

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 experienced 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: RK, Policy Manager

What is the title of this piece of work? Creation of a new Personnel Security and National Security Vetting Policy.

Briefly describe the overall purpose of this work. A new policy has been developed to sets out the ICO's approach to personnel security and National Security Vetting (NSV).

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. The work involves the creating of a new ICO policy.

*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	Is there likely to be a specific impact	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	<p>Some questions around personal history, travel, or contacts may feel intrusive if they touch on religious practices or affiliations.</p> <p>Potential travel restrictions may disproportionately affect staff of specific faiths. The assessment of national security risk and identification of countries of risk are determined by UKSV and are outside the ICO's direct control. However, the ICO recognises this as a potential indirect impact arising from the requirement to hold security clearance for certain roles.</p> <p>This may have a deterrent effect on application for, or progression into, roles requiring higher levels of clearance, potentially impacting workforce diversity if not appropriately mitigated.</p>	<p>The ICO mitigates this impact by applying vetting requirements proportionately and only where necessary for the role; by being transparent about clearance expectations during recruitment and progression; and by supporting individuals through vetting processes, including signposting wellbeing support where needed.</p>
Race, nationality or cultural background	Possibility of being unable to complete BPSS in full where a candidate has	In relation to BPSS checks, People Services will conduct a risk-based

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	<p>resided in a country where a police check cannot be obtained.</p> <p>NSV processes may involve enhanced scrutiny of an individual's nationality, family connections, travel history or links to overseas jurisdictions. Individuals from certain racial, ethnic or national backgrounds, including those with dual nationality or close ties to countries designated as higher risk may therefore experience vetting as more intrusive or prolonged.</p> <p>Travel restrictions associated with NSV clearance may disproportionately affect individuals with overseas family. This could limit their ability to travel freely or maintain regular contact with relatives abroad.</p> <p>NSV residency requirements may prevent individuals from overseas or those who have lived abroad from attaining clearance.</p>	<p>assessment in consultation with the recruiting manager where there are challenges preventing the BPSS check from being completed in full.</p> <p>In relation to NSV, the ICO applies vetting requirements proportionately and only where necessary for the role; by being transparent about clearance expectations during recruitment and progression; and by supporting individuals through vetting processes, including signposting wellbeing support where needed.</p> <p>Where applications are rejected due to residency requirements, People Services will work with the employee and their manager to review options for resubmission with supporting information.</p>

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	<p>This may have a deterrent effect on application for, or progression into, roles requiring higher levels of clearance, potentially impacting workforce diversity if not appropriately mitigated.</p>	
Disabled people	<p>Vetting processes may require reasonable adjustments. Individuals may experience additional stress, delays, or difficulty in providing required evidence.</p> <p>Certain medical conditions including mental health, neurological or physical may attract additional scrutiny in the vetting process. The purpose of this scrutiny is risk management, and each case is considered individually, with decisions based on functional impact rather than diagnosis alone. For example, someone with diabetes may have restrictions applied to prevent lone working, or someone with a history of severe mental illness might be declined a clearance because of associated risks.</p>	<p>Security vetting applicants can request reasonable adjustments as part of the process. People Services can signpost to relevant guidance on how to request adjustments. This helps to ensure that individuals can participate in the process as full as possibly, within the ICO's sphere of influence.</p> <p>Applying vetting requirements proportionately and providing advance information about vetting expectations, signposting wellbeing support and exploring alternative options where clearance cannot be obtained helps to mitigate this risk. The policy also requires managers and People Services to support individuals undergoing NSV vetting.</p>

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	<p>The content and conduct of vetting interviews are determined by UKSV and are outside the ICO's direct control. However, the ICO recognises this as a potential indirect impact arising from the requirement to hold security clearance.</p>	
Sexual orientation	<p>Individuals required to undergo higher levels of NSV may experience increasing levels of intrusion into personal and private matters. For LGBQ staff, this may include disclosure of sexual orientation or intimate personal information in circumstances where they may not otherwise be open about their identity. This may result in feelings of vulnerability or discomfort which could discourage disclosure.</p> <p>The content and conduct of vetting interviews are determined by UKSV and are outside the ICO's direct control. However, the ICO recognises this as a potential indirect impact arising from the requirement to hold security clearance.</p>	<p>Applying vetting requirements proportionately and providing advance information about vetting expectations, signposting wellbeing support and exploring alternative options where clearance cannot be obtained helps to mitigate this risk. The policy also requires managers and People Services to support individuals undergoing NSV vetting in a confidential and sensitive manner, including providing guidance and assistance with applications as appropriate.</p>

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Sex (see note 1)	No disproportionate impact identified.	No negative impact identified.
Age	Older applicants with long or complex career histories may find it challenging to provide historical employment or residence information required for vetting.	Managers in conjunction with People Services will support individuals undergoing NSV vetting, providing guidance and assistance with applications as appropriate.
Gender reassignment (see note 2)	<p>Individuals undergoing or who have undergone gender reassignment may experience additional sensitivity during NSV because the process can involve intrusive personal questions about identity, relationships, and personal history. For transgender staff, this may include disclosure of gender history, medical treatments, or previous names, which can create vulnerability, discomfort or stress.</p> <p>The content and conduct of vetting interviews are determined by UKSV and are outside the ICO's direct control. However, the ICO recognises this as a</p>	Applying vetting requirements proportionately and providing advance information about vetting expectations, signposting wellbeing support and exploring alternative options where clearance cannot be obtained helps to mitigate this risk. The policy also requires managers and People Services to support individuals undergoing NSV vetting in a confidential and sensitive manner, including providing guidance and assistance with applications as appropriate.

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	potential indirect impact arising from the requirement to hold security clearance	
Marital status	<p>The vetting process itself does not treat individuals differently based on marital status. Indirect impacts could relate to questions around cohabiting partners, dependents, or household arrangements which could feel intrusive for individuals in non-traditional relationships.</p> <p>Individuals may feel discomfort or stress disclosing personal information about partners or family during vetting.</p>	<p>Applying vetting requirements proportionately and providing advance information about vetting expectations, signposting wellbeing support and exploring alternative options where clearance cannot be obtained helps to mitigate this risk. The policy also requires managers and People Services to support individuals undergoing NSV vetting in a confidential and sensitive manner, including providing guidance and assistance with applications as appropriate.</p>
Pregnancy and maternity	No disproportionate impact identified.	No negative impact identified.
Political opinions	<p>The vetting process may involve questions about political affiliations, past activities, or associations to assess potential risks. Staff with certain political beliefs may feel uncomfortable or vulnerable disclosing this information.</p> <p>There is a risk of perceived pressure or fear of misuse, particularly for staff</p>	<p>Applying vetting requirements proportionately and providing advance information about vetting expectations, signposting wellbeing support and exploring alternative options where clearance cannot be obtained helps to mitigate this risk. The policy also requires managers and People Services to support</p>

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	whose views are less common or politically sensitive.	individuals undergoing NSV vetting in a confidential and sensitive manner, including providing guidance and assistance with applications as appropriate.
People with dependants	The vetting process itself does not treat individuals differently based on whether they have dependents. Indirect impacts could relate to questions around cohabiting partners, dependents, or household arrangements which could feel intrusive for individuals, especially those in non-traditional family set-ups. Individuals may feel discomfort or stress disclosing personal information about family during vetting.	Applying vetting requirements proportionately and providing advance information about vetting expectations, signposting wellbeing support and exploring alternative options where clearance cannot be obtained helps to mitigate this risk. The policy also requires managers and People Services to support individuals undergoing NSV vetting in a confidential and sensitive manner, including providing guidance and assistance with applications as appropriate.
People without dependants	No disproportionate impact identified.	No negative impact identified.
Socio-economic groups or social classes (see note 3)	Candidates from less privileged backgrounds may have had non-traditional work histories, gaps, or international moves which could make BPSS checks slower or more	The policy requires managers and People Services to support individuals undergoing NSV vetting in a confidential and sensitive manner, including providing

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	complicated. This could also present challenges for NSV applications.	guidance and assistance with applications as appropriate.
Multiple protected characteristics (see note 4)	There are no further impacts identified in addition to what has been stated above.	There are no further mitigations proposed in addition to what has been stated above.

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?

Answer: 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 the 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 negative impacts identified.

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>	The policy does not contribute to this objective.

Objective	Contribution to objective
<p>Objective 2: Our culture will be inclusive 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 policy ensures that vetting requirements are applied proportionately and communicated transparently. These requirements are identified early in the recruitment process and shared openly with candidates. Managers, working alongside People Services, have a responsibility to support colleagues undergoing vetting by signposting advice and wellbeing resources, and guidance on requesting reasonable adjustments. While the ICO cannot influence vetting processes or decisions managed by the PSC, these measures help colleagues engage with the process, reduce procedural barriers, and promote an inclusive experience.</p>
<p>Objective 3: We will better understand the needs of everyone to deliver services that are accessible to all 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>The policy does not contribute to this objective.</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: The policy will be reviewed at least every three years.

Q8. How long will these arrangements be in place?

Answer: Ongoing.

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: A review will take place alongside any review or amendment to the Personnel Security and National Security Vetting Policy.

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: RK, People and Policy Manager

Date: 17 December 2025

Approved by line manager:

Signed by: SM, Director of People Services

Date: 17 December 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 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 corporate governance.

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

Version number	1.0
Status	Draft

Relevant or related policies	Equality Impact Assessment Guidance, Recruitment and Selection Policy
Author/owner	RK, People and Policy Manager
Approved by	SM, Director of People Services
Date of sign off	17 December 2025
Review date	17 December 2028

Version	Changes made	Date	Made by