



EQUALITY SCREENING TEMPLATE

See [Guidance Notes](#) (POL:PP:032) for further information on the 'why' 'what' 'when', and 'who' in relation to screening, for background information on the relevant legislation and for help in answering the questions on this template .

(1) INFORMATION ABOUT THE POLICY OR DECISION

1.1 Title of policy (incl. doc. reference number) or decision :

IGP006 Data Breach Policy

1.2 Description of policy or decision

- **what is it trying to achieve? (aims and objectives)**
- **how will this be achieved? (key elements)**
- **what are the key constraints? (for example financial, legislative or other)**

This policy sets out the NIBTS commitment to ensuring data breaches are correctly identified, assessed, investigated and reported as required. It aims to reduce the impact of a data breach by ensuring staff are aware of their obligations and the actions that should be taken.

1.3 Main stakeholders affected (internal and external)

For example staff, actual or potential service users, other public sector organisations, voluntary and community groups, trade unions or professional organisations or private sector organisations or others

Staff (current and past)
Donors (current and past)
Patients (current and past)
Staff dealing with the incident

1.4 Other policies or decisions with a bearing on this policy or decision

- **what are they?**
- **who owns them?**



IGP:001 Confidentiality and Data Protection Policy (HR & Corporate Services)
 IGP:002 Records Management Policy (HR & Corporate Services)
 IGP:003 NIBTS Information Governance Policy (HR & Corporate Services)
 IGP:004 NIBTS Security of Confidential Information Policy (HR & Corporate Services)
 IGP:005 NIBTS Information Lifecycle Management Policy (HR & Corporate Services)
 QA:070 Procedure for Reporting and Management of Quality Incidents (NIBTS Quality Department)
 GL:017 Procedure for Reporting and Management of Serious Adverse Incidents (HR & Corporate Services)
 GL:021 Early Alert Procedure (HR & Corporate Services)
 IG:002 Processing Subject Access Requests
 IG:004 Management and Retention of NIBTS Records
 IG:006 Management and Control of Confidential Waste

(2) CONSIDERATION OF EQUALITY AND GOOD RELATIONS ISSUES AND EVIDENCE USED

2.1 Data gathering

What information did you use to inform this equality screening? For example previous consultations, statistics, research, Equality Impact Assessments (EQIAs), complaints. Provide details of how you involved stakeholders, views of colleagues, service users, staff side or other stakeholders.

Available statistics re. the NIBTS workforce and donors. Statistics re.the general population of Northern Ireland taken from the 2011 Census.

2.2 Quantitative Data

Who is affected by the policy or decision? Please provide a statistical profile. Note if policy affects both staff and service users, please provide profile for both.

Category	<i>What is the makeup of the affected group? (%) Are there any issues or problems? For example, a lower uptake that needs to be addressed or greater involvement of a particular group?</i>
Gender	NIBTS Staff Data: 68% female, 32% male



	<p>Donor Data: 49% female, 51% male</p> <p>Census Data: Northern Ireland population (2011 Census): Female 51%, Male: 49%.</p>														
Age	<p>NIBTS Staff Data:</p> <table border="1"> <thead> <tr> <th>Age Group</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>16-24</td> <td>6%</td> </tr> <tr> <td>25-34</td> <td>18%</td> </tr> <tr> <td>35-44</td> <td>25%</td> </tr> <tr> <td>45-54</td> <td>25%</td> </tr> <tr> <td>55-64</td> <td>23%</td> </tr> <tr> <td>>=65</td> <td>3%</td> </tr> </tbody> </table> <p>Donor Data: Blood donors need to be at least 17 years of age and can continue to donate with no age limit if health check is passed.</p> <p>Census Data: Census 2011 figures report the 16-64 age group represents just under 65% of the total NI population</p>	Age Group	%	16-24	6%	25-34	18%	35-44	25%	45-54	25%	55-64	23%	>=65	3%
Age Group	%														
16-24	6%														
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Religion	<p>NIBTS Staff Data: 39% Catholic 45% Protestant 6% Neither 10% Not determined</p> <p>Donor Data: Donors are not asked their religion.</p> <p>Census Data: 45.1% of the population from a Catholic background. 48.4% of the population from Protestant and other Christian background. 0.9% of population from other religions. 5.6% of population no religion or religion not stated (2011 Census).</p>														
Political Opinion	<p>Staff Data: 9% Broadly Nationalist 9% Broadly Unionist 16% Other 66% No answer</p> <p>Donor Data: Donors are not asked for their political opinion.</p> <p>Census Data: Of those eligible to vote in the NI Assembly election of 2011, 43.21% voted for a Unionist candidate as a first preference, 41.18% voted for a Nationalist/Republican candidate as a first preference and approximately 15%</p>														



	voted for other candidates as a first preference
Marital Status	<p>Staff Data: 12% Unknown 31% Single 55% Married / Civil Partnership 1% Divorced 0.5% Widowed 0.5% Separated</p> <p>Donor Data: Donors are not asked for this.</p> <p>Census Data: 2011 Census figures report 48% of the resident population aged 16 and over are married, whilst 36% are single, 0.1% are registered in same-sex civil partnerships, 9.4% are divorced, separated or formerly in same-sex partnership and 6.8% are either widowed or a surviving partner.</p>
Dependent Status	<p>Staff Data: 28% Staff with dependents 26% Staff without dependants 46% Not assigned</p> <p>Donor Data: Donors are not asked this.</p> <p>Census Data: Census 2011 figures report 12% of the resident population provide unpaid care to family members, friends, neighbours, and 34% of households contain dependent children and 34% of households contain dependent children.</p>
Disability	<p>Staff Data: 55% No Disability 3% With Disability 42% Not Assigned</p> <p>Donor Data: Data not collect as a whole information provided by donors only if it affects their ability to donate. The system does not allow for data for all donors to be retrieving in relation to this.</p> <p>Census Data: Census 2011 figures report 21% of the population regard themselves as having a disability or long-term health problem which has an impact on their day to day activities.</p>
Ethnicity	<p>Staff Data: 69% White 1% Pakistani 1% Indian 1 % Other</p>



	<p>30% Not Assigned</p> <p>Donor Data: Donors are not asked this.</p> <p>Census Data: Census 2011 figures report 1.8% of the resident population belong to a minority ethnic group, with 3.1% stating their first language is not English.</p>
Sexual Orientation	<p>Staff Data: 51% Someone of the opposite sex 3% Someone of the same sex 3% Do not wish to answer 43% Not assigned</p> <p>Donor Data: Donors are not asked this, however, the health check questionnaire asks males if they have had sex with another male in the last 12 months and asks females if they have had sex in the last 12 months with a man who has ever had sex with another man. A yes response would lead to a 12 month deferral.</p> <p>Census Data: NI population estimates 1 in 10 are LGB</p>



2.3 Qualitative Data

What are the different needs, experiences and priorities of each of the categories in relation to this policy or decision and what equality issues emerge from this? Note if policy affects both staff and service users, please discuss issues for both.

Category	Needs and Experiences
Gender	There is no data to suggest that the needs and experiences of service users differ on the basis of gender
Age	There is no data to suggest that the needs and experiences of service users differ on the basis of age
Religion	There is no data to suggest that the needs and experiences of service users differ on the basis of religion
Political Opinion	There is no data to suggest that the needs and experiences of service users differ on the basis of political opinion
Marital Status	There is no data to suggest that the needs and experiences of service users differ on the basis of marital status
Dependent Status	There is no data to suggest that the needs and experiences of service users differ on the basis of dependent status
Disability	Issues relating to accessibility information for people with disabilities are considered in our Accessible Formats Policy.
Ethnicity	Issues relating to accessible information for people whose first language is not English are considered in our Accessible Formats Policy.
Sexual Orientation	There is no data to suggest that the needs and experiences of service users differ on the basis of sexual orientation



2.4 Multiple Identities

Are there any potential impacts of the policy or decision on people with multiple identities? For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people.

None

2.5 Making Changes

Based on the equality issues you identified in 2.2 and 2.3, what changes did you make or do you intend to make in relation to the policy or decision in order to promote equality of opportunity?

<i>In developing the policy or decision what did you do or change to address the equality issues you identified?</i>	<i>What do you intend to do in future to address the equality issues you identified?</i>
<p>Section 4.6 states the IG Manager and relevant IAOs should risk assess the data breach to establish the risk to the data subject(s).</p> <p>Also, 4.10 states:</p> <p>Consideration should also be given to notifying any affected individuals. The risk to the rights and freedoms of the individual should be assessed along with the likely impact of the breach.</p>	



2.6 Good Relations

What changes to the policy or decision – if any – or what additional measures would you suggest to ensure that it promotes good relations? (refer to guidance notes for guidance on impact)

<i>Group</i>	<i>Impact</i>	<i>Suggestions</i>
Religion	N/A	N/A
Political Opinion	N/A	N/A
Ethnicity	N/A	N/A

(3) SHOULD THE POLICY OR DECISION BE SUBJECT TO A FULL EQUALITY IMPACT ASSESSMENT?

A full equality impact assessment (EQIA) is usually confined to those policies or decisions considered to have major implications for equality of opportunity.

How would you categorise the impacts of this decision or policy? (refer to guidance notes for guidance on impact)

Please tick:

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Please tick:

Major impact	<input type="checkbox"/>
Minor impact	<input checked="" type="checkbox"/>
No further impact	<input type="checkbox"/>

Do you consider that this policy or decision needs to be subjected to a full equality impact assessment?



Please give reasons for your decisions.

Having screened the policy and put in place mitigation for any impacts identified it is not thought that subjecting the policy to an EQIA will further identify opportunities to promote equality of opportunity.



(4) CONSIDERATION OF DISABILITY DUTIES

4.1 In what ways does the policy or decision encourage disabled people to participate in public life and what else could you do to do so?

<i>How does the policy or decision currently encourage disabled people to participate in public life?</i>	<i>What else could you do to encourage disabled people to participate in public life?</i>
N/A	N/A

4.2 In what ways does the policy or decision promote positive attitudes towards disabled people and what else could you do to do so?

<i>How does the policy or decision currently promote positive attitudes towards disabled people?</i>	<i>What else could you do to promote positive attitudes towards disabled people?</i>
N/A	N/A



(5) CONSIDERATION OF HUMAN RIGHTS

5.1 Does the policy or decision affect anyone's Human Rights? Complete for each of the articles

ARTICLE	Yes/No
Article 2 – Right to life	No
Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment	No
Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour	No
Article 5 – Right to liberty & security of person	No
Article 6 – Right to a fair & public trial within a reasonable time	No
Article 7 – Right to freedom from retrospective criminal law & no punishment without law	No
Article 8 – Right to respect for private & family life, home and correspondence.	No
Article 9 – Right to freedom of thought, conscience & religion	No
Article 10 – Right to freedom of expression	No
Article 11 – Right to freedom of assembly & association	No
Article 12 – Right to marry & found a family	No
Article 14 – Prohibition of discrimination in the enjoyment of the convention rights	No
1 st protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property	No
1 st protocol Article 2 – Right of access to education	No

*If you have answered no to all of the above please move on to **Question 6** on monitoring*



5.2 If you have answered yes to any of the Articles in 5.1, does the policy or decision interfere with any of these rights? If so, what is the interference and who does it impact upon?

List the Article Number	Interfered with? Yes/No	What is the interference and who does it impact upon?	Does this raise legal issues?* Yes/No

** It is important to speak to your line manager on this and if necessary seek legal opinion to clarify this*

5.3 Outline any actions which could be taken to promote or raise awareness of human rights or to ensure compliance with the legislation in relation to the policy or decision.

**(6) MONITORING**

6.1 What data will you collect in the future in order to monitor the effect of the policy or decision on any of the categories (for equality of opportunity and good relations, disability duties and human rights)?

Equality & Good Relations	Disability Duties	Human Rights
N/A	N/A	N/A

Approved Lead Officer: PAULA JOHNSTON

Position: INFORMATION GOVERNANCE
MANAGER

Date: 24/09/2020

Policy/Decision Screened by: Paula Johnston

Please note that having completed the screening you are required by statute to publish the completed screening template, as per NIBTS equality scheme. If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, you will need to review the screening decision.

Please forward a copy of the completed screening template and policy/strategy to the HR Office for publishing.

If you require this document in an alternative format (such as large print, Braille, disk, audio file, audio cassette, Easy Read or in minority languages to meet the needs of those not fluent in English) please contact a member of the HR department.