

GSA SUMMARY REPORT OF EQUALITY CONSIDERATION AND ASSESSMENT OF EQUALITY IMPACT

Date of Assessment:	06/03/2015	
School / Department:	IT	
Lead member of staff:	Colin Watson	
Location of impact assessment documentation (contact or web link):	Colin Watson (U:\Reports\policies\Data Protection) c.watson@gsa.ac.uk	
Area of decision making / Title of policy, procedure or relevant practice:	Data Protection Policy Subject Access Request Protocol	
Please indicate if this is:	New:	<input type="checkbox"/>
	Existing/Reviewed:	<input type="checkbox"/>
	Revised/Updated:	<input checked="" type="checkbox"/>
<p>Summary of how equality, diversity and participation have been considered and due regard given to the Public Sector Equality Duty (PSED):</p> <p>The Data Protection Policy and associated SAR Protocol were reviewed section by section and consideration given to the implications of each for people with protected characteristics and the PSED.</p>		
<p>Evidence used to make your assessment:</p> <p>Previous Subject Access Requests Data Protection Policy SAR Protocol – developed as a response to historic Subject Access Requests GSA Guidance for Equality Impact Assessment The Data Protection Act - 1998 Consultation with Human Resources and Academic Registry regarding their approach to seeking consent and exemptions.</p>		
<p>Outline any positive or negative impacts you have identified:</p> <p>The policy has positive impact in that it upholds the rights of individuals and protects their personal data in accordance with the Data Protection Act. It includes special recognition of sensitive personal data which would relate to protected characteristics. No negative impact has been identified.</p>		
<p>Summary of the actions you have taken or plan to take as a result:</p> <p>Minor change to the policy was made during the process of undertaking the Equality Impact Assessment. This clarified that consent must be given in all cases where <i>sensitive personal data</i> is to be processed.</p> <p>Furthermore to support implementation, a plan will be drawn up by Sep 2015 to conduct staff briefings so that staff are fully aware of their responsibilities under this policy.</p> <p>The recently introduced PREVENT duties under the Counter Terrorism & Security Act (2015) will be carefully monitored. Their relation to Data Protection policy will follow best practice in the Higher Education sector, as this develops in the coming months.</p>		

Summary of what you anticipate will change as a result of your actions and where / when will these be reported and reviewed:

The policy has been amended to clarify that consent must be given in all cases where sensitive personal data is processed. "Sensitive personal data" includes data regarding protected characteristics, hence this provides positive protection.

The policy will be reviewed again when it is updated in 2017, or earlier if it is impacted by a change to legislation.

State how these changes will contribute to the delivery of GSA's equality outcomes:

The policy and its implementation will contribute to an environment that respects personal and sensitive information and uses it only for legitimate purposes and for which consent has been given. It also provides for individuals to access the data held about them.

This has the potential to contribute to the delivery of equality outcomes 1, 2 and 4.

The outcome of your assessment:

No action – no potential adverse impact

Amendments or changes to remove barriers / promote positive impact

Proceed with awareness of adverse impact

Sign-off, authorisation and publishing

Review Lead

Name	Colin Watson
Position	Head of IT
Signature	Colin Watson
Date	March 2015

Executive Lead

Name	Craig Williamson
Position	Registrar
Signature	Craig Williamson
Date	April 2015

Equality Lead (Head of Student Support and Development)

Name	Jill Hammond
Signature	Jill Hammond
Date	April 2015