

## Equality Impact Screening (CORPORATE)

1. SUMMARY INFORMATION	
Name of policy / project:	Data Breach Procedure
What is the aim or purpose of the policy / project?	This document sets out the procedure for staff to follow in the event of loss, theft or accidental disclosure of company information.
Who is affected by this policy / project?	All employees and member of the general public engaged with the company services or provisions.
Who is responsible developing this policy or delivery of this project?	Corporate Support
Date of Assessment	01.10.15

2. INITIAL SCREENING QUESTIONS – DOES THIS POLICY / PROJECT:	YES	NO
Introduce a new policy or amends an existing policy affecting employees?	Yes	
Involve a change of departmental or Company structure?		No
Involve a reduction or increase in workforce?		No
Change employee's terms and conditions		No
Change employee's working hours?		No
Change employee's work location?		No
Change aspect of employee's physical work environment?		No
Introduces new or amends existing working practices for employees?		No

3. EQUALITY ACT 2010 SCREENING QUESTIONS		
Question	Protected Characteristic	Potential Impact
1. Will this policy or decision impact on each of the groups shown opposite in different or particular ways?  If yes please provide detail in the end column.	Age N	The policy ensures that the Company complies with its legal obligations in relation to the Data Protection Act 1998 and appropriately to the situation and the needs of those affected by the loss of personal information.
	Disability N	
	Gender Reassignment N	
	Pregnancy & Maternity	
	Race N	
	Religion or Belief N	
	Sex (Gender) N	
Sexual Orientation N		

Question	Protected Characteristic	Potential Impact
<p>2. Is there a risk that any part of this policy or decision could cause discrimination to any of the groups opposite?</p> <p>If yes please provide detail in the end column.</p>	Age N	<p>The policy ensures that there is transparency, accountability and equality in the procedures followed in line with the Company's duty to safeguard personal information and the reactive steps required to mitigating harm through information loss.</p> <p>This ensures that information loss incidents can be dealt with appropriately, quickly and delivers a duty of care provision to those affected by the loss.</p> <p>The above is delivered equally to all communities, groups or individuals and therefore does not present a risk of discrimination against one or more groups with protected characteristics.</p>
	Disability N	
	Gender Reassignment N	
	Pregnancy & Maternity N	
	Race N	
	Religion or Belief N	
	Sex (Gender) N	
Sexual Orientation N		
Question	Equality Act 2010 duties	Potential Impact
<p>3. How can this policy or decision help us to:</p>	<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010?</p>	<p>The procedure is designed to ensure that information that could be used against an individual or group based on a protected characteristic, if lost, stolen or accidentally disclosed, is contained as much as possible. Therefore it is an important control mechanism against unlawful discrimination, harassment and victimisation.</p>
	<p>Advance equality of opportunity between people who share a relevant protected characteristic and those who do not?</p>	
	<p>Foster good relations between people who share a protected characteristic and those who do not?</p>	

4. EVIDENCE OF IMPACT		
In coming to the above decision, with whom have you consulted and/ or	Consulted with / Research	The policy meets that Company's

what information was gathered?  <i>(Sources such as: Household Surveys, consultations, research reports, equality monitoring, customer feedback forms, complaints etc.).</i>	Details of when / how	legal duties in relation to the Data Protection Act 1998 and is based on the procedure adopted by Glasgow City Council.
	Outcome and findings	

5. PUBLIC INTEREST		
Is there any public concern that the functions / policies / project are being operated in or likely to operate in a discriminatory manner. Or that they are likely to be discriminatory ?  <i>(E.g. media report, research, etc.)</i>	A little	No - The policy provides a clear statement on the Company's commitment to safeguarding personal information and is issued to any affected member of the public if a breach occurs, regardless of any potentially identifying features they possess (e.g. gender, surname).
	Some	
	A lot	The policy does not raise public concerns on discriminatory practice when operational.  The policy ensures accountability and transparency as required by the Data Protection Act 1998.

6. ANY OTHER INFORMATION
Not applicable.

7. ASSESSMENT	
Given the information above is a full Equality Impact Assessment required?	No

5. SCREENING SIGN OFF			
Responsibility	Print Name	Signature	Date
Officer responsible for the screening.	Iain Paterson		01/10/15

<b>Equality Officer</b>			
<b>Head of Service Approval</b>			
<b>Document / information for publication to either:</b> (a) CSG Web Site <b>(b) CSG Intranet</b> (c) Neither			