

Equality, Diversity, Cohesion and Integration Screening



As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration.

A **screening** process can help judge relevance and provides a record of both the **process** and **decision**. Screening should be a short, sharp exercise that determines relevance for all new and revised strategies, policies, services and functions.

Completed at the earliest opportunity it will help to determine:

- the relevance of proposals and decisions to equality, diversity, cohesion and integration.
- whether or not equality, diversity, cohesion and integration is being/has already been considered, and
- whether or not it is necessary to carry out an impact assessment.

Directorate: PPI	Service area: Business Transformation
Lead person: Annamaria Cooper	Contact number: 07891271801

1. Title: Information Incident Management and Reporting Policy

Is this a:

- Strategy / Policy**

 Service / Function

 Other

If other, please specify

2. Please provide a brief description of what you are screening

The aim of this policy is to ensure that the Council’s incident reporting systems (including the management of Serious Incidents) are robust in managing, reporting and learning from adverse events, thereby minimising the potential impact of any security incidents. The Council also recognises the importance of reporting ‘Near Misses’ to promote a learning culture within the organisation.

This policy covers *all incidents and suspected breaches* involving all users of the council’s information and information systems.

The purpose of this policy is to:

- **Ensure that council information systems, applications and networks are available when required, they can be accessed only by legitimate**

users and contain complete and accurate information.

- Ensure the management of Information Security incidents conforms to the processes and procedures set out for managing all such incidents;
- Ensure there is a consistent approach to evaluating Information Security incidents;
- Ensure appropriate action is taken to prevent harm to service users and staff and to minimise the impact on business operations and mitigate against any potential reputational, operational or financial impact;
- Ensure that Leeds City Council reacts promptly and appropriately to any actual or suspected security incidents relating to its information assets;
- Reduce the impact of information security breaches by ensuring incidents are reported promptly and managed effectively;
- Ensure early reports of an Information Security incident are sufficient to decide appropriate escalation, notification and communication to interested parties;
- Ensure all aspects of an incident are fully explored and any lessons learnt are identified and communicated across the Council;
- Help identify areas for improvement to prevent the risk of recurrence and impact of any future incidents.
- Ensure the Council has an audit trail of the decisions taken in respect of all information security incidents.

The policy is designed to ensure that information governance practices are fit for purpose and support the delivery of services. It has been developed to ensure that all users of the council's information comply with the legislation relating to information security and which applies to everyone. The outcome will be that the council complies with relevant legislation on Information Security and that its information systems are managed safely and protected from security breaches.

3. Relevance to equality, diversity, cohesion and integration

All the council's strategies/policies, services/functions affect service users, employees or the wider community – city wide or more local. These will also have a greater/lesser relevance to equality, diversity, cohesion and integration.

The following questions will help you to identify how relevant your proposals are.

When considering these questions think about age, carers, disability, gender reassignment, race, religion or belief, sex, sexual orientation and any other relevant characteristics (for example socio-economic status, social class, income, unemployment, residential location or family background and education or skills levels).

Questions	Yes	No
Is there an existing or likely differential impact for the different equality characteristics?		X
Have there been or likely to be any public concerns about the policy or proposal?		X
Could the proposal affect how our services, commissioning or procurement activities are organised, provided, located and by whom?		X
Could the proposal affect our workforce or employment practices?	X	
Does the proposal involve or will it have an impact on <ul style="list-style-type: none">• Eliminating unlawful discrimination, victimisation and harassment• Advancing equality of opportunity• Fostering good relations		X

If you have answered **no** to the questions above please complete **sections 6 and 7**

If you have answered **yes** to any of the above and;

- Believe you have already considered the impact on equality, diversity, cohesion and integration within your proposal please go to **section 4**.
- Are not already considering the impact on equality, diversity, cohesion and integration within your proposal please go to **section 5**.

4. Considering the impact on equality, diversity, cohesion and integration

If you can demonstrate you have considered how your proposals impact on equality, diversity, cohesion and integration you have carried out an impact assessment.

Please provide specific details for all three areas below (use the prompts for guidance).

- **How have you considered equality, diversity, cohesion and integration?** (think about the scope of the proposal, who is likely to be affected, equality related information, gaps in information and plans to address, consultation and engagement activities (taken place or planned) with those likely to be affected)

This policy forms part of the Information Governance Framework. It is being implemented through the Information Governance Project which is delivering a training programme for all information governance policies to all users of council information. This may include, but is not limited to employees of the council, members of the council, temporary workers, partners and contractual third parties.

Equality, diversity, cohesion and integration are all being considered as part of this programme of work, both in the way in the training is to be delivered as well as in how the policy will impact on staff, partners and customers.

The information governance policies are being communicated and trained to all users who are undergoing the Changing the Workplace programme. For each service undergoing Changing the Workplace, consultation takes place with users in the service to identify the best and most appropriate ways of disseminating information on information governance, taking into account the way different people learn, peoples working patterns and people's ability to access training. A plan is then drawn up to ensure the learning and training required for the policies is tailored to the diverse learning styles and needs of people within the service.

A good example of this is in the ICT service undergoing Changing the Workplace. The service needed the information governance policies to be communicated in two ways, firstly through face to face briefings and secondly through handouts to be given out with laptops. The service also required DSE health and safety assessments to be provided to all employees. The project quickly realised that in order to ensure all staff received the information governance briefing face to face that several adjustments needed to be made for certain staff. These were as follows:

- **Extra briefings were provided to ensure staff who worked reduced and flexible hours were captured**
- **Since one of the briefing rooms is inaccessible to staff in a wheel chair a combined health and safety assessment and information governance briefing is being delivered on a one to one basis with members of staff. This ensures that staff who have specialist needs are dealt with in a way that meets their needs.**

- **Key findings**

(think about any potential positive and negative impact on different equality characteristics, potential to promote strong and positive relationships between groups, potential to bring groups/communities into increased contact with each other, perception that the proposal could benefit one group at the expense of another)

This policy has been prepared to ensure that all users of the council's information comply with the legislation relating to information security and which applies to everyone.

The policy applies to all users of council information and does not discriminate against any diversity group. With regard to the implementation of the policy, there are few equality implications that can be identified at this stage, but the potential impacts could include:

Learning Disability group: Tight controls on how information is handled and stored may be a difficulty for those people who are restricted in comprehending the standards that apply to the processing of electronic data and hard copy records.

Those who do not have a reasonable use of the English language may require additional assistance in order to implement this Policy.

This policy is only available in English and not in other formats, but it is possible that it can be made available in other languages and formats on request.

Staff and customers will benefit as there is a more formal framework for managing information in the Council thereby improving the handling and security of all information assets.

- **Actions**

(think about how you will promote positive impact and remove/ reduce negative impact)

Equality, diversity, cohesion and integration are all being considered as part of the IG Project, both in the way the training is to be delivered as well as in how the policy will impact on staff and partners. This will be addressed as part of the roll-out to ensure staff take equality and diversity into account when implementing the policy.

Where possible, this policy will be made available in other languages and formats on request.

Policy exemption requests will be monitored to ensure no inequalities are introduced.

5. If you are **not already considering the impact on equality, diversity, cohesion and integration you **will need to carry out an impact assessment.****

Date to scope and plan your impact assessment:	
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Date to complete your impact assessment	
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Lead person for your impact assessment (Include name and job title)	
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6. Governance, ownership and approval

Please state here who has approved the actions and outcomes of the screening

Name	Job title	Date
Annamaria Cooper	Corporate Information Compliance Manager	29 th March 2011

7. Publishing

This screening document will act as evidence that due regard to equality and diversity has been given. If you are not carrying out an independent impact assessment the screening document will need to be published.

Please send a copy to the Equality Team for publishing

Date screening completed	29 March 2011
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Date sent to Equality Team	13 May 2011
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Date published (To be completed by the Equality Team)	16 May 2011
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