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| **TITLE**  *Name / description of the issue being assessed* | | | Confidentiality and Data Protection Policy | | | | |
| **DATE**  *Date the DIA is completed* | | | First Published January 2018  Reviewed October 2020 | | | | |
| **LEAD OFFICER**  *Name, title and dept of person responsible for carrying out the DIA*. | | | Aisling Sims - Policy and Partnerships Manager | | | | |
| 1. **Summary description of the proposed change**  * *What is the change to policy / service / new project that is being proposed?* * *How does it compare with the current situation?* | | | | | | | |
| The Confidentiality and Data Protection Policy sets out the Homes for Independent Living (HfIL) team stores residents’ personal and confidential information; manages the disclosure of personal and confidential information between third parties such as social workers, support workers and residents’ family or friends; and complies with GDPR and the Data Protection Act 2018.  The Confidentiality and Data Protection Policy was reviewed in October 2020 and updated to ensure it reflects current legislation. There have been no significant policy changes. | | | | | | | |
| 1. **Summary of evidence used to support this assessment**  * *Eg: Feedback from consultation, performance information, service user records etc.* * *Eg: Comparison of service user profile with Medway Community Profile* | | | | | | | |
| There have been no complaints regarding the Confidentiality and Data Protection Policy.  There have been no significant data breaches with the Homes for Independent Living schemes.  The Confidentiality and Data Protection Policy applies to all residents living within the Homes for Independent Living schemes. | | | | | | | |
| What is the likely impact of the proposed change? *Is it likely to :*   * *Adversely impact on one or more of the protected characteristic groups?* * *Advance equality of opportunity for one or more of the protected characteristic groups?* * *Foster good relations between people who share a protected characteristic and those who don’t?* | | | | | | | |
| **Protected characteristic groups** | | **Adverse impact** | | | **Advance equality** | **Foster good relations** | |
| **Age** | |  | | | ***✓*** | ***✓*** | |
| **Disabilty** | |  | | |  |  | |
| **Gender reassignment** | |  | | |  |  | |
| **Marriage/civil partnership** | |  | | |  |  | |
| **Pregnancy/maternity** | |  | | |  |  | |
| **Race** | |  | | |  |  | |
| Religion/belief | |  | | |  |  | |
| **Sex** | |  | | |  |  | |
| **Sexual orientation** | |  | | |  |  | |
| **Other (eg low income groups)** | |  | | |  |  | |
| 1. **Summary of the likely impacts**  * *Who will be affected?* * *How will they be affected?* | | | | | | | |
| It has not been identified that this policy will have a negative impact on any protected characteristic.  Homes for Independent Living Resident’s equality will be advanced as they will be able to review information that is held on file and review the documentation, such as their HFIL support document to ensure that adequate measures are in place. | | | | | | | |
| 1. **What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?**  * *Are there alternative providers?* * *What alternative ways can the Council provide the service?* * *Can demand for services be managed differently?* | | | | | | | |
| Not Applicable | | | | | | | |
| Action plan  * *Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence* | | | | | | | |
| **Action** | | | | **Lead** | | | **Deadline or review date** |
| Monitor any Homes for Independent Living complaints on data breaches/confidentiality | | | | Homes for Independent Living Team Leader | | | Ongoing |
| Recommendation *The recommendation by the lead officer should be stated below. This may be:*   * *to proceed with the change, implementing the Action Plan if appropriate* * *consider alternatives* * *gather further evidence*   *If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.* | | | | | | | |
| To proceed with the implementation of the updated policy | | | | | | | |
| Authorisation *The authorising officer is consenting that:*   * *the recommendation can be implemented* * *sufficient evidence has been obtained and appropriate mitigation is planned* * *the Action Plan will be incorporated into the relevant Service Plan and monitored* | | | | | | | |
| **Authorising Officer** | **Mark Breathwick** | | | | | | |
| **Date** | **October 2020** | | | | | | |