Equality Impact Assessment Record - ID Card Policy – V0.2
- update post first workshop and agreed at second workshop (24/11/21)

Title of policy/ practice/ strategy/ legislation etc.	Identity Card Control Policy Social Security Scotland
Lead official	Jim Hannah
Directorate: Division: Team	Social Security Scotland
Is this new policy or revision to an existing policy?	A New Policy

Equality Impact Assessment Identity Card Policy

Identity Card Policy
The policy will deliver and manage Social Security Scotland Identity Card (ID card) process in a secure way to support staff who engage directly with members of the public as well as current and future clients. This amended policy will deliver a clear form of secure personal ID and governance of the process for managing the agreed ID card.

Desired Outcomes

- Customer confidence in our service – customers recognise that they are dealing with legitimate representatives of Social Security Scotland
- Staff security – the ID card contains the minimum information required to confirm the bearers' ID and the policy encourages safe use of the card
- Organisational security – the ID cards are issued, returned and used in an agreed controlled manner with any losses recorded and appropriate action taken
- Organisational reputation – the Social Security Scotland ID cards look professional, conform to accepted government standards for ID cards and clearly convey the required information.

Who will it affect?

Social Security Scotland security staff, Mailroom, Local Delivery teams, Fraud and Health & Social Care colleagues as well as their line managers. Clients may also be affected as well as representatives of third-party organisations and other external stakeholders. The card will be available to any staff operating outside Social Security Scotland buildings who may need to identify themselves.

What might prevent the desired outcomes being achieved?
- Failure to follow policy and process by card bearers or line managers may result in loss or misuse of cards with the risk of reputational damage.
- Cards displayed in public may lead to risk of threat or harm to a staff member.
- Lost or stolen cards may be used for fraudulent purposes which could cause harm to the public.
- Security risk – theft or unlawful access to blank ID cards could lead to fraudulent activity
- Mailroom capacity may impact distribution to Local Delivery staff and other colleagues.
- Security processing ability at risk if there is a large volume of card requests or renewals to deliver at the same time.

Stage 1 - Framing

What are the Operational Processes covered in the Policy?
1. ID Card request and Issue
2. ID Card return and destruction
3. ID Card Loss reporting
4. ID Card production/showing in support of bearers operational role

Impact of Operational processes
A Yes/No Assessment to give Impact processes

	Issue	Return	Loss reporting	Production
Bearer	Y	Y	Y	Y
Line Manager	Y	Y	Y	N
Security	Y	Y	Y	N
Public	N	N	Y	Y
Mailroom	Y	Y	Y	N
Data Controllers	N	N	N	Y
External Stakeholders	N	N	Y	Y

Impact by role requirements

Card Bearer
- Make a request for a new card
- Confirm receipt of a new card
- Report loss/theft of a card
- Be able to return a card (in person or by mail)
- Able to produce an ID card to confirm ID to the public
- Need to be able to produce ID when working on a multi-agency approach to a member of the public
- Need to be able to produce ID when engaging with a data controller for an external organisation

Line Manager

- Able to request ID cards from security
- Able to handle the return of ID cards from the bearer to Security
- Need to report ID card loss to security

Security - role requirements
- Handle card requests – producing a card (print out using specific software)
- Handle card returns and destruction
- Handle card loss/theft reports – reporting onwards to the police/Data Protection Information Group

Mailroom - role requirements
- Able to handle the issue of new cards to field colleagues
- Able to receive in and direct to security returned cards (from bearers or Lost card Post Office box)

Public
- Can see and understand the presented ID card
- Able to drop a lost ID card into police station/or send to a Post Office box (need to be able to read the "on card" instructions)

Data Controller
- Need to be able to recognise our ID card on production prior to sharing of data

External Stakeholders
- Need to be able to recognise our ID on production for admission to a hosted environment
- Need to be able to produce ID when working on a multi-agency approach to a member of the public
- Able to drop a lost ID card into police station/or send to a Post Office box (need to be able to read the "on card" instructions)

Stage 2 - Data and evidence gathering, involvement and consultation – ID Cards

The ID Card Policy and ID card design was based on the wider Scottish Government approach and project stakeholder experience (Fraud and Local Delivery professionals). The Equality Impact Assessment is based on this approach supplemented by a challenging Workshop approach.

Analysis of the ID Card Policy Equality Impact Assessment Scope for Negative Outcomes and Mitigations

	Who	What	Possible Negative outcome	Mitigations in place
1	Public	Need to able see and understand the presented ID card	ID card is not understood or accepted by the member of the public so engagement does not continue successfully	1 card designed to current Scottish Government standard 2 Clear, professional looking card that gives confidence 3 Clear current passport style photo of bearer (renewed every 24 months or more frequently if significant appearance change) 4 Card to be displayed whilst meeting is ongoing 5 Face coverings are removed for Photos and also in confirmation of ID 6 ID Card design was user-tested and suggestions implemented 7 Pre Meeting engagement to ensure success as per Local Delivery/Fraud/Health & Social Care operating processes and according to client needs

2	Public	Able to drop a lost ID card into a police station/or send to a PO box (need to be able to read the "on card" instructions)	A lost card may not be returned and even possibly be subsequently fraudulently used	1 card designed to current Scottish Government standard 2 clear instructions on card reverse for return of a card that has been found
3	Data Controller	Need to be able to recognise our ID card prior to sharing of data with Fraud colleagues	May not accept our proof of ID and thus not share the requested data	1 card designed to current Scottish Government standards 2 Clear professional looking card that gives confidence 3 clear passport style photo of bearer 4 Pre Meeting engagement to ensure success as per Fraud operating process
4	External Stakeholder	Need to be able to recognise our ID on production for admission to a hosted environment	May delay our access to hosted environment and hence the meeting with member of the public	1 card designed to current Scottish Government standard 2 Clear professional looking card that gives confidence 3 clear passport style photo of bearer 4 Pre Meeting engagement to ensure success as per Local

				Delivery operating process
5	External Stakeholder	Need to be able to produce ID when working on a multi-agency approach to a member of the public	May limit our ability to engage on multi-agency approaches to the detriment of the public	1 card designed to current Scottish Government standard 2 Clear professional looking card that gives confidence 3 clear passport style photo of bearer 4 Pre Meeting engagement to ensure success as per Local Delivery operating process
6	External Stakeholder	Able to drop a lost ID card into a police station/or send to a PO box (need to be able to read the "on card" instructions)	A lost card may not be returned and even possibly be subsequently fraudulently used	1 card designed to current Scottish Government standard 2 clear instructions on card reverse for return of a card that has been found

Reviewing the Impact against Key Characteristics on the ID Card Policy

Review of the 6 EIA scope items against the Key Characteristics

	Age	Disability	Sex	Preg/ Maternity	Gender Change	Sexual Orientation	Race	Care Experience	Religion
1	N	Y	N	N	N	N	N	Y	N

2	N	Y	N	N	N	N	N	Y	N
3	N	N	N	N	N	N	N	N	N
4	N	N	N	N	N	N	N	N	N
5	N	N	N	N	N	N	N	N	N
6	N	N	N	N	N	N	N	N	N

Reviewing the evidence gathered against Key Characteristics – on the ID Card Policy
Analysis of the impacts by Key Characteristics

Characteristic[1]	Evidence gathered and Strength/quality of evidence	Source	Data gaps identified and action taken
AGE	Not an issue apart from potential disability	Stakeholders and workshop	None
DISABILITY	- Possible impact of sight impairment, dementia - Quality/Clarity of Photo image – especially its being up to date - Handling of ID card	Stakeholders and workshop	Will need 1 review of Engagement processes adopted by Fraud, Local Delivery, Health &Social Care 2 update to policy on Image quality 3 update of operating process and ID card policy on handling of card to establish the compromise balance
SEX	Not an issue	Stakeholders and workshop	None

PREGNANCY AND MATERNITY	Not an issue but may need to be considered in engagement process	Stakeholders and workshop	Will need 1 review of Engagement processes adopted by Fraud, Local Delivery, Health &Social Care
GENDER REASSIGNMENT	Not an issue	Stakeholders and workshop	None
SEXUAL ORIENTATION	Not an issue	Stakeholders and workshop	None
RACE	Not an issue	Stakeholders and workshop	None
RELIGION OR BELIEF	Not an issue	Stakeholders and workshop	None
CARE EXPERIENCE	Needs assurance on process and card validity	Stakeholders and workshop	Will need 1 review of Engagement processes adopted by Fraud, Local Delivery, Health &Social Care 2 update to policy on Image quality 3 update of operating process and ID card policy on handling of card

Actions

1. Operating process for Fraud/Local Delivery and Health and Social Care to be reviewed – to ensure approach to varying capabilities of interviewees is matched

2. Card Production/Display – ID card policy discourages the wearing of cards in public (for bearers safety) Need to consider in light of user testing how an ID card can be displayed during interview (Lanyard/clip) and then removed at the end of the interview. May need operating process for engagement teams.

3. ID Card Handling – security guidance is to not put yourself or the organisation at risk by handing over a card – need to look at the operational engagement process to ensure the best compromise is reached to meet the varying needs of interviewees

4. ID Card Photo image – policy update to state clearly the need to have a quality picture that reflects the bearer's current image

Stage 3:   Assessing the impacts and identifying opportunities to promote equality on the ID Card Policy

Do you think that the ID Card policy impacts on people because of their age?

Age	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care
Advancing equality of opportunity			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care
Promoting good relations among and between different age groups			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care

Do you think that the ID Card policy impacts disabled people?

Disability	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination, harassment and victimisation			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health &Social Care
Advancing equality of opportunity			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care

Promoting good relations among and between disabled and non-disabled people			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care

Do you think that the ID Card policy impacts on men and women in different ways?

Sex	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care
Advancing equality of opportunity			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care
Promoting good relations between men and women			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care

Do you think that the ID Card policy impacts on women because of pregnancy and maternity?

Pregnancy and Maternity	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care
Advancing equality of opportunity			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local

				Delivery, Fraud and Health & Social Care
Promoting good relations			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care

Do you think the ID Card policy impacts on people proposing to undergo, undergoing, or who have undergone a process for the purpose of reassigning their sex? (NB: the Equality Act 2010 uses the term 'transsexual people' but 'trans people' is more commonly used)

Gender reassignment	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care
Advancing equality of opportunity			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care
Promoting good relations			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care

Do you think that the ID Card policy impacts on people because of their sexual orientation?

Sexual orientation	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination			True	The ID Card is Standard for everyone and is a component of the overall

	Positive	Negative	None	Reasons for your decision
				engagement process for Local Delivery, Fraud and Health & Social Care
Advancing equality of opportunity			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care
Promoting good relations			True	The ID Card is Standard for everyone and is a component of the overall engagement process for Local Delivery, Fraud and Health & Social Care

Do you think the ID Card policy impacts on people on the grounds of their race?

Race	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination			True	The ID Card is Standard for everyone and is a component of the overall engagement process for LD, Fraud and Health &Social Care
Advancing equality of opportunity			True	The ID Card is Standard for everyone and is a component of the overall engagement process for LD, Fraud and Health &Social Care
Promoting good race relations			True	The ID Card is Standard for everyone and is a component of the overall engagement process for LD, Fraud and Health &Social Care

Do you think the ID Card policy impacts on people because of their religion or belief?

Religion or belief	Positive	Negative	None	Reasons for your decision

	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination			True	The ID Card is Standard for everyone and is a component of the overall engagement process for LD, Fraud and Health &Social Care
Advancing equality of opportunity			True	The ID Card is Standard for everyone and is a component of the overall engagement process for LD, Fraud and Health &Social Care
Promoting good relations			True	The ID Card is Standard for everyone and is a component of the overall engagement process for LD, Fraud and Health &Social Care

Do you think the ID Card policy impacts on people because of their marriage or civil partnership?

Marriage and Civil Partnership	Positive	Negative	None	Reasons for your decision
Eliminating unlawful discrimination			True	The ID Card is Standard for everyone and is a component of the overall engagement process for LD, Fraud and Health &Social Care

Stage 4 – Decision Making and Monitoring - ID Card Policy

Identifying and establishing any required mitigating action on the ID Card Policy

Have positive or negative impacts been identified for any of the equality groups?	No Positive or Negative impacts have been identified for any of the equality groups
Is the policy directly or indirectly discriminatory under the Equality Act 2010[2]?	No
If the policy is indirectly discriminatory, how is it justified under the relevant legislation?	No
If not justified, what mitigating action will be undertaken?	N/A

Ongoing Development action on the ID Card Policy

Done
- ID Card Policy and design followed accepted good practice
- ID Card Policy and design was guided by key business stakeholders
- ID Card Policy and design took account of ID card user testing feedback

To Do
- Ongoing Monitoring of operational feedback for card users/requesters - with a view to policy update
- Ongoing Monitoring of ID Card loss /theft incidents and – with a view to policy update
- Review of operational engagement processes adopted by Fraud, Local Delivery and Health & Social Care in which the ID card is involved – with a view to updating those policies and Equality Impact Assessments
- Review of policy 6 months after Agency Leadership Team approval (Leadership Team request)

Describing how Equality Impact Assessment has shaped the policy making process for the ID Card Policy

All operational activity requires policy oversight – to define the "what". The ID Card policy has been shaped through a review of best Equality Impact Assessment process.

This Equality Impact Assessment does not stand by itself, with the ID card it is part of larger operational processes around external engagement; Local Delivery, Fraud, Health & Social Care

Monitoring and Review - ID Card Policy

There are several steps to review the ID Card Policy, short term and going forward

- Security Policies are reviewed on a 12-month cycle as standard unless there has been significant changes which require early policy update
- The Security ID Card policy will be reviewed 6 months after launch to determine any urgent update requirements
- ID Card Launch will comprise 3 checkpoints for early updates on any possible policy weaknesses
- ID Card Launch project will conduct a close out exercise which will capture and document early issues and consequent actions.

Stage 5 – Authorisation

Please confirm that:

♦ This Equality Impact Assessment has informed the development of this policy:

Yes ☒   No ☐

♦ Opportunities to promote equality in respect of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation have been considered, i.e.:

    o Eliminating unlawful discrimination, harassment, victimisation;
    o Removing or minimising any barriers and/or disadvantages;
    o Taking steps which assist with promoting equality and meeting people's different needs;
    o Encouraging participation (e.g. in public life)
    o Fostering good relations, tackling prejudice and promoting understanding.

Yes ☒   No ☐

♦ If the Marriage and Civil Partnership protected characteristic applies to this policy, the Equality Impact Assessment has also assessed against the duty to eliminate unlawful discrimination, harassment and victimisation in respect of this protected characteristic:

Yes ☐   No ☐   Not applicable ☒

Declaration

I am satisfied with the equality impact assessment that has been undertaken for the Social Security Scotland ID Card Policy and give my authorisation for the results of this assessment to be published on the Scottish Government's website.

Name: Andy McClintock

Position:
Deputy Director – Chief Digital Office

Authorisation date: 29 November 2021