



# Equality Impact Assessment Summary

## Summary

Name of Product	Appropriate Policy Document – Safeguarding sensitive and special category personal data
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Brief Description of Product	Policy outlining our approach to information management and data protection compliance.
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Product / Product Summary Attached	Yes
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Department	Information Management, Department of Standards and Ethics
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Assessment Writer	██████████ Head of Information Management and Data Protection Officer
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Date Started	18 <sup>th</sup> March 2022
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Head of Dept Sign Off	██████████ 19/07/22
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EDI Manager Sign Off	██████████ 18/07/2022
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Review Date	March 2025
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## Version Control

This is a living document and should be updated as we update our products and receive new insights and data on how our people or communities engage with our product.

Version	Date	Reason for update	Author
0.1	Mar 2022	First iteration of document	██████████

**Please ensure you consult the Equality Impact Assessment Guidance while completing this document**

## Stage One – Early Thinking



## Equality Impact Assessment Summary

Use this space to confirm if you are developing a proposal that will impact upon policies and practices that are likely to impact upon our communities or workforce. Consider If you aren't sure how your product may impact people due to their protected characteristics please use our [Equality Consideration Checklist](#).

Is an EIA required at this time?	Yes
If no, what is your rationale?	<p>It is a legal requirement within data protection legislation for us to have an Appropriate Policy Document to safeguard sensitive and special category personal data. The existence of this document fulfils one of the Data Controller's legislative obligations.</p> <p>This policy has a positive impact on the protected characteristics, as the very nature of the policy affords additional protections and safeguards to special category data and sensitive data, which incorporates the protected characteristics.</p>

### Stage Two – Identify Scope

Please consult the [Equality Impact Assessment Guidance](#) for suggestions as to consider how you might evidence both positive and negative impact. Where possible please provide references or links.

Sources	N/A
Consultation	N/A

### Stage Three - Impact

What potential positive or negative impacts has your research and consultation revealed? Consult the [Equality Considerations Checklist](#) for previously identified impacts that may be relevant.

#### Age

#### Data & Background Information

This characteristic is not affected by the Policy as this is not deemed special category data.

#### Positive Impacts

#### Negative Impacts

#### Disability

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Data & Background Information	
This characteristic is within the definition of special category data.	
Positive Impacts	Negative Impacts
The Policy affords additional protections and further justification to the lawful basis for processing this personal data, ensuring the lawful, necessary and proportionate use of the data.	N/a
Gender Reassignment	
Data & Background Information	
This characteristic is within the definition of special category data.	
Positive Impacts	Negative Impacts
The Policy affords additional protections and further justification to the lawful basis for processing this personal data, ensuring the lawful, necessary and proportionate use of the data.	N/a
Marriage and civil partnership	
Data & Background Information	
This characteristic is not affected by the Policy as this is not deemed special category data.	
Positive Impacts	Negative Impacts
N/a	N/a
Pregnancy and Maternity	
Data & Background Information	
This characteristic is not affected by the Policy as this is not deemed special category data.	
Positive Impacts	Negative Impacts
The Policy affords additional protections and further justification to the lawful basis for processing this personal data, ensuring the lawful, necessary and proportionate use of the data.	N/a
Race	
Data & Background Information	
This characteristic is within the definition of special category data.	
Positive Impacts	Negative Impacts
The Policy affords additional protections and further justification to the lawful	N/a



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basis for processing this personal data, ensuring the lawful, necessary and proportionate use of the data.		
<b>Religion or Belief</b>		
Data & Background Information		
This characteristic is within the definition of special category data.		
Positive Impacts	Negative Impacts	
The Policy affords additional protections and further justification to the lawful basis for processing this personal data, ensuring the lawful, necessary and proportionate use of the data.	N/a	
<b>Sex</b>		
Data & Background Information		
This characteristic is not affected by the Policy as this is not deemed special category data.		
Positive Impacts	Negative Impacts	
N/a	N/a	
<b>Sexual Orientation</b>		
Data & Background Information		
This characteristic is within the definition of special category data.		
Positive Impacts	Negative Impacts	
The Policy affords additional protections and further justification to the lawful basis for processing this personal data, ensuring the lawful, necessary and proportionate use of the data.	N/a	
<b>Other – Please clarify</b>		
Data & Background Information		
Nothing further to add.		
Positive Impacts	Negative Impacts	
N/a	N/a	

<b>Stage Four – Mitigation – Actions</b>		
What can be done to mitigate/minimise negative impacts?		
Action	Action Owner	Action Status



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N/A		

<b>To be filled in by Head of Department</b>			
<b>Stage Four – Mitigation – Risk Tolerance</b>			
Have we exhausted options to mitigate/minimise any negative impacts? List negative impacts we have not been able to mitigate here – these should be added to the relevant departmental risk register.			
Impacts we cannot mitigate	N/A		
Which Risk Register have these impacts been added to?	N/A		
Departmental Risk Assessment	Impact	Likelihood	Total
	N/A	N/A	N/A
EDI Team Risk Assessment	Impact		
	N/A		

<b>Stage 5 – Sign Off</b>
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Once complete, you must send your completed EIA and the product or product summary to the EDI team at [edi@cleveland.pnn.police.uk](mailto:edi@cleveland.pnn.police.uk)

The team will review your EIA and will either: provide final sign off, OR, return your document with further considerations and recommendations for you to implement.