

People Impact Assessment (PIA)

Policy/activity or service area to be assessed:	Information Security Policy	Person completing assessment:	Andrea Jones
Reason for this assessment: (new policy / review etc)	Revised policy	Date of assessment:	08/05/2017

A PIA involves analysing the effect, or potential effect, of the way we do our business upon groups that share protected characteristics as defined in the Equality Act 2010. This requires us to look at the equality data which we capture or have access to and to consider the outcome of our community engagement. We need to assess whether our policies and practices show ‘due regard’ for the three aims (see below) of the Public Sector Equality Duty (PSED). The analysis should highlight effects that *increase* equality, *decrease* equality or have *no impact* upon equality across the protected characteristics. Its purpose is not just to paint a picture, but to *identify practical steps* to improve our performance by:

- (a) Eliminating any unlawful discrimination,**
- (b) Advancing equality of opportunity and**
- (c) Fostering good relations between different groups.**

1. Briefly describe the purpose, aims and objectives of the policy/activity: ¹	To ensure confidentiality, integrity and availability of the Service’s information assets is maintained at all times in order to enable the Service to fulfil its business objectives.
2. Who is the policy/activity aimed at: (communities, staff, partners etc)	Staff, customers, partners, volunteers, contractors and anyone whose data we process.
3. Who is responsible for the policy/activity: (Directorate/Department/individual)	Protective security steering group, Senior Information Risk Owner (SIRO), Information Security Manager, IT Security Officer (ITSO) and Information Asset Owners (IAO).

1. For ‘policy’: any new and existing policy, strategy, services, functions, work programme, project, practice and activity. This includes decisions about budgets, procurement, commissioning or de-commissioning services, service design and implementation.
2. Socio economic is not a Protected Characteristic under the Equality Act 2010. We will however demonstrate due regard to it because as a risk factor poverty has a significant contributor to inequality indicators. Also when present alongside a PCs or multiple PCs the risk increases exponentially

Equality Statement

Clearly explain and provide supporting evidence to show how the policy/activity satisfies the three aims of the Public Sector Equality Duty (PSED) and **DOES NOT** cause or have the potential to cause a **NEGATIVE** (detrimental) effect:

The policy satisfies the PSED by:

- 1) Eliminating any unlawful discrimination – by ensuring the service stores and processes information in line with relevant legislation such as the EU General Data Protection Regulation and implements measures to guard against loss and unauthorised modification of information.
- 2) Advancing equality of opportunity – by providing all staff with the information necessary to carry out their job effectively and protect information in line with the Information Security Management System, together with specific advice, guidance and training to appropriate staff.
- 3) Fostering good relations between different groups – by implementing appropriate controls to improve information security and ensure that sensitive personal data is processed in line with legislation such as the Data Protection Act 1998 and the EU General Data Protection Regulation. Assurance that the Service has implemented suitable controls to provide information security gives other relevant national and local partner's confidence to share their sensitive data.

Information security risk treatment is based on risk assessment. When carrying out this assessment, consideration needs to be given to the possibility that some personal data is more sensitive due to societal mores, and these factors are represented by the protected characteristics covered by the Equality Act 2010, and as such require extra controls and evidence of due regard under the Public Sector Equality Duty to be implemented to ensure its security. These controls will be covered by further policies within the Information Security Management System. Moreover all of the PCs as listed below will need due regard considerations within the supporting policies. This is an action in the appropriate section of the assessment.

Where the policy/activity **DOES** or has the **POTENTIAL TO** have a **NEGATIVE** (detrimental) effect indicate which of the Protected Characteristics **MUST** be considered:

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Describe the NEGATIVE (detrimental) effect and provide supporting evidence for your rationale *	
Age	The procedural assessment of personal data security will be evidenced within the supporting policies and it is applicable to all the PCs. Socio economic is not currently recognised within the parameters of the Equality Act 2010, despite being within the legislation when it received Royal Assent. We as a Service recognise its risk implications in isolation and the exponential risk when coupled with a PC.
Disability	
Gender reassignment	
Marriage or civil partnership	
Pregnancy or maternity	
Religion or belief	
Race	
Sex	
Sexual orientation	
Socio-economic disadvantage 2	

* **NOTE:** Where any **NEGATIVE** (detrimental) effects are likely to occur:

- (a) For the policy/activity to continue corrective actions/amendments **MUST** be taken to prevent/minimise unlawful discrimination
- (b) An action plan **MUST** be completed (next section)

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(c) Where a negative (detrimental) effect can not be avoided, continuation of the policy/activity (with or without amendment) **MUST** be justified

Action plan

This action plan **MUST** accompany the policy/activity and be used continually to assess any negative (detrimental) effects resulting from the delivery of or amendments to the policy/activity based on customer feedback and evaluation.

Negative/detrimental effect	Action needed to prevent/minimise it	By who	By when	Complete (tick)
Lack of due regard as stipulated by the Equality Act 2010 in policy development	Evidence of due regard as stipulated by the Equality Act 2010 to all the accompanying policy development	Protective Security Steering Group	Ongoing in line with Policy developments	

All Completed PIA's should be submitted to E&D team for approval.

Signed: _____ (E&D)

Name: _____

Date: _____

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