>	
Political opinions	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on their political opinions. This applies equally to agency workers and permanent staff, of all grades.</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>People with dependants</p>	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person with dependants. This applies equally to agency workers and permanent staff, of all grades.</p> <p>In PADPCS we are able to offer flexibility and a range of working patterns, which can be a positive support for someone with dependants.</p> <p>If a temporary, or permanent staff member, has a line management change we will ensure that any reasonable adjustments are shared to ensure continuity.</p>	
<p>People without dependants</p>	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect,</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>this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person without dependents. This applies equally to agency workers and permanent staff, of all grades.</p> <p>In PADPCS we are able to offer flexibility and a range of working patterns, which are available for all staff and not just those with EDI needs or dependents.</p>	
<p>Socio-economic groups or social classes (see note 3)</p>	<p>No. The ICO and PADPCS welcomes a diverse workforce. All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on their socio-economic groups or social classes. This applies equally to agency workers and permanent staff, of all grades.</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>Multiple protected characteristics (see note 4)</p>	<p>No. The ICO and PADPCS welcomes a diverse workforce.</p> <p>All new starters to PADPCS are treated fairly and with dignity and respect, this applies equally to temporary and permanent staff. We follow all ICO guidelines and will make adjustments as necessary.</p> <p>Being trained in the 'training school' does not negatively impact a person based on multiple protected characteristics. This applies equally to agency workers and permanent staff, of all grades.</p> <p>We recognise that people's individual needs are unique and we consider a range of adjustments to enable a new starter to flourish. This is not unique to the training school and is indicative of the ICO wide approach to onboarding.</p> <p>If a temporary, or permanent staff member, has a line management change we will ensure</p>	<p>Yes – we will consider individual needs to put suitable reasonable adjustments in place.</p> <p>If a temporary, or permanent staff member, has a line management change we will ensure that any reasonable adjustments are shared to ensure continuity.</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?
	that any reasonable adjustments are shared to ensure continuity.	

Note 1: you may also wish to consider gender while considering sex, although gender is not a protected characteristic under the Equality Act.

Note 2: you may wish to consider the impact on transgender people while considering people undergoing gender reassignment, although gender is not a protected characteristic under the Equality Act

Note 3: Socio-economic group or social class is not a protected characteristic, but we would still like to ensure that we consider the impact of our work in this area.

Note 4: Multiple protected characteristics is an opportunity to consider whether there are issues which affect people with most or all of the protected characteristics, or where there may be different impacts of the same issue on different characteristics (e.g. the same issue has a positive impact on people with one protected characteristic but a negative impact on people with another protected characteristic)

If you state that for any negative impact the mitigation you have identified will not be able to fully mitigate the negative impact, you will need to contact HR to discuss next steps. Details are provided at the end of this document.

Q4. The ICO's has a statutory requirement to provide services through the medium of the Welsh language. Will there be a requirement for this work to include a Welsh-language element?

Please answer Yes, No or Don't Know

Answer: No

If you answer **Yes or Don't Know** to this question, you will need to contact the Welsh Regional Office to discuss next steps.

Contributing towards the ICO's equality objectives

Q5. How does this work contribute towards the ICO's equality objectives? For each of the objectives in the table below, please explain how the work you are doing will contribute to achieving this objective or state "no contribution". If there are ways that the contribution could be increased, please also mention them here.

Objective	Contribution to objective
Objective 1: <u>Spreading knowledge and taking action</u> : We will raise awareness of information rights across the community and take action to ensure that organisations fulfil their obligations. We will have 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.	Having the ability to train new starters consistently in a training school environment will support a higher level of service delivery and provide a more effective service to the public as a whole.
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.	No contribution
Objective 3: <u>Encouraging others</u> : We will use our status as a regulator, advisory body and purchaser of	No contribution

Objective	Contribution to objective
services to influence improvements in equality by other organisations and across society.	
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.	No contribution

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: The training school concept is a new one that we are trialling and so we are regularly monitoring the impact of the work.

Q7. How long will these arrangements be in place?

Answer: We don't know. The need for a training school in PADPC is driven by a high turnover of staff. It is currently being trialled at the moment and so we will decide at a later date whether it will become a permanent feature of the department.

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: Regularly and at least every 6 months

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: Suitable for publication.

Conclusion and sign-off

Thank you for completing this PEIA.

You should ensure that the person with overall responsibility for the piece of work the PEIA refers to is content that all potential equality issues have been identified and considered, that appropriate monitoring will be in place and the publication issues have been considered. This might be you, your line manager or someone else in the ICO. Therefore, you may need to provide this PEIA form to that person for review prior to completing it.

Please tick here to confirm that you have consulted with the relevant EDI staff networks or other colleagues where appropriate.

Please state here who has signed off the PEIA.

Signed off by: Faye Bower

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.