

# **Equality impact assessment form**

**Directorate: Corporate Resources**

**Service area: Information Governance**

**Name of policy, strategy, review or function being assessed: Information Security and IT Acceptable Use Policy**

**Date of assessment: 17/05/18**

**Name of Director/Head of Service signing it off: Jill Craig**

**Decision of Cabinet, Personnel Committee or Chief Officer Group**

**Date published on website**



Derby City Council



## **Equality impact assessment – please read this section first before you do the assessment**

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact you need to do an equality impact assessment whenever a decision is needed that affects people and **before** that decision is made.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to do them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have '**due regard**' to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a '**relevant protected characteristic**' and people who don't.

Having 'due regard' means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

The protected characteristics are:

- age
- disability
- gender identity
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

This completed form should be attached to any Chief Officer Group, Cabinet or Personnel Committee report to help elected members make their decisions by taking the equality implications into account. Equality impact assessments **must be done before** decisions are made. Include the Cabinet or Personnel Committee's decision on the front sheet when you know it.

You'll find that doing these assessments will help you to:

- understand your customers' and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Don't do the form by yourself, get a small team together and make sure you include key people in the team such as representatives from our Diversity Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website.** It is a public document so must not contain any jargon and be easy to understand.

Remember, we need to do these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010.

## **Equality groups and protected characteristics**

These are the equality groups of people we need to think about when we are doing equality impact assessments and these people can be our customers or our employees and job applicants...

- Age equality – the effects on younger and older people
- Disability equality – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties and people with physical impairments
- Gender identity – the effects on trans people
- Marriage and civil partnership equality
- Pregnancy and maternity equality - women who are pregnant or who have recently had a baby, including breast feeding mothers
- Race equality – the effects on minority ethnic communities, including newer communities, gypsies and travellers and the Roma community
- Religion and belief or non-belief equality – the effects on religious and cultural communities, customers and employees
- Sex equality – the effects on both men and women and boys and girls
- Sexual Orientation equality – the effects on lesbians, gay men and bisexual people

## **Contact for help**

Ann Webster – Lead on Equality and Diversity

[ann.webster@derby.gov.uk](mailto:ann.webster@derby.gov.uk)

Tel 01332 643722 Minicom 01332 640666 Mobile 07812301144

## The form

We use the term ‘policy’ as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures
- Key decisions such as allocating funding to voluntary organisations, budget setting
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays

If in doubt – it’s better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

### What’s the name of the policy you are assessing?

**Information Security and IT Acceptable Use Policy**

### The assessment team

Team leader’s job title – Information Security Officer

Other team members

<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>
Interim Director of IT and Governance	Derby CC	IT and Governance
Lead on Equality and Diversity	Derby CC	Equality

## Step 1 – setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side tracked.

### 1 What are the main aims, objectives and purpose of the policy? How does it fit in with the wider aims of the Council and wider Derby Plan? Include here any links to the Council Plan, Derby Plan or your Directorate Service Plan.

The purpose of information security is to protect the highly valued information assets of Derby City Council ('the Council', 'DCC'). The objective is to reduce the risk of information security incidents and be able to demonstrate to citizens and businesses that we collect, handle and store their information securely and in line with relevant legislation and compliance requirements:

- Staff will understand the rules and regulations that they need to comply with in respect of access to information at work (both paper and electronic)
- Staff understand obligations they have both in work and outside of work in respect of making comments on email, internet sites and using social media
- Staff understand the need to stay and be safe on-line both in their workplace and at home and can support council customers in understanding the need for internet and social media security (Safe derby)
- To meet mandatory compliance requirements be these through specific legislation, imposed by regulatory bodies or needed to meet government standards for information governance.

### 2 Who delivers/will deliver the policy, including any consultation on it and any outside organisations who deliver under procurement arrangements?

The Information Security Officer, following approval of the Information Governance Board. The policy includes requirements identified and best practice recommended by a number of bodies including the Information Commissioners Office, The Health and Social Care Information Centre, the Caldicott Guidelines, the NHS Data Security Protection Toolkit and the Public sector Network compliance standards (supported by guidance from the CESG, the Information security arm of GCHQ).

**3 Who are the main customers, users, partners, employees or groups affected by this proposal?**

All Councillors  
All permanent and temporary employees  
Casual employees and volunteers  
Customers who provide information to the Council in either manual or electronic format.  
It will also impact on consultants, contractors and agents employed by DCC.

**Step 2 – collecting information and assessing impact**

**4 Who have you consulted and engaged with so far about this policy, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.**

This will be available on iDerby to all staff and we will make reasonable adjustments for disabled employees to access it The Information Security and Acceptable Use Policy aims to ensure good information governance and security and the safeguarding of information held and processed by the Council.

The information governance policies have been available on the Intranet for comment by all staff. The Information Security and IT Acceptable Use Policy will be available to all staff on the intranet. This version has been shared with the Interim Director of IT (SIRO), Data Protection Officer (DPO) IT Senior Project Managers, Team Leader - End User Computing, Information Governance Board and Audit and Accounts Group and Lead on Equality and Diveristy.

The policy itself does not have any particular or specific impact on different groups, but the actions in implementing them have a positive impact for people with protected characteristics. It is recognised that there are some emerging trends for example cyber and internet bullying where some groups can be more exposed than others. The policy seeks to prevent or minimise the risks of any such bullying and harassment to all groups. They also stress to our employees how extremely important it is for information about people to be absolutely secure and not divulged to people who are not authorised to know.

**5 Using the skills and knowledge in your assessment team, and from any consultation you have done, what do you already know about the equality impact of the policy on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. If it's negative, fill in the mitigation section as well to explain how you are going to lessen the impact.**

**Age**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
People are often faced with age related cyber bullying, particularly young people and we will do all we can to tackle this.	✓		

**Disability**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
Disabled people are often faced with cyber bullying and we will do all we can to tackle this.	✓		
Some disabled people need reasonable adjustments at work to access and implement this policy. We know that some of our Deaf employees mainly use BSL as their main communication and we will explore putting the policy into BSL.	✓		

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>

### **Gender identity- trans**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
Trans people are often faced with cyber bullying and we will do all we can to tackle this.	✓		

### **Marriage and Civil Partnership**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
People in Civil Partnership and equal marriages are often faced with cyber bullying and we will do all we can to tackle this.	✓		

### **Pregnancy and maternity**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
Pregnant women and women returning to work after a having a baby may face cyber bullying and we will do all we can to tackle this.	✓		

## Race

What do you already know?	Positive impact	Negative impact	Mitigation
Minority Ethnic people are often faced with cyber bullying and we will do all we can to tackle this.	✓		

## Religion or belief or none

What do you already know?	Positive impact	Negative impact	Mitigation
People with particular religions and belief are often faced with cyber bullying and we will do all we can to tackle this.	✓		

## Sex

What do you already know?	Positive impact	Negative impact	Mitigation
Sexual harassment is often committed through cyber bullying and we will do all we can to tackle this.	✓		

## Sexual orientation

What do you already know?	Positive impact	Negative impact	Mitigation
Many people face cyber bullying because of their sexual orientation and we will do all we can to tackle this.	✓		


**Important** - For any of the equality groups you don't have any information about, then make it an equality action at the end of this assessment to find out. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. You can get lots of information on reports done from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

**6 From the information you have collected, how are you going to lessen any negative impact on any of the equality groups? How are you going to fill any gaps in information you have discovered?**

Ensure that we increase awareness of the risks associated with information security, with use of email, internet and social media facilities and that staff and customers know how to report suspected abuse of this policy. We will actively support and promote national, regional and local stay safe on line campaigns, including such campaigns aimed at groups who may be more vulnerable to cyber-bullying.

**Step 3 – deciding on the outcome**

**7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?**

<b>Outcome 1</b>	✓	<b>No major change needed</b> – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
<b>Outcome 2</b>		<b>Adjust the policy</b> to remove barriers identified by the EIA

		or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
<b>Outcome 3</b>		<b>Continue the policy</b> despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are: <ul style="list-style-type: none"> <li>• sufficient plans to stop or minimise the negative impact</li> <li>• mitigating actions for any remaining negative impacts</li> <li>• plans to monitor the actual impact.</li> </ul>
<b>Outcome 4</b>		<b>Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination

Our Assessment team has agreed Outcome number(s)

**Outcome 1:**

The policy is in accordance with best practice guidelines and statutory instructions issued by various compliance bodies. In this version of the policies following feedback we have provided shorter simpler statements that focus on the different specific components of Information Governance and security; this is to make them easier to understand and apply.

Why did you come to this decision?

The Information Security Policy addresses the responsibilities of all staff equally in the handling of information. In essence the policy is taken from national policies and has been informed by national bodies including employer and employee organisations, equality groups and information security specialists. We have other policies that deal with accessibility matters and the use of IT; these policies do not cover such aspects and are all in respect of governance and security controls not the actual use of IT.

If you have decided on **Outcome 3**, then please tell us here the justification for continuing with the policy. You also need to make sure that there are actions in the Equality Action Plan to lessen the effect of the negative impact. This is really important and may face a legal challenge in the future.

If you have decided on **Outcome 4** then if the proposal continues, without any mitigating actions, it may be likely that we will face a legal challenge and possibly a

Judicial Review on the process - it is really important that the equality impact assessment is done thoroughly, as this is what the Judge will consider.

**Step 4 – equality action plan – setting targets and monitoring**

**8 Fill in this table with the equality actions you have come up with during the assessment. Indicate how you plan to monitor the equality impact of the proposals, once they have been implemented.**

**Equality Action Plan –setting targets and monitoring**

**Age**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to reported incidents of cyber bullying which is age related.	Learn from incidents and consider further policy or technical measures necessary	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Maintain policies in line with best practice and compliance requirements	Amend policies in line with revised best practice guidance or new compliance obligations	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Investigate complaints of age related abuse by employees	Deal effectively with suspected and actual age related abuse – avoid repeat or continued abuse	As required – Information Security Officer	As required – Information Security Officer

**Disability**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to	Learn from incidents	As required –	Reported to IG Board

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
reported incidents of cyber bullying against Disabled people	and consider further policy or technical measures necessary	Information Security Officer	and as necessary COG each month
Maintain policies in line with best practice and compliance requirements	Amend policies in line with revised best practice guidance or new compliance obligations	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Investigate complaints of abuse of Disabled people by employees	Deal effectively with suspected and actual abuse of Disabled people– avoid repeat or continued abuse	As required – Information Security Officer	As required – Information Security Officer
We will explore putting the policy in BSL.	It will make the policy more accessible to deaf people	ASAP – Information Security Officer	As required – Information Security Officer
Approach the information security e-learning training provider and explore including sign language in the information security e-learning	It will make the training more accessible to deaf people	ASAP – Information Security Officer	As required – Information Security Officer

## **Gender identity - trans**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to reported incidents of cyber bullying against Trans people	Learn from incidents and consider further policy or technical measures necessary	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Maintain policies in line with best practice and compliance requirements	Amend policies in line with revised best practice guidance or new compliance	As required – Information Security Officer	Reported to IG Board and as necessary COG each month

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
	obligations		
Investigate complaints of abuse of Trans people by employees	Deal effectively with suspected and actual abuse of Trans people – avoid repeat or continued abuse	As required – Information Security Officer	As required – Information Security Officer

### **Marriage and Civil Partnership**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to reported incidents of cyber bullying of people in equal marriage and Civil Partnerships	Learn from incidents and consider further policy or technical measures necessary	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Maintain policies in line with best practice and compliance requirements	Amend policies in line with revised best practice guidance or new compliance obligations	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Investigate complaints of abuse people in equal marriage and , in Civil Partnerships by employees	Deal effectively with suspected and actual abuse – avoid repeat or continued abuse	As required – Information Security Officer	As required – Information Security Officer

### **Pregnancy and maternity**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to reported incidents of cyber	Learn from incidents and consider further	As required – Information	Reported to IG Board and as necessary

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
bullying in relation to pregnancy and maternity	policy or technical measures necessary	Security Officer	COG each month
Maintain policies in line with best practice and compliance requirements	Amend policies in line with revised best practice guidance or new compliance obligations	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Investigate complaints of abuse by employees in relation to pregnancy and maternity	Deal effectively with suspected and actual abuse in relation to pregnancy and maternity – avoid repeat or continued abuse	As required – Information Security Officer	As required – Information Security Officer

## **Race**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to reported incidents of cyber bullying based on Race	Learn from incidents and consider further policy or technical measures necessary	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Maintain policies in line with best practice and compliance requirements	Amend policies in line with revised best practice guidance or new compliance obligations	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Investigate complaints of Racial abuse by employees	Deal effectively with suspected and actual Racial abuse – avoid repeat or continued	As required – Information Security Officer	As required – Information Security Officer

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
	abuse		

### Religion or belief or none

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to reported incidents of cyber bullying regarding Religion or belief, or none.	Learn from incidents and consider further policy or technical measures necessary	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Maintain policies in line with best practice and compliance requirements	Amend policies in line with revised best practice guidance or new compliance obligations	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Investigate complaints of abuse by employees in relation to religion or belief, or none.	Deal effectively with suspected and actual abuse regarding Religion or belief, or none – avoid repeat or continued abuse	As required – Information Security Officer	As required – Information Security Officer

### Sex

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to reported incidents of cyber bullying in relation to Sex	Learn from incidents and consider further policy or technical measures necessary	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Maintain policies in line with best practice and compliance	Amend policies in line with revised best	As required – Information	Reported to IG Board and as necessary

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
requirements	practice guidance or new compliance obligations	Security Officer	COG each month
Investigate complaints of abuse by employees with regards to Sex.	Deal effectively with suspected and actual abuse regarding Sex– avoid repeat or continued abuse	As required – Information Security Officer	As required – Information Security Officer

### **Sexual orientation**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Monitor and respond to reported incidents of Sexual orientation cyber bullying	Learn from incidents and consider further policy or technical measures necessary	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Maintain policies in line with best practice and compliance requirements	Amend policies in line with revised best practice guidance or new compliance obligations	As required – Information Security Officer	Reported to IG Board and as necessary COG each month
Investigate complaints of abuse by employees regarding Sexual orientation	Deal effectively with suspected and actual abuse regarding Sexual orientation – avoid repeat or continued abuse	As required – Information Security Officer	As required – Information Security Officer

We can give you this information in any other way, style or language that will help you access it. Please contact us on: 01332 643722  
Minicom: 01332 640666

### Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku.

Prosimy o kontakt: **01332 643722** Tel. tekstowy: 01332 640666

### Punjabi

ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਟੈਲੀਫੋਨ **01332 643722** ਮਿਨੀਕਮ 01332 640666 ਤੇ ਸੰਪਰਕ ਕਰੋ।

### Slovakian

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Skontaktujte nás prosím na tel.č: 01332 643722 Minicom 01332 640666

### Urdu

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم **01332 643722** منی کام 01332 640666 پر ہم سے رابطہ کریں۔



Derby City Council