

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 Sharing 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 purpose of this information sharing policy is to outline how information might be shared with partner agencies, third parties, other organisations and the communities of Leeds whilst also respecting the privacy of people's personal information and a general description of the categories of information sharing. This is particularly relevant with the move towards greater information sharing, service delivery through shared services and outsourcing.

The aim of the policy is to:

- **Standardise the sharing of personal and sensitive information both internally and externally with third parties.**
- **Assist in the protection of all information assets owned and used by Leeds City Council from the risks posed by inappropriate disclosure.**

- **Provide a frame work for secure and confidential information sharing, based on legal and ethical requirements.**
- **Provide all staff with the appropriate guidance with regard to the sharing of information with other agencies, third parties, other organisations and the communities of Leeds in providing services to the public. It is recognised that the exchange of relevant information between such bodies is fundamental in achieving an effective quality service.**
- **Ensure that any use of information is lawful, properly controlled and the Data Protection rights of individuals are respected.**
- **Distinguish between statutory obligations for sharing information and the need to share for immediate operational requirements, emergency response and safeguarding children and vulnerable adults.**

The policy sets out the over-arching guidance and principles that flow from the Data Protection Act 1998, Human Rights Act 1998, the Caldicott recommendations, and the raft of other related legislation and central guidance. It applies to all users of council information.

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 sharing 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 staff and key partners.

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 policy has been aligned with the provisions of the Data Protection Act 1998 and Human rights Act 1998 in respect of sharing personal and sensitive personal information.

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 sharing 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:

Sharing sensitive personal information may impact on particular groups of people more than others e.g. people identifying as lesbian/ gay or bisexual, people who have a gender recognition certificate, pay numbers, benefit claims and bank details. The Information Sharing Policy clearly states the conditions for sharing such information and is aligned with the provisions of the Data Protection Act 1998 and the Human Rights Act 1998.

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.

Checks will be undertaken to ensure compliance with the policy and ensure it is applied in a way that protects the rights of individuals. Regular compliance checks will be undertaken by Information Compliance Officers in Directorates.

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 or risks to individuals or particular groups 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:

Date to complete your impact assessment

Lead person for your impact assessment
(Include name and job title)

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

Date sent to Equality Team

13 May 2011

Date published

(To be completed by the Equality Team)

16 May 2011