

## Equality, Good Relations and Human Rights Screening Template

**\*\*\*Completed Screening Templates are public documents and will be posted on the Trust's website\*\*\***

See [Guidance Notes](#) for further background information on the relevant legislation and for help in answering the questions on this template (follow the links).

### **(1) Information about the Policy/Proposal**

(1.1) Name of the policy/proposal –  
Data Protection Policy Statement

(1.2) Is this a new, existing or revised policy/proposal? –  
Revised

(1.3) What is it trying to achieve (intended aims/outcomes)?

This policy has been introduced with the aim of empowering managers to be proactive in relation to the protection of personal information in the workplace.

(1.4) Are there any Section 75 categories (see list in 3.1) which might be expected to benefit from the intended policy/proposal?

Inclusive to all

(1.5) Who owns and who implements the policy/proposal - where does it originate, for example DHSSPS, HSCB?

South Eastern Health & Social Trust

(1.6) Are there any factors that could contribute to/detract from the intended aim/outcome of the policy/proposal/decision? (Financial, legislative or other constraints?)

No

(1.7) Who are the internal and external stakeholders (actual or potential) that the policy/proposal/decision could impact upon? (staff, service users, other public sector organisations, , trade unions, professional bodies, independent sector, voluntary and community groups etc)

Trust Staff

Partner organisations internal and external to the HSC including voluntary sector

Trust population – patients and clients

(1.8) Other policies with a bearing on this policy/proposal (for example regional policies) - what are they and who owns them?

Information Governance Strategy – SET

Records Management Policy - SET

Freedom of Information Policy - SET

ICT Security Policy - SET

Guidance on the Securing of Records for the Purposes of Investigation - SET

Policy and Procedures for Processing Subject Access Requests - SET

Access to Data for Organisations External to the Trust - SET

## (2) Available evidence

Evidence to help inform the screening process may take many forms. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for relevant Section 75 categories.

<i>Details of evidence/information</i>
<p><b>UK General Data Protection Regulation, 2018</b></p> <p><b>UK Data Protection Act 2018</b></p> <p><b>Code of Practice on Protecting the Confidentiality of Service User Information, revised 2019</b></p> <p><b>Information Commissioners Office Website</b></p> <p><b>Computer Misuse Act 1990</b></p> <p><b>NIS Regulations 2018</b></p>

## (3) Needs, experiences and priorities

(3.1) Taking into account the information above what are the different needs, experiences and priorities of each of the Section 75 categories and for both service users and staff.

<b>Category</b>	<b>Needs, experiences and priorities</b>	
	<b>Service users</b>	<b>Staff</b>
Gender	This policy is designed to meet the needs of all categories listed.	This policy is designed to meet the needs of all categories listed.
Age		
Religion		

Political Opinion		
Marital Status		
Dependent Status		
Disability		
Ethnicity		
Sexual Orientation		

(3.2) Provide details of how you have involved stakeholders, views of colleagues, service users and staff etc when screening this policy/proposal.

This policy was subject to consultation the Digital Health & Information Governance Sub Committee within the South Eastern Health & Social Care Trust.

#### (4) Screening Questions

You now have to assess whether the impact of the policy/proposal is major, minor or none. You will need to make an informed judgement based on the information you have gathered.

<b>(4.1) What is the likely impact of equality of opportunity for those affected by this policy/proposal, for each of the Section 75 equality categories?</b>			
<b>Section 75 category</b>	<b>Details of policy/proposal impact</b>		<b>Level of impact? Minor/major/none</b>
	<b>Services Users</b>	<b>Staff</b>	
Gender			None
Age			



Religion			
Political Opinion			
Marital Status			
Dependent Status			
Disability			
Ethnicity			
Sexual Orientation			

<b>(4.2) Are there opportunities to better promote equality of opportunity for people within Section 75 equality categories?</b>	
<b>Section 75 category</b>	<b>Please provide details</b>
Gender	The policy is designed to meet the needs of all categories listed.
Age	
Religion	
Political Opinion	
Marital Status	
Dependent Status	
Disability	
Ethnicity	
Sexual Orientation	

<b>(4.3) To what extent is the policy/proposal likely to impact on good relations between people of different religious belief, political opinion or racial group? minor/major/none</b>		
<b>Good relations category</b>	<b>Details of policy/proposal impact</b>	<b>Level of impact Minor/major/none</b>
Religious belief		None.
Political opinion		
Racial group		

<b>(4.4) Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?</b>	
<b>Good relations category</b>	<b>Please provide details</b>
Religious belief	The policy is designed to meet the needs of all categories listed.
Political opinion	
Racial group	

## **(5) Consideration of Disability Duties**

<b>(5.1) How does the policy/proposal encourage disabled people to participate in public life and promote positive attitudes towards disabled people?</b>
The Policy is developed in accordance with the Legislation listed in Section 2. The guidance sets out staff responsibilities for the processing of personal information.

## (6) Consideration of Human Rights

(6.1) Does the policy/proposal affect anyone's Human Rights?

Complete for each of the articles

Article	Positive impact	Negative impact = human right interfered with or restricted	Neutral impact
Article 2 – Right to life			X
Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment			X
Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour			X
Article 5 – Right to liberty & security of person			X
Article 6 – Right to a fair & public trial within a reasonable time			X
Article 7 – Right to freedom from retrospective criminal law & no punishment without law			X
Article 8 – Right to respect for private & family life, home and correspondence.			X
Article 9 – Right to freedom of thought, conscience & religion			X
Article 10 – Right to freedom of expression			X
Article 11 – Right to freedom of assembly & association			X
Article 12 – Right to marry & found a family			X
Article 14 – Prohibition of discrimination in the enjoyment of the convention rights			X
1 <sup>st</sup> protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property			X
1 <sup>st</sup> protocol Article 2 – Right of access to education			X

**Please note: If you have identified potential negative impact in relation to any of the Articles in the table above, speak to your line manager and/or Equality Unit. It may also be necessary to seek legal advice.**

(6.2) Please outline any actions you will take to promote awareness of human rights and evidence that human rights have been taken into consideration in decision making processes.

## (7) Screening Decision

**(7.1) Given the answers in Section 4, how would you categorise the impacts of this policy/proposal?**

Major impact	
Minor impact	
No impact	x

**(7.2) Do you consider the policy/proposal needs to be subjected to ongoing screening**

Yes	
No	x

**(7.3) Do you think the policy/proposal should be subject to and Equality Impact Assessment (EQIA)?**

Yes	
No	x



(7.4) Please give reasons for your decision and detail any mitigation considered.

It is not expected that the policy will have a negative impact to Service users or staff

Ongoing screening was not identified as a requirement until the policy is revised in the future of when guidance/legislation changes are received.

**(8) Monitoring**

Please detail how you will monitor the effect of the policy/proposal for equality of opportunity and good relations, disability duties and human rights?

Departmental audits carried out on a regular basis  
Internal audit as per their agreed internal audit cycle  
Controls Assurance  
Directorate Annual Review

Approved Lead Officer:

*Robyn Watterson*

Position:

Head of Information Governance &  
Litigation Services

Date:

18/12/2024

Policy/proposal screened by:

Robyn Watterson

**Please forward completed schedule to:**

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