



# **EQUALITY IMPACT ASSESSMENT**

Policy for Data Protection (Mar 2009)

Directorate: Human Resources	Author: Sara Townsend E & D Manager	Document Created: March 2009
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<b>Step 1</b>	<b>Details of Assessment Team – refer to guidance notes</b>
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Please use this form to record the details of your team. Use the guidance notes to help you to pull a relevant team together.

**About the policy, practice, service or function you are assessing**

Name of policy, practice, service or function: **Policy for Data Protection**

Name of Assessment Team Leader: **Sara Townsend**

Department responsible: **MIS/HR**

**Other members of assessment team:**

Name	Position	Area of Expertise	Comments
Sara Townsend	E&D Manager	E&D, Student matters	
Angela Killeavy	Director of HR and H&S	E&D, Human Resources	
Jason Folkett	Director of MIS	MIS	
Phil Wilson	Curriculum Support Manager	Library services	

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**Step 2 – Collecting information and data on consulting on how the policy, procedure, service or function impacts on students, employees, communities and other stakeholders – refer to guidance notes**

Consider all six equality strands: <i>Racial Group, Disability, Gender, Age, Sexual Orientation, Religion or Belief</i>	<b>Date data was collected</b>
<b>Examples of evidence could be:</b>	
<b>Tick evidence gathered and state briefly what it tells you.</b>	
<input type="checkbox"/> data showing evidence of higher or lower participation of any particular groups (e.g. who uses the service and who doesn't) <b>N/a as policy applies to everyone. Very low participation levels (1 request per year on average).</b>	
<input type="checkbox"/> student/ employee feedback from surveys or complaints. <b>No</b>	
<input type="checkbox"/> any important demographic changes or trends. <b>N/a as policy applies to everyone.</b>	
<input type="checkbox"/> comparative information or data where no local information is available. <b>N/a</b>	
<input type="checkbox"/> census, national or regional statistics <b>N/a</b>	
<input type="checkbox"/> Access Audits, DDA assessments. <b>Not currently deemed necessary as college policy is to supply the information requested in an appropriate format tailored to the individual's specific needs.</b>	
<input type="checkbox"/> workforce profile (ethnicity, disability, gender etc) <b>N/a</b>	
<input type="checkbox"/> outcomes of previous monitoring. <b>To date, requests for information too minimal to necessitate monitoring (see above).</b>	
<input type="checkbox"/> existing or previous inspections of the policy, procedure, practice, service or function. <b>Some recommendations relating to processes/procedure were made (and are being actioned) but not to the overall policy.</b>	<b>Internal Audit May 08</b>
<input type="checkbox"/> research/ knowledge of the effects of the policy, procedure, practice, service or function on any of the College's stakeholders (including external stakeholders). <b>N/a</b>	
<input type="checkbox"/> how part-time or sessional staff may be affected. <b>N/a</b>	
<input type="checkbox"/> any consultation and community involvement <b>Reviewed by Directors and governors</b>	
<input type="checkbox"/> existing or previous impact assessment action points. <b>N/a</b>	

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**Step 3 – Defining the policy, procedure, service or function and identifying inequalities by analysing the information you have and identifying actions – refer to guidance notes**

**Question 1**

What is the name of the policy, procedure, practice, service or function you are assessing, what are the main aims and objectives; what outcomes do we want; and who is responsible for implementing or delivering the policy, procedure, practice, service or function?

**Response/ Findings:**

**The main objective of the Policy is to ensure the college is meeting its statutory requirements and obligations under the Act. The duties outlined in the policy apply to all members of staff. However, the overarching responsibility for the policy is jointly owned by Director of HR and Director of MIS.**

**Question 2**

Who is affected by the policy, procedure, practice, service or function and is there any evidence that any groups within the following characteristics are adversely affected.

**Response/ Findings:**

**Everyone is equally affected by the policy. To date, there is no evidence that any particular groups are adversely affected by its existence.**

	<b>YES – state briefly</b>	<b>NO</b>
Age	<b>Non discriminatory</b>	√
Disability	<b>Non discriminatory</b>	√
Gender	<b>Non discriminatory</b>	√
Racial Group	<b>Non discriminatory</b>	√
Religious Belief	<b>Non discriminatory</b>	√
Sexual orientation	<b>Non discriminatory</b>	√

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**Question 3**

Is there any evidence that different groups, organisations or individuals have different needs, experiences, issues and priorities in relation to this policy? *For instance higher or lower uptake or participation.* Consider student and staff surveys, research, community consultations, prior performance monitoring or inspection.

**Response/ Findings:**

**Not applicable as the Policy is there to ensure the college meets its statutory obligations and there is no evidence to suggest that any particular groups are either adversely, or positively, affected by its existence and/or detail. On average only 1 request per year is made to the college.**

**Note: A broad interpretation should be taken of the word ‘evidence.’ It should include anecdotal evidence and evidence derived from qualitative and quantitative analysis where available.**

**Question 4**

Is the service that is underpinned by this policy, procedure or function having a positive or negative effect on particular students, employees, community groups or other stakeholders?

**Response/ Findings:**

**Positive. The policy applies to all in equal measure and is there to ensure individual rights and freedoms are met across the board.**

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**Question 5**

In relation to this policy, procedure, practice, service, or function does any equality or diversity actions already exist? If YES detail below.

**Response/ Findings:**

**The policy is subject to, and falls under, the college's Equality and Diversity and Safeguarding Policies including accompanying processes/procedures.**

**Question 6 – Look at Questions 2 & 3 Answers**

Is there an opportunity to promote equality of opportunity or good community relations by altering the policy, or by working with others?  
If YES, detail your action on FORM IMP.ACT. If NO state briefly how the team came to this conclusion.

**Response/ Findings:**

**Not applicable as the Policy is there to ensure the college meets its statutory obligations and doesn't provide opportunities to actively improve social/community cohesion etc and/or address any inequalities as its terms apply to all.**

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## EQUALITY IMPACT ASSESSMENTS – Summary

Policy/ Service/ Procedure/ Function Title: <b>Policy for Data Protection</b>
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Report of EIA Findings:

**1) Overview of policy/ service**

The main objective of the Policy is to explain the College's underlying approach to ensuring it meets its obligations and requirements under the Data Protection Act 1998.

**2) Findings**

The Policy itself is protectionist and responsive to demand/need and the E & D implications are in the College's processes and responses. Due to the lack of requests under the Act (one per year on average), it has not been deemed necessary to date to monitor and evaluate findings from an E & D perspective.

**3) Actions Taken**

	By When	By Whom	Progress
<ul style="list-style-type: none"> <li>Update the Data request form taking into account the six main equality strands.</li> </ul>	April 2009	Dir HR	On going
<ul style="list-style-type: none"> <li>Provide Registrar with HR example of E &amp; D monitoring form</li> </ul>	April 2009	Dir HR	On going

**Data/ Information considered:**

Requests made to date under the Act.

**Consultation:**

12<sup>th</sup> March 2009

Sara Townsend – E&D Manager and Curriculum Manager, Adult Ed.

Angela Killeavy – Director of Human Resources and H&S

Jason Folkett – Director MIS

Phil Wilson - Head of Library Services

**Date of Publication of EIA:**

Subject to Governor's approval.

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To be attached to each policy before obtaining Governor Approval.

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