Equality Impact Assessment Form

Revised June 2009

(Equality target groups are those which cover the 6 equality strands: race, disability, gender, age, sexual orientation and religious belief)

Part 1   Aims & implementation of the service, policy, procedure, practice or project
This section is the title of what is being assessed, responsible officers, purpose, where it fits within the council's wider aims and how it supports the legislation to eliminate unlawful discrimination and the promotion of equal opportunities. *(please refer to the guidance for additional information)*

1.1   What is being assessed

Corporate Information Unit ("CIU"), Legal Services, County Hall, Newport, Isle of Wight, PO30 1UD

The Unit provides and co-ordinates advice and practical support to members of the public and Council officers on access to council held information. It also facilitates such access. In addition it provides Information governance to the Council including developing policy and best practice in accordance with the law.

The main policies that steer the service are:
1. Access to Information Policy
2. Data Protection Act Policy
3. Access to User records policy
4. Protective marking Policy

1.2   Officer(s) and section or service responsible for completing the assessment

Justin Thorne, Ben Gard, Su Holman Harris, Vanda Niemiec, Georgina Hazell (being Corporate Information Unit). Assisted by Carmelle James and Sara Rose and Rosie Barnard.

The officers were selected as they form the CIU. Carmelle and Sara were chosen to provide independent input into the process, to assist in identifying possible negative or neutral affects of current policy and practice, and to assist in identifying more positive ways in which we can operate.

1.3   What is the main purpose or aims of the service, policy, procedure, practice or project

The Unit provides and co-ordinates advice and practical support to members of the public and Council officers on access to council held information, in addition to facilitating such access. It also provides Information governance to the Council including developing policy and best practice in accordance with the law.

1.4   Who is affected by the service, policy, procedure, practice or project? Who is it intended to benefit and how?

The service affects the manner in which the Council processes information (including storing, disclosing, using, keeping, amending and destroying information). The Council holds an enormous amount of information so the unit, and its policies, can affect a large number of persons including companies, individuals and voluntary/partner agencies. Special mention is made of social care records as the unit provides extensive guidance on access to social care records which is recognised to contain particularly sensitive information.

It is recognised that our policies and procedures should provide the most open and transparent access to records and decision making of the council, unless there is good legal reason not to. It is also recognised that the unit is guided extensively by statute, code of practice and procedural guidance notes from the regulatory body (Information Commissioners Office). The Unit, and the Council, must process information in accordance with the Data Protection Act 1998 and Freedom of Information Act 2000.

1.5 **Has the service, policy, procedure, practice or project been promoted or explained to those it might affect directly or indirectly?**

The Council publishes the access to information arrangements by way of :

Leaflet - 'The records we keep about you and how you can see them – Access to your personal records - Adults'
Leaflet - 'The records we keep about you and how you can see them – Access to your personal records - Children'
(The relevant leaflet is handed to all service users on referral and at review and explained).

Leaflet - Access to information – available at all council offices.

All policies and rights published on www.iwight.com/foi

1.6 **How does the service, policy, procedure, practice or project contribute to better community cohesion?**

The Service drives and supports the Council in making information accessible to enable the public to be better informed and involved with decision making etc.

1.7 **How does the service, policy, procedure, practice or project fit in with the council's wider aims?**

Ensuring appropriate access to information will support the Council in delivering potentially all its 4 key objectives. This will be by ensuring that appropriate information is available to allow transparent decision making and better informed public. The service will also assist making sure that Council decisions are made based on relevant advice; officers know what information they are able to use and in what manner. It is considered therefore, that the service has potential to impact on assisting the council to promote the following themes; a thriving island; a healthy and supportive island; a safe and well kept island; and an inspiring island

1.8   **What is the relevance of the aims of the service, policy, procedure, practice or project to the equality target group and the council's duty to eliminate unlawful discrimination and promote equality of opportunity?**

Access to information held by the Council in the most accessible format recognizing the needs of the person requesting the information.

1.9   **How is, or how will the service, policy, procedure, practice or project be put into practice and who is responsible for it?**

The Unit sits within Legal Services with ultimate responsibility resting with the Director of Corporate Services as Data Protection Officer and Caldicott Guardian.

The Unit sits within the Litigation team which is managed by the Principal Lawyer for litigation.

The Unit is made up of 5 officers including Information Governance Manager, Information Manager, Principal Lawyer, Trainee Legal Executive and Information Access Officer.

The Unit assists other service areas with their statutory obligations of access and management of information.

Part 2   Consideration of data and research

To conduct the assessment, you will need information about service users and staff that provide the service. This section is to help you identify the sort of information that will be needed to help you assess whether there may be barriers to different equality groups who access your service, policy, procedure, practice or project. *(please refer to the guidance for additional information)*

2.1   List all examples of quantitative and quantitative data or any consultation information available that will enable the impact assessment to be undertaken

Access to information:

1. Data is held on the numbers of requests submitted under the Freedom of Information Act, broken down by Directorate, subject and applicant type.

2. Data is held on the number of Subject Access Requests (SARs), submitted under the Data Protection Act, broken down by Directorate.

2.2   Equalities profile of users and beneficiaries

Staff
Community and service users
Government departments
Partners
Public
Media

2.3   Evidence of complaints against the service, policy, procedure, practice or project on the grounds of discrimination

To date one complaint received, steps were taken to provide information as requested in alternative format resulting in a mediated provision of information to the individual concerned.

2.4   What does the consultation, research and/or data indicate about the negative impact on the service, policy, procedure, practice or project

No formal consultation undertaken. No negative impacts identified save in 2.3 above.

2.5   What does the consultation, research and/or data indicate about the positive impact on the service, policy, procedure, practice or project

No formal consultation undertaken

Part 3   Assessment of impact

Now that you have looked at the purpose etc of the service, policy, procedure, practice or project (part 1) and looked at the research (part 2), this section asks you to assess the impact, positive and negative, of the service, policy, procedure, practice or project on each of the 6 strands of diversity covered in the Authority's single equality scheme.

3.1   Complete this section with the following information – relating to all of the identified groups: *(please refer to the guidance for additional information)*

	Reason, evidence, comment					
	Race	Disability	Gender	Sexual Orientation	Age	Religious Belief
Barriers, negative impact						
Neutral impact						
Positive impact		Access to information is required under legislation to be submitted in written form; however, if this causes the requestor any difficulty, the service accepts requests verbally.			Independent advocate sits with vulnerable persons in relation to SARs.	

Positive – All service users have their rights to access information explained at referral and annual review.

Negative – Unsure if people are receiving information leaflets –

Negative – Lack of quantitative data on service users ethnicity and diversity makeup.

Part 4   Measures to mitigate disproportionate or adverse impact or improve on neutral or positive impacts: *(please refer to the guidance for additional information)*

4.1   **If there is any negative impact on any target equality group identified in part 3, is the impact   intended or legal?**

Unforeseen that data would be required on equality groups, so this data has not previously been collected.

There is no intention that some people may be excluded from accessing information.

4.2   **Specify measures that can be taken to remove or minimize the disproportionate or adverse effect identified in part 3. if none were identified, identify how disproportionate or adverse effect could be avoided in the future**

Circulate briefing note to care managers reminding them that information of the individuals rights to access their personal information, must be given at first contact and annual review.

To draft a feedback form to include diversity categories for monitoring purposes only.

4.3   **If there is no evidence that the service, policy, procedure, practice or project promotes equality, equal opportunities or improves relations within equality target groups, what amendments can be made to achieve this?**

As described in 4.2 above

4.4   **If a neutral or positive impact has been identified, can that impact be improved upon (continuous improvement)?**

No Neutral impact as areas for improvement have been identified as described above.

4.5   **How will any service, policy, procedure, practice or project be implemented?**
Following EQiA services improvements will be taken forward.

4.6   **As 4.5 above please identify training requirements**
Care managers to receive briefing as described above.

Equality and Diversity training to be received by the CIU team.

Part 5   Conclusions & recommendations

This section ensures that what ever we are impact assessing, whether it be a service, policy, procedure, practice or project that ensure that we abide by the general and specific duties to promote race, disability and gender equality. *(please refer to guidance for additional information)*

5.1   Does the service, policy, procedure, practice or project comply with equalities legislation?

Yes

5.2   What are the main areas requiring further attention?

Promoting the service across the six diversity strands.

5.3   Summary of recommendations for improvement

Please see action plan.

5.4   What equality monitoring, evaluation, review systems have been set up to carry out regular checks?

1. Equality Impact Assessment
2. Introducing a feedback form to include monitoring information.
3. Identifying training needs with Care Managers.
4. Advise amendments to file audit form.

5.5   When will the amended service, policy, procedure, practice or project be reviewed?

2013

Part 6   Action / improvement plan

The table below should be completed using the information from the equality impact assessment to produce an action plan for the implementation of the proposals to:

1. Lower the negative impact, and/or
2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact

Please ensure that you update your service/business plan within the equality objectives/targets and actions identified below:

Area of negative impact	Changes proposed	Lead officer	Timescale	Resource implications	Comments
Race		JT			
Disability		JT			
Age		JT			
Religious and Philosophical belief		JT			
Gender		JT			
Sexual orientation		JT			
Geographical location		JT			
All of the above	1. Briefing note to Care Managers 2. Feedback form 3. Widgets 4. File reviews	JT	6 Months		

Part 6 continued – Equality Impact Assessment – Summary report

The results of equality impact assessments must be published. Please complete this summary and the publish your report using the Equality and Diversity pages of the Intranet. Your summary information and a copy of your completed report will then be made available to the public on the Council's website.

Date of assessment | 3 November 2009

Officer's name | Justin Thorne | **Role** | Principal Lawyer – Litigation

Service, policy, procedure, practice or project that was impact assessed | Corporate Information Unit (CIU)

Summary of findings | CIU ensures that information is available in accessible formats however the EqIA has identified areas for improvement to ensure information is available in the required formats across the six diversity strands.

Summary of recommendations and key points of action plan | Briefing note to Care Managers
Feedback form
Widgets
File reviews

Groups that this policy will impact upon

Race	☐	Gender	☐
Sexual Orientation	☐	Age	☐
Disability	☐	Religion or belief	☐
Other	☐	All	X