

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: PP & I	Service area: Business Transformation
Lead person: Cathryn Baggott	Contact number: 279221

1. Title: Information Governance Framework

Is this a:

Strategy / Policy

Service / Function

Other

If other, please specify

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

An Information Governance Framework is being developed to identify the corporate policies that need to be rolled out throughout the organisation. The framework brings together all the legislative requirements, government standards and best practice that apply to the management of information within Leeds City Council.

The aim of the Information Governance Project is to control the development of and embed the Corporate Policies initially defined in the Information Governance Framework. Any further Information Governance policy requirements for up and coming initiatives/projects will also be included, as well as the Changing the Workplace Programme (CTW) requirements.

The Information Governance Framework replaced the previous ad-hoc arrangements the Council had in place for managing information by providing a set of objectives defining the approach to information governance, together with the

required policies and procedures. The Council's Executive Board approved the Information Governance Framework as the Council's method for delivering information governance across the organisation on 5th November 2008. The decision also endorsed the intention to provide the Assistant Chief Executive (Planning, Policy & Improvement) with delegated decision making arrangements to sign-off relevant policies and procedures associated with the Framework.

The Framework was developed based on best practice models adopted nationally. These included the NHS Information Governance Toolkit and the draft Local Government Information Governance Toolkit. Further development of these models within the context of Leeds was aided through a similar exercise being conducted on a West Yorkshire basis through the West Yorkshire Information Management Forum. The Framework is structured around six areas of Information Governance including:

- Information Governance Management;
- Records Management;
- Information Legal Compliance;
- Information Security;
- Information Sharing;
- Data Quality.

The Information Governance Framework provides the intellectual architecture which governs how the Council captures, creates, accesses, secures, manages and shares its information both internally and externally.

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 		X
		X

<ul style="list-style-type: none"> • Advancing equality of opportunity • Fostering good relations 	X	
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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)
 - All staff, service users, and members of the public will be concerned or aware about their personal information which is held by Leeds City Council and the security regarding that data. It is very important that the Framework regarding Information Governance is clear, understandable, consistent, and precise.
 - There are 14 policies being reviewed at present and all have been given due regard to equality and diversity. The policies form part of 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 policies will impact on staff, partners and customers.

- There is a communication and engagement plan for the framework. The Framework will affect each Directorate differently due to the diverse range of services provided. Consultation has taken place in each Directorate and an Information Officer will tailor each policy to suit the needs of the Directorate. Information Officers are experts within each Service area. Consideration will be given to training via e-learning, classroom training, one to one and any other training which is appropriate to Directorate individuals.
- All policies within the Framework have been written in plain English to ensure these are very clear and understandable.
- It has been known from our complaints findings that personal information has gone missing for example when a customer has handed an original birth certificate at a Council Office, even though this has been scanned into the computer system the customer states that they never received back their original certificate as promised.

- **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)

- The scope of the framework will impact across many different groups. Personal Information held by Leeds City Council includes a wide variety of groups, including:
 - Unemployed, pensioners, lone parents and other citizens of Leeds who have claimed Housing/Council Tax or Education Benefits.
 - Vulnerable adults with learning/mental health difficulties.
 - Children & families receiving care services, or are considered to be at risk.
 - Citizens fleeing violence,
 - Information held by Human Resources regarding staff within Leeds City Council
 - Ethnicity/faith/sexuality data completed voluntarily by individual groups.
 - 3rd party information
- The commissioner's news website can be found [here](#). This gives details of instances where confidential information has gone astray and the impact this has had on groups of people. This includes:
 - Surrey County Council receiving a monetary penalty of £120,000 for a serious breach of the Data Protection Act after sensitive personal information was emailed to the wrong recipients on 3 separate occasions.
 - North Lanarkshire Council breached the Data Protection Act after the theft of a home support worker's bag containing papers which included sensitive personal information.
 - Somerset County Council breached the Data Protection Act by sending a social service assessment about a local teenager to the wrong family.
- The workforce of Leeds City Council is diverse so some groups will use information much more than others. This is why the Information Officer in each Directorate will tailor each policy to suit the needs of the Directorate, and give consideration to training via e-learning, classroom training, one to one and any other training which is appropriate to Directorate individuals.
- Liaison with other Local Authorities has also meant that the development of SharePoint needs to consider what information can be put on there without breaking the rules. It is therefore very important that the information which is on there is correct and complies with Information Governance.
- Expertise of the respective assessment team members in identifying equality issues and the specialists within each directorate.

- **Actions**

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

- The Consultation processes for all policies either have or will include Human Resources, Members, Information Communication Technology, and legal to ensure all requirements have been met.
- Information Compliance Officers have been recruited within each directorate to support and embed policies across their own directorate.
- Changing the Workplace and Electronic Data Records Management System will be delivering training alongside change management. Audits will take place and ongoing support will be provided to individuals via Corporate Policy Team and the Local Information Officers.
- All policies are similar in the fact they are all done in plain English and the standard practices are a minimum of what you would expect. These policies can be available in large print, audio, and different languages. There is one policy across all Directorates and then each Information Officer will tailor each policy to suit the needs of the Directorate. Training will be given via e-learning, classroom training, handouts, one to one or whichever method is appropriate for Directorate individuals. This approach will suit different needs.
- There is an information sharing policy regarding confidential information.
- There needs to be:
 - Further work to better understand the impact on staff.
 - Specific understanding of the impact on managers who are managing staff involved in adopting these policies.

A communication / training plan will be developed to ensure all affected individuals are engaged in the change process and this is portrayed in a positive way.

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
C Baggott	Project Manager	08/08/2011

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	08/08/2011
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Date sent to Equality Team	09/08/2011
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Date published	09/08/2011
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