

Form 1: Preparation

Part A must be completed at the beginning of a Policy/function/strategy development or review, and for every such occurrence. (Refer to the Step-by-Step Guide for additional information).

Step 1 - Preparation		
1.	Title of Policy - what are you equality impact assessing?	Records Management Policy
2.	Policy Aims and Brief Description - what are its aims? Give a brief description of the Policy (The What, Why and How?)	Effective information governance systems will ensure that all information held by the UHB is dealt with legally, securely, efficiently and effectively in order to deliver the best possible health care.
3.	Who Owns/Defines the Policy? - who is responsible for the Policy/work?	Executive Lead – Medical Director
4.	Who is Involved in undertaking this EqIA? - who are the key contributors to the EqIA and what are their roles in the process?	Head of Corporate Risk and Governance Corporate Risk and Governance Administrator
5.	Other Policies - Describe where this Policy/work fits in a wider context. Is it related to any other policies/activities that could be included in this EqIA?	The requirements for NHS Wales are set out in WHC (2000) 71: For The Record which include suggested minimum retention periods for NHS records. The Department of Health have issued a revised version of their Records Management : NHS Code of Practice (2006) that includes comprehensive

Step 1 - Preparation

		<p>retention and disposal schedules covering both corporate and health records. This code has not been formally adopted in Wales but it does provide an indicative guide in respect of records that are not detailed in the Welsh Health Circular.</p> <p>Relevant legislation includes:- The Data Protection Act 1998 The Freedom of Information Act 2000</p> <p>Other relevant UHB documents includes:- Draft Records Management Retention and Destruction Protocol Draft Electronic and Paper Clinical Results Review and retention Protocol</p>
6.	Stakeholders - Who is involved with or affected by this Policy?	All Health Board Staff including those with honorary contracts Patients / users of the UHB.
7.	What factors may contribute to the outcomes of the Policy? What factors may detract from the outcomes? These could be internal or external factors.	<p>Awareness, understanding of and compliance with the Policy. Compliance will deliver the expected outcomes.</p> <p>Resource – The Records Management Policy depends on the ongoing availability of the resources required to ensure continued compliance. As such issues arise a full review will be undertaken and resources will be identified as part of the action/business planning process.</p> <p>A new method for managing records should not be introduced without assessment of the resources required.</p>

Form 2: Evidence Gathering

Equality Strand	Evidence Gathered	Does the evidence apply to the following with regard to this Policy/work? Tick as appropriate.												
Race	An Internet search of the topic 'Records retention equality impact assessment' was conducted on 13/09/2012 All of the Equality Impact Assessments (EQIAs) that were scrutinised identified that the effect of the policy on the equality strands with the exception of age is "no impact" . An analysis chart of the identified documents has been kept.	Eliminating Discrimination and Eliminating Harassment	x	Promoting Equality of Opportunity	x	Promoting Good Relations and Positive Attitudes	x	Encouraging participation in Public Life	x	Take account of difference even if it involves treating some individuals more favourably*				
Disability	As Above		x		x		x		x		x	x	x	
Gender	As Above		x		x		x		x		x	x	x	
Sexual Orientation	As Above		x		x		x		x		x	x	x	
Age	As Above – A number of EQIA's accessed suggested that there was a "positive impact" . The "National Archives of Scotland Public Records (Scotland) Bill EQIA" dated 25 th August 2010 draws attention to the fact that appropriate retention of records ensures that they are available for children to access in later life which may allow them to independently exercise certain rights. The results of the 2011 Cardiff and Vale Census provide statistical information which shows a growth in the number of children between the ages of 0-4 who will benefit from this. Cardiff and Vale Population Estimates – 2011 Census Results report was presented to the UHB	x	x	x	x	x	x	x						

	Board in September 2012									
Religion or Belief	As detailed for "Race"		x		x		x		x	
Welsh Language	As detailed for "Race"		x		x		x		x	
People have a human right to: life; not to be tortured or treated in a degrading way; to be free from slavery or forced labour; to liberty; to a fair trial; not to be punished without legal authority; to respect for private and family life, home and correspondence; to freedom of thought, conscience and religion; to freedom of expression and of assembly; to marry and found a family and to not be discriminated against in relation to any of the rights contained in the European Convention.										
Human Rights	As detailed for "Race"									

* This column relates only to Disability due to the specific requirement in the DDA 2005 to treat disabled people more favourably to achieve equal outcomes. This is not applicable to the other equality strands.

Form 3: Assessment of Relevance and Priority

Equality Strand	Evidence: Existing evidence to suggest some groups affected. Gathered from Step 2. (See Scoring Chart A)	Potential Impact: Nature, profile, scale, cost, numbers affected, significance. Insert one overall score (See Scoring Chart B)	Decision: Multiply 'evidence' score by 'potential impact' score. (See Scoring Chart C)
Race	1	0	0
Disability	1	0	0
Gender	1	0	0
Sexual Orientation	1	0	0
Age	3	+1	3
Religion or Belief	1	0	0
Welsh Language	1	0	0
Human Rights	1	0	0

Scoring Chart A: Evidence Available

Scoring Chart B: Potential Impact

Scoring Chart C: Impact Decision

3	Existing data/research
2	Anecdotal/awareness data only
1	No evidence or suggestion

-3	High negative
-2	Medium negative
-1	Low negative
0	No impact
+1	Low positive
+2	Medium positive
+3	High positive

-6 to -9	High Impact (H)
-3 to -5	Medium Impact (M)
-1 to -2	Low Impact (L)
0	No Impact (N)
1 to 9	Positive Impact (P)

FORM 4: (Part A) Outcome Report

Policy Title:	Records Management Policy
Organisation:	Cardiff and Vale University Health Board
Name:	Melanie Westlake
Title:	Head of Corporate Risk and Governance
Department:	Risk and Governance
Summary of Assessment:	<p>This policy has been developed to support the good practice recommendations in the Code of Practice on Records Management issued by the Lord Chancellor under section 46 of the Freedom of Information Act 2000 and following the guidance from DH Records Management – NHS Code of Practice. It has been found that there is the potential for a “low positive” impact on children and young people.</p>
Decision to Proceed to Part B Equality Impact Assessment:	<p>Yes/No</p> <p>Please record reason(s) for decision</p> <p>No evidence of any negative impact.</p>

Action Plan

You are advised to use the template below to detail any actions that are planned following the completion of Part A or Part B of the EqIA Toolkit. You should include any remedial changes that have been made to reduce or eliminate the effects of potential or actual adverse impact, as well as any arrangements to collect data or undertake further research.

	Action(s) proposed or taken	Reasons for action(s)	Who will benefit?	Who is responsible for this action(s)?	Timescale
1. What changes have been made as a result of the EqIA?	N/A				
2. Where a Policy may have differential impact on certain groups, state what arrangements are in place or are proposed to mitigate these impacts?	N/A				

<p>3. Justification: For when a policy may have adverse impact on certain groups, but there is good reason not to mitigate.</p>	<p>N/A</p>				
<p>4. Describe any mitigating actions taken?</p>	<p>N/A</p>				
<p>5. Provide details of any actions planned or taken to promote equality.</p>	<p>N/A</p>				

Date:	September 2012
Monitoring Arrangements:	Three years from ratification of policy or sooner if required.
Review Date:	To be agreed by Committee
Signature of all Parties:	<p>Head of Corporate Risk and Governance Corporate Risk and Governance Administrator</p>

Records Management Policy EqIA

Evidence gathered from other organisations – 13th September 2012

Search words	Web address	Document Name	Comments
Records retention equality impact assessment	<p>http://www.nas.gov.uk/downloads/PRSB%20Equality%20Impact%20Assessment.pdf</p> <p>A lot of useful information and quotes that would also be relevant for UHB document. Analogies with social care likely to be consistent with health.</p> <p>Accessed 13.09.12</p> <p>Date of completion 25th August 2010</p>	<p>NATIONAL ARCHIVES OF SCOTLAND PUBLIC RECORDS BILL EQUALITY IMPACT ASSESSMENT</p>	<p>Page 8</p>
Records retention equality impact assessment	<p>http://www.sevenoaks.gov.uk/documents/records_retention_policy_eqia.pdf</p> <p>Accessed – 13.09.12</p> <p>Date of Approval – 4 March 2009</p>	<p>Records Retention Policy for Freedom of Information Equality Impact Assessment 2008-9</p>	<p>Seven oaks District Council</p>
Records retention equality impact assessment	<p>http://www.uhsm.nhs.uk/AboutUs/Policies/Health%20Records%20Retention%20Policy%20V2.00.pdf</p> <p>Accessed – 13.09.12</p> <p>Date of Approval – 15 December 2010</p>	<p>University Hospital of South Manchester NHS Foundation Trust Policy for the retention, disposal and destruction of</p>	<p>Page 12 Appx C</p>

		Health Records	
Records retention equality impact assessment	http://www.ashfordstpeters.org.uk/attachments/1438_EIA%20Retention%20of%20radiology%20transitory%20record.pdf Accessed – 13.09.12 Date of approval - June 2008	ASHFORD & ST. PETER'S HOSPITAL NHS TRUST Equality Impact Assessment Summary Policy on the Retention of Radiology Transitory Record	
Records retention equality impact assessment	http://www.slam.nhs.uk/media/107383/clinical%20record%20policy%20v7%201%20-%20september%202011.pdf Accessed – 13.09.12 Date of approval – 01.08.11	South London and Maudsley NHS Foundation Trust CLINICAL RECORDS POLICY	Page 20 Appx 5
Records retention equality impact assessment	www.nuh.nhs.uk/handlers/downloads.ashx?id=17570 Accessed – 13.09.12 Implementation Date October 2010	Retention and Disposal of Health Records Policy Nottingham University	Page 12
Telephone enquiry	Records Management Policy EQIA 11th May 2010	Betsi Cadwaladr University Health Board	Sent by e-mail
e-mail	Public Health Wales Records Management Policy Equality Impact Assessment	Public Health Wales	received 13/9/12
e-mail	Summary Equality Impact Assessment – Records Management Framework – 7/11/11	Hwyl Dda Health Board	received

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