

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: CH

What is the title of this piece of work: Excess Fares Policy

Briefly describe the overall purpose of this work: The excess fares policy describes when staff are entitled to claim financial support from the ICO when their contractual workplace changes.

Initial screening questions

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

Yes

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

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

No

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

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

Impact on people with protected characteristics

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

Protected characteristic	Is there likely to be a specific impact on people with this characteristic?	List the mitigations proposed for each impact, stating whether the impact will be reduced or removed. Please state proposed timescale for mitigations.
Religion or belief	No impact. A person's eligibility for excess fares and the process for calculating and claiming the allowance is not impacted by a person's religious beliefs.	NA
Race, nationality or cultural background	No impact. A person's eligibility for excess fares and the process for calculating and claiming the allowance is not impacted by a person's ethnic background.	NA
Disabled people	<p>There are few potential impacts that have been identified in this policy:</p> <ol style="list-style-type: none"> 1. Staff are not allowed to claim car parking costs as part of the excess fares allowance calculation. As a result, disabled people may see proportional costs to travel to the Manchester office as blue badge holders currently have free parking at the ICO's Wilmslow office. Manchester City Council allows blue badge holders to use parking bays for free and for an unlimited time. Additionally blue badge holders can park for three hours on any single or double yellow lines. As long as there is no loading restrictions 	<p>To reduce the impacts:</p> <ol style="list-style-type: none"> 1. We have arranged for two specific disability parking spaces to be used at Circle Square. In addition, car parking costs for disabled spaces will be reimbursed if these spaces are full. Parking for blue badge holders Parking restrictions Manchester City Council 2. Alternative mapping tools can be used to calculate a person's route. If none are available, a manager, or the inclusion and wellbeing team, can input information into the mapping tools on a person's behalf.

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>2. Staff are asked to use Google Maps to calculate their new commute to their contractual workplace. Some people with a disability may be impacted if they cannot use Google Maps due to their disability and/or assistive technology.</p> <p>3. Some disabled people may be impacted by an increase in commute time and/or mode of transport they need to use to get to the office.</p>	<p>3. The policy has been drafted to allow staff to determine which route/mode of transport they will use. The term 'cost effective and practical' allows staff to explain and use the most practical route for them and their disability. This includes for those who may have mobility needs, or chronic health conditions which might be impacted by the extended commute time.</p>
Sexual orientation	<p>No impact. A person's eligibility for excess fares and the process for calculating and claiming the allowance is not impacted by a person's sexual orientation.</p>	
Sex (see note 1)	<p>Potential negative impact for female staff due to safety concerns when travelling solo, through a city centre, or in the dark. This may see an increase in costs of travel when opting for peak travel times, or the use of taxis which isn't applicable for claiming back.</p>	<p>Flexitime can help colleagues manage their working hours to accommodate personal circumstances. However, flexibility is dependent on operational needs and team cover, as set out in the Flexi Time Policy. On this basis, flexitime should be considered a conditional mitigation, available where service delivery allows. Colleagues with safety</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>concerns or specific needs are encouraged to discuss options with their people manager to identify suitable arrangements.</p> <p>Mitigation to reduce impact include allowing peak time travel to be claimed within the excess fares policy.</p>
Age	No impact. A person's eligibility for excess fares and the process for calculating and claiming the allowance is not impacted by a person's age.	
Gender reassignment (see note 2)	No impact. A person's eligibility for excess fares and the process for calculating and claiming the allowance is not impacted by a person's gender reassignment.	
Marital status	No impact. A person's eligibility for excess fares and the process for calculating and claiming the allowance is not impacted by a person's marital status.	
Pregnancy and maternity	Staff who are on maternity for the first 3 years of a contractual move will be negatively impacted as:	<ol style="list-style-type: none"> 1. To reduce the impact, a person's entitlement will be paused whilst on maternity leave. However, they can make use of their entitlement if they choose to

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	<p>1. They will not receive the same entitlement to 3 years of support if they are on maternity leave during this period.</p> <p>Staff who are pregnant may be negatively impacted as:</p> <p>2. The change in the time and/or mode of transport could be challenging for them to manage.</p>	<p>take a KIT/SPLIT day and attend the office.</p> <p>2. To reduce the impact, the policy has been drafted to allow staff to determine which route/mode of transport they will use. The term 'cost effective and practical' allows staff with dependents use the most practical route for them whilst they are pregnant.</p>
Political opinions	No impact. A person's eligibility for excess fares and the process for calculating and claiming the allowance is not impacted by a person's political opinions.	
People with dependants	<p>People with dependents have arrangements to care for children and these may be impacted by an increase in commute time and/or a change in the mode of transport they need to use to get to the office.</p> <p>People with additional caring responsibility may be impacted with having a longer</p>	<p>To reduce the impact, the policy has been drafted to allow staff to determine which route/mode of transport they will use. The term 'cost effective and practical' allows staff with dependents to use the most practical route for them and their dependents.</p> <p>For those with caring responsibilities the reasonable adjustment passport can and</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.
	response time / further distance of travel for familial emergencies.	should be used to enable them to work whilst supporting their caring duties. The individual consultation process will encourage all people managers to address any concerns and accommodate the need for any adjustments.
People without dependants	No impact. A person's eligibility for excess fares and the process for calculating and claiming the allowance is not impacted by a person's sexual orientation.	
Socio-economic groups or social classes (see note 3)	Potential for impact here for those who may be impacted by the increase of cost due to the nature of claiming back a reimbursement. Rather than the fee being covered ahead of time.	<p>Mitigation to reduce impact include availability of salary advances for 3, 6 and 12 month season tickets.</p> <p>Mitigation to prevent negative impacts include the advanced information sharing of the excess fares policy and wider accommodation communications to enable people to plan in advance.</p> <p>Mitigation to prevent negative impacts include the personal consultation period and people manager support.</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.
		Additional access to financial advice and support via The Charity of Civil Servants.
Multiple protected characteristics (see note 4)	No further impacts in addition to those described for separate protected characteristics.	The individual consultation phase of the accommodation move, including discussion on excess fares, will enable all colleagues to address potential concerns with their people manager and feed into the wider work.

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

No

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

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

Considered and no impact to mitigate.

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
<p>Objective 1: We will represent the communities and societies we serve</p> <p>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 most effective and have the greatest impact when we are representative and consider different perspectives.</p>	<p>The wider accommodation project and move to Manchester will encourage us to recruit more diverse teams. Additionally enabling us to engage with the innovation of the Universities and post graduate communities in the local area.</p>
<p>Objective 2: Our culture will be inclusive</p> <p>We're at our best when we support and look out for one another, and when we trust and empower each other to be ourselves. That applies whether it's within the workplace or in the work that we do.</p> <p>We have measures in place to support our diverse workforce, such as reasonable adjustments. However, we will do more to remove the barriers that are preventing people from developing and progressing.</p>	<p>We have considered the impacts of all staff within the policy, ensuring we continue a culture that is inclusive to all. And that the potential increased costings of a commute don't exclude any demographic.</p>

Objective	Contribution to objective
<p>Objective 3: We will better understand the needs of everyone to deliver services that are accessible to all</p> <p>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>	No contribution

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: Excess fares claimed will be reviewed on an annual basis to determine who is claiming them and any potential wider impacts.

Q8. How long will these arrangements be in place?

Answer: 3 years from the date staff move to a new workplace

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

Answer: We will review the EqIA if changes to the policy are made.

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: No redactions required

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: CH
Date: 03/12/2025

Approved by line manager:

Signed by: SM
Date: 03/12/2025

You **must** send your completed form to corporategovernance@ico.org.uk for storage and publication.

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

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

Section 75 The Northern Ireland Act

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

1. We will externally publish a list of all EqIA screenings we complete. We should publish these quarterly. The spreadsheet will be 'housed' on the ICO website [Equality and diversity | ICO](#) (these will include **all** EqIA screenings we complete)
2. Where an EqIA screen results in the need for a full EqIA on a policy, procedure or change that relates directly to the ICO carrying out its external statutory functions; we will consult with key stakeholders at the earliest opportunity for 12 weeks. By law we must consult with the Northern Ireland stakeholder list, but good practice would be to include other relevant stakeholders from across the UK. The author/approval manager will be best placed 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 it's good practice to consult with staff, TU etc about changes that impact employees, ways of working etc, this type of internal change would not engage s75. We should of course complete an EqIA at the earliest opportunity, it's just that the s75 consultation requirement is unlikely to be engaged.
5. We have agreed that it would be for the manager who approves the EqIA to determine if a s75 consultation is needed. The Inclusion and Wellbeing team can provide support, but the author and manager will know

their business area and will be best placed to assess if a new/change to a policy impacts external customer and stakeholders as part of our statutory function and should therefore be consulted on.

6. We have agreed that it should be for the author/approving manager to send the EqIA screening form or full EQIA form to corporate governance.

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

Version number	1.0
Status	Published
Relevant or related policies	Equality Impact Assessment Guidance
Author/owner	CH
Approved by	SM
Date of sign off	03/12/2025
Review date	03/12/2028

Version	Changes made	Date	Made by