Stage 1: Rapid Impact Checklist

Document title: Information and Records Management Policy

Author & School/Service: Governance Office

Reason for the Equality Impact Assessment:

Proposed new document	
Proposed change to existing document	X
Review of existing document	
Other (please state): Proposed restructure of Schools and Divisions.	

Could any protected characteristics be affected by this proposal?[1]

Yes	No
	X

If yes, which protected characteristic groups could be affected?

Age		Disability	
Gender reassignment		Pregnancy and maternity	
Race/ethnicity		Religion or belief (including lack of belief)	
Sex		Sexual orientation	

Will the proposal have any impact on:

	Yes	No
Discrimination?		X
Equality of opportunity?		X
Relations between groups?		X

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[1] 'Proposal' is used as shorthand for any policy, procedure, strategy or proposal that might be assessed.

Will the proposal have an impact on the physical environment? For example, will there be impacts on:

Living conditions?	
Working conditions?	X
Pollution or climate change?	X
Accidental injuries or public safety?	

If the answer to any of the above is 'yes', please proceed to complete the Comprehensive Equality Impact Assessment, overleaf.

Stage 2: Comprehensive Equality Impact Assessment (CEIA)

Details of document

Document title	Information and Records Management Policy
Document owner	Robert McCaffrey-Turners, Records Management and Information Governance Officer
School/Service	Governance Office

Aim of the document

What are the aims and objectives of the document?
The changes to the document set out the University's commitment to, and the authority to carry out, the development and implementation of information and records management at the University, along with establishing a hierarchy of responsibility for the monitoring and continued support for Information and Records Management (IRM).

How important is the document in terms of equality in the University? Does it relate to an area with known inequalities or where equality objectives have been set by the University?
The document relates to all of the information and records produced and maintained at the University. Of specific relevance to equality, it will improve access controls to special category and sensitive information, by promoting the embedding of IRM in the University culture. This is imperative to ensuring that personal, special category and sensitive data is accessed only by those with a need to see it.

Who is affected by the document and how have they been involved in the development of it?
All staff that manage or produce information and records are affected by the document. As this is a revised document, all staff are already responsible for the information and records, but the changes to this version are reinforcing that commitment and providing a structure to enable our staff to continuously improve IRM. Staff were involved in the development of this new iteration via consultation and representation on the Information and Records Management Project Board - which has had regular attendance from the Schools and Services throughout. The board is overseen by the Vice-Principal (Strategy and Governance) and University Secretary and consists of regular attendees from the Governance Office, IT and Corporate Services, Communications, Student and Academic Services and the Academic Schools.
The IRM Policy has also been presented to the Senior Management Team for consultation, who recommended it to the Finance and Corporate Performance

Committee (FCPC) for consideration. FCPC have recommended the revised policy to Court for approval.

Are any persons affected by the document likely to benefit from it and in what way?
Aside from better governance, security, and compliance, developing a good information and records management (IRM) culture at Abertay brings wide benefits in relation to more efficient work practices and resource savings that in turn will lead to a better environment for our staff to work in.

Is there any evidence or concern that any of the protected characteristic groups have different experiences, issues or needs in relation to this document? (Please provide details in the box below)

Age		Race	
Disability		Religion or Belief	
Gender Reassignment		Sex	
Pregnancy & Maternity		Sexual Orientation	
Marriage & Civil Partnership			

How does the document fit into the broader strategic aims of the University?
The policy links directly to the Sustainable Development Strategy as noted in the document and the revised Digital Strategy and sits within the University's Strategic plan.

Consideration of available data

(Consider what data is available. Data can include surveys, focus groups, analysis of complaints made, feedback received, consultations, etc.)

What do we know from existing data already held by the University?
A Health Check was conducted with University staff between February to March 2022. The Health Check indicated an urgent need for a University wide IRM programme to achieve central oversight of our information and records, legislative compliance, and reduce risks of information failures, such as accidental destruction or personal data breaches. Input from the Information and Records Management Project Board.

What do we know from existing data which is available externally?
N/A

Are there any apparent gaps in knowledge?
There is an apparent gap in the oversight of information and records management within the University and currently a lack of regular reporting on the matter. Staff awareness of the importance and their roles and responsibilities for delivering IRM, and the guidance and training available is not at the standard expected of a public authority. There are considerable gaps that need to be addressed.

Impact of document

Could this document lead to any positive, negative, intended or unintended impact on the University or any of its stakeholders?
IRM plays an important role in business continuity, risk management, and maintaining the institutional memory. Business continuity benefits from a robust information and records management system by preventing the duplication of work, enabling the efficient navigation of information, and facilitating the exchange/use of reliable information assets. It also negates the occurrence of lost or compromised information. From a risk management perspective, effective records management enables an overview of the information generated by the University. Information can be readily identified by vulnerability and sensitivity, allowing the targeted application of established practice to better protect certain information types. The care of our records is crucial to preserving the institutional and corporate memory of Abertay. Abertay has a unique foundation and much of what has been accomplished will go on to shape our future. It is of huge importance that the information we generate at present is reviewed and submitted to the University Archive when appropriate. Failed compliance can bring serious harm to the University and its stakeholders. Some of the negative outcomes that we want to avoid are: Legal action: this can result in costly settlements or restrictions to our activities. Information regulators' audit and review: the Information Commissioner's Office (ICO) is the regulatory body for Scottish Higher Education (HE) institutions on data protection legislation including GDPR. The Office of the Scottish Information Commissioner (OSIC) is the equivalent body overseeing the implementation of FOISA and Environmental Information (Scotland) Regulations (EIRs). Failure to comply with FOISA, EIRs, Data Protection Act or GDPR can result in substantial fines and closer scrutiny of our data protection and freedom of information processes. Reputational damage: Funders, partners, and students want to know that they can trust us to handle their information. Failure to comply with regulations, the accidental release and/or loss of confidential information, or the misuse of information is damaging to those relationships and can inhibit our success.

Could there be a differential[2] impact on any protected characteristics? Could any differential impact be adverse?
No.

Please consider

Is this policy directly discriminatory? If yes, is it intended to increase equality? If no, this is unlawful discrimination.

Is this policy indirectly discriminatory? If yes, is this justifiable or proportionate? If no, this is unlawful discrimination.

If this policy is not indirectly discriminatory, but could have an adverse impact on any of the protected characteristics, you must provide details of how the University will act to address this.

Is this policy unlawfully discriminatory? If you find that it is, you must decide how the University will act lawfully.

Consultation

What did this equality analysis conclude?
That the policy is written and intended is not discriminatory.

Is any action required to be taken in response to the findings from the consultation?
Feedback from the project board has been incorporated.

What is the recommendation for this document following consultation?

Reject the document		Approve and publish the document	x
Amendment required		Other (please provide details below)	

Declaration

I confirm that this equality analysis represents a fair and reasonable view of the implications of the document for all protected characteristic groups, and that appropriate actions have been identified to address the findings.

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[2] Differential impact = where the positive or negative impact on one particular protected characteristic is likely to be greater than on another.

Robert McCaffrey-Turner, Records Management and Information Governance Officer	**CEIA owner**
Dr Dianne Peden, Head of Governance and Deputy Secretary	**Line manager** (if appropriate)

Committee approval

Which Committee has this document gone before for approval?
University Court
Date of Committee meeting: 14 June 2023

Following Committee consultation, what is the decision for this document?

Reject the document		Approve and publish the document	x
Amend the document		Other (please give details below)	

If the Committee requires that the document be amended, please list amendments below.