

	Freedom of Information Act Publication Scheme
Protective Marking	Official
Publication Scheme Y/N	Yes
Title	Child-Friendly Privacy Notice - EIA
Version	1.0
Summary	Child-Friendly Privacy Notice - EIA
(B)OCU or Unit, Directorate	Digital and Innovation
Review Date	17/09/2027
Date Issued	17/09/2026
Accessibility	This document may not be suitable for users of assistive technology. Please email MPSPublicationScheme@met.police.uk to request an accessible version. See our accessibility statement.

EQUALITY IMPACT ASSESSMENT (updated January 2022)

Follow the Equality Impact Assessment (EIA) policy when completing this form.

Need some help? If you are unsure of any of the questions, click the 'GUIDANCE' button which provides key information about each step.

You can also view the CPIE Inclusion Unit intranet pages for additional advice and guidance.

FOIA INFORMATION						GUIDANCE
Protective Marking	Official	Publication Scheme	Yes			
Title	Child-Friendly Privacy Notice					
Branch / OCU	Digital and Innovation					
Date Created	01/06/2026	Review Date	01/06/2027	Version	V1	
Author						

STAFF INFORMATION						GUIDANCE
Person Completing EIA						
Signed				Date	01/06/2026	
Person Supervising EIA/SLT Approval						
Signed				Date	09/07/2026	
Quality Assurance Approval						
Name		Unit	CD&I	Date	02/06/2026	

DECISION MAKING			GUIDANCE
Reject the proposal / policy	☐ Yes	☒ No	
Implement the proposal / policy	☒ Yes	☐ No	
Produce an alternate proposal / policy (if so, a new EIA must be completed)	☐ Yes	☒ No	
If this EIA is a successor to a previous EIA as a result of an alternative proposal, state the date of the original EIA	Date		
SLT OCU / BCU / Management Board endorsing decision			
Name		Rank / Grade	T/BB2 Director of Data

Please note: The information on this page is retained, it is not published.

EQUALITY IMPACT ASSESSMENT

STEPS 1 TO 8

STEP 1. Aims and purpose of the proposal / policy

GUIDANCE

We intend to update the *Child-Friendly Privacy Notice* (also referred to as the *Child-Friendly Privacy Policy*) to reflect evolving legislative requirements.

Purpose of the Update

The revised Privacy Notice will:

- improve clarity and accessibility so children and young people can better understand how their personal data is used by the MPS
- better explain data subject rights to children (for example, access, correction, deletion and restriction) and how to use them
- provide clearer guidance on how to raise concerns or make a complaint, including the support available from a parent, carer, or another trusted adult
- reflect current operational practices (for example, technologies such as automated decision making) in a way that remains age-appropriate and easy to understand.

These amendments are designed to ensure the Privacy Notice remains accurate, accessible and aligned with applicable data protection requirements.

Purpose of the Policy

The Privacy Notice outlines the following key areas:

1. **What is personal data?** – Child-friendly definition of personal data and examples. Child-friendly definition of special category data and examples of special category data.
2. **Why do we use personal data?** – Child-friendly examples on when we may use personal data and when we use it. Caveats for following strict rules to protect the personal data and not making important decisions without human involvement (automated processing).
3. **Whose personal data do we handle?** – Child-friendly examples of whose personal data we handle.
4. **How do we get and use this personal data?** – Child-friendly examples of personal data provenance. Caveat that personal data is used to facilitate our role and that we are following the legislation to process the data.
5. **Can we use your personal data for anything?** – Child-friendly explanation of consent for processing personal data, the fact that we use personal data for policing purposes. When we share personal data and with whom.
6. **How long do we keep your data?** – Child-friendly explanation of personal data retention.
7. **What can you do about the data we hold on you?** – Child-friendly explanation of individual's rights and reassurance about making contact to exercise rights.
8. **How to contact us about your information (and if you are worried or unhappy)** – Child-friendly explanation of how to contact us (email, post, in person) if they want to exercise their rights and if they are worried/unhappy about how we use their personal data.

STEP 2. Screening process for relevance to diversity and equality issues				GUIDANCE
Each "protected characteristic" in Section 5 has guidance as to what implications / issues you may need to consider.				
Does this proposal / policy have any relevance to:		Internal, relevant to staff / or working practices	External, relevant to service delivery	Not relevant to either
A	Age	☐ Yes	☐ Yes	☒ No
B	Deaf and disabled / Disability	☐ Yes	☐ Yes	☒ No
C	Gender Reassignment	☐ Yes	☐ Yes	☒ No
D	Marriage and Civil Partnership (employment only)	☐ Yes	☐ Yes	☒ No
E	Pregnancy and Maternity	☐ Yes	☐ Yes	☒ No
F	Race	☐ Yes	☐ Yes	☒ No
G	Religion or Belief	☐ Yes	☐ Yes	☒ No
H	Sex	☐ Yes	☐ Yes	☒ No
I	Sexual Orientation	☐ Yes	☐ Yes	☒ No
J	Other Issues	☐ Yes	☐ Yes	☒ No

STEP 3. If you have ticked yes to any protected characteristic box in Step 3, a full impact assessment is required.		GUIDANCE
Full assessment required? (If Yes, a full EIA is required.)	☐ Yes	☒ No

STEP 4. Examination of available information	GUIDANCE
Based on an assessment of the protected characteristics under the Equality Act 2010, we do not believe that a full Equality Impact Assessment (EIA) is required for the updated Child-Friendly Privacy Notice. The Privacy Notice is an informational document that outlines statutory data protection requirements and applies equally to all children. It does not introduce any operational changes, alter service delivery, or create differential treatment between groups. However, to ensure accessibility and inclusivity, the following considerations were taken into account during the drafting process: 1. Accessibility We recognise the importance of making the Privacy Notice accessible to all children, including those with disabilities, neurodiversity, learning difficulties, sensory impairments, and those who may need information presented in different formats or with additional support. To support this: • Short sentences, clear headings, and a logical structure have been used to support comprehension and navigation. • Jargon has been reduced and explained where it cannot be avoided, to support children with varying levels of literacy and understanding. These measures ensure that the Notice is accessible without introducing any differential impact on those with protected characteristics. 2. Inclusive Communication The Privacy Notice must be written in language that all children can understand, regardless of background, or	

literacy level.

To achieve this:

- The Notice has been drafted in clear, transparent, and jargon free language, avoiding technical terminology where possible.
- The MPS Digital and Innovation (D&I) Policy Team has reviewed the text to identify any language that may be unclear.
- The drafting avoids assumptions about family structure, identity, background, or lived experience and uses inclusive terms (for example, “parent, carer, or another trusted adult”).

These actions support equality by ensuring the Notice can be understood by all children.

While a full EIA is not considered proportionate, the implementation of the updated Child-Friendly Privacy Notice will provide an opportunity to test whether the assumptions made about impact remain valid and whether the mitigations outlined above are effective in practice. Any feedback received or issues identified will be considered and addressed as part of ongoing review and maintenance of the document.

The ICO expects privacy information addressed to children to be provided in a clear and plain way that they can access and understand, and in language suited to the age of the child. As a practical benchmark for readability, we have aimed for content that can be understood by readers with a reading age of around 13, and we believe the revised Child-Friendly Privacy Notice meets this standard although this has not been formally tested.

To further support children under 13, we are also considering developing a supplementary infographic (and/or other visual formats) to sit alongside the written notice, in line with ICO guidance that privacy information for children may be presented using diagrams, graphics and other age-appropriate formats.

STEP 5. Full Impact Assessment Process**STEP 5a. Consultation Log****GUIDANCE**

Consultation activities held must be specific and proportionate. These could include the MPS Staff Support Associations and networks, Federation and Unions (MET-TUS), Independent Advisory Groups & Diversity Forums and other Public Sector Organisations and/or Government Departments.

Where are the consultation records stored? (These should be either in Box or One Drive alongside this EIA, to meet GDPR retention requirements).

Name of Business Group / Unit, Association, Stakeholder (External)	Why are you approaching them?	Date and method of planned consultation	Outcome of consultation

STEP 5b. EIA Action Plan

From your consultation activities and available information explain within the appropriate Action Plan template the potential positive and / or negative impact of the proposal / policy, internally on members of your workforce and externally on your communities / service delivery:

Age	GUIDANCE	Race	GUIDANCE
Deaf and disabled / Disability	GUIDANCE	Religion and Belief / No Belief	GUIDANCE
Gender Reassignment	GUIDANCE	Sex	GUIDANCE
Marriage and Civil Partnership (employment only)	GUIDANCE	Sexual Orientation	GUIDANCE
Pregnancy and Maternity	GUIDANCE	Other Issues	GUIDANCE

STEP 5c. Action Plan Template Workforce Impacts (Internal)**GUIDANCE**

Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring

STEP 5d. EIA Action Plan Template Service Delivery Impacts (External)				GUIDANCE
Potential positive / negative issues / impacts	Activity	Role Holder	Action By Date	Progress/Timescale/ Monitoring

STEP 6. Ensure monitoring and review arrangements are put in place**GUIDANCE**

How will the implementation of the proposal / policy be monitored and by whom?

Overall responsibility for monitoring the implementation and ongoing effectiveness of this Policy and associated EIA sits with the author of this EIA.

Monitoring will involve:

- Reviewing the practical application of the Policy to ensure it is being implemented as intended.
- Assessing any feedback, complaints, or identified issues that may indicate differential impact on individuals or groups with protected characteristics.
- Ensuring that any identified risks, adverse impacts, or opportunities to promote equality are appropriately addressed.

In addition to scheduled reviews, any significant changes (including but not limited to updates in legislation, organisational policy, operational processes, or emerging equality considerations) will trigger an immediate review of both the Policy and this EIA to ensure continued compliance and relevance.

All Public Authorities such as the Metropolitan Police Service (MPS) have to comply with section 149 of the Equality Act 2010 more commonly known as the General Duty.

The Duty requires us to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.

One of the ways we can demonstrate that we are complying with the General Duty is to document how decisions are reached and resulting activities including monitoring and review arrangements. In the MPS, the way we evidence this is by completing EIAs.

What is the timetable for monitoring, with dates?

This EIA was completed on 1 June 2026. The formal review schedule is as follows:

- First annual review: 1 June 2027
- Subsequent reviews: Annually thereafter (every 12 months from the initial review date)

In addition to the formal annual review cycle, monitoring will be conducted on an ongoing basis through:

- Regular checks on Policy implementation and adherence.
- Review of any operational data, feedback, or reported issues relevant to equality impacts.
- Consideration of any internal or external developments that may affect the policy.

Where monitoring identifies any potential or actual disproportionate impact, appropriate mitigating actions will be implemented promptly, and the EIA will be updated to reflect these changes.

STEP 7. Public availability of reports / result. What are the arrangements of publishing, where and by whom?**GUIDANCE**

Access to the EIA will be managed in line with organisational governance and information management requirements. The document can be made available upon request, including in response to Freedom of Information (FOI) requests, where appropriate and in accordance with statutory obligations.

Responsibility for ensuring the EIA is appropriately stored, maintained, and made available (when required) rests with both the EIA author and the central EIA Team, in line with established MPS processes.

Please see below for the checklist.

STEP 8: SUPERVISION / QUALITY ASSURANCE CHECKLIST (Completed by Line Manager)

<i>I have read the MPS EIA Policy and understand my obligations under the Public Sector Equality Duty (Sec 149 Equality Act 2010) prior to completing Quality Assurance?</i>	☒ Yes	☐ No
<i>Has the Lead Responsible Officer (LRO) clearly outlined the policy / project design/ business change proposal / operational decisions aims, objectives and strategy, providing sufficient information to effectively assess equality impact?</i>	☒ Yes	☐ No
<i>Has the LRO taken proportionate and necessary steps to collate and evaluate sufficient available qualitative and quantitative demographic diversity data to identify impacted individuals/groups, including consultation?</i>	☒ Yes	☐ No
<i>Where relevant information is not readily available, has the /LRO demonstrated due regard to obtaining it by; a) Collecting new sources of data itself and/or b) Commissioning research and/or c) Direct engagement with affected individuals/groups and/or d) Collating external information sources?</i>	☒ Yes	☐ No
<i>Has the LRO conducted effective proportionate and necessary consultation activities with internal/external stakeholders and subject matter experts to identify impacted individuals/groups?</i>	☒ Yes	☐ No
<i>Has the /LRO listed all equality impact identified via their collation and evaluation of data/information and/or consultation activities?</i>	☒ Yes	☐ No
<i>Has the LRO effectively demonstrated taking proportionate and necessary steps to eliminate and/or reduce all identified negative equality impact?</i>	☒ Yes	☐ No
<i>If negative impact has been identified which cannot be eliminated or reduced, has the LRO mitigated the impact by providing an objective justification supported through an evidenced-based Legitimate Aim?</i>	☒ Yes	☐ No
<i>Has the LRO clearly outlined their Monitoring and Review Strategy demonstrating how future equality impact will be 'collated, evaluated, identified and mitigated'?</i>	☒ Yes	☐ No

Line Managers Recommendations:

Approve this EIA document, and implement Policy.

Supervisor Name Rank/Band:		Date Completed:		09/07/2026
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STEP 8B: SENIOR RESPONSIBLE OFFICER (SRO) DECISION MAKING

SRO's are required to endorse policies and practices within the MPS. If an SRO rejects a proposal based on an EIA's findings, they are required to record their recommendations. Rejected proposals require new EIA completion and further SRO endorsement (in which case state the date of the original EIA for audit purposes).

Reject the Policy / Proposal	☐ Yes	☒ No
Implement the Policy / Proposal	☒ Yes	☐ No
Produce an alternate Policy / Proposal (if so, a new EIA must be completed)	☐ Yes	☒ No
If this EIA is a successor to a previous EIA as a result of an alternative proposal, state the date of the original EIA	Date	

SRO Recommendations:

Approved

SRO Name Rank/Grade:	T/BB2 Director of Data	Date Completed:	09/07/2026
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NOT PROTECTIVELY MARKED

Retention period: 7 years