

# Equality analysis form

If the activity you are planning to analyse is covered by an existing Equality Analysis or a relevant former Equality Impact Assessment, please use Section 2 of the form to highlight any updated information. The updated form should be sent through to the Equality and Diversity Unit for feedback, the start of the online consultation process and publication.

## Section 1

### Equality Analysis Screening

The following questions will identify whether a full Equality Analysis will be required. Please read the Equality Analysis guidance prior to completing the screening.

1. Name of the activity (strategy, policy, practice etc)

GDPR (General Data Protection Regulation) Programme

Programme of work to ensure that UWE progresses along its journey towards compliance with the GDPR requirements that will come in to force in May 2018.

2. Will this activity have the potential to deliver positive outcomes for students, staff and/or visitors from equality groups? Please provide evidence for your answer.

The programme, and UWE's GDPR compliance, have the potential to deliver a positive outcome for all staff, students and visitors including those from equality groups. In particular, everyone who provides personal (including special category) information to the University should be reassured that the outcome of the programme will ensure that:

- They will have opportunities to move / transfer / copy their personal information elsewhere
- personal information (including any special category information relating to them) is kept in a secure environment, and only shared within clearly defined legal parameters
- personal information is only processed for the express reason it was collected. This includes information about:
  - reasonable adjustments or accessibility requirements (for staff, students and visitors)
  - information about health and wellbeing
  - special category information that is collected for monitoring purposes
- the accuracy of that personal information is taken seriously by the University
- the personal information will be retained only as long as we have reason to keep it
- transgendered people can relinquish links to former identity (except where we have a legal duty to retain specific information) with the regulation principle of being able to apply the "right to be forgotten"
- individuals can request the deletion of data about them

In providing this reassurance, we hope that another positive outcome might be more willingness to disclose information that will help UWE to meet its equality duty and provide opportunities for us to monitor our inclusivity agenda with a more robust dataset.

3. Will this activity have the potential to create negative impacts on students, staff and/or visitors from equality groups? Please provide evidence for your answer.

The programme outcome will not have a negative impact on students or visitors from equality groups, as it relates only to better protection for the personal information they have provided to UWE.

The programme will not have a directly negative impact on staff from any particular equality groups but a change agenda that involves reviewing the way UWE processes information is likely to have some impact on all staff. That impact is likely to be around ways of working and how these may need to be adjusted to ensure the protection and integrity of the information they handle, and this will be different for each member of staff and their current operating style.

4. Does the activity have the potential to impact equality groups in the following ways:

- Access to or participation in UWE Faculties or Professional Services? YES
- Levels of representation across the UWE workforce? NO
- Student experience, attainment or withdrawal? NO
- Staff experience? YES

Please indicate YES or NO. If the answer is YES then a full analysis must be carried out. If the answer is NO, please provide a justification.

**Equality analysis screening sign off:**

Faculty Dean or Head of Service	
Faculty / service	
Date	

**Please return the completed form back to the Equality & Diversity Unit for feedback and publication**

**Section 2**

**Full Equality Analysis**

1. Name of the activity (strategy, policy or practice etc)

General Data Protection Regulation introduction programme

2. What is the aim of the activity (objective or purpose)?

This programme is being set up to prepare the University to the new EU legislation which takes effect on 25 May 2018.

UWE Bristol's vision for GDPR is that:

Our current and future students, colleagues and business partners feel confident UWE Bristol is a safe and secure place to study, work or do business because our policies, procedures and

day-to-day working practices fully align with the requirements of GDPR and our behaviours clearly demonstrate that we respect and protect individuals' personal information.

3. If amending a current activity, what changes are proposed?

- Amendment of data protection and information security policies (including data breach reporting Update of existing procedures and creation of new ones e.g. data breach procedure
- Review and recording of processes that include personal data across the university (including where the data is shared with 3<sup>rd</sup> parties, where it is located, where consent is required, where privacy notices need to be updated)
- Change of working practices when emailing and recording personal data (of students and staff)
- Review of suppliers contracts (3<sup>rd</sup> party contracts)
- Introducing privacy by design when updating or creating new processes or introducing new systems
- Ensure that personal data is accurate, kept for no longer than it is needed and that it is visible and accessible only by people who needs to process that data for the purpose it was collected

4. Who is responsible for developing and delivering the activity?

Everyone in the University.

GDPR is all about accountability: " We're all going to have to change how we think about data protection."

Change of mindset from compliance to a mindset of commitment: commitment to managing data sensitively and ethically.

5. What measures will be used to assess whether the activity is successful?

- Training take up
- Records of processes completed
- Risk assessment documented
- Necessary policies in place and clearly communicated
- All privacy notices updated
- All consent requirements identified and with a remedial plan
- Good data practices introduced and start to be embedded
- Security event/ incident monitoring in place
- Robust technical infrastructure in relation to the sensitivity of data processed at the University e.g. backup, systems secure by design, systems change management (change control)
- Roadmap for reaching full compliance

6. Does the activity have a potentially adverse impact on equality groups, in terms of employment issues and/or service delivery for students and/or staff? In the table below, please give evidence to support your yes or no answers. If the answer is not known, indicate how you will source evidence.

**Meeting the public sector equality duty**

Please also use the table below to demonstrate whether the activity has the potential to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Please use the 'no' column to highlight your responses.

	<b>Yes</b>	<b>No</b>	<b>Not known</b>
<b>All Groups</b>	✓ There is a lack of diversity in the Data Protection Liaison Officers (DPLOs) group at the moment		
<b>Women and men</b>		✓	
<b>Trans people</b>	✓ Provide support to staff who are going through gender re-assignment and who may be away from the university. They will need to be made aware of the changes applied as a result of GDPR Be made aware of communications, toolkit including training in their absence		
<b>Black and minority ethnic groups</b>		✓	
<b>Disabled people</b>	✓ Staff who require to take time away as a result of a disability or long term illness will need to be informed of the changes applied as a result of GDPR. e.g. Be made aware of communications, toolkit including training in their absence ✓ e-learning packages (like the information security and data protection online training) must follow Accessibility standards		
<b>Younger or older people</b>	✓ Older people may need to be provided with some printed materials as pointers towards digital GDPR guidance and training		
<b>People of different religion and beliefs</b>		✓	

<b>Lesbian, gay, bisexual people</b>		✓	
<b>Marriage and civil partnership</b>		✓	
<b>Pregnancy and maternity</b>	✓ Mothers on maternity leave will need to be informed of the changes applied as a result of GDPR. Be made aware of communications, toolkit including training in their absence		

7. Please give evidence of how you have engaged equality groups in the equality analysis process. Is further engagement required?

Consultation via publication on the UWE web site  
 Consultation with the Equality and Diversity Unit at UWE  
 Actioning any feedback received on the potential negative impacts

8. What action can be taken to mitigate any potential negative impacts or address different needs? Please comment and then complete an action plan (see appendix 1).

Please refer to Appendix no. 1

9. Please indicate the level of equality relevance:

- High   
 Medium   
 Low

10. Equality analysis sign off:

Faculty Dean or Head of Service	Steve Dinning – AVC for Data protection, Privacy and Complaints
Faculty / service	<i>Steve Dinning</i>
Date	21-6-18

**Please return this form to the Equality and Diversity Unit for feedback, the start of the consultation process and publication.**

# Equality analysis - action plan

## Appendix 1

Name of activity: Ensuring that the impact of behavioural change as a result of the strengthening of the data protection regulation i.e. GDPR

Plan completed by:

Service / faculty:

Issues	Actions required	Responsible Person	Resources required	Target date	Success Indicators	What progress has been made?
<b>Information/data required</b>	Provide paper format pointers e.g. postcards to point staff with little access to computer to information about the requirements of GDPR	Assistant Vice-Chancellor for Data protection, Privacy and Complaints. As well as line managers (with the support of their Deans and Directors/heads of department) will need to take steps towards informing their staff and allowing access to the information online		By December 2018	Paper formats produced and distributed	Message and format being decided upon
<b>Consultation</b>	Ensure staff on leave are kept up to date of development related to their	Line managers with the backup of heads of department				

	<p>duty towards data protection</p> <p>GDPR will form part of staff induction and PDRs (where training requirements or any other requirements can be drawn)</p>	<p>Line managers of groups impacted on (see section no. 6 above) will need to conduct a return to work interview.</p> <p>When staff come back from long-term illnesses or disabilities, gender re-assignment leave, maternity leave, line managers with the support of the HR department need to ensure that training requirements and updates about GDPR (some of which will be on the <u>Intranet</u>) are clearly communicated to those staff</p>		Ongoing	TBC	HR working on the implementation of these including Academic practice
<p><b>Monitoring and review arrangements</b></p>						

<b>Publication</b>	Comms update on GDPR (refer to the GDPR Intranet page)	Line manager of groups impacted on (see section no. 6 above) need to point staff who have been on long-term leave to check the latest comms on <u>GDPR on the Intranet</u>		By December 2018	1:1 checks	HR to confirm
<b>Other actions</b>	All staff have completed the mandatory online module	Line managers and heads of department of groups impacted on (see section no. 6 above) need to point staff who have been on long-term leave to update their data protection training including the <u>online training module</u> or contact the Learning and Development Unit to find out about the latest		By May 2018	Online module stats	Stats are already readily available



<p><b>Other actions</b></p>	<p>All staff to be made aware of where to get help about GDPR</p>	<p>training available</p> <p>Line managers and heads of department to ensure that all the groups (trans people, disabled people, younger or older people, pregnancy and maternity) know where to get help and support with adapting their working practices to the new regulation: For example:</p> <ul style="list-style-type: none"> <li>• Line managers</li> <li>• <u>Data Protection Liaison Officers</u> for their area</li> <li>• <u>The Data Protection and Privacy office.</u></li> </ul>											
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<b>Other actions</b>	Allow for more diversity in the DPLO (Data Protection Liaison Officers) group	Assistant Vice – Chancellor for Data Protection, Privacy and Complaints		By December 2018	List of DPLOs being revised as the GDPR agenda is being embedded into the fabric of the University	Awareness of the lack of diversity has been raised and will be reiterated at senior management level
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Please return form to the Equality and Diversity Unit