



AGENDA ITEM

3.1.3

CTM BOARD

“POLICY ON POLICIES” – DPIA & EQIA SECTION

Date of meeting	25 th May 2023
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FOI Status	Open/Public
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If closed please indicate reason	Not Applicable - Public Report
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Prepared by	Cally Hamblyn, Assistant Director of Governance & Risk
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Presented by	Cally Hamblyn, Assistant Director of Governance & Risk
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Approving Executive Sponsor	Chief Executive
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Report purpose	FOR APPROVAL
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Engagement (internal/external) undertaken to date (including receipt/consideration at Committee/group)

Committee/Group/Individuals	Date	Outcome

ACRONYMS

DPIA	Data Protection Impact Assessment
EQIA	Equality Impact Assessment
ICO	Information Commissioners Officer

1. SITUATION/BACKGROUND

- 1.1 This “Policy on Policies” outlines the process for development, consultation, approval, dissemination, and review of key organisational documents such as policies, strategies, procedures, guidelines and protocols.
- 1.2 The purpose of this early review is to address a recommendation from the ICO Action Plan in relation to the need to reference the requirement to undertake a DPIA and to update the links and narrative relating to the EQIA process.

- 1.3 The review only relates to these specific areas, a full review will be undertaken in 2024 as planned.

2. SPECIFIC MATTERS FOR CONSIDERATION BY THIS MEETING (ASSESSMENT)

- 2.1 In response to a recommendation in the ICO Action Plan a section on DPIA needed to be captured within the "Policy on Policies" and following recent changes to the EQIA Process the "Policy on Policies" required updating to ensure colleagues were signposted to the updated areas.
- 2.2 The following paragraphs have been added at sections 5.8, 5.9, 5.10 and 5.12:

EQIA:

- 5.8 In accordance with the Equality Act 2010, if the document is assigned the status of being a 'policy' it will require an Equality Impact Assessment (EIA). **Undertaking an EIA at an early stage of the planning process and with involvement of the relevant groups ensures that equity issues are addressed. Identification of negative impacts, especially where no mitigation is planned, indicates the need to find a better way forward. This can be done by adjustments to the activity or, if necessary, by means of a more detailed impact assessment.**
- 5.9 **There are two parts to the EIA, part one is a screening tool which needs to be completed by everyone and once you have completed this screening tool you will be notified whether a more detailed impact assessment is required or whether the screening tool is sufficient for the activity you are undertaking.**
- 5.10 The document author must carry this out and a notice to this effect must appear on the front of the document confirming the outcome. Also in accordance with the Welsh Language (Wales) Measure 2011, when a policy is being formulated or revised, consideration of the effects, if any, of a policy on (a) opportunities for persons to use the Welsh Language, and (b) treating the Welsh language no less favourably than the English language must be considered and views sought. This has been incorporated into the EIA process. Full guidance is available on the CTM_Equality@wales.nhs.uk (sharepoint.com)

Removal of Appendix 4 within current policy as replaced with a link.



DPIA

5.12 If the key document you are developing or reviewing involves the sharing of information or data you should link in at the start of the process with the Information Governance Team in order to determine if a Data Protection Impact Assessment is required and if so ensure this is undertaken in conjunction with the policy development or review.

3. KEY RISKS/MATTERS FOR ESCALATION TO BOARD/COMMITTEE

3.1 The "Policy on Policies" has not been appended due to the targeted focus of this update. The policy can be viewed in full via the following link: [Policy for the management identification and authorisation of policies and procedures.docx](#)

4. IMPACT ASSESSMENT

Quality/Safety/Patient Experience implications	Yes (Please see detail below) To ensure that there is a system and process so that all risks which could cause harm are identified and that control mechanisms are implemented;
Related Health and Care standard(s)	Governance, Leadership and Accountability If more than one Healthcare Standard applies please list below:
Equality impact assessment completed	Yes See Policy Document – completed in October 2021.
Legal implications / impact	There are no specific legal implications related to the activity outlined in this report.
Resource (Capital/Revenue £/Workforce) implications / Impact	There is no direct impact on resources as a result of the activity outlined in this report.
Link to Strategic Well-being Objectives	Improving Care

5. RECOMMENDATION

5.1 The Board is asked to **APPROVE** the amendments to the "Policy on Policies" as outlined in section 2.2 of this report.