

SECTION 75 POLICY SCREENING FORM

Section 75 Statutory Equality Duties

http://www.equalityni.org/S75duties

The promotion of equality of opportunity entails more than the elimination of discrimination. It may also require proactive measures to be taken to maintain and secure equality of opportunity.

Section 75 (1) requires the University in carrying out its functions, powers and duties to have *due regard to the need to promote equality of opportunity* between –

- persons of different religious belief, political opinion, racial group, age, marital status, or sexual orientation
- men and women generally
- persons with a disability and persons without
- persons with dependants and persons without.

Without prejudice to the obligations set out above, the University is also required to:

- a) have *regard to the desirability of promoting good relations* between persons of different
 - religious belief
 - political opinion; or
 - racial group
- b) meet legislative obligations under the Disability Discrimination Order.

What is a policy?

The Equality Commission for Northern Ireland state in their guidance¹ that the term 'policy' is used to denote any strategy, policy (proposed/amended/existing) or practice and/or decision, whether written or unwritten.

The University's Equality Scheme reflects the Equality Commission's definition of a policy and this should be applied in determining what needs to be screened.

If you are in doubt, please contact the Diversity and Inclusion Unit for advice. Equality screening guidance is also available at Queen's website or by contacting the Diversity and Inclusion Unit.

Part 1. Policy scoping

The first stage of the screening process involves scoping the policy under consideration. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

It should be remembered that the Section 75 statutory duties apply to internal policies (relating to people who work for the University), as well as external policies (relating to those who are, or could be, served by the University).

¹ Section 75 of the Northern Ireland Act 1998, A Guide for Public Authorities' (April 2010), page 30. A policy may include planning decisions, service changes, corporate strategies, policy development, practices, guidelines, procedures and protocols; board papers

A. Information about the policy

Name of the policy to be screened and description				
Student Complaints Procedure				
Is this an existing, revised or a new policy? (please append policy to the screening form)				
Existing Policy				
What is it trying to achieve? (intended aims/outcomes)				
The University is dedicated to the highest international standards of teaching, scholarship and research, and to the advancement of knowledge, in an environment of equality, tolerance and mutual respect for all its staff and students. To help achieve and maintain these standards, the University has in place a range of quality assurance mechanisms, including the following Student Complaints Procedure				
Are there any Section 75 categories which might be expected to benefit from the policy? If so, explain how.				
It is intended that all students, including those from Section 75 categories would benefit from having access to the Student Complaints Procedure				
Who initiated or wrote the policy?				
The Procedure, which has been in existence for a number of years, would have been drafted by staff in Academic Affairs, and approved through the University's governance committees				
Directorate responsible for devising and delivering the policy?				
Academic and Student Affairs				

Background to the Policy to be screened.

Include details of any pre-consultations/consultations which have been conducted and/or whether the policy has previously been tabled at the University's Operating Board or the Standing Committee of the Senate.

be th	nis is a Procedure which has been in existence for some time – it would have originally een approved by Academic Council and published in the University Calendar as well as be University website. There is no record of an Equality Impact Assessment being Indertaken at the time it was originally drafted.
В.	Implementation factors
	re there any factors which could contribute to/detract from the intended m/outcome of the policy?
No	0
If y	yes, are they
	financial
	legislative
	other, please specify:
C.	Main stakeholders affected
	ho are the internal and external stakeholders (actual or potential) that e policy will impact upon?
\boxtimes	staff
\boxtimes	service users
	other public sector organisations
	voluntary/community/trade unions

other, please specif	y:

D. Other policies with a bearing on this policy

• what are they? (please list)

Serious Misconduct Policy Academic Appeals Policy Student Conduct Regulations

• who owns them?

Academic and Student Affairs

E. Available evidence

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

This means any data or information you currently hold in relation to the policy or have gathered during policy development. Evidence to inform the screening process may take many forms and should help you to decide who the policy might affect the most. It will also help ensure that your screening decision is informed by relevant data.

Section 75 category	Details of evidence	ce/informat	ion	
	QUB Student Profile			
Religious belief	Our Student HESA data for 2020-2021 shows our student profile by Religion:			
		No. of		
	Community Background	Students	6.5	
	Refused or Unknown	1,643	7.5	
	Other religion	1,904	30.0	
	No Religion	7,606	56.0	
	Christian	14,211	30.0	
	Total	25,364	100.00%	
Political opinion	We do not collect data in relation to student political opinion(s). We do not make assumptions on student political opinion(s) based on student community background.			
Racial group These statistics reflect our Student HESA data for 2020-2021 by Ethnicity: 94.9% of our students identified as White; and 5.1% identified as Black Minority Ethnic (BME). Of those students who identified as Black Minority Ethnic:			d E).	
	No. of			
		Students	%	
	1			52.9%
	Asian	544	;	32.970
	Asian Black	544 131		12.8%

	Other			0.00/	
	Other		68	6.6%	
	Total		1027	100.00%	
Age		Student HES	lents were und	0-2021 which sh er 21 years of a	
Marital status	9.37% w1.18% w2.31% w0.52% w	were single; ere married or ere cohabiting ere divorced of	r in a civil partr I; or civil partners	ership;	ed that:
Sexual orientation	QUB Student Pr		data relating t	o the sexual orio	entation of its students.
Men and women generally	prefer to select 'd	No. of Students 14,594 10,767 3 25,364 le data shows other' in regardne wider popu	d to their gende lation, a greate	r identity. How	in 2020-2021 academic year, ever, we recognise that there will our student population who do
Disability	QUB Student Provided Out • 85.5% of	Student HES	A data for 202 no known disa		nowed that:

	14.5% of students reported having a disability.			
Of those who disclosed they had a disability:				
	Disability	No. of Students	%	
	A long standing illness or health condition	348	946.17%	
	A mental health condition such as depression, schizophrenia or anxiety disorder	1312	3567.16%	
	A physical impairment or mobility issues	96	261.01%	
	A social/communication impairment such as Asperger's syndrome/other autistic spectrum disorder	163	443.18%	
	A specific learning difficulty such as dyslexia, dyspraxia or AH(H)D	796	2164.22%	
	Blind or a serious visual impairment uncorrected by glasses	28	76.13%	
	Deaf or a serious hearing impairment	49	133.22%	
	Two or more impairments and/or disabling medical conditions	589	1601.41%	
	a disability, impairment or medical condition that is not listed above	297	807.50%	
	Total	3678	100.00%	
Dependants QUB Student Profile We reviewed our Student HESA data for 2020-2021 which showed that: 88.17% of students had no dependants; and 11.83% of students reported having dependant(s).				

F. Needs, experiences and priorities

Having looked at the data/information you have collected in the question above, what does this tell you are the needs, experiences and priorities for the people who fall into the groups below, in relation to your policy²? And what is the actual or likely impact on equality of opportunity for those affected by the policy. (See appendix 1 for information on levels of impact).

² If you do not have enough data to tell you about potential or actual impacts you may need to generate more data to distinguish what groups are potentially affected by your policy.

Religious belief	Having reviewed the data there should be no additional needs for the section 75 group in relation to accessing or using the Student Complaints Procedure.	Minor
Political opinion	Having reviewed the data there should be no additional needs for the section 75 group in relation to accessing or using the Student Complaints Procedure.	Minor
Racial group	Having reviewed the data there should be no additional needs for the section 75 group in relation to accessing or using the Student Complaints Procedure.	Minor
Age	Having reviewed the data there should be no additional needs for the section 75 group in relation to accessing or using the Student Complaints Procedure.	Minor
Marital status	Having reviewed the data there should be no additional needs for the section 75 group in relation to accessing or using the Student Complaints Procedure.	Minor
Sexual orientation	This data is not held and therefore cannot be reviewed - however there should be no additional needs for the section 75 group in relation to accessing or using the Student Complaints Procedure.	Minor
Men and women generally	Having reviewed the data there should be no additional needs for the section 75 group in relation to accessing or using the Student Complaints Procedure.	Minor
Disability	Having reviewed the data there should be no additional needs for the section 75	Minor

	group in relation to accessing or using the Student Complaints Procedure.	
Dependants	Having reviewed the data there should be no additional needs for the section 75 group in relation to accessing or using the Student Complaints Procedure.	Minor

Part 2 Screening questions

1. What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories?				
Section 75 category	Issue	Minor/major/none?		
Religious belief	No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	None		
	All students are advised on how to receive support and guidance when using the Student Complaints Procedure. The Student Complaints Procedure will potentially have a positive impact on			
	have a positive impact on all students, including on			

	the grounds of religious belief.	
Political opinion	No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	None
	All students are advised on how to receive support and guidance when using the Student Complaints Procedure.	
	The Student Complaints Procedure will potentially have a positive impact on all students, including on the grounds of political opinion.	
Racial group	No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	None

Marital status	Procedure will potentially have a positive impact on all students, including on the grounds of age. No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to	None
	All students are advised on how to receive support and guidance when using the Student Complaints Procedure. The Student Complaints	
Age	No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	None
	All students are advised on how to receive support and guidance when using the Student Complaints Procedure. The Student Complaints Procedure will potentially have a positive impact on all students, including on the grounds of race.	

		,
	equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	
	All students are advised on how to receive support and guidance when using the Student Complaints Procedure.	
	The Student Complaints Procedure will potentially have a positive impact on all students, including on the grounds of marital status.	
Sexual orientation	No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	None
	All students are advised on how to receive support and guidance when using the Student Complaints Procedure.	
	The Student Complaints Procedure will potentially have a positive impact on all students, including on	

	the grounds of sexual orientation.	
Men and women generally	No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	None
	All students are advised on how to receive support and guidance when using the Student Complaints Procedure.	
	The Student Complaints Procedure will potentially have a positive impact on all students, including on the grounds of gender.	
Disability	No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	None
	All students are advised on how to receive	

	support and guidance when using the Student Complaints Procedure. The Student Complaints Procedure will potentially have a positive impact on all students, including on the grounds of disability.	
Dependants	No issues – all students are expected to benefit from a clear complaints procedure and there is an explicit commitment to equality, diversity and fair treatment in the policy – and a commitment that students are not treated less favorably having used the procedure.	None
	All students are advised on how to receive support and guidance when using the Student Complaints Procedure.	
	The Student Complaints Procedure will potentially have a positive impact on all students, including on the grounds of dependents.	

2. Are there any actions which could be taken to reduce any adverse impact which has been identified or opportunities to better promote equality of opportunity?

Section 75 category	Issue	Mitigating Measure
Religious belief	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All complaints are an opportunity to identify issues of concern, including those which impact on good relations, and put in place remedial cation where identified as required.	None
Political opinion	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All complaints are an opportunity to identify issues of concern, including those which impact on good relations, and put in place remedial cation where identified as required.	None
Racial group	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All	None

	complaints are an opportunity to identify issues of concern, including those which impact on good relations, and put in place remedial cation where identified as required.	
Age	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All complaints are an opportunity to identify issues of concern, including those which impact on good relations, and put in place remedial cation where identified as required.	None
Marital status	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All complaints are an opportunity to identify issues of concern, including those which impact on good relations, and put in place remedial cation where identified as required.	None

Sexual orientation	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All complaints are an opportunity to identify issues of concern, including those which impact on good relations, and put in place remedial cation where identified as required.	None
Men and women generally	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All complaints are an opportunity to identify issues of concern, including those which impact on good relations, and put in place remedial cation where identified as required.	None
Disability	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All complaints are an opportunity to identify issues of concern, including those which	None

	impact on good relations, and put in place remedial cation where identified as required.	
Dependants	There is a commitment in the procedure that those raising complaints are not treated less favorably as a result of having raised a complaint. All complaints are an opportunity to identify issues of concern, including those which impact on good relations, and put in place remedial cation where identified as required.	None

3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Details of policy impact Level of impact Good minor/major/none relations category Religious Positive – if an evidence based Major belief complaint of this nature is upheld (and even when it is not) then it gives the University an opportunity to identify learnings and put in place both remedial action as well as proactive measures to address future recurrence of the issues as far as it reasonably can.

Political opinion	Positive – if an evidence based complaint of this nature is upheld (and even when it is not) then it gives the University an opportunity to identify learnings and put in place both remedial action as well as proactive measures to address future recurrence of the issues as far as it reasonably can.	Major
Racial group	Positive – if an evidence based complaint of this nature is upheld (and even when it is not) then it gives the University an opportunity to identify learnings and put in place both remedial action as well as proactive measures to address future recurrence of the issues as far as it reasonably can.	Major

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If Yes , provide details	If No , provide reasons
Religious belief	Positive – if an evidence based complaint of this nature is upheld (and even when it is not) then it gives the University an opportunity to identify learnings and put in place both remedial action as well as proactive measures to address future recurrence of the issues as far as it reasonably can.	

Political opinion	Positive – if an evidence based complaint of this nature is upheld (and even when it is not) then it gives the University an opportunity to identify learnings and put in place both remedial action as well as proactive measures to address future recurrence of the issues as far as it reasonably can.	
Racial group	Positive – if an evidence based complaint of this nature is upheld (and even when it is not) then it gives the University an opportunity to identify learnings and put in place both remedial action as well as proactive measures to address future recurrence of the issues as far as it reasonably can.	

E Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities? (For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

There are no specific barriers to people of multiple identities accessing the Student Complaints Procedure. There are protections built into the scope of the procedure, and at each stage, students' needs can be accommodated to help them access the investigation and hearing stages. Students are routinely directed to Advice SU for individual support in raising a complaint – and a Student Guide is published alongside the procedure to help students understand how best to use and access the Student Complaints form. Where students are invited to formal meetings they are asked to indicate any accessibility requirements.

F Disability Duties

Disability Duties

Consider whether the policy:

a) Discourages disabled people from participating in public life and fails to promote positive attitudes towards disabled people.

The Student Complaints Procedure is widely promoted to all students, including students with disabilities. The forms and guidance are accessible. The procedure by its nature encourages individuals to raise complaints and concerns with the University. In addition, the Student Disability Service has in the past undertaken a survey of students registered with a disability to ask them about their experiences – this gives students an additional an opportunity

to raise specific issues relating to their disability rather than relying on students raising a complaint in order for the University to address the issue.

b) Provides an opportunity to better positive attitudes towards disabled people or encourages their participation in public life.

Yes – if a complaint is upheld, and even when it is not, this gives the University the opportunity to reflect and make adjustments – including where the nature of the complaint could imply negative attitudes to people with disabilities.

Part 3. Screening decision

Through screening, an assessment is made of the likely impacts, either major, minor or none, of the policy on equality of opportunity and/or good
relations for the relevant categories. Completion of screening should lead to one of the following three outcomes; please mark an x in the
appropriate box:
□ 'Screened out' i.e. the likely impact is none and no further action is required
□ 'Screened out' with mitigation i.e. the likely impact is minor and measures will be taken to mitigate the impact or an alternative policy will be proposed
☐ 'Screened in' for an equality impact assessment (EQIA) i.e. the likely impact is major and the policy will now be subject to an EQIA
If the decision is not to conduct an equality impact assessment, please provide details of the reasons.
Click here to enter text.

If the decision is not to conduct an equality impact assessment, but the policy has minor equality impacts, please provide details of the reasons for this decision and of any proposed mitigating measures or proposed alternative policy.

The Student Complaints procedure is accessible to individuals from section 75 groups – whether or not their complaint relates to their section 75 characteristic. Some minor adjustments will be made to ensure that at the Stage 1 and 2 levels, those operating the procedures are mindful of the accessibility needs of section 75 categories – for example the timings of meetings for students with dependents, or accessible rooms for students with mobility needs.

If the decision is to subject the policy to an equality impact assessment, please provide details of the reasons.	
Click here to enter text.	

D Timetabling and prioritising

If the policy has been 'screened in' for equality impact assessment answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	Click
Social need	Click
Effect on people's daily lives	Click
Relevance to the University's functions	Click

E is the policy affected by timetables established by other relevant public authorities?

If yes, please pr	ovide details		

Part 4. Monitoring

Effective monitoring will help the University identify any future adverse impact arising from the policy which may lead the University to conduct an equality impact assessment, as well as help with future planning and policy development.

Please detail how	you will monitor	the effect of	the policy	?

Academic Affairs is required to produce an annual report to Education Committee on all complaints undertaken in the previous year – this includes a screening of the profile of students raising complaints (where known) as well as any trends or lessons learnt.	

What data is required in the future to ensure effective monitoring of the policy?

See above. Schools and Directorates are asked to retain data on stage 1 complaints including the nature of the complaint. At Stage 2 and 3 of the procedure this is retained in Academic Affairs.

Part 5 - Data Protection

If applic	able	, has l	legal	advic	e been given due consideration?
Yes	\boxtimes	No		N/A	
Has due this poli		nsidera	ation	been	given to information security in relation to
Yes	\boxtimes	No			

Part 6 - Approval and authorisation

Screened by:	Position/Job Title	Date
Helen McNeely	Head of Student and Academic Affairs	18/03/22
Approved by:		
Maria Lee	Acting Director, Academic and Student Affairs	21/03/22

Please note, an update to the Religious Belief evidence section with more accurate data (page 6) was reviewed and approved 29 September 2022.

A copy of the screening form, for each policy screened, should be 'signed off' and approved by the senior manager responsible for the policy

In instances where a screening decision concludes that an EQIA is required then the screening form should be countersigned by a Director.

There may at times be policy issues which fall within the scope of being novel, contentious or politically sensitive and could only be taken forward following consultation with the University's Operating Board and/or Standing Committee of the Senate. Where a policy screening highlights such issues the screening form must be signed off by the Director prior to proceeding to the University's Operating Board and/or the Standing Committee of the Senate.

Following ratification, a copy of the approved screening form, and associated policy must be forwarded to the Diversity and Inclusion Unit for publication on the University's website.

ADDITIONAL INFORMATION TO INFORM THE ANNUAL EQUALITY PROGRESS REPORT TO THE EQUALITY COMMISSION

1.	Please provide details of any measures taken to enhance the level of engagement with individuals and representative groups as part of screening.
2.	In developing this policy were any changes made as a result of equality issues raised during : (a) pre-consultation / engagement; (b) formal consultation;
	(c) the screening process; and/or(d) monitoring / research findings.If so, please provide a brief summary including how the issue was identified, what changes were made, and what will be the expected outcomes / impacts for those affected.
3.	Does this policy / decision include any measure(s) to improve access to services including the provision of information in accessible formats? If so please provide a short summary.

Appendix 1

Levels of Impact (Questions 6-9)

Introduction

In making a decision as to whether or not there is a need to carry out an equality impact assessment, you should consider the answers provided to the questions above.

In addition, the **screening questions** above further assist you in assessing your policy and must be completed. Some of these questions require you to assess the level of impact of the proposed policy on "equality of opportunity" and "good relations". The scale used when assessing this impact is either "None", "Minor" or "Major". The following paragraphs set out what each of these terms mean.

If your conclusion is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then you may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, you should give details of the reasons for the decision taken.

If your conclusion is <u>major</u> in respect of one or more of the Section 75 equality of opportunity and/or good relations categories, then consideration should be given to subjecting the policy to the equality impact assessment procedure.

If your conclusion is <u>minor</u> in respect of one or more of the Section 75 equality categories and/or good relations categories, then consideration should still be given to proceeding with an equality impact assessment, or to introduce:

- measures to mitigate the adverse impact; or
- an alternative policy to better promote equality of opportunity and/or good relations.

In favour of a 'major' impact

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;
- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

In favour of 'minor' impact

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

a) The policy has no relevance to equality of opportunity or good relations.

The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.