



EQUALITY IMPACT ASSESSMENT

Partial Assessment Form

Policy, practice, function or project assessed	Data Protection
Lead Officer	Stephen Horner
Team	Matt Hudson, Paul Knight, Tara Crabtree
Start date of assessment	08/02/11
Completion of assessment	

Please use this form to record your findings in relation to the assessment of an existing policy, function, service or practice.

A. POLICY, PRACTICE, FUNCTION OR PROJECT TO BE ASSESSED

A1. Please describe what are the main aims, objectives, purpose and intended outcomes of the policy or function?

This Policy is intended to:

- Ensure the Council meets its legal obligations for collecting and processing personal information in accordance with the Data Protection Act
- Inform all Council and agency staff, contractors and council Members about their responsibilities for managing and handling personal information and
- Ensure personal information is handled in accordance with the Council's Information Governance Strategy, including the Records Management Policy; Records Management Manual; Records Retention Schedule; Protective Marking Policy and Data Quality Policy and Strategy and best practice based on BS 10012:2009 (Data Protection Specification for a personal information system)

Compliance will ensure the lawful handling of personal information, timely access and retrieval of relevant information, provide protection against litigation or business interruption and comply with the legal and operational requirements of the Council.

A2. Is this policy or function associated with any other Council policy or priority?

Yes –

- Information Government Strategy Project
- ICT Corporate Services Plan
- ICT & Security Policy and usage guidelines
- Data Handling Policy
- Data Quality Policy
- Information Governance Policy
- Information Security Incident Management Policy
- Information Risk Policy
- Information Sharing Policy
- Legal Admissibility & Evidential Weight of Electronic Records Policy
- Remote Working Policy
- Re-use of Public Sector Information Policy
- Website Administration Policy
- Members ICT Security Policy
- Records Management Policy and Procedures Manual
- Freedom of Information Act Policy and Procedures
- Council aim to be a listening Council and provide first class services that are accessible to all. By ensuring our standards are equivalent to, or exceed best practice, the residents of South Cambridgeshire will be reassured that all reasonable steps are being taken to preserve and protect their information.

A3. Who are the intended beneficiaries/stakeholders of the policy or function? How many people are affected and from what sections of the community?

All existing and future residents of South Cambridgeshire, the Council, its staff, agency staff, contractors and Members.

A4. Is the policy/function corporate and far-reaching?

Yes. It is a high impact policy. There could be significant financial and reputational repercussions for the Council if the policy is not adhered to.

A5. Are you expecting to make any significant change to the policy or service in the near future? If so, please give details.

No significant changes are anticipated in the near future. The policy will be reviewed every 2 years, unless there are changes to legislation before this time.

A6. Is this a new or existing policy or function?

A new policy (first draft developed in April 2010). For timescale, please refer to the 'Document Information' section of the policy on page 3.

B. EVIDENCE/ DATA and CONSULTATION

It is important to consider all information that is available in determining whether the policy or function could have a differential impact. Please attach examples of monitoring information, research or consultation reports.

B1. What monitoring or other information do you have about relevant target groups, which will show the impact of the policy or function?

A comprehensive records and information survey was undertaken in 2008/2009 to inventory and understand the types of information/records held by the authority. This has provided the platform for the Council's Information Governance Strategy and understanding, which Services within the Council will be affected by the policy.

Impact (risk assessments) will be carried out and monitored over the next 3 years, which is part of the Information Governance Project strategy.

B2. Have you compared the data you have with the equality profile of the local population? What does it show?

N/A

B3. Have you identified any improvements or other changes that could be made from monitoring the data?

The Council's Information Governance Strategy and the Data Protection Policy were created as a result of legislative requirements, best practice and analysis of the records and information survey, which was carried out by Stephen Horner and Matt Hudson.

B4. Have you consulted or involved external stakeholders about the policy or function? If so, what were their views?

No external stakeholders have been consulted, as it is an internal policy.

B5. Have you undertaken any consultation with staff to assess their perception of any impacts of the policy or function? If so, what has been learnt from them?

The Information Government Working Group has been consulted. In addition, IGWG members have consulted with their own teams. The policy has also been reviewed and approved by the ICT & Information Governance Steering Group.

B6. Please provide information about any other consultation, research, or involvement undertaken in relation to this impact assessment.

A thorough review of business, legal, best practice and organisational requirements were carried out.

C1. IMPACT OF THE POLICY OR FUNCTION

Assess the potential impact on each of the following protected characteristics. The impact could be negative, positive or neutral. If you assess a negative impact for any of the groups then you will need to assess whether that impact is low, medium or high. Refer to the evidence you use.

DESCRIPTION OF IMPACT	Nature of Impact (Positive, Neutral, Adverse)	Extent of Impact (Low, Medium, High)
AGE: Identify the potential impact of the policy or function on different age groups.		
The Data Protection Policy will benefit those of any age, but is not specific to age.	Neutral	
DISABILITY: Identify the potential impact of the policy or function on disabled people.		
The Data Protection Policy will benefit those with a disability, but is not specific to disability.	Neutral	
GENDER REASSIGNMENT: Identify the potential impact of the policy or function on people that have changed gender identity.		
The Data Protection Policy will benefit those who have changed the gender identity, but is not specific to gender identity.	Neutral	
MARRIAGE AND CIVIL PARTNERSHIPS: Identify the potential impact of the policy or function on people who are married or in a civil partnership.		
The Data Protection Policy will benefit those who are married or in a civil partnership, but are not specific to these.	Neutral	
PREGNANCY AND MATERNITY: Identify the potential impact of the policy or function on pregnant or maternal mothers and those women who wish to breastfeed.		
The Data Protection Policy will benefit pregnant or maternal mothers but is not specific to these.	Neutral	

RACE: Identify the potential impact of the policy or function on different ethnic groups, including national origins, colour and nationality.		
The Data Protection Policy will benefit those of any race, but is not specific to race.	Neutral	
RELIGION/BELIEF: Identify the potential impact the policy or function on different religious/faith groups.		
The Data Protection Policy will benefit those of any religion or belief, but is not specific to religion or belief.	Neutral	
SEX: Identify the potential impact of the policy or function on men and women.		
The Data Protection Policy will benefit those of either sex, but is not specific to sex.	Neutral	
SEXUAL ORIENTATION: Identify the potential impact of the policy or function on lesbian, gay men, bisexual or heterosexual people.		
The Data Protection Policy will benefit those of any sexual orientation, but is not specific to sexual orientation.	Neutral	
OTHER CHARACTERISTIC SPECIFIC TO SOUTH CAMBRIDGESHIRE – RURALITY: Identify the potential impact of the policy or function on people who are rurally isolated.		
The Data Protection Policy will benefit those who are rurally isolated but is not specific to rural isolation.	Neutral	

PLEASE NOTE: Following completion of the section above, if the nature of any impact is adverse then you need to proceed to a full equality impact assessment.

C2. Could you minimise or remove any adverse or potential impact that is high, medium or low significance, in advance of a full impact assessment? Explain how.

N/A

C3. Does the policy or function actively promote equal opportunities and good community relations? Or could changes be made so that it does so?

Yes. All sections of the community will be treated fairly and equally through this policy, and all will benefit in equal measure.

The policy promotes good community relations as it shows the Council is taking all reasonable steps to preserve and protect residents' information.

C4. Please provide any further information, qualitative or quantitative that does not fit into the questions but you feel has a likely impact on this assessment.

N/A

D. CONCLUSIONS

D1. Was there sufficient data to complete the partial assessment?

Yes?

✓

No?

If "NO", what arrangements are in place for evidence gathering and continuing with the assessment?

D2. Is the outcome of the partial assessment that the

Yes?

If "YES", will you proceed to a full assessment? If so, what arrangements are in place to carry out the full assessment?

<p>policy or function would have an adverse impact (medium or high impact) on one or more target group?</p>	<p>No?</p>	<p>✓</p>	
<p>D3. Is the outcome of the partial assessment that the policy or function would have a neutral or positive impact on equalities?</p>	<p>Yes?</p>	<p>✓</p>	<p>If “YES”, have you included proposals in the Action Plan to further improve the impact of the policy or function on equalities?</p> <p>Do you plan to review the service or policy again in future to assess whether there has been any change? If so, when?</p> <p>The policy will be reviewed every 2 years, unless legislation dictates it is reviewed before this time</p> <p>Has the Equalities Steering Group and the Consultative Forum reviewed the assessment? If so what were their comments?</p> <p>Not yet.</p>
	<p>No?</p>		
<p>D4. Do you have any other conclusions/outcomes from the partial assessment?</p>			

ACTION PLAN for enhancing existing practice

Recommendation/ issue to be addressed	Planned Milestone	Planned completion of milestone (date)	Officer Responsible	Progress

RESOURCES

Does the above action plan require any additional resources?

ARRANGEMENTS FOR MONITORING

Please give your plans for monitoring the achievement of the above actions.

SIGN OFF: The officers below confirm that this partial assessment has been completed in accordance with the Council's guidance

Signature of Lead Officer

Date:

**Signature of Corporate Manager or Chief
Officer:**

Date:

**Please retain the original form on your service area and return a copy of the completed form to the Equality & Diversity
Officer.**