

Equality Impact and Needs Assessment Form

Section One – Screening

Name of strategy, policy or project:
Data Protection Policy and supporting procedures
Directorate and service area:
Finance, IT and Trading - ICT Services
Name and contact details of officer completing assessment:
Peter Hoskin - extension 4679
1. What is the main purpose of the strategy/policy/project (or the changes you want to make to it)? The policy helps Devon County Council comply with its obligations under the Data Protection Act 1998 and informs the public of their rights under the legislation
2. What are the main activities of the strategy/policy/project? Develop the policy/guidance and publish it on the Internet
3. Who is intended to benefit from the strategy/policy/project, and how? Those members of the general public about whom the County Council holds personal information. To assure the public that Devon County Council is an ethical organisation and is committed to complying with its obligations relating to the storage and processing of personal information.
4. Is the strategy/policy/project consistent with the Council's equality policies? Yes
5. Is responsibility for the strategy/policy/project shared with another department, authority or organisation? If so, what responsibility and which bodies? No. The corporate Information Compliance Team has full responsibility for the implementation and maintenance of the policy and procedures.

6. What impact is the strategy/policy/project likely to have on different sections of the community? You may wish to use the table below as a prompt.

	Positive impact – it could benefit ✓ (check box)	Negative impact – it could disadvantage ✓ (check box)	Reason	Are there additional factors that could contribute to the experience of isolation¹? If so, what are they?	Evidence
Gender					

¹ Refer to section 3 of the EINA guidance.

	Positive impact – it could benefit ✓ (check box)	Negative impact – it could disadvantage ✓ (check box)	Reason	Are there additional factors that could contribute to the experience of isolation¹? If so, what are they?	Evidence
<ul style="list-style-type: none"> • Women 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	For all groups, the policy and procedures are designed to clearly explain to the public their rights under the Data Protection Act and Devon County Council's commitment to it. The procedures are designed to make it as easy as possible for individuals to access their information.		Management and staff discussions. Consultation with directorate Data Protection Liaison Officers. Consultation with DCC staff to provide additional information which will help to enhance guidance for the public. Consultation with Language Line to ensure alternative language facilities are available if needed. Enhanced guidance produced for staff on handling access requests. See also notes at end of form.
<ul style="list-style-type: none"> • Men 	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Ethnic Group					
<ul style="list-style-type: none"> • Asian or Asian British people 	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-

	Positive impact – it could benefit ✓ (check box)	Negative impact – it could disadvantage ✓ (check box)	Reason	Are there additional factors that could contribute to the experience of isolation¹? If so, what are they?	Evidence
• Black or Black British people	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
• Chinese people	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
• Gypsy or Roma People	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
• Irish People	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
• People of Mixed Heritage	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
• White People	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
• People of other ethnic backgrounds	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Asylum Seekers and Refugees	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
People with physical, sensory or learning disabilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Deaf People who use British Sign Language	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
People with mental health issues	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Lesbians, gay men and bisexual people	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Trans people	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Age					
• Older people (60 +)	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
• Younger people (17-25) and children	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-

	Positive impact – it could benefit ✓ (check box)	Negative impact – it could disadvantage ✓ (check box)	Reason	Are there additional factors that could contribute to the experience of isolation¹? If so, what are they?	Evidence
People of different faith groups or beliefs including non-believers	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Travellers	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Other (please specify)	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-
Other (please specify)	<input checked="" type="checkbox"/>	<input type="checkbox"/>			-ditto-

Notes:

- Faith groups cover a wide range of groupings, the most common of which are Muslims, Buddhists, Jews, Christians, Sikhs and Hindus. Consider faith categories individually and collectively when assessing positive and negative impacts.
- The categories relating to ethnicity include those used in the 2001 census. Consideration should be given to the needs of specific communities within the broad categories such as Bangladeshi people and to the needs of other communities such as Turkish/Turkish Cypriot, Greek/Greek Cypriot and Polish that do not appear as separate categories in the census.
- An adverse impact does not necessarily require action to be taken. Actions must remain in proportion with the benefits that could be achieved and resources available to complete them. If adverse impacts are identified and actions for improvement are not proportionate, the reasons for not taking action should be detailed and open to challenge.

7. If you have indicated there is a negative impact on any group, is that impact:		
Legal?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<i>(i.e. it is not discriminatory under anti-discriminatory legislation – refer to the Council's website or your Directorate Equality Representative if guidance is needed)</i>		
Intended?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Level of impact	HIGH <input type="checkbox"/>	LOW <input type="checkbox"/>
If the negative impact is possibly discriminatory and not intended and/or of high impact you must complete section two of this form. If not, complete the rest of section one below and consider if completing section two would be helpful in making a thorough assessment.		
8. a) Could you minimise or remove any negative impact that is of low significance? Explain how:		
b) Could you improve the strategy, project or policy's positive impact? Explain how: <i>You may wish to use the action sheet at the end of Section Two.</i>		
9. If there is no evidence that the strategy, policy or project promotes equality, equal opportunities or improved relations – could it be adapted so that it does? How?		

Please sign and date this form. Keep one copy, send a copy to your Directorate Equality Representative and publish the results on the Council's website.

Signed: Peter Hoskins

Date: 21st August 2006

Equality Impact and Needs Assessment Action Plan

Please list below any recommendations for action that you plan to take as a result of this impact assessment.

Issue	Action required	Lead officer	Timescale	Resource implications	Comments

NOTES:

As a result of this assessment, consultation was also carried out with:

Communications Unit to establish percentage of population who had access to Data Protection information on the website and in particular guidance and help on how to access their own information. A 2004 survey indicated that an estimated 67% of the population had access. This is likely to be re-surveyed in Autumn/Winter 2006 at which stage we will re-assess whether this is adequate.

Web Manager to assess procedure available to persons not speaking English. Web Manager suggests dealing with translations as and when the issue arises. The number of Subject Access Requests is low and the percentage likely to be required by persons not speaking English is assessed as very low.