OneTrust
PRIVACY, SECURITY & TRUST

Assessment Details

ID 474

Name Information Governance Policy Suite EqIA

Organization Care Inspectorate

Description

Approver Jacqui Duncan

Respondent Molly Edmond,Caitlin Edwards,Caroline Rose,Rachel Mitchell

Template Equality Impact Assessment Form v0_25

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Creator Hannah Lindsay

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Stage Completed

Approval Stage

Status Active

Very High Risks 0

High Risks 0

Medium Risks 0

Low Risks 0

Total Risks 0

Residual Risk Level None

Residual Risk Score 0.0

Result Approved

Result Comments
   Under Review (Jacqui Duncan - Not Reviewed) ; (Hannah Lindsay - Approved) ;

Primary Record Id

Primary Record Name

Template Version 1

Project Version 1

Open Risk Count 0

Open Info Request 0

Tags

Submission Progress (%) 100

Assessment Questions

(1) General information

1.1 **Your Equality Impact assessment relates to the following processing activity**

Response

Information Governance Policy Suite | Intelligence

Justification

None

1.2 **Work to be assessed**

Response

New

Justification

None

1.3 **Details of policy, process or initiative**

Response

The Information Governance policy suite of the Care Inspectorate explains and provides guidance as to how we, as an organisation manage our records in accordance with our Records Management Plan, which is a statutory requirement under the Public Records Scotland Act 2011 and also supports the Data Protection Act 2018 and the UK GDPR. It is crucial that we manage our information assets to meet the strategic, operational and legal requirements of the Care Inspectorate to maximise its value for the organisation and its stakeholders and to stop it becoming a liability and a risk- good information governance provides this assurance. The Information Governance team has responsiblity for dealing with the following statutory enquiries:
Freedom of Information
Environmental Information (Scotland) Regulations 2004
Data Protection Act 2018
Subject Access Requests (SAR) as well as service of information rights requests that arise as a result of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

1.4 **Information Asset Owner**

Response

Information Governance Policy Suite | Intelligence

Response
Head of Intelligence
Justification
None

1.5 **Business Process Owner**

Response

Information Governance Policy Suite | Intelligence

Response
Rachel Mitchell
Justification
None

(2) Further details

2.1 **Please select the criteria which best relates to this work**

Response

(Information Governance)

Justification
None

2.2 Who will it affect?

Response

(Care service providers)   (Volunteers)   (Employees)

(Children and young people for whom we have corporate parenting responsibilities)   (Members of the public)   (People who use care services)

Justification
None

Comments

Molly Edmond   _17/03/2022 05:04 PM_
The Information Governance team and the Information Governance policy suite of the Care Inspectorate explains and provides guidance as to how we, as an organisation manage our records in accordance with our Records Management Plan, which is a statutory requirement under the Public Records Scotland Act 2011 and also supports the Data Protection Act 2018 and the UK GDPR. The Information Governance team has responsibility for dealing with the following statutory enquiries:
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2.3 What is the aim?

Response

The Information Governance policy suite of the Care Inspectorate explains and provides guidance as to how we, as an organisation manage our records in accordance with our Records Management Plan, which is a statutory requirement under the Public Records Scotland Act 2011 and also supports the Data Protection Act 2018 and the UK GDPR. It is crucial that we manage our information assets to meet the strategic, operational and legal requirements of the Care Inspectorate to maximise its value for the organisation and its stakeholders and to stop it becoming a liability and a risk- good information governance provides this assurance.

The Information Governance team has responsibility for dealing with the following statutory enquiries:
Freedom of Information
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Subject Access Requests (SAR) as well as service of information rights requests that arise as a result of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and this helps us ensure we answer such enquiries effectively.

2.4 Why is the change required?

Response

There is not a change however this is the first time an EQIA has been documented on OneTrust for Information Governance.

2.5 What outcomes do you want to achieve?

Response

It is crucial that we manage our information assets to meet the strategic, operational and legal requirements of the Care Inspectorate to maximise its value for the organisation and its stakeholders and to stop it becoming a liability and a risk- good information governance provides this assurance. The Information Governance team has responsibility for dealing with the following statutory enquiries:
Freedom of Information
Environmental Information (Scotland) Regulations 2004
Data Protection Act 2018
Subject Access Requests (SAR) as well as service of information rights requests that arise as a result of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and this helps us ensure we answer such enquiries effectively.

2.6 What barriers are there to achieving these outcomes?

Response

Barriers to achieving these outcomes include: not reviewing the information governance policies suite regularly to incorporate organisational and/or legislative changes, not having senior management approval, ineffective mechanisms for handling enquiries etc

2.7 **When is the change due to be implemented?**

Response

📅 17/03/2022

2.8 **What other Care Inspectorate policies or projects may be linked to or affected by changes to this work?**

Response

Information Governance
Strategy

Justification

None

(3) **Potential impacts - Age**

3.1 **Do you think the work impacts on people of different ages differently?**

Response

Yes

Justification

None

3.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment and victimisation of people based on their age?**
Please include a justification for your answer. You may select both positive and negative if you identify both kinds of impact.

Response

Positive   Negative

Justification

Positive: We have multiple different routes through which individuals may contact and ask for preferred format in receiving the answer- this will help avoid indirect discrimination of older people who are less likely to have access to technology/be digitally literate.

Negative: The information governance policy suite generally recommends digital enabling over hard copy, this could negatively indirectly discriminate against older people who are less likely to have access to technology/be digitally literate.
Positive: We have a 'making it easy to do the right thing' approach- we champion information governance and data protection on their behalf.

3.3 **What kind of impact is there in terms of advancing equality of opportunity between people of different ages?**
Please include a justification for your answer. You may select both positive and negative if you identify both kinds of impact.

Response

Negative   Positive

Justification

See above (3.2)
Positive: We are getting rid of barriers in terms of digital literacy and indirect discrimination through this by always providing alternative means based on the recipients needs.

3.4 **What kind of impact is there in terms of fostering good relations among and between different age groups?**
Please justify your answer. You may select both positive and negative if you identify both kinds of impact.

Response

(None)

Justification
No perceived impact

3.5 **If you answered 'negative' to any of the questions above, please outline how you will mitigate this.**

Response
Negative: There are mitigations in place for employees digital literacy in that the care inspectorate supports training opportunities . We encourage feedback on any processes we have in place across the organisation.

(4) **Potential impacts - Disability**

4.1 **Do you think this work affects disabled people differently to non-disabled people?**
Disability: a physical or mental impairment that has a substantial and long-term negative effect on your ability to do normal daily activities.

Response

(Yes)

Justification
None

4.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of disabled people?**
Please justify your answer. You may select both positive and negative if you identify both kinds of impact.

Response

(Positive)

Justification

Positive: We have multiple different routes through which individuals may contact and ask for preferred format in receiving the answer- this will help avoid indirect discrimination of disabled people as it gives them an opportunity to receive information in the format they require (e.g. we can provide alternative formats such as braille for those with sight issues, larger text for those with sight issues and simplified language for those who may have difficulties in comprehension).

Positive: Formats- We can also provide audio (saved to a CD or audio file) or digital formats (visual recordings)for requests. This helps to mitigate indirect discrimination for disabled people who may have hearing issues, sight issues or different access needs.

4.3 **What kind of impact is there in terms of advancing equality of opportunity between people with and without a disability?**
Please justify your answer. You may select both positive and negative if you identify both kinds of impact.

Response

(Positive)

Justification
See above

4.4 **What kind of impact is there in terms of fostering good relations among & between disabled and non-disabled people?**
Please justify your answer. You may select both positive and negative if you identify both kinds of impact.

Response

(None)

Justification
None

4.5 **If you answered 'negative' to any of the questions above, please outline how you will mitigate this.**

Response
None

5 Potential impacts - Sex

5.1 **Do you think this work affects people of different sexes in different ways?**

Response
(No)

Justification
None

5.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of people based on their sex?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

5.3 **What kind of impact is there in terms of advancing equality of opportunity between people of different sexes?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

5.4 **What kind of impact is there in terms of fostering good relations among & between people of different sexes?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

5.5 **If you answered 'negative' to any of the questions above, please give details on how you will mitigate this.**

Response
N/A

6 Potential impacts - Pregnancy and maternity

6.1 **Do you think this work impacts on people who are pregnant or have given birth in the past 26 weeks differently to others?**

Response
(No)

Justification
None

6.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment &**

victimisation of people who are pregnant or gave birth in the past 26 weeks?
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

6.3 **What kind of impact is there in terms of advancing equality of opportunity between people who are pregnant or have given birth in the past 26 weeks, and those who are/have not?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

6.4 **What kind of impact is there in terms of fostering good relations between people who are pregnant or have given birth in the past 26 weeks, and those who are/have not?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

6.5 **If you answered 'negative' to any of the above questions, please outline how you will mitigate this.**

Response
N/A

(7) **Potential impacts - Gender reassignment**

7.1 **Do you think this work impacts transgender people/ people with a trans history differently to people whose gender identity and expression matches their biological sex?**
A decision to undertake gender reassignment is made when an individual feels that their gender at birth does not match their gender identity. This is called 'gender dysphoria' and is a recognised medical condition.

Gender reassignment refers to individuals, who either:

- *Have undergone, intend to undergo or are currently undergoing gender reassignment (medical and surgical treatment to alter the body).*
- *Do not intend to undergo medical treatment but wish to live permanently in a different gender from their gender at birth.*

Response
(No)

Justification
None

7.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of transgender people?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

7.3 **What kind of impact is there in terms of advancing equality of opportunity between transgender/**

people with a trans history and people whose gender identity and expression matches the biological sex?

Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

(None)

Justification

N/A

7.4 What kind of impact is there in terms of fostering good relations between transgender/ people with a trans history and people whose gender identity and expression matches the biological sex?

Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

(None)

Justification

N/A

7.5 If you answered 'negative' to any of the above questions, please outline how you will mitigate this.

Response

N/A

(8) Potential impacts - Sexual orientation

8.1 Do you think this work impacts people of different sexual orientations differently?

Response

(No)

Justification

None

8.2 What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of people of different sexual orientations?

Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

(None)

Justification

N/A

8.3 What kind of impact is there in terms of advancing equality of opportunity between people of different sexual orientations?

Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

(None)

Justification

N/A

8.4 What kind of impact is there in terms of fostering good relations between people of different sexual orientations?

Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

(None)

Justification

N/A

8.5 **If you answered 'negative' to any of the above questions, please outline how you will mitigate this.**

Response
N/A

(9) **Potential impacts - Race**

9.1 **Do you think this work impacts people of different races differently?**
Race applies to national or ethnic origin, nationality, colour, Gypsy, Roma and Traveller community membership.

Response
(Yes)

Justification
None

9.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of people of different races?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(Positive)   (Negative)

Justification
Positive: We offer different languages for our policies and responses to enquiries. This mitigates indirect discrimination of people who do not speak English or have English as a second language.

Negative: Evidence showing the Roma, Gypsy, Traveller community can experience limited access to digital technologies, possibly impacting their ability to access or request information.

9.3 **What kind of impact is there in terms of advancing equality of opportunity between people of different races?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(Negative)   (Positive)

Justification
See above

9.4 **What kind of impact is there in terms of fostering good relations between people of different races?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

9.5 **If you answered 'negative' to any of the above questions, please outline how you will mitigate this.**
Response
Requests for information do not require to be made electronically, we can accept written letters and, sometimes, telephone calls/voicemails. However it is understood that to locate a suitable mailing address, telephone number, or understanding your rights under different legislation could require access to the internet.

(10) **Potential impacts - Religion or belief**

10.1 **Do you think this work impacts on people of different religions or beliefs differently?**
This includes people with no religion or belief, and environmentalism.

Response

No

Justification

None

10.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of people of different religions or beliefs?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

None

Justification

N/A

10.3 **What kind of impact is there in terms of advancing equality of opportunity between people of different religions or beliefs?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

None

Justification

N/A

10.4 **What kind of impact is there in terms of fostering good relations between people with different religions and beliefs?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

None

Justification

N/A

10.5 **If you answered 'negative' to any of the above questions, please outline how you will mitigate this.**

Response
N/A

(11) **Potential impacts - Marriage or civil partnership**

11.1 **Do you think this impacts employees who are married or in a civil partnership differently to those who are not?**
This refers specifically to Care Inspectorate employees, not service users who are married or in a civil partnership.

Response

No

Justification

None

11.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of employees based on their marriage/civil partnership status?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response

None

Justification

N/A

11.3 **What kind of impact is there in terms of advancing equality of opportunity between employees who are and are not married or in a civil partnership.**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

11.4 **What kind of impact is there in terms of fostering good relations between people who are and are not married or in civil partnerships?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

11.5 **If you answered 'negative' to any of the above questions, please outline how you will mitigate this.**

Response
N/A

(12) **Potential impacts - Children and young people for whom we have corporate parenting responsibilities**

12.1 **Do you think this work impacts children and young people who we have a corporate parenting responsibility for differently to others?**
We have corporate parenting responsibility for every child who is looked after by a local authority, and every young person under the age of 26 who was looked after on their 16th birthday.

Response
(Yes)

Justification
None

12.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of children and young people we have a corporate parenting responsibility for?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(Positive)

Justification
Positive: We treat children as data subjects in their own right (e.g. someone with parental responsibility does not have access rights, unless proven) to the child's information. This mitigates indirect discrimination against children as they are treated the same as adults.

12.3 **What kind of impact is there in terms of advancing equality of opportunity between children and young people we do and do not have a corporate parenting responsibility for?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(Positive)

Justification
Positive: We treat children as data subjects in their own right (e.g. someone with parental responsibility does not have access rights, unless proven) to the child's information. This mitigates indirect discrimination against children as they are treated the same as adults.

12.4 **What kind of impact is there in terms of fostering good relations between children and young people**

12.4 **What kind of impact is there in terms of fostering good relations between children and young people we do and do not have a corporate parenting responsibility for?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(Negative)

Justification
Negative: In some circumstances, those with parental responsibility may request information in regard to the child. They may or may not be contacted for consent which could affect upon the relations between the requester and child.

12.5 **If you answered 'negative' to any of the above questions, please outline how you will mitigate this.**
Response
We cannot mitigate -It is a lawful requirement for us to ask for consent where this can be given.

(**13**) **Potential impacts - Care Inspectorate employees who have caring responsibilities**

13.1 **Do you think this work impacts Care Inspectorate employees who have caring responsibilities differently to those who do not?**
Response
(No)

Justification
None

13.2 **What kind of impact is there in terms of eliminating unlawful discrimination, harassment & victimisation of employees who have caring responsibilities?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

13.3 **What kind of impact is there in terms of advancing equality of opportunity between employees who do and do not have caring responsibilities?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

13.4 **What kind of impact is there in terms of fostering good relations between employees who do and do not have caring responsibilities?**
Please justify your answer below. You may select both positive and negative if you identify both kinds of impact.

Response
(None)

Justification
N/A

13.5 **If you answered 'negative' to any of the above questions, please outline how you will mitigate this.**
Response
N/A

14 Child Rights and Wellbeing Impact Assessment

14.1 Please note this section only needs to be completed if the work involves/impacts on children in any way.
Please write n/a in the questions below if this section is not applicable to your work.

14.2 Which UNCRC Articles are relevant?
List all relevant Articles of the UNCRC and Optional Protocols All UNCRC rights are underpinned by the four general principles: non-discrimination; the best interests of the child; the right to life, survival and development; and the child's right to have their views given due weight.

Response
N/a

14.3 What impact will this work have on children's rights?

Response
(None)

Justification
N/a

14.4 Will there be different impacts on different groups of children and young people?
Which groups of children will be affected by the policy/measure? Are there competing interests between different groups of children and young people, or between children and young people and other groups?

Response
N/a

14.5 How will the work contribute to the wellbeing of children and young people in Scotland?
Outline how the implementation of the policy/measure will support public bodies in Scotland to meet their duties to safeguard, support and promote the wellbeing of children in their area, with wellbeing defined by eight wellbeing indicators. The indicators are: Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, and Included.

Response
N/a

14.6 How will the work give better or further effect to the implementation of the UNCRC in Scotland?
This will inform Scottish Ministers' duty to report to Parliament on children's rights under the Children and Young People (Scotland) Act 2014

Response
N/a

14.7 Have you involved children and young people in the development of this work?
Is there enough information on the views of the children and young people who will be affected by the policy/measure that enables you to make an informed assessment of impact?

Response
N/a

15 Considering the available evidence

15.1 Considering the available evidence
The information you gather in this section will:

- *help you to understand the importance of your policy for different equality groups*
- *provide justification and an audit trail behind your decisions.*

The evidence base may include demographic information, academic research, service monitoring/inspection reports, service evaluation reports, user surveys, etc.

Look at what existing evidence tells you about the experiences of people who share relevant equality characteristics, and/or what it tells you about their views of the work in question. Identify any gaps in the evidence base and set out how you will address these.

The attached document provides helpful suggestions for where you might look for relevant evidence. You can also find this document by searching 'evidence sources' on the Intranet.

15.2 **Which equality characteristics have you gathered relevant evidence for?**

Response

(Age) (Race)

Justification
None

15.3 **Please include quantitative and qualitative evidence relating to age**
Name the source(s) used, and either provide a link (if external) or attach below (if internal).

Response
Employees aged 55-64 equate to the highest proportion of the workforce (37.86%). Under 25s make up just 0.85% of the workforce. Source: [Equalities Mainstreaming Report](#)

According to CIPD (2015), Generation Y/Z (up to age around 40) are more technically literate than older adults.

15.4 **What does the evidence tell you about the experiences of people of different ages in relation to the policy?**

Response
This tells us that digital literacy/access may be lower amongst those who are older

15.7 **Please include quantitative and qualitative evidence relating to race**
Name the source(s) used, and either provide a link (if external) or attach below (if internal).

Response
Access to digital technologies is shown to be significantly lower in the Gypsy, Roma, Traveller community, for different reasons including less access to digital resources. This could impact their ability to access information from us.

https://www.gypsy-traveller.org/report/new-report-reveals-significant-digital-exclusion-in-gypsy-and-traveller-communities-in-the-uk/

https://lordslibrary.parliament.uk/gypsy-roma-and-traveller-communities-impact-of-brexit-and-covid-19/

15.8 **What does the evidence tell you about the experiences of people of different races in relation to the policy?**

Response
It tells us that for different reasons, members of the Roma, Gypsy, Traveller Community could face challenges in accessing or requesting data from us, especially via digital means.

(16) **Stakeholder engagement & consultation**

16.1 **Have you engaged and consulted with relevant groups?**

Response
(Yes)

Justification
None

16.2 **Please state who was engaged/consulted with**

Response

We engage with functional stakeholders (e.g. Legal services, IT) but not with requester groups

16.4 How was the engagement/consultation carried out?
If other, please specify below

Response
Draft versions for review

Justification
None

16.5 Has the proposal been reviewed/changed because of the engagement/consultation?

Response
Yes

Justification
None

16.6 What did you learn from the engagement/consultation?

Response
With O365 policy suites terminology was commented upon- plain English rather than professional terminology was used.
Information Governance policies- incorporated functional perspectives for best practise working from other areas of the organisation.

16.7 Have the results been shared with the people you engaged/consulted with?

Response
Yes

Justification
None

16.8 Is further engagement/consultation recommended?

Response
Yes

Justification
None

(17) Assessment outcome

17.1 Please read the following four statements:
1) No major change required. Your assessment demonstrates that the work is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.

2) The work must be adjusted to reduce impact on protected characteristic groups. You need to take proportionate steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the work when implemented.

3) Continue with the work but it is not possible to remove all the risk to protected characteristic groups. The work will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.

4) Stop the work as this is potentially in breach of equality legislation. The work will not be implemented due to adverse effects that are not justified and cannot be mitigated.

17.2 **Which of the four statements best matches your assessment?**

Response

Option 3

Justification
None

17.3 **Option 2**
If you select this option you must submit an action plan to make arrangements to monitor any potential adverse impacts.

(18) Monitoring and review

18.1 **How will you monitor the implementation of this work?**

Response

We have instigated a 2 year review of all of our information governance policy suites (this is specified in our records management plan)
We also encourage feedback outside of these times at any times through our training sessions (Good Information Governance and Information Asset Owner training)

18.2 **How will you use the results of the monitoring to develop the work?**

Response

We will amend and improve the policy suite according to any feedback received.

18.3 **When and how will you review this work? Please also give details of who is responsible.**

Response

The Information Governance Lead is responsible for the process of reviewing and monitoring of the policy suite but the overall responsibility lies with the SIRO (Senior Information Risk Owner) for sign off. We have instigated a 2 year review of all of our information governance policy suites (this is specified in our records management plan)

18.4 **Please give details of how you will monitor any adverse impact over time, and how you will consider the monitoring information gathered in relation to equality. This ensures that you understand the actual impact of the policy, process or initiative once implemented.**

Response

We monitor any complaints that are received and the reasons why this is- if someone requests a review we will document the reasons why this for review and whether this is linked to an equality issue.

(19) Sign off and approval

19.1 **Approved by (senior manager or Executive Director)**
Please state full name and job title

Response
Ewan Stewart, Head of Intelligence

19.2 **Date Approved**

Response
📅 06/04/2022

19.3 **Review Date**

Response
📅 01/02/2024

19.4 **Person responsible for reviewing?**

Response
Information Governance team

20 Conclusion

20.1 **The full Equality Impact Assessment Form is now complete.**
Thank you for your time in helping the Care Inspectorate and your Information Asset Owner understand equality impact associated with your activity.

20.2 **Do you wish to discuss any aspect of this form with the Equalities Team?**

Response
(No)

Justification
None

────── **Assessment Notes** ──────