

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: Planning, Policy & Improvement	Service area: Business Transformation
Lead person: Katie McNeill	Contact number: 07891271821

1. Title: Records Retention and Disposal Policy

Is this a:

Policy

Service / Function

Other

If other, please specify

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

The main aim of this policy is to set out the principles to be followed to ensure that council records are retained and disposed of appropriately, in line with a corporately agreed retention and disposal schedule. This schedule will clearly state requirements for reviewing, retaining, and disposing of or transferring the councils records to the councils' archive service provider.

This policy aims to:

- promote the development and approval of a corporate retention and disposal schedule which will enable improved and consistent record retention and disposal practices across the council;
- ensure that the council only retains records that are required by law or to support the business activity or transactions of the organisation;
- outline the standards that must be met to ensure appropriate retention and disposal of council records;

- ensure that the council complies with relevant regulations and legislation, for example the Data Protection Act (1998);
- protect the council against the business and compliance risks associated with retaining records for too long, or disposing of them too soon;
- promote the identification of records which require permanent preservation to ensure protection of the councils' corporate memory;
- ease pressures on physical and electronic storage space, facilitate fast retrieval of records, and improve staff confidence in records, by reducing the volume of records that are kept unnecessarily;
- ensure that when additional information governance rules (for example security classifications) are applied to records, this is carried out in the most efficient way possible, as these rules will only be applied to records that actually need to be retained.

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 1 Eliminating unlawful discrimination, victimisation and harassment 2 Advancing equality of opportunity 3 Fostering good relations	X – 1 and 3	

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?**

Ensuring that records are retained and disposed of for appropriate periods of time, in accordance with legislation (such as the Data Protection Act), regulations, and standards, will benefit customers and employees of the council where the records contain information about them. Improving control of retention and disposal therefore could improve relations between the organisation, and its staff and customers. The policy has been widely consulted on internally and with the West Yorkshire Archive Service.

The Policy states that the council will develop a retention and disposal schedule for all its records. This schedule has been under development for 18 months, and extensive internal consultation has been taking place, including Legal Services. Records document all the council's activities, and how long they are kept can have an impact on customers and employees, particularly where records are used as evidence in legal action. Issues such as this have been considered as the schedule has developed, ensuring the council enables individuals to exercise their human rights and supports them in bringing claims against the organisation where relevant.

Retention rules for personnel- related records have a clear potential impact on staff – for example, this section of the schedule outlines how long disciplinary and grievance case files will be retained by the authority. On this basis, there is a plan for consultation with the trade unions regarding this section of the retention schedule.

Embedding this Policy will ensure that records of long-term value will be transferred to the West Yorkshire Archive Service. This will improve the amount and types of records that are available to the public via this service. The communications needs of those who can benefit from this improvement will be taken in to account by officers involved in embedding this policy.

This policy is part of the Information Governance Project which is delivering a training programme for all staff and key partners with respect to information governance. Equality, diversity, cohesion and integration are all being considered as part of this programme of work, both in the way that training will be delivered, and also how the policy will impact on staff and partners.

The information governance policies are being communicated and trained to all users who are undergoing the Changing the Workplace programme as a first priority. In future training will also be provided to other council staff and Elected Members.

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.

Similar consultation will take place with users and Elected members who are not involved in the Changing the Workplace programme, to ensure that user needs are taken in to account.

- **Key findings**

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

Embedding this policy across the council will be of benefit to customers and staff because it will improve control of how long records are retained, and when / how they are disposed of, and will improve the flow of records to the council's archive provider, thereby improving public access to information. On this basis, there is an opportunity to improve relations between the council and its customers and employees, via effective communications.

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:

- Some staff, for example disabled staff, may have specific needs / requirements in order to ensure they can access and participate in training.
- Employees and customers will be affected because records about them may be kept for different periods of time than previously.
- Some groups of employees or customers may benefit sooner than others given that embedding this policy will be governed by resource availability and an assessment of risks to the council and groups of customers / employees.
- People who may have language and literacy issues 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.

- **Actions**

Equality, diversity, cohesion and integration are all being considered as part of the Information Governance 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.

This policy will be made publicly available in order to foster good relationships between the council and customers. Customers should be reassured by the policy as it states that records containing personal data (i.e. about them) should not be held for longer than necessary.

In the development of the council's retention schedule, officers will ensure the continuation of effective consultation and communication, which takes in to account the needs of different groups of employees and customers.

This policy will be made available in appropriate languages and formats on request.

. Employee groups will be able to request exemptions to compliance with Policies for a

range of reasons – these will be subject to a process of consideration for approval. Such requests will be monitored to ensure they do not impact adversely on a particular group of customers / employees.

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
Katie McNeill	Corporate Records Manager	14 th February 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	Originally completed 14.02.11; amended version completed 15.08.11.
Date sent to Equality Team	15 th August 2011.
Date published	5 th September 2011