



Equality Screening Guidance Notes

Alternative formats

If you require this document in an alternative format, such as Braille, audio CD/MP3, easy read, computer disc and/or another language, please contact us to discuss your requirements.

24 November 2017

Equality Screening Guidance

	Page
Introduction	
1. Legislation	3
2. Equality Screening	6
3. Monitoring	32
4. Data Protection	34
5. Approval and Authorisation	34
6. Publication of Screening Decision	35
7. Contact Details	35
Annex 1 Northern Ireland Act 1998, Section 75	

Equality Screening Guidance

Introduction

This guidance is intended to assist staff when considering whether a new strategy, plan or legislative development, policy review or decision has the potential to impact on different groups of people.

Integrating equality and good relations at all levels and all stages of policy making and service delivery is central to the statutory equality duties. Public authorities are required to tackle inequalities and disadvantage, and to also take pro-active steps to encourage greater participation and improved outcomes for under-represented groups.

Legislation – An Overview

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.

In addition, Section 75 (2) requires the University to have *regard to the desirability of promoting good relations* between persons of different

- religious belief
- political opinion; or
- racial group

As individuals do not neatly fit into one equality category or another, this means that individuals may be members of a number of Section 75 categories. Section 75 enables multiple identity issues to be considered¹ as well as issues regarding particular equality categories.

Note - The Section 75 duties apply to all policies; this includes our internal policies (relating to staff) as well as to our external policies (relating to those who use or could potentially use our services).

Disability Discrimination Order (DDO) 2006

<http://www.equalityni.org/Employers-Service-Providers/Public-Authorities/Public-authority-duties>

Under the DDO², public authorities, when carrying out their functions must have due regard to the need to:

- promote positive attitudes towards disabled people; and
- encourage participation by disabled people in public life³.

¹ See ECNI 'A Guide for Public Authorities' April 2010, page 25

² Section 49A of the Disability Discrimination Act 1995 (as amended by the Disability Discrimination (NI) Order 2006)

³Public life is a very broad term. It can include for example; public appointments, community groups, internal / external committees and boards.

These two duties recognise that in many areas of life, disabled people do not have an opportunity to contribute and participate on an equal basis with others. The Equality Commission for Northern Ireland suggest that people with disabilities can often experience ‘hidden barriers’ such as negative attitudes, lack of respect or intolerance as well as other barriers; physical access to buildings and the wider community environment; and barriers in the way information and public services are provided.

Public authorities are required to take action to tackle discrimination and negative attitudes towards disabled people; to remove barriers to their participation, and to take forward work to help encourage greater participation and representation.

How do we implement the statutory duties?

Under Schedule 9 of the Act, public bodies are required to submit an Equality Scheme to the Equality Commission for Northern Ireland showing how we intend to carry out our equality duties.

The Equality Scheme is our plan to show how we will promote equality of opportunity and good relations. It ensures that the promotion of equality is central to our decision making and policy processes. The University’s Equality Scheme is available at this [link](#)

Under Section 49B of the DDA we are required to submit, to the Equality Commission, a Disability Action Plan showing how we intend to carry out our disability duties. We also submit an annual equality progress report

which details the progress we have made towards meeting our statutory duties.

The University's Disability Action Plan and annual equality progress reports are available at the [Diversity and Inclusion Unit's website](#).

Equality Screening

Note: specific training on equality screening can be made available for staff. Please contact the Diversity and Inclusion Team for further details.

What is a policy?

The Equality Commission for Northern Ireland state in their guidance⁴ 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.

What is screening?

Screening is the filtering process by which we determine if our actions or proposed actions create a differential impact on different groups of people. Screening should be initiated during the development of any policy, procedure or function whether written or unwritten; and across all aspects of our business, both internal and external.

⁴Section 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

The Equality Commission for Northern Ireland⁵ state that “Screening identifies policies that are likely to have an impact on equality of opportunity and helps to draw considerations of equality of opportunity into the policy making process. It is one of the two methods by which the necessary level of “**regard**” is demonstrated as being paid to the statutory equality duty and public authorities must follow the arrangements contained in equality schemes.”

Why screen?

As a public authority, we have a statutory duty to do so. The University has committed within our equality scheme to use the tools of screening and equality impact assessment to assess the likely impact of a policy on the promotion of equality of opportunity and good relations.

Screening enables us to identify at an early stage; those policies, actions or duties that are likely to have an impact on equality of opportunity and / or good relations for specific groups⁶. It also offers an opportunity to identify how to better promote equality of opportunity and good relations, improve decision making and support ‘evidence-based’ policy making.

Using the ‘screening template’⁷ provides the following benefits:

- it provides a paper trail to demonstrate that equality considerations have been made;
- it supports ‘evidence based’ policy making;
- it takes you through the screening process step-by-step and as such serves as a **screening tool**; and

⁵ Effective Section 75 Equality Assessments: Screening and Equality Assessments, 2017, page 2.

⁶ As above, see page 3-4.

⁷ Equality Screening Template available [here](#).

- it also provides a **mechanism** to quality-assure your policy/decision and to manage any associated risks.

When to screen?

Screening should be introduced at the earliest opportunity when developing or reviewing a policy, or during successive stages of implementation⁸, rather than after the policy has been established.

Even if a screening exercise and / or a full Equality Impact Assessment (EQIA) has been carried out on an 'overarching' strategy or early options paper; it may still be necessary for equality screening to be carried out again⁹, in respect of those separate policies or strands emerging from the overarching strategy.

There are generally two main circumstances when screening should be conducted, these are:

1. Where a 'policy' is being developed and screening can easily be integrated into the process and engagement with stakeholders can begin at an early stage. This is normally where the policy-making process is proactive.
2. Where an existing policy has to be changed or modified in response to a new situation or because of external forces e.g. financial constraints. This is normally where the policy-making process is likely to be more reactive.

Undertaking screening after policy proposals have been developed may be inefficient in terms of time and less effective if the policy has to be

⁸ ECNI 'A Guide for Public Authorities' (April 2010), page 52

⁹ ECNI 'A Guide for Public Authorities' (April 2010), page 52.

retrospectively reviewed to address or mitigate against negative equality impacts.

The University's Equality Scheme commits the staff to:

- complete screening “at the earliest opportunity in policy development”;
- screen “prior to implementation” unless there are exceptional circumstances; and

for more detailed strategies or policies that are to be put in place through a series of stages screening should take place at “the appropriate stages during implementation”.

Who is responsible for screening?

The Equality Commission for Northern Ireland recommends¹⁰ that the lead role in the screening of a policy is taken by the policy decision-maker who has the authority to make changes to the policy. The screening of a policy should also involve other relevant team members, those who implement the policy and staff members from other relevant work areas.

Screening is about mainstreaming equality and good relations. As staff within the Diversity and Inclusion Unit may be required to investigate any alleged failures to comply with the Equality Scheme they will only be able to provide you with advice and support on the screening process.

They cannot be directly involved in the completion of the screening template.

¹⁰ ECNI 'A Guide for Public Authorities' (April 2010), page 52.

What does screening involve?

The first step to screening involves gathering relevant evidence to inform the assessment, which may be either qualitative or quantitative or both.

The absence of evidence does not mean that there is no impact.

The Equality Commission advises that ‘arrangements must be made to obtain relevant information, whether quantitative or qualitative.... to clearly demonstrate why a policy is screened in for equality impact assessment¹¹ or screened out [as not requiring] an equality impact assessment’¹².

The Screening Template

The Screening Template is made up of 6 parts as follows:

Part 1- Policy scoping – asks you to provide details about the policy / decision being screened and what available evidence you have gathered to help make an assessment of the likely impact on equality of opportunity and good relations.

Part 2 - Screening questions – asks about the extent of the likely impact of the policy on groups of people within each of the Section 75 categories. This includes consideration of multiple identity and good relations issues.

Part 3 - Screening decision – in light of the evidence you are asked to record your assessment of the impact and whether or not there is a need to carry out an Equality Impact Assessment (EQIA), or to introduce

¹¹ An Equality Impact Assessment (EQIA) is a thorough and systematic analysis of a policy, whether that policy is written or unwritten, formal or informal, and irrespective of the scope of that policy or size of the public authority. An EQIA must always be conducted in accordance with the produce outlined in Annex 1 of the ‘Guide to Statutory Duties (Procedure for Conduct of Equality Impact Assessments).

¹² ECNI ‘A Guide for Public Authorities (April 2010), page 52; ECNI Practical Guidance on EQIA (Feb 2005).

measures to mitigate the likely impact, or the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

Part 4 - Monitoring – you are asked to record what monitoring arrangements will be put in place in relation to this particular policy / decision.

Part 5 – Data protection – you are asked to record your consideration of data protection.

Part 6 - Approval and authorisation – verifies the public authority's approval of a screening decision by a senior manager responsible for the policy.

Part 1 – Policy scoping

Information about the policy

Name of the policy to be screened and description

Is this an existing, revised or a new policy? (please append policy to the screening form)

What is it trying to achieve? (intended aims/outcomes)

Are there any Section 75 categories which might be expected to benefit from the policy?

If so, explain how.

Who initiated or wrote the policy?

Directorate responsible for devising and delivering the policy?

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

Information about the policy / decision

What is the name of the policy / description: Provide a short name for the policy/decision that accurately describes its purpose.

Is this an existing, revised or a new policy/decision?

It is sufficient to simply record 'existing', 'revised' or 'new' as appropriate. However, if you think that it is necessary to clarify this further please add additional comments.

What is it trying to achieve? (Intended aims / outcomes)

You should provide an overview of the policy / decision in particular highlighting the aims and expected outcomes. If necessary you can cross reference this to other documents, for example, if you are consulting on a draft policy document you could provide a summary and refer the reader to the appropriate parts of that document.

Who initiated or wrote the policy?

Complete as appropriate.

Directorate responsible for devising and delivering the policy?

Complete as appropriate.

Background to the Policy/Strategy/Procedure to be screened.

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

Implementation factors

If there are any factors which could contribute to and/or detract from the intended aim(s)/outcome(s) of the policy/decision you should identify

them (e.g. financial, legislation). If you consider it necessary add text to explain.

Main Stakeholders affected

Use your knowledge of the policy / decision to identify the key stakeholders. Four key groupings have been identified – staff, service users, other public sector organisations and voluntary/community/trade unions. If there are any other, please tick the ‘other’ box and provide details as appropriate.

Other policies with a bearing on this policy

Specify if the policy/decision relates to any other policies. There can be a wide range of policies that are in some way linked with others. Specify only the key related policies that have a direct bearing on the policy/decision.

These may already have been screened and the process and outcome will be relevant. Make sure you obtain and use this information. If you are developing the policy according to statutes or guidance from elsewhere, make this clear – do not be seen to have responsibility for something, which “belongs” to another body.

Consideration of available data/ research

In this section you **must** record the evidence you have gathered to inform the policy. This section is very important as it will help to inform subsequent sections accordingly and it is essential that it is considered carefully.

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/information
Religious belief	Click here to enter text.
Political opinion	Click here to enter text.
Racial group	Click here to enter text.
Age	Click here to enter text.
Marital status	Click here to enter text.
Sexual orientation	Click here to enter text.
Men and women generally	Click here to enter text.
Disability	Click here to enter text.

Dependants	Click here to enter text.
------------	---

Gathering Evidence/Available data

The University's Equality Scheme commits staff to gather relevant information and data, both qualitative and quantitative. In taking this evidence into account you should consider the different needs, experiences and priorities for each of the Section 75 equality categories.

Any screening decision will be informed by evidence.

Qualitative data refers to the experiences of individuals related in their own terms, and based on their own experiences and attitudes.

Qualitative data is often used to complement quantitative data to determine why policies are successful or unsuccessful.

Quantitative data refers to numbers (that is, quantities), typically derived from either a population in general or samples of that population. This information is often analysed either using descriptive statistics (which summarise patterns), or inferential statistics (which are used to infer from a sample about the wider population).

Actions to source relevant data (quantitative and / or qualitative) should be undertaken early on in the process. This will help ensure that the decisions made and recorded on the screening template are based on relevant information and evidence; that they accurately reflect the impact of the proposed decisions on different groups of people and indicate whether a full equality impact assessment will be required.

Evidence can come from many sources, including for example -

- Formal systems – such as Census / NISRA data
- Feedback from various staff, public and customer surveys
- Feedback from consultations / meetings with equality groups
- Research / reports where specific issues / inequalities have been identified
- Engagement with others e.g. trade unions, other directorates, sectoral representative's, Diversity and Inclusion Unit
- Anecdotal and other locally available information sources
- Early consultation meetings, workshops, telephone conversations
- Information / research on policy issues from outside NI

Remember the absence of evidence does not necessarily mean that there is no likely impact. You should take reasonable steps to obtain relevant information. In some cases, e.g. significant strategies, you may wish to consider commissioning research. You should record any steps that you have taken and evidence found. Completed screening forms will be published on the University website and will also be made available to consultees. As your assessment of the potential equality impacts of the policy may be subjected to close scrutiny or challenge; it is important that the screening assessment is robust.

Needs, experiences and priorities

In light of the information you have collected, in particular the available evidence, you now need to record your findings in terms of any of the groups that might have different needs in relation to the policy/decision.

For example:

- If you are looking at a training strategy, those working part-time (most of which are females who may have dependants) might have difficulties attending full-day training courses.
- If your policy/decision relates to a service there may be access issues, for example – those with a physical or sensory disability, language needs etc.

Part 2 - Screening Questions

Introduction

The screening questions below have been developed by the Equality Commission¹³ and are designed to help you consider and record the possible impact of the policy/decision for Section 75 groups. The University's Equality Scheme commits staff to applying these four questions. These will help inform your overall screening decision. They should be completed in light of all the evidence you have collected from research, consultation etc.

If the policy / decision involves a procurement aspect you should consider whether there is potential to promote equality of opportunity through the procurement services. The Equality Commission has produced detailed [guidance](#) on integrating equality of opportunity and sustainable development into public sector procurement.

The four questions below and should be applied to all policies as part of the screening process. All four questions **must** be answered.

1. What is the likely **impact on equality of opportunity** for those affected by this policy, for each of the Section 75 equality categories? (minor/ major/ none).

¹³ See Page 54, ECNI 'A Guide for Public Authorities' published April 2010

This question is asking are there any steps/action which could be taken to reduce any adverse impact (as addressed above). Details of the policy impact and your assessment of the level of impact should be recorded for each of the Section 75 categories. You should quote or reference any of the evidence and any findings in relation to needs, experiences and priorities that you rely on in making your assessment.

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	Details of impact.	Impact level.
Political opinion	Details of impact.	Impact level.
Racial group	Details of impact.	Impact level.
Age	Details of impact.	Impact level.
Marital status	Details of impact.	Impact level.
Sexual orientation	Details of impact.	Impact level.
Men and women generally	Details of impact.	Impact level.
Disability	Details of impact.	Impact level.

Dependants	Details of impact.	Impact level.
------------	--------------------	---------------

2. To what extent is the policy likely to impact on good relations between people of a different religious belief, political opinion or racial group? (minor / major/ none)

This should be completed in light of your knowledge of the policy / decision and the impacts that it will have. In particular, you should focus on the three categories – religious belief, political opinion and racial group. It is important to note that the context is the impact on good relations. A policy / decision may benefit one or more of these categories without having a good relations aspect and vice versa. It is ok to simply say “None”.

To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?		
Good relations category	Details of policy impact	Level of impact minor/major/none
Religious belief		
Political opinion		
Racial group		

3. Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?

This should be completed in light of your knowledge of the policy / decision and the impacts that it will have. You should pay particular attention to the aims and objectives identified and any Section 75 categories which are expected to benefit.

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	Details of impact.	Impact level.
Political opinion	Details of impact.	Impact level.
Racial group	Details of impact.	Impact level.
Age	Details of impact.	Impact level.
Marital status	Details of impact.	Impact level.
Sexual orientation	Details of impact.	Impact level.
Men and women generally	Details of impact.	Impact level.

Disability	Details of impact.	Impact level.
Dependants	Details of impact.	Impact level.

- 4. Are there opportunities to better promote good relations** between people of different religious belief, political opinion or racial group? Use your knowledge of the policy / decision to determine whether the policy will give any opportunities to better promote good relations. If there are opportunities provide details.

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		
Political opinion		
Racial group		

Consultation

This should include who you have talked to about your proposals, either internally or externally, to help you decide if the policy needs further or no further equality investigation. This will include any/all pre-consultations with for example trade unions, relevant section 75 groups and/ or their representatives etc.

Disability Duties

Under section 49A of the Disability Discrimination Act 1995 (as amended by the Disability Discrimination NI Order 2006), the Commission is required to proactively consider how it can:

- promote positive attitudes towards disabled people; and
- encourage the participation by disabled people in public life.

The Equality Commission has produced guidance for public authorities on ‘Promoting positive [attitudes](#) towards disabled people and encouraging the participation of disabled people in public life’:

<http://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/DisabilitydutiesGuideforPAs2007.pdf>

Public Life’ is a very broad term, encompassing for instance public appointments, user groups, reference or advisory groups etc.

You are asked to consider two questions and provide a response based on your knowledge of the policy / decision and feedback from stakeholders. If the answer is ‘No’ that is all that needs to be entered. If the answer is ‘Yes’ then you should provide details as appropriate.

- 1. Does the policy/decision in any way promote positive attitudes towards disabled people and/or encourage the participation by disabled people in public life?**
- 2. Is there an opportunity to better promote positive attitudes towards disabled people or encourage their participation in public life by making changes to the policy/decision or introducing additional measures?**

Additional considerations - Multiple Identity

Your earlier consideration will have been in relation to the impact for each of the S75 categories individually. Multiple identity refers to combinations of any of the nine equality categories, for example: older women (age / gender), traveller children (ethnicity / age) etc. You are asked to review the evidence in this context. As before, you should quote or reference any of the evidence and any findings in relation to needs, experiences and priorities that you rely on in making your assessment.

Part 3 - Screening decision

In this section of the form you must record:

- your overall assessment of the impact;
 - whether the evidence suggests that an EQIA is required;
 - your reason(s) for making your decision; and
 - if applicable, details of any mitigation or alternative policy introduced.
-
- 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.

Click here to enter text.

- If the decision is to subject the policy to an equality impact assessment, please provide details of the reasons.

Click here to enter text.

Outcome from Screening

The outcome from screening will lead to an assessment of the likely impacts of the policy on equality of opportunity and good relations. This assessment may be 'minor', 'major' or 'none'. All 'minor' or 'none' assessments should be accompanied with supporting evidence to explain how the decision was reached. Decisions should normally be approved by, where appropriate, and depending on the nature of the policy, a senior manager/or 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.

The overall screening assessment will lead to a conclusion that the policy is –

- 'screened in' - for an Equality Impact Assessment (EQIA)
- 'screened out' with mitigation or an alternative policy proposed or amended (assessments should describe the mitigating measures that will be introduced and explain how they will address the inequalities)
- 'screened out' - no EQIA needed. (Policies which are 'technical' in nature and will have no impact on people within the equality categories may lead to a 'none' assessment being reached).

Impact not known?

When considering the level of impact, you should not think of a 'none' assessment as an easy option to each of the screening questions. In cases where you don't know the likely impact and you do not have any data to draw from, you will need to outline how you propose to seek the necessary evidence to enable you to reach an informed screening decision. In the event of no relevant data being available, consideration should then be given to carrying out an equality impact assessment.

In reaching a decision as to whether or not there is a need to carry out an equality impact assessment or screen out the policy with mitigation, you should consider the evidence and answers to the four screening

questions.

There are three possible outcomes - no impact, minor impact and major impact. It is important to remember that the Commission's Equality Scheme stipulates that "**Any screening decision will be informed by evidence.**" Accordingly, the evidence should be the main factor in making your decision.

Major – if screening concludes that the likely impacts for one or more of the equality categories is 'major' – the policy should be 'screened in' for an equality impact assessment.

Minor – if screening concludes that the likely impacts for one or more of the equality categories is 'minor' – the policy should still be considered for a possible equality impact assessment. However, the policy may also be 'screened out' for an equality impact assessment, but with measures put in place to mitigate the adverse impact, or introducing an alternative policy to better promote equality of opportunity and good relations. The screening assessment should include a description of the mitigating measures that will be introduced, and an explanation of how they will address the inequalities.

None – if screening concludes that the likely impacts for one or more of the equality categories is 'none' i.e. as having no relevance to equality of opportunity or good relations, the policy should be 'screened out' for an equality impact assessment, with details provided of the reasons for the decision taken. All screened out decisions should include a sound rationale and be supported with

empirical evidence to show the basis upon which the screened out decision was reached.

Consideration of ‘major impact’

Screening can help identify those policies or decisions that will likely have a major impact on particular groups of people and should be subjected to an equality impact assessment. However, defining precisely what *major* means may be difficult to do, as opinions will vary widely (such as finances, services or legislative developments) depending on who you ask. You will need to make an informed judgement but the examples below may potentially result in a ‘major impact’ and would require a closer assessment-

- the proposed decision in terms of strategic importance is significant
- the proposed decision affects the public, customers or staff considerably
- the proposed decision is significant in terms of expenditure
- the proposed decision will likely have a direct and possibly unfair impact, or is likely to be experienced disproportionately, by one or more different groups of people
- the proposed decision will directly affect social need across one or more groups
- there exists a prior commitment to conduct an EQIA
- potential adverse impacts are unknown, because, for example, there is insufficient data upon which to make an assessment
- the proposed decision is likely to be politically controversial

Note that the Commissions' equality scheme stipulates that "If the screening concludes that the likely impact of a policy is 'major' in respect of one, or more, of the equality of opportunity and/or good relations categories, the Commission will subject the policy to an equality impact assessment."

Consideration of 'minor impact'

Where the screening assessment has concluded that the likely impact is 'minor' on one or more of the equality categories and an EQIA is not to be conducted; consideration should be given to actions to mitigate the adverse impact or to the introduction of an alternative policy to better promote equality of opportunity or good relations.

The ECNI recommends that where a policy is amended or an alternative one is introduced that the public authority should monitor more broadly than for adverse impact¹⁴

A '**minor impact**' might be your finding in the following circumstances:

- The policy / decision is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can be, or has been, eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;

¹⁴ of ECNI 'Monitoring Guidance for Use by Public Authorities (July 2007) page 9-10, para 2.13-2.20.

- Any equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

Consideration of ‘none’

‘No impact’ may be your finding and this might arise when the policy / decision:

- has no relevance to equality of opportunity or good relations;
- 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.

Mitigation

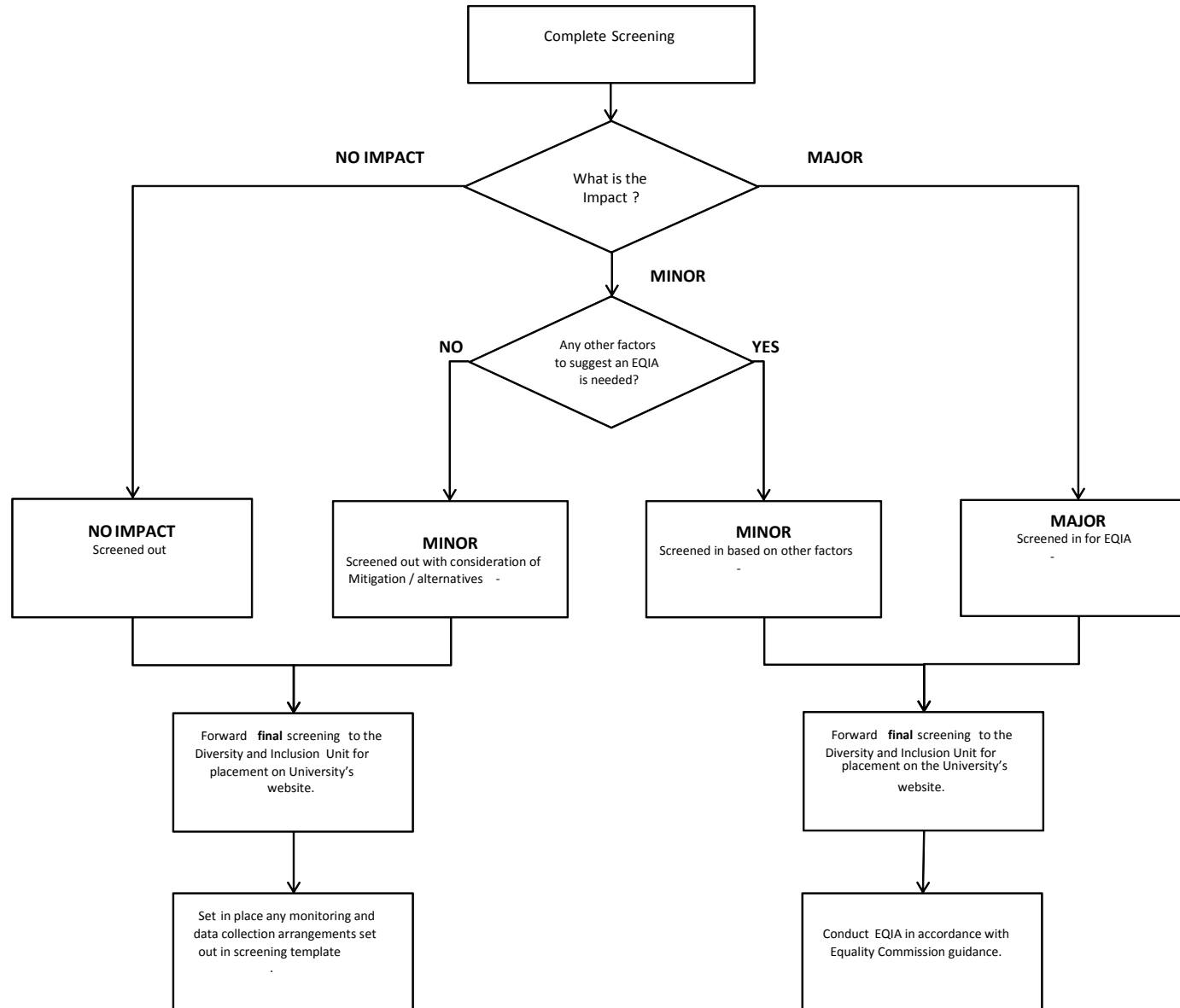
If you concluded during the course of screening that the likely impact is ‘**minor**’ and an equality impact assessment is not to be conducted, you **must** consider mitigation (or scope for further mitigation if some is already included) to lessen the severity of any adverse impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Can the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations?

You should use your knowledge of the policy / decision and any particular opportunities that it might present that would better promote equality of opportunity and/or good relations.

If you responded 'yes', please give reasons to support your decision, together with the proposed changes/amendments or alternative policy.

The Screening Decision.



Part 4 Monitoring

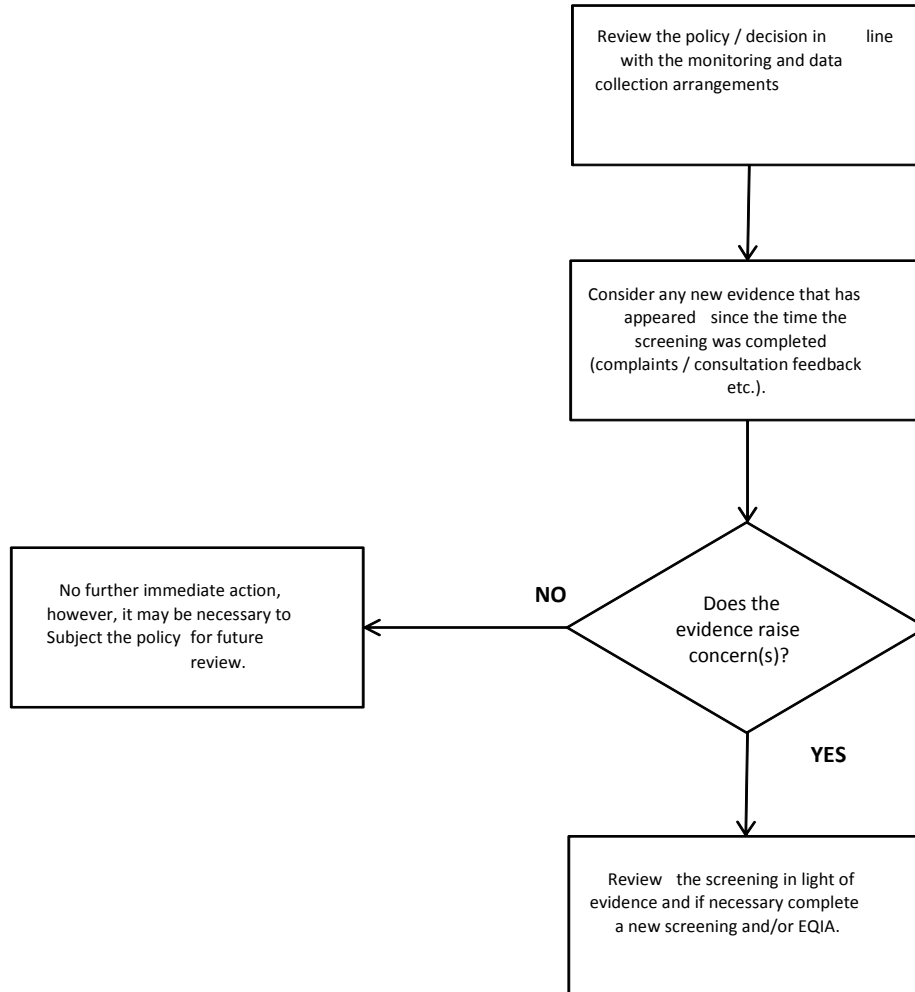
Effective monitoring will help identify any future adverse impact arising from the policy which may lead the University to revisit the original screening decision which could result in a decision to conduct an Equality Impact Assessment or consider further mitigations. The University acknowledges that monitoring can assist us to deliver better services and continuous improvement.

The University's Equality Scheme commits us to monitoring any adverse impact on the promotion of equality of opportunity of policies we have adopted. [We] are also committed that "where monitoring and evaluation shows that a policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, the University will ensure that the policy will be revisited to achieve better outcomes for relevant equality groups".

What data is required to ensure effective monitoring?

You should record on the screening template **how** you will monitor. This includes how you intend to monitor the effect of the policy/decision. Monitoring may also be through other work streams e.g. complaints, service feedback/uptake. You should put in place arrangements for how you will record the data collected, and/ or collect and record the data from other business areas

Monitoring. What happens after the screening is completed?



Part 5 - Data Protection

In this section please record your consideration of data protection.

Part 6 - Approval and Authorisation

The screening template should be used to formally record the screening assessment and the decision reached. The policy lead should sign and date the policy under the 'screened by' heading. It should then be countersigned by an approver. The approver should be 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 the 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.

Publication of Screening Decision

Details of all policies screened will be published on the University's website as committed to in the University's equality scheme.

Screening forms are published on a quarterly basis. All those on the University's Section 75 consultation list will be informed of the outcomes of our screening exercises every three months at which time an internet link will be provided to each screening assessment.

It is also good practice for you to advise those groups and individuals that you may have directly engaged with of the outcomes of the screening exercise - this also includes staff. If a consultee / stakeholder raises a concern about a screening decision and the evidence used, it may be necessary to rescreen the policy again.

Contact details -

For further advice on any aspect of screening or the statutory duties, please contact the Diversity and Inclusion Unit at:

Conor Curran on extension 1045
Fiona O'Connell on extension 1046
Leeann Matchett on extension 3039

Email: eqdiv@qub.ac.uk

Northern Ireland Act 1998, Section 75

<https://www.legislation.gov.uk/ukpga/1998/47/contents>

Statutory duty on public authorities

- 75.** (1) A public authority shall in carrying out its functions relating to Northern Ireland have due regard to the need to promote equality of opportunity -
- (a) between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
 - (b) between men and women generally;
 - (c) between persons with a disability and persons without;
and
 - (d) between persons with dependants and persons without.
- (2) Without prejudice to its obligations under subsection (1), a public authority shall in carrying out its functions relating to Northern Ireland have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

