

# Equality Impact Assessment (EqIA)

This document fulfils the ICO's requirements to conduct Equality Impact Assessments, as a requirement to have due regard under the Equality Act 2010, S75 of the Northern Ireland Act 1998 and the public sector equality duty. This document helps you to assess the equality relevance of a policy or procedure on one or more groups of people with protected characteristics. Guidance is also available for Equality Impact Assessments (EqIAs), along with a glossary of issues to consider. The purpose of an EqIA is to ensure that equality issues are identified and mitigated. The guidance and 'issues to consider' documents are intended to assist with this, but they are not a substitute for consultation with people with lived experience of any of the protected characteristics. Therefore, you should, wherever appropriate, consult with the relevant EDI staff networks or other colleagues to discuss potential impacts.

You must read the [guidance](#) and [glossary of issues to consider](#) before completing the document.

Completed EqIAs will be published [on the ICO's website](#).

## Summary

**Prepared by: CR**

**What is the title of this piece of work? Leadership Summit**

**Briefly describe the overall purpose of this work.**

With our new governance structure taking shape, a refreshed strategy on the horizon and preparations underway for our move to Manchester, this year represents a significant moment of change for the ICO. We are intentionally using this period as a catalyst to build a culture that supports our future direction – one rooted in open curiosity,

inclusion, effective collaboration and delivering real impact for the people we serve. To facilitate this, we are holding a one-day leadership summit, which will cover:

morning session for all people managers – supporting them to lead confidently through change, connect culture to our values and reinforcing the critical role leaders play in shaping everyday experiences.

afternoon session for senior leaders – focusing on coming together as one leadership team, building trust, reducing siloes and continuing the work on improved decision making.

## 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.

No.

*If you answer **No** to this question, you may not need to complete a EqIA.*

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

No.

*If you answer **No** to this question, you may not need to complete a EqIA.*

If you answered no to both Q1 and Q2, it is best practice to rationalise why there are no negative impacts to each protected characteristic in the table below.

## Impact on people with protected characteristics

Q3. For each of the protected characteristics, you should consider whether there are any **positive impacts** for people with each characteristic and set those out in the table below. If you think there are any **negative impacts**, set those out in the table below **and** explain how you will fully mitigate those impacts. It is best practice to include three mitigations per negative impact. Sign off can only be done with a minimum of two mitigations. If you think there is no impact, please explain why you think that is the case.

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
<b>Religion or belief</b>	<p>Potential negative impact for those who require private space for prayer during the day, or who have specific dietary requirements.</p> <p>The venue is owned by King’s Church. There is a potential risk that their views may not align with views of other communities and groups.</p>	<p>A private room will be available for prayer needs. When introducing the day, we will remind people that they are able to leave the sessions as and when they need to remove any potential risk that they may not feel safe or comfortable to do so.</p> <p>Lunch and refreshments will be provided, and all dietary and religious requirements will be catered for.</p> <p>The venue choice was made based on an assessment of available venues that met our criteria of being available on a set date, Manchester city centre location and within a reasonable budget to ensure value for money. The venue is used by a number of</p>

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
		<p>other government and public sector organisations. Post confirming the venue and securing the booking, we have been made aware of some of the content available on the King’s church website, which may cause upset or offence to some groups with differing beliefs. We have however discussed this with our Pride network chairs, who understood that information about the ownership of the venue was discovered after the venue had been secured. The Pride network were comfortable that mitigations had been made such as checking the venue to ensure no visible content of this nature was present. In recognition of the concerns raised and to remain fully aligned with our values, we have taken the decision that Kings House will not be used for future events</p>
<b>Race, nationality or cultural background</b>	Possible negative impact of perceived lack of diversity at senior leadership levels and among speakers leading to people feeling less likely to contribute	Comms before and during the event will emphasise our inclusive value and arrangements available for those who wish to step away during the event to meet their needs.

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	Possible negative impact of lack of dietary options meeting cultural needs	Dining options at the event are limited due to space, time and budget. We are collating all dietary requirements in advance and will do our best to meet those needs. Where this is not possible we will signpost other options, such as bringing lunch or where to buy locally.
<b>Disabled people</b>	Potential negative impact for those with disabilities, as the venue is over three floors and will be unfamiliar.	<p>The fully accessible venue has been chosen to meet the needs of all our people. Accessible car parking is available nearby, a one-minute walk away. With additional parking a five-minute walk away. Activities will take place over three floors and there is a lift. Accessible toilets are available on the ground floor and first floor. We will speak to those known to us in advance with additional needs and find out how we can support them</p> <p><a href="#">Accessibility Information for King's House, Manchester — King's House</a></p> <p>Any materials used, including handouts will be produced in line with our accessibility guidelines and style guide. Materials will be sent in advance to those who require them. In addition to the reasonable adjustments we</p>

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	Potential negative impact for those who are neurodivergent and may be affected by a noisy, bright space with lots of people	<p>know about, we will also ask everyone if they have any additional needs when we send the invite.</p> <p>We are making a quiet room available for those who need to step away and will make people aware at the beginning of the event. If anyone requests to sit near an exit this will be accommodated.</p>
<b>Sexual orientation</b>	The venue is owned by King’s Church. Specific statements on their website make reference to their views on same sex marriage and this may therefore have a negative impact on colleagues from LGBTQ+ communities.	The venue choice was made based on an assessment of available venues that met our criteria of being available on a set date, Manchester city centre location and within a reasonable budget to ensure value for money. The venue is used by a number of other government and public sector organisations. Post confirming the venue and securing the booking, we have been made aware of some of the content available on the King’s church website, which may cause upset or offence to some groups with differing beliefs. We have however discussed this with our Pride network chairs, who

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		understood that information about the ownership of the venue was discovered after the venue had been secured. The Pride network were comfortable that mitigations had been made such as checking the venue to ensure there is no visible content of this nature present. In recognition of the concerns raised and to remain fully aligned with our values, we have taken the decision that Kings House will not be used for future events
<b>Sex (see note 1)</b>	No impact	
<b>Age</b>	No impact	
<b>Gender reassignment (see note 2)</b>	Potential negative impact for those requiring gender neutral toilets	The venue has male and female toilets, and a gender-neutral accessible toilet.
<b>Marital status</b>	No impact	
<b>Pregnancy and maternity</b>	Possible impact on those who are pregnant or on maternity leave and who don't feel able to attend	We will provide a quiet room for people to use throughout the day. We will also provide a private room for people who need it. This will have a sign indicating if it's occupied and we will remind people to knock before entering. Those on maternity/paternity leave will be invited and will be able to use one of their KIT

<b>Protected characteristic</b>	<b>Is there likely to be a specific impact on people with this characteristic?</b>	<b>List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.</b>
		days to attend. We will provide a quiet room for people to use throughout the day and also a private room for breastfeeding. This will have a sign indicating if its occupied and we will remind people to know before entering. If anyone requests to sit near an exit this will be accommodated.
<b>Political opinions</b>	No impact	
<b>People with dependants</b>	Potential negative side effect on those who have childcare or caring responsibilities and are unable to meet those needs due to start and finish times	A date has been chosen that is not in school holidays, making it easier to attend. Three months' notice has been provided, allowing people to make arrangements to attend. We will be flexible with people needing to arrive late or leave early due to caring commitments. Nobody will be asked to attend on their non-working day.
<b>People without dependants</b>	N/A	
<b>Socio-economic groups or social classes (see note 3)</b>	Potential negative impact of people having to pay for some travel costs up front and wait to be reimbursed	We have a central booking system for more expensive items such as trains and hotels. Local travel costs will be fully reimbursed within a month, and refreshments will be provided throughout the day.
<b>Multiple protected</b>	Potential negative impact of people not feeling included or able to participate fully	The introduction will include clear messaging that everyone is welcome and there will be

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characteristics (see note 4)	The event will have a positive impact on inclusion. We are focusing on embedding our values and this includes reasserting our commitment to inclusion to all leaders and managers.	clear tolerance for non-inclusive behaviours. We will encourage people to participate in ways in which they feel comfortable and take time away to meet their needs. We will design networking to be inclusive.

*Note 1: you may also wish to consider gender while considering sex, although gender is not a protected characteristic under the Equality Act or s75 of the Northern Ireland Act 1998.*

*Note 2: you may wish to consider the impact on transgender people while considering the protected characteristic of gender reassignment. This includes if the person is proposing to undergo, is undergoing or has undergone a process.*

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

*Note 4: Multiple protected characteristics is an opportunity to consider whether there are issues which affect people with most or all of the protected characteristics, or where there may be different impacts of the same issue*

*on different characteristics (eg the same issue has a positive impact on people with one protected characteristic but a negative impact on people with another protected characteristic).*

Q4. The ICO has a number of legal obligations in relation to the provision of Welsh language services. Is this work being delivered in Wales, or to the people of Wales, and if so will there be a need to consider the impact on the Welsh language?

No

*If you answer **Yes or Don't Know** to this question or would like further information, please contact the Welsh Regional office to discuss next steps via [wales@ico.org.uk](mailto:wales@ico.org.uk) .*

Q5. In interests of best practice, you should consider whether this work may have a negative impact on or contravene any Human Rights. Click this link to find an overview of each of the human rights and further details about each. The Human Rights Act itself is available at this link. Please confirm that you have considered this and set out any actions you will take to mitigate any impacts.

Answer: No impact

## Contributing towards the ICO's equality objectives

Q6. How does this work contribute towards the ICO's equality objectives? Please explain contributions, state ways contribution could be increased, or state 'no contribution'.

Objective	Contribution to objective
<b>Objective 1: We will represent the communities and societies we serve</b> We believe that diverse teams make better decisions, boost creativity and innovation, enable greater professional growth and increase our understanding of the communities we regulate. As a workforce, we are	The leadership summit is an opportunity for all people managers to come together, build relationships and hear different perspectives and ideas. It is an event designed to help us develop our culture of open curiosity, inclusion, effective collaboration and delivering real impact for the people we serve.

Objective	Contribution to objective
<p>the most effective and have the greatest impact when we are representative and consider different perspectives.</p>	
<p><b>Objective 2: Our culture will be inclusive</b>            We're at our best when we support and look out for one another, and when we trust and empower each other to be ourselves. That applies whether it's within the workplace or in the work that we do.</p> <p>We have measures in place to support our diverse workforce, such as reasonable adjustments. However, we will do more to remove the barriers that are preventing people from developing and progressing.</p>	<p>The event has been designed with inclusion at its heart, ensuring that all our leaders are able to attend and participate fully. It also has 'building trust' as one of its objectives and will support empowerment through better decision making. We will set expectations around behaviour and our inclusive value and that the event has been designed with that in mind.</p>
<p><b>Objective 3: We will better understand the needs of everyone to deliver services that are accessible to all</b>            We target our regulatory interventions on the areas of greatest harm and to make a real difference to people's lives. Technological innovation by businesses means the landscape we regulate is constantly transforming. We know we're at our best when we understand the needs of all our customers, including those who experience vulnerability and communities of unmet need.</p>	<p>No contribution</p>

## Monitoring and evaluation

Q7. What arrangements are in place, or will be put in place, to monitor and evaluate the impact of the work on equality?

*Answer:* This event is part of a larger piece of work on organisational culture that will be evaluated through the people survey. We will evaluate the event itself with an evaluation form immediately after the event. This EQIA is iterative and will be edited if any additional information is gained that impacts the event or attendees or if people share additional adjustment needs when asked.

Q8. How long will these arrangements be in place?

*Answer:* Ongoing, through the people survey

Q9. When do you intend to review this EqIA? This should usually be done upon any change that is made to the original piece of work that this EqIA is for.

*Answer:* The EQIA will be reviewed when anyone shares any additional needs or adjustments.

## Publication

Q10. As stated above and in the guidance, we intend to publish all completed EqIAs on the ICO's website. Please provide detail of any necessary redactions and the intended publication date.

You should also review the wording to ensure that it is as clear as possible for any staff or public to read.

*Answer:* 8 June 2026

## Governance and sign-off

The person who completes this document must be content that all potential equality issues have been identified and considered, that appropriate monitoring will be in place and the publication issues have been considered.

Please tick here to confirm that you have consulted with other colleagues and those it would largely impact where appropriate.

Please state here who has completed the EqIA:

*Signed by:* CR  
*Date:* 23/4/26

Approved by line manager:

*Signed by:* SM  
*Date:* 4/6/26

You **must** send your completed form to [inclusionandwellbeingteam@ico.org.uk](mailto:inclusionandwellbeingteam@ico.org.uk) for storage and publication.

The EDI Board provides overall assurance that the EqIA process is operating effectively, but it is not for them to review or approve EqIAs.

If you have identified any negative impacts to any protected characteristics that you cannot fully mitigate, please contact Inclusion and Wellbeing for advice via [inclusionandwellbeingteam@ico.org.uk](mailto:inclusionandwellbeingteam@ico.org.uk).

## Section 75 The Northern Ireland Act

To meet the NI section 75 consultation requirement, we must incorporate the following into our EqIA process. Please read through the below and implement as appropriate whilst completing your EqIA

1. We will externally publish a list of all EqIA screenings we complete. We should publish these quarterly. The spreadsheet will be 'housed' on the ICO website [Equality and diversity | ICO](#) (these will include **all** EqIA screenings we complete)
2. Where an EqIA screen results in the need for a full EqIA on a policy, procedure or change that relates directly to the ICO carrying out its external statutory functions; we will consult with key stakeholders at the earliest opportunity for 12 weeks. By law we must consult with the Northern Ireland stakeholder list, but good practice would be to include other relevant stakeholders from across the UK. The author/approval manager will be best places to determine who these should be.
3. We have clarified that if we don't receive a response from these stakeholders to a consultation, that is fine. We record no response and move on with the policy, procedure or change.
4. We have clarified that we do not need to consult under s75 for policies that only impact our staff. Whilst its good practice to consult with staff, TU etc about changes that impact employees, ways of working etc, this type of internal change would not engage s75. We should of course complete an EqIA at the earliest opportunity, it's just that the s75 consultation requirement is unlikely to be engaged.
5. We have agreed that it would be for the manager who approves the EqIA to determine if a s75 consultation is needed. The Inclusion and Wellbeing team can provide support, but the author and manager will know their business area and will be best placed to assess if a new/change to a policy impacts external customer and stakeholders as part of our statutory function and should therefore be consulted on.
6. We have agreed that it should be for the author/approving manager to send the EqIA screening form or full EQIA form to the Inclusion and wellbeing team

**EqIA version control** (to be updated by the person completing the EqIA)

Version number	1
Status	Approved

Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	CR
Approved by	SM
Date of sign off	04/06/26
Review date	

Version	Changes made	Date	Made by