

Information Governance Framework Equality Impact Assessment

Audience:	Public
Applies to:	All University Members
Classification:	Corporate Governance
Category:	Equality Impact Assessment
Subcategory:	Information Governance
Author:	Head of Governance and Deputy Secretary
Owner:	Vice-Principal and University Secretary
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Stage 1: Rapid Equality Impact Assessment Checklist

“Proposal” is used as shorthand for any policy document, practice or project that might be assessed.

Please provide a brief description of the proposal:

Information is a critical asset for all aspects of University operations and for efficient management of its resources. An information governance framework facilitates efficient decision making throughout the information lifecycle.

Reason for the Equality Impact Assessment: New proposal

If selected Other, please provide more information:

<insert free text, delete if not applicable>

Could any protected characteristics be affected by this proposal: Choose an item.

If Yes, which protected characteristic groups could be affected (select all that apply)?

- ☐ Age
- ☐ Disability (including by association)
- ☐ Gender Reassignment
- ☐ Marriage and Civil Partnership¹
- ☐ Pregnancy or Maternity
- ☐ Race (including ethnicity and nationality)
- ☐ Religion or belief (including lack of belief)
- ☐ Sex
- ☐ Sexual orientation

Will the proposal have any impact on:

Discrimination?	No
Equality of opportunity?	No
Relations between groups?	No

If the answer to any of the above is 'Yes':

Is the impact only beneficial?	Yes
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¹Only the duty to eliminate discrimination applies to marriage and civil partnership.

There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect

Stage 2: Comprehensive Equality Impact Assessment (CEIA)

Summary of the Proposal and Who will be effected?

What are the aims and objectives of the proposal?

Information is a critical asset for all aspects of University operations and for efficient management of its resources. Information Governance covers the legal frameworks such as the Data Protection Act and Freedom of Information and the standards that need to be established to ensure the University's management and security of information operates within the law and the rights of individuals. It concerns all physical and electronic information and its associated systems within the University, as well as information held outside the University that affects its regulatory and legal obligations.

As the steward of information, the University is responsible for ensuring its management, security, and effective use. The information governance framework looks to facilitate efficient decision making throughout the information lifecycle and it outlines the governance of information as a critical business asset, essential for meeting the University's business, accountability, legal and regulatory requirements. Achieving this requires the cooperation and commitment of all relevant stakeholders.

Throughout the document, Information is used as an umbrella term encompassing all university data and content types, including but not limited to structured data; documents and records; research materials and outputs; teaching resources; audio-visual content; and assets such as website content.

How important is the proposal in terms of equality in the University? Does it relate to an area with known inequalities or where equality objectives have been set by the University?

The document relates to all of the information produced and maintained at the University. Of specific relevance to equality, it will improve access controls to special category and sensitive information, by promoting the embedding of information governance in the University culture. This is imperative to ensuring that personal, special category and sensitive data is accessed only by those with a need to see it.

Who is affected by the proposal and how have they been involved in the development of it?

All University members that manage or produce information are affected by the document. Representative staff were involved in the development of the framework as part of the Information Governance Working Group, which consists of attendees from Governance, IT Services, Strategic Planning, People Services, Student and Academic

Services, Finance, Projects and Business Change, AbLE Academy, International Recruitment and Partnerships Office, Research and the Academic Faculties.

The Information Governance Framework has also been presented to the Senior Management Team for consultation, who recommended it to the Finance and Corporate Performance Committee (FCPC) for consideration. FCPC reviewed and recommended the framework to the University Court for approval.

Are any persons affected by the proposal likely to benefit from it and in what way?

Aside from better governance, security, and compliance, developing a good information and records management (IRM) culture at Abertay brings wide benefits in relation to more efficient work practices and resource savings that in turn will lead to a better environment for our staff to work in.

Is there any evidence or concern that any of the protected characteristic groups have different experiences, issues or needs in relation to this document? No

If Yes, which protected characteristic groups could be affected (select all that apply)?

- | | |
|--|--|
| <input type="checkbox"/> Age | <input type="checkbox"/> Race (including ethnicity and nationality) |
| <input type="checkbox"/> Disability (including by association) | <input type="checkbox"/> Religion or belief (including lack of belief) |
| <input type="checkbox"/> Gender Reassignment | <input type="checkbox"/> Sex |
| <input type="checkbox"/> Marriage and Civil Partnership ² | <input type="checkbox"/> Sexual orientation |
| <input type="checkbox"/> Pregnancy or Maternity | |

Please provide further details:

<insert free text>

How does the proposal fit into the broader strategic aims of the University?

The framework links to the Sustainable Development Strategy and the revised Digital Strategy and sits within the University's strategic plan.

Consideration of available data

What do we know from existing data already held by the University?

An Information Governance and Records Management Health Check was conducted with University staff between February to March 2022. The Health Check indicated an urgent need for a university-wide information governance programme to achieve central oversight of the University's information, for legislative compliance, and to reduce risks of information failures, such as accidental destruction or personal data breaches. This led to the creation of a university-wide information and records management project entitled InfoSmart. In addition, a Data Governance audit was conducted in April 2024 and the findings of the audit were incorporated into a wider remit for the InfoSmart project from August 2024.

What do we know from existing data which is available externally?

N/A

Are there any apparent gaps in knowledge?

There is an apparent gap in the oversight and management of information within the University and currently a lack of regular reporting on the matter.

There is also a likely gap in staff awareness of the importance of the InfoSmart project and their roles and responsibilities in its delivery. In addition, upskilling of staff in the use of SharePoint and other tools will be required as part of the project.

Impact of Proposal

Could this proposal lead to any positive, negative, intended or unintended impact on the University or any of its stakeholders?

Information Governance plays an important role in legislative compliance, risk management (including financial and reputational risk), business continuity and maintaining the institutional memory.

Failure to meet our legislative compliance requirements can bring serious harm to the University and its stakeholders including potential legal action and associated reputational and financial risks as well as information regulators' audit and review. Failure to comply with regulations, the accidental release and/or loss of confidential information, or the misuse of information is damaging to those relationships and can inhibit our success.

Effective information governance enables an overview of the information generated by the University and ensures that information can be readily identified by vulnerability and sensitivity, allowing the targeted application of established practices to better protect certain information types.

Business continuity benefits from a robust information management system by preventing the duplication of work, enabling the efficient navigation of information, and facilitating the exchange/use of reliable information assets. It also negates the occurrence of lost or compromised information.

The care of our records is crucial to preserving the institutional and corporate memory of Abertay. It is of huge importance that the information we generate at present is reviewed and submitted to the university archive when appropriate.

Could there be a differential² impact on any protected characteristics? Could any differential impact be adverse?

No

Please consider:

Is this policy directly discriminatory? If yes, is it intended to increase equality? If no, this is unlawful discrimination.

Is this policy indirectly discriminatory? If yes, is this justifiable or proportionate? If no, this is unlawful discrimination.

If this policy is not indirectly discriminatory but could have an adverse impact on any of the protected characteristics, you must provide details of how the University will act to address this.

Is this policy unlawfully discriminatory? If you find that it is, you must decide how the University will act lawfully.

² Differential impact = where the positive or negative impact on one particular protected characteristic is likely to be greater than on another.

Consultation

What did this equality analysis conclude?

This equality impact assessment confirmed that there would be no groups of staff that would be adversely impacted by this policy.

Is any action required to be taken in response to the findings from the consultation?

Feedback from the Information Governance Working Group, the Senior Management Team and the Finance and Corporate Performance Committee has been incorporated.

What is the recommendation for this proposal following consultation?

Approve the proposal

If selected Other, please provide more information:

N/A

Declaration

I confirm that this equality analysis represents a fair and reasonable view of the implications of the proposal for all protected characteristic groups, and that appropriate actions have been identified to address the findings.

Signature	Date	Individual
Dr Dianne Peden, Head of Governance and Deputy Secretary	3 April 2025	CEIA owner
Caroline Summers, Vice-Principal and University Secretary	23 April 2025	Line manager*

* if appropriate

Action and Monitoring

The Information Governance Working Group will monitor the impact of the Governance Framework and will be a key group in its implementation. In addition, the group will develop the policy documents contained within the framework. Equality Impact Assessments will be carried out on these documents.

Equality Impact Assessment Outcome

What is the recommended outcome for this proposal?

Outcome 1: No change required – the assessment is that the proposal will be robust.

Definitions

For the purposes of this policy document and related policy documents, terms are defined in the Policy Document Library Glossary.

Related Policy Documents and Supporting Documents

Legislation	Equality Act 2010; Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012
Strategy	Abertay University Strategic Plan and all sub-strategies
Policy	Equality and Diversity Policy; Policy Document Governance Policy
Procedures	Policy Document Governance Procedure
Guidelines	Equality Impact Assessment Guidance
Local Protocol	N/A
Forms	N/A