



## Equality Impact Assessment form

### 1) Name the Strategy, Policy, and Procedure or Function being assessed.

Records management and document retention policy

### 2) What are the aims of the strategy, policy, procedure or function being assessed?

Whose need is it designed to meet?

Are there any measurable elements such as time limits or age limits?

Derby Homes has a statutory duty to have the appropriate retention period, and Article 5(1)(e) of the UK GDPR, reinforces the existing retention principle that personal data should not be kept for longer than necessary for the purposes for which the data is processed. Recital 39 of the UK GDPR states, Derby Homes should ensure that the period for which the personal data is stored is limited to a strict minimum, and in order to ensure that the personal data is not kept longer than necessary, time limits should be established, by the controller, for erasure.

Personal data may be kept for longer periods, however, there needs to be a lawful reason for doing so and not a 'kept just in case' scenario. Data may also be stored for longer periods, in so far as the personal data will be processed, solely for archiving purposes in the public interest, scientific, or historical research purposes, or statistical purposes (storage limitation).

### 3) Who has been consulted?

Governance Manager and Information Governance Manager

### 4) Identify potential impact on each of the of the diversity 'groups' by considering the following questions. There may be other questions you need to think about which are specific to the strategy, policy, procedure or function you are assessing.

- Might some groups find it harder to access the service?
- Do some groups have particular needs that are not well met by the current service, policy, procedure or function?

- What evidence do you have for your judgement (e.g. monitoring data, information from consultation / research / feedback)?
- Have staff / residents raised concerns and or complaints?
- Is there any local or national research to suggest there could be a problem?

Please use the table below to record your findings / answers

| Strand             | No Impact | Negative Impact | Positive Impact | Comments / Evidence                                                                                                                                                                                              |
|--------------------|-----------|-----------------|-----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Age                | x         |                 |                 | no adverse impact of the Records Management Policy has been identified in practice                                                                                                                               |
| Disability         | x         |                 |                 | staff awareness should continue to be raised around the availability of a range of ICT equipment to mitigate the impact of any disability (through the DSE assessment process and general workplace monitoring). |
| Gender             | x         |                 |                 | no adverse impact of the Records Management Policy has been identified in practice                                                                                                                               |
| Race               | x         |                 |                 | no adverse impact of the Records Management Policy has been identified in practice                                                                                                                               |
| Religion & Belief  | x         |                 |                 | no adverse impact of the Records Management Policy has been identified in practice                                                                                                                               |
| Sexual Orientation | x         |                 |                 | no adverse impact of the Records Management Policy has been identified in practice                                                                                                                               |
| Transgender        | x         |                 |                 | no adverse impact of the Records Management Policy has been identified in practice                                                                                                                               |
| Marital Status     | x         |                 |                 | no adverse impact of the Records Management Policy has been identified in practice                                                                                                                               |

**5) Does the strategy, policy, practice or function promote equality of opportunity?**

- Does it link to Derby Homes Core objectives
- Can any positive impacts be promoted as best practice

Data management structures will speed up and improve customer access, and improve access to our services.

Internal Policy.

**6) If 'adverse Impacts' are identified is it?**

- Legal (i.e. not discriminatory)
- What is the level of impact?

**7) Are there any changes you could introduce which make this strategy, policy, procedure or function, work better for this group of people? Detail the actions planned and any further research or consultation required and how the actions will be monitored.**

N/A

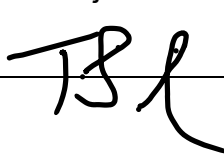
**8) If actions / suggestions for improvement have been identified, what should the positive outcome be for Derby Homes customers?**

N/A

**9) Do you consider a full Equality Impact Assessment is required or do the actions identified and planned meet the adverse impacts identified?**

No

**Monitoring**

|                                                      |                                                                                                         |
|------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| <b>Review/New EIA (date or Timeframe)</b>            | Triennial                                                                                               |
| <b>Name of person/s completing this form</b>         | Taranjit S Lalria                                                                                       |
| <b>Date assessment completed</b>                     | 26/10/2023                                                                                              |
| <b>Name (and signature) of manager approving EIA</b> | Taranjit Lalria<br> |