**University of Limerick**

**POLICY MANAGEMENT FRAMEWORK**

**Proposal for Policy Development/Review Form**

## APPENDIX A: Proposal for Policy Development/Review Form

**Approval for the Development/Review of:**

**[POLICY TITLE]**

Key for policy author:

* Use all sections and add additional sections only if absolutely necessary,
* Text in [square brackets] is to be replaced by the relevant text as required by the policy,
* Red text is guidance, to be deleted upon completion.

# Summary Information

## Purpose

Set out the purpose of the policy document briefly including what need it is intended to address and what is to be included in the policy.

## Key Policy Information

|  |  |
| --- | --- |
| **Policy author** | [role] |
| **Policy area status** | [Urgent/high priority/routine] |
| **UL’s position in the policy area** | [New policy/Revised policy] |
| **If revised, previous review date** | [date] |
| **Approval Pathway to Date** | [Who has signed off on the policy so far] |
| **Proposed Approval Date** | [Date] |
| **Proposed Effective Date** | [Date] |
| **List of Stakeholders with whom consultation will take place in the development/ review of Policy** | [Should state all stakeholders who will be consulted in the development/revision of the policy] |
| **Accompanied by an Implementation, Monitoring and Review Checklist?** | [Yes/No – if no, why?] |
| **Accompanied by a** [**Data Protection(1) Checklist**](#Data_Protection_Checklist) | [Yes/No – if no, why?] |
| **Accompanied by an** [**Equality(2) Impact Assessment Checklist**](#Equality_Impact_Assessment_Checklist) | [Yes/No – if no, why?] |
| **Decision sought** | [Approval/discussion/repeal] |

(1) **Data Protection Assessment:** Any proposal for the development/revision of a policy should specifically state if this policy impacts on how the University processes personal data and how the provisions of Data Protection legislation are adhered to in the implementation of the policy. Any risks to the processing of personal data in accordance with legislation should be made known and mitigating factors identified. Where relevant a [Data Protection Checklist](#Data_Protection_Checklist) must accompany the proposal for the development /review of a policy.

(2) **Equality Impact Assessment:** Any proposal for the development/revision of a policy should specifically state if the policy impacts on equality and human rights legislation, as currently prioritised by the University as set out in the [Equality Impact Assessment Checklist](#Equality_Impact_Assessment_Checklist).

# Approval Information

## Rationale for Development

Set out why the development is required. Is the policy due for review? Did the law change? Did a management or governance decision require or demand the change? Or is there a principled rationale for the change proposed?

## Impact of Adoption

The impact of adoption of the proposal should be assessed using a risk management approach i.e. what are the risks of adopting the proposal and how are these risks mitigated to an acceptable level. Assessment of risk should, inter alia, address if there is any foreseeable strategic impact? What will change if the proposal is adopted? How will this impact on stakeholders such as staff/ students? Will it add or change any roles or responsibilities.

## Resource Requirements

### Implementation Resource Requirements

Summarise the resource requirements for full implementation of the proposed policy.

### Ongoing Resource Requirements

Summarise any new, additional or reductions in resource requirements for sustained implementation, monitoring and review of the policy.

## 2.4 Data Protection and Equality Impact Assessments

***2.4.1 Decision Options for Approving Body***

In consideration of the tenets of Human Rights and Equality and Data Protection legislation, and in approving the development of the new policy/revision of existing policy, the approving body will indicate if:-

(a) No change is required: assessment is that the proposed policy will be robust and/or promote/identify human rights and equality in the University and complies with data protection requirements;

(b) Adjust the policy – this involves taking steps to address any adverse impacts before the policy is fully developed;

(c) Continue the policy – while mitigating against any adverse impacts;

(d) Stop the policy or practice as there are adverse effects that cannot be prevented or mitigated.

***2.4.2 Data Protection Checklist***

A range of factors must be considered in the event the proposed policy/revised policy impacts on how the University processes personal data (including sensitive personal/special category data) and how the provisions of Data Protection legislation are adhered to in the implementation of the policy. Any risks to the processing of personal data in accordance with legislation should be identified and mitigating actions put in place.

Personal Data is defined as any information, irrespective of the format in which it is held, related to a natural person or ‘Data Subject’ that can be used to directly or indirectly identify the person. The definition is technology neutral.  It does not matter how the personal data are stored – on paper, on an IT system, on a CCTV system etc. Common personal data include but are not limited to name & address, personal email address, civil status, identification data, living habits, marital status, income, financial situation, IP addresses, web cookies, event logs, location data, GPS data etc.

Special Category Data is personal data, irrespective of the format in which it is held, that is of a particularly sensitive or private nature e.g. data relating to health , sexual orientation, racial or ethnic origin, religious beliefs, political beliefs., or trade union membership, and the processing of genetic and biometric data for the purpose of uniquely identifying a natural person.

Any proposed policy/revised policy that impacts on the processing of personal data must address the data protection principles outlined in GDPR and the Data Protection Act, 2018 as follows:

1. Process personal data lawfully, fairly and in a transparent manner in relation to the data subject;
2. Collect for specified, explicit and legitimate purposes and do not further process in a manner that is incompatible with those purposes;

3. Ensure personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;

4. Keep accurate and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;

5. Keep in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;

6. Process in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;

7. The University as a data controller is responsible for and must be able to demonstrate compliance with the Data Protection Principles.

Further information/advice is available from the Data Protection Officer at DataProtection@ul.ie

***2.4.3 Equality Impact Assessment Checklist***

Any proposal for the development/revision of a policy should specifically state how the policy provides opportunities to promote, or any potential adverse effects that it may have on each of the human rights and equality grounds as listed below. If this policy does not affect any individual ground, then this should be stated explicitly.

Equality and human rights grounds currently prioritised by the University are:

 Race

 Disability (including neurodiversity)

 Gender (including gender identity)

 Age

 Sexual Orientation

 Religion

 Civil Status

 Family Status

 Membership of the Travelling Community

 Socio-Economic Status

 National Identity