

# Equality Impact Assessment

## EIA Data Strategy Programme

Did you use the EIA Screening Tool?

No

### 1. Explaining the matter being assessed

Is this a:

- A new strategy or policy

**Summarise the strategy, policy, service(s), or function(s) being assessed. Describe current status followed by any changes that stakeholders would experience.**

**The Data Strategy programme is a new programme of work, delivering new activities within Surrey County Council (SCC).**

The Data Strategy sets out SCC's vision of becoming a 'data-enabled organisation that uses data to underpin policy, decisions, and actions in our effort to improve services and outcomes for residents, businesses, and the county'.

The Data Strategy programme is a three-year programme of activity to deliver the Data Strategy within SCC. The programme will deliver projects and activities against the three main themes identified in the strategy:

- 1) **Building the foundations** of governance, policy, processes, and systems that will allow SCC to fully exploit our data. To ensure data that is high quality, consistent and well defined with clear ownership and accountability.
- 2) **Increasing engagement and skills** to ensure all staff are confident in managing, analysing and interpreting data, relevant to their role. Driving cultural changes to improve how SCC value, share, and collaborate with our data.
- 3) **Delivering new approaches to insight**, actionable insight building on trustworthy, joined-up data to enable faster, smarter decisions

The Data Strategy is an enabler of change and improvement across SCC. The breadth of the programme, and the fact that it is in its early stages of development, mean that some of the activities and projects are still to be defined in detail.

This EIA is being written to enable consideration of the impact on residents and staff of the Data Strategy, particularly those people with protected characteristics, as well as other groups recognised by Surrey County Council as being vulnerable. It will then be maintained and updated whilst the programme is running.

The evidence being considered to inform this EIA is drawn from:

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- a Data Review which was undertaken with SCC staff in the summer of 2021 and is documented in the Data Strategy [Data strategy - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk);
- SCC Equality and Diversity analysis for staff [Equalities and Diversity Analysis 2019-2021 \(surreycc.gov.uk\)](https://www.surreycc.gov.uk);
- a data sharing survey completed through the Surrey Citizen Panel in January 2022. This survey will be published on the website Surrey-I [Home | Surrey-i \(surreyi.gov.uk\)](https://www.surreyi.gov.uk);
- a Healthwatch Surrey survey on record sharing [If-Ive-told-you-once- Peoples-views-on-record-sharing-between-health-and-social-care-professionals-FULL-REPORT.pdf \(healthwatchesurrey.co.uk\)](https://www.healthwatchesurrey.co.uk)
- a national survey on public attitudes to data from the Centre for Data Ethics [Public attitudes to data and AI: Tracker survey \(Wave 2\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk);

## How does your service proposal support the outcomes in [the Community Vision for Surrey 2030](#)?

The Data Strategy programme is an enabler of all ten of the Vision outcomes. Improving SCC's data and the use of that data will support improved decisions that will better deliver the outcomes for both people and place.

## Are there any specific geographies in Surrey where this will make an impact?

- County-wide

## Assessment team

- Angela Lawrence, SCC, Head of Data
- James Lizamore, SCC, Data Governance Manager
- Isabel Wootton, SCC, Programme Manager
- Emma Slade, SCC, Learning and Development Lead
- Simon Willson, SCC, Change Manager
- Russ Bourner, SCC, Senior Population Insight Lead
- Joe Osborne, SCC, Corporate EIA Team
- Ioni Sullivan, SCC, Programme Manager Equality, Diversity and Inclusion

## 2. Service Users / Residents

### All Groups

#### Who may be affected by this activity?

Improving SCC's data and the use of that data has the potential to impact on all service users and residents. The Public Sector Equality Duty in section 149 of the Equality Act (2010) requires that local authorities have 'due regard' to the potential impacts of their decisions on residents and staff who share a relevant protected characteristic. Surrey County Council recognises that there are other vulnerable groups without strictly defined characteristics whose needs will also be considered within EIAs.

#### Positive impacts

- **Improvements in planning and service delivery to meet the needs of those with protected characteristics or in other vulnerable groups.** By improving our data and the way we use that data, we can increase our understanding of residents and service users so that we can make effective decisions about future resource allocations and the provision of services to best reflect and meet need. It is expected that over time data improvements, combined with new approaches to insight, will foster deeper analysis of equalities issues by developing a more comprehensive view of our communities and better understanding ways we can tailor services to the needs of different groups.
- **Increasing our knowledge of residents and service users so that we can monitor equal opportunities/anti-discrimination policies.** By improving the data we hold on residents with protected characteristics and vulnerable groups we will be able to better monitor the position, including supporting data for EIAs. The national Public Attitudes Tracker Survey shows there is high public support for access to demographic data to enable systems to be checked for fairness. It finds no evidence to suggest that respondents' personal characteristics influenced their willingness to share different types of demographic data. This is positive because it suggests that there will not be biases in the data due to individuals with different personal characteristics having different response rates.
- **Increasing the transparency of the data we hold will support greater awareness and understanding of resident and service user needs.** By publishing (anonymised) data that we hold or are able to access and analyse (e.g. census data) we will support partner organisations and individuals with an interest in equality issues to have available data to support their own design and delivery of services.
- **Increasing resident/service users' confidence in the way SCC manages data that respects people's wishes and remains compliant with the law.** By improving our processes and the transparency of those processes around our legal and ethical treatment of data we hope to increase resident confidence in the way we use data. A survey with the SCC citizen's panel showed residents are currently more confident in data being shared across the NHS (83%) than they are with data being shared across different government organisations, including local authorities (35%). These results are also reflected in a

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national survey where the majority of UK adults, 73%, select the NHS as the most trusted actor to take actions with data safely, effectively, transparently, and with accountability. Trust in government is relatively low at 40%.

- **Increasing our ability to respond in a timely way to changing needs.** By improving the timeliness of our data we will be able to respond faster, this could particularly support vulnerable groups whose locations can change frequently, including: migrants; refugees; asylum seekers; people on probation; Gypsy, Roma and Traveller communities.
- **Reducing the need for service users to have to repeat their personal details and their “story”.** By improving the way we join-up and manage the quality of data we can avoid residents having to give their details and repeat their experiences on multiple occasions. A Healthwatch Surrey survey on record sharing shows 58% of respondents replied to say they have had experience of records not being shared, and of having to repeat their story, with many providing comments about how frustrating that was. User insight produced for Surrey’s Adult Social care teams identifies users having to repeat their story as a key pain point.

## Negative impacts

- **Potential that residents and service users are anxious about the amount of data we hold about them and the security of that data.** This potential negative impact exists without the programme changing anything and a range of communications tools and processes are already in place. However, as the programme seeks to raise the profile of the benefits of data and the benefits of sharing data this increased profile has the potential to increase awareness and, in some cases, increase anxiety. A national survey shows the main perceived risks that the public associate with data use are related to data security and selling data for a profit. Both concerns are especially high amongst those who are aged over 55. Those who feel they have less knowledge about data and technology are more likely to have concerns surrounding data security.
- **Potential that residents and service users are particularly concerned about the use of Artificial Intelligence (AI).** A national survey shows people are positive that AI will improve the efficiency of regular tasks, access to healthcare, and saving money on services and goods. However, UK adults are wary of potential negative impacts of AI, for example in producing unfair outcomes or reducing job opportunities. Older people are more likely to have a negative expectation of the impact of AI on society. Those with a lower digital familiarity are more likely to express scepticism towards AI.
- **Potential for data breaches due to the data we hold not being managed securely.** This potential negative impact exists without the programme changing anything and is very carefully managed in a range of ways including security measures around the data and staff training. However, given the intention of the Data Strategy is to increase the appropriate sharing of data the potential should be actively considered by the programme.
- **Potential for use of flawed/incomplete data.** Data sets with low quality data, including gaps in the data, may be used to support decisions. This risks decision makers coming to conclusions that may not reflect the full picture. The ONS Equalities Data Audit ([Equalities data audit, final report - Office for National Statistics \(ons.gov.uk\)](#)) identifies that more data

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are needed that encompass the full range of protected characteristics, alongside socio-economic groups. More data are needed at lower levels of geography to inform local decisions. It is also recognised that response rates vary among the characteristics, suggesting that respondents are more comfortable being asked questions on certain topics ([https://www.equalityhumanrights.com/sites/default/files/ep\\_diversity\\_monitoring.doc](https://www.equalityhumanrights.com/sites/default/files/ep_diversity_monitoring.doc)).

## Mitigations

- Clearer staff procedures and processes for information sharing and data ethics considerations so that the impacts expressed here are well understood and addressed.
- Increased staff training and communications on data security and data sharing to continue to reduce the risk of data breaches.
- Improved communications with residents, to include how their data is kept securely, how it is used, and how and why their data is shared. With communications plans that reflect a wide range of channels to include those identified as likely to reach older residents and users who are less familiar with digital technology.
- Ensure that we work to prevent building in biases to any AI systems or complex data processes ) in line with the Information Commissioners Office guidance ([Explaining decisions made with AI | ICO](#)). Reference will also be made to the Equalities and Human Rights guidance including how to meet the Public Sector Equalities Duty in this regard ([Artificial intelligence in public services | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)).
- Proactively inform residents when they are subject to complex data processes (e.g. automated decisions, AI powered robots) in line with the Information Commissioners Office guidance ([Explaining decisions made with AI | ICO](#)).
- Engagement with residents so that our approaches to information sharing and data ethics reflect resident views and support their understanding. With engagement plans that reflect the inclusion of older residents and users who are less familiar with digital technology.
- Work on data quality with SCC teams to support them to improve the quality of their data and reduce gaps in the data. A survey will be completed with SCC analytical teams to inform this work. This includes potentially commissioning work through the research team to expand our understanding of our communities, outside of what type of data is typically collected by national bodies and organisations.
- Increase understanding of equalities data within SCC and build from the learning of the Centre for Equalities and Inclusion which aims to improve the evidence base for understanding equity and fairness in the UK today, enabling new insights to important policy questions. As the implementation of the Data Strategy will be an iterative process, we accept there may be some issues that arise that are not easy or always possible to mitigate against with existing structures or processes. We will continue to actively review measures being taken and explore further ways to alter or work accordingly.

## 3. Staff

### All Staff

#### Positive impacts

- Increased staff training on topics concerning data, enabling all staff to develop their learning, increase career prospects, and improve job satisfaction.
- Increased accessibility and ease of access to data due to the technology available e.g. increase in use of digitised documents where screen readers can be used compared to use of paper documents.
- Increased use of a wide range of data presentation techniques and storytelling, including visualisation, will support staff with different learning styles to work with data and use it to make decisions in a way that suits them best.

#### Negative impacts

- Disabled staff who have visual disabilities may be disadvantaged as the tools (data quality, data catalogue and information sharing) being introduced are specialised. Approximately 270 (2.66%) SCC staff declared a disability in 2021. There are currently approximately 190 (1.86%) staff within SCC who use specialist software to enable them to use Council systems. Not all disabilities are known and some staff may not have disclosed any potential disabilities that could be effected by this to their line manager, therefore the true scale of this might be difficult to measure.
- Staff who do not have laptops/access to electronic devices through work may feel excluded from the positive impacts of the programme as they may be less able to access the communications available. There are 1300 (circa) bank staff, 14% of SCC staff who largely do not have access to SCC laptops or digital devices.
- 27% of SCC staff are over 55. There is evidence that within the general population older residents may have less access to digital technology and be less confident about its use (<https://phw.nhs.wales/publications/publications1/digital-technology-and-health-inequalities-a-scoping-review/>). There therefore may be a correlation between the general population and older SCC staff. Those aged 50 and over are less likely to take part in workplace training than their younger colleagues, and older people report that they are less likely both to seek work-related training, and to be offered it ([future-of-an-ageing-population.pdf](#) ([publishing.service.gov.uk](http://publishing.service.gov.uk))).
- Staff on maternity leave or other forms of longer-term absence may not be able to access learning and training offers.

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- Staff who are anxious about maths, data or digital may feel cautious about the training on offer and the expectations around increasing data literacy across all staff. We do not have evidence of the number of staff this may apply to but are aware of “maths anxiety” ([What is maths anxiety? | National Numeracy](#)) as an issue that some staff may experience. There is also evidence at national level that 49% of adults have numeracy skills no better than the level expected of an 11-year-old; for literacy, it is 15%. 52% of the workforce do not have essential digital skills for work ([Skills for Jobs: Lifelong Learning for Opportunity and Growth \(publishing.service.gov.uk\)](#)).

## Mitigations

- The tools being introduced (data quality, data catalogue and information sharing) will only be used by a small number of staff. Individual adjustments will therefore be considered if staff require this.

### Aperture

Experian, who provide the data quality tool Aperture, have confirmed that Aperture Data Studio has been designed with accessibility in mind and is compliant to Web Content Accessibility Guideline standards. It is largely possible to use the software with assistive tools, such as screen readers.

### Alation

Alation, who provide the meta data catalogue tool we are using, have confirmed that the tool does partially support screen readers in the current application. They have plans to further develop the user interface to improve accessibility.

- A variety of training methods will be used to ensure all staff are able to engage if they wish to. A significant amount of the data training will be offered online via the Data Academy SharePoint site. Much of this will be accessible on demand, so that staff are able to access at a time to suit them whatever their work pattern. All training will be developed considering SCC accessibility guidelines. Where live virtual training is used delegates will be asked whether they have any accessibility requirements and adjustments made as necessary. Where services/teams identify that staff do not have digital access but require data training, arrangements for access to suitable equipment and/or alternative methods of delivering training will be agreed.
- A variety of communication channels and options to participate will be used so that staff can engage in a variety of ways, this will include in person events and roadshows and newsletters for those who do not have frequent digital access or are unable to attend in person. Notes and recordings will be available for staff out of the office due to maternity leave, sickness or other reasons.

## 4. Recommendation

Based on your assessment, please indicate which course of action you are recommending to decision makers. You should explain your recommendation below.

- **Outcome One: No major change to the policy/service/function required.** This EIA has not identified any potential for discrimination or negative impact, and all opportunities to promote equality have been undertaken
- **Outcome Two: Adjust the policy/service/function** to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
- **Outcome Three: Continue the policy/service/function** despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:
  - Sufficient plans to stop or minimise the negative impact
  - Mitigating actions for any remaining negative impacts plans to monitor the actual impact.
- **Outcome Four: Stop and rethink the policy** when the EIA shows actual or potential unlawful discrimination. (For guidance on what is unlawful discrimination, refer to the [Equality and Human Rights Commission's guidance and Codes of Practice on the Equality Act](#) concerning employment, goods and services and equal pay).

**Recommended outcome:**

**Outcome Three**

**Explanation:**

Option three is recommended as whilst it is not always possible to mitigate every potential negative impact, on balance, the positives outweigh the negatives. The programme will be iterative. A range of mitigating actions are already in place and further learning as the programme develops will inform additional mitigating actions. Central to this learning will be the additional consultation and engagement with staff groups and the public, as set out in the action plan below, that will help shape and further improve implementation.

This transformation programme will improve the data position for Surrey and enable wider improvements in service delivery across the Council through the provision of improved data and the use of that data.



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## 5. Action plan and monitoring arrangements

Insert your action plan here, based on the mitigations recommended.

Involve your Assessment Team in monitoring progress against the actions above.

Item	Initiation Date	Action/Item	Person Actioning	Target Completion Date	Update/Notes	Open/ Closed
1.	January 2023	Staff data skills and training plan – to include accessibility for staff	Emma Slade	Plan – April 2023  To include 6 month reviews thereafter, with measures on attendance and how applicable the training is to the workplace	•	
2.	January 2023	Staff communication and engagement plan – to include accessibility for staff	Simon Willson	Plan – April 2023  To include 6 month reviews thereafter, with measures on reach and impact	•	
3.	August 2023	Resident and service user communication and engagement plan – to include mitigations to	Isabel Wootton/Simon Willson	Plan – January 2024	• Engage groups/staff representing these client groups in SCC and the community to seek their	

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Item	Initiation Date	Action/Item	Person Actioning	Target Completion Date	Update/Notes	Open/ Closed
		impacts identified in this EIA for older residents and those who are less familiar with digital technology		Engagement from 2024  To include annual reviews thereafter	views and advice on communications channels and approaches	
4.	January 2023	Proactive information to residents subject to complex data processes – with a process and approach implemented by all teams undertaking this work	Uma Datta/Isabel Wootton	As required by projects.	<ul style="list-style-type: none"> <li>Consider through the Insights Delivery Group and the work planned as part of the Data Ethics project.</li> </ul>	
5.	December 2022	Review accessibility for users of data quality (Aperture) and data catalogue tools (Alation) and make potential further adjustments, liaising with suppliers, in relation to staff needs	James Lizamore	Ongoing as new users are onboarded  Full review Summer 2024	<ul style="list-style-type: none"> <li></li> </ul>	

## 6a. Version control

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<b>Version Number</b>	<b>Purpose/Change</b>	<b>Author</b>	<b>Date</b>
1	First draft with input from Data Strategy Programme team members.	Isabel Wootton	20/12/2022
2	Updates in response to comments from the Corporate and EDI teams	Isabel Wootton	25/01/2023
3	Updated in line with feedback from peer review	Isabel Wootton	28/02/2023

The above provides historical data about each update made to the Equality Impact Assessment.

Please include the name of the author, date and notes about changes made – so that you can refer to what changes have been made throughout this iterative process.

For further information, please see the EIA Guidance document on version control.

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## 6b. Approval

Secure approval from the appropriate level of management based on nature of issue and scale of change being assessed.

Approved by	Date approved
Head of Service – Angela Lawrence, Head of Data	01/03/2023
Head of Service – Uma Datta, Assistant Director for Insight	03/03/2023
Executive Director – Rachel Crossley, Director for Public Service Reform	15/03/2023

### **Publish:**

It is recommended that all EIAs are published on Surrey County Council's website.

Please send approved EIAs to: **INSERT SHARED EMAIL ACCOUNT ADDRESS**

### **EIA author:**

## 6c. EIA Team

Name	Job Title	Organisation	Team Role
Joe Osbourne	Strategy Officer	Surrey County Council	Corporate Strategy

If you would like this information in large print, Braille, on CD or in another language please contact us on:

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