

CUNNINGHAME HOUSING ASSOCIATION LTD

EQUALITY IMPACT ASSESSMENT FORM

1. Information	
Document/Policy/ Strategy being created or updated	Data Protection Policy
Purpose of creation or update / Executive Summary:	The Data Protection Policy sets out how Cunninghame Housing Association (CHA) collects, uses, stores, shares and protects personal data in line with the UK GDPR and Data Protection Act 2018. The purpose of this update is to ensure compliance with current legislation, strengthen organisational governance, and provide clear guidance to staff on lawful processing, data subject rights, retention, and security measures. The policy aims to protect individuals' privacy, maintain transparency, and ensure fairness in all data-handling activities across CHA.
2. Protected Characteristics	
	Commentary on impact. Positive/neutral/negative as well as mitigations
Age	Neutral / Positive The policy applies consistently to all service users and staff, regardless of age. Older individuals and young people may particularly benefit from enhanced clarity and safeguards around personal data use. Mitigation: Ensure communication materials (e.g., privacy notices) are accessible using plain language.
Disability	Neutral / Positive Individuals with disabilities may require information presented in accessible formats. The policy promotes fair and secure processes that protect sensitive health related data. Mitigation: Provide alternative formats (easy read, large print, audio). Ensure staff follow confidentiality requirements when handling sensitive data.-related data.
Gender identity/ reassignment	Positive Data relating to gender identity is highly sensitive. The policy strengthens confidentiality, minimises unnecessary processing, and protects individuals from unauthorised disclosure. Mitigation: Restrict access to such data to authorised staff only; ensure privacy by design in systems.-by-design in systems.
Marriage/civil partnership	Neutral The policy has no differential impact on people based on marital status. Mitigation: None required.
Pregnancy/ maternity	Neutral / Positive Processing of pregnancy related information (e.g., HR records) benefits from strengthened confidentiality and appropriate retention. Mitigation: Ensure sensitive health information is stored securely and only accessed when necessary.-related information (e.g., HR records) benefits from strengthened confidentiality and appropriate retention.
Religion or Belief	Neutral Data about religious belief is rarely collected. Where it is necessary (e.g., equality monitoring), the policy ensures lawful and proportionate processing. Mitigation: Limit collection to essential purposes and maintain confidentiality.

Race	Neutral / Positive Any ethnicity related information processed for monitoring or service improvement is protected through strengthened data governance. Mitigation: Ensure equality monitoring data is anonymised wherever possible.-related information processed for monitoring or service		
Sex/Gender	Neutral The policy applies equally to all genders with no disproportionate impact expected. Mitigation: None required.		
Sexual Orientation	Positive As a sensitive personal category, sexual-orientation data benefits from enhanced privacy controls under the policy. Mitigation: Restrict access and ensure any monitoring data is anonymised.		
Other	Neutral / Positive All groups benefit equally from improved data security and clarity on how personal information is used. Mitigation: Provide tailored communication support where individuals may experience additional barriers.		
3. Sign Off			
Lead Assessor:	Joanna Thomson, Governance Officer		
Co- Assessor:	John McIntyre, Executive Director of Finance & Corporate Support		
Date initiated:	February 2025		
Consultation:	Internal consultation with Governance, ICT, HR, and relevant service areas. No concerns raised. External consultation not required for this update.		
Research:	Reviewed UK GDPR, Data Protection Act 2018, ICO guidance, and CHA internal procedures.		
Signature:		Date:	