

# PBNI Equality Impact Screening

## Part 1 Policy Scoping

### Information about the policy

*This form should be read in conjunction with the Equality Commission's revised Section 75, "A Guide for Public Authorities" April 2010 and available via the following link [S75 Guide for Public Authorities April 2010](#). Staff should complete a form for each new or revised policy for which they are responsible (see page 6 for a definition of policy in respect of section 75).*

*The purpose of screening is to identify those policies that are likely to have an impact on equality of opportunity and/or good relations and so determine whether an Equality Impact Assessment (EQIA) is necessary. Screening should be introduced at an early stage when developing or reviewing a policy.*

#### 1.1 Name of the policy

Complaints Policy for Service Users & members of the public

#### 1.2 Is this an existing, revised or a new policy? (Use drop down menu)

Revised

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

To have in place a process for receipt, recording, investigating and responding to complaints

#### 1.4 Are there any Section 75 categories which might be expected to benefit from the intended policy? If so, explain how.

This policy applies to all members of the public and of particular relevance to those currently under PBNI supervision.

#### 1.5 Who initiated or wrote the policy?

Kevin Rooney

#### 1.6 Who owns and who implements the policy?

Louise Cooper – Head of Business Planning & Development

## Implementation factors

**1.7** Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

N/A

If yes, are they

financial

legislative

other, please specify

## Main stakeholders affected

**1.8** Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

staff

service users

other public sector organisations

voluntary/community/trade unions

other, please specify

**1.9** Other policies with a bearing on this policy

- what are they?

Grievance Policy  
Disciplinary Policy  
Capability Policy  
Health & Safety Policy  
Management of Information Policy  
Whistleblowing Policy  
Counter-Fraud Policy  
Protocol between PBNI and the Prisoner Ombudsman for Northern Ireland  
Best Practice Framework  
Dignity at Work  
PBNI Grievance Policy

- who owns them?

Human Resources, Business Planning & Development, PBNI Operations.

**Available evidence**

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

***The following statistical information relates to all Pre-Sentence Reports (PSR) and New Orders and not those specifically those who have made a complaint under the previous Complaints Policy***

Section 75 category	Details of evidence/information																					
<b>Religious belief</b>	<p><b>Religious Belief Profile: Persons on whom PSRs completed and Orders Made: 2011/12</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="border-top: 1px solid black; border-bottom: 1px solid black;">Religious Belief</th> <th style="border-top: 1px solid black; border-bottom: 1px solid black;">PSRs N=3,002 (49%)</th> <th style="border-top: 1px solid black; border-bottom: 1px solid black;">New Orders N=1,670 (46%)</th> </tr> </thead> <tbody> <tr> <td>Roman Catholic</td> <td>52%</td> <td>52%</td> </tr> <tr> <td>Protestant</td> <td>36%</td> <td>38%</td> </tr> <tr> <td>Other Christian</td> <td>2%</td> <td>2%</td> </tr> <tr> <td>Muslim</td> <td>*</td> <td></td> </tr> <tr> <td>Other</td> <td>1%</td> <td>1%</td> </tr> <tr> <td style="border-bottom: 1px solid black;">None</td> <td style="border-bottom: 1px solid black;">8%</td> <td style="border-bottom: 1px solid black;">8%</td> </tr> </tbody> </table>	Religious Belief	PSRs N=3,002 (49%)	New Orders N=1,670 (46%)	Roman Catholic	52%	52%	Protestant	36%	38%	Other Christian	2%	2%	Muslim	*		Other	1%	1%	None	8%	8%
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	(49%)	(46%)	
	White	97%	98%
	Chinese	*	
	Black African	1%	*
	Black	*	*
	Black Other	*	
	Irish Traveller	1%	1%
	Other	1%	1%
<b>Age</b>	Age Profile: Persons on whom PSRs completed and Orders Made: 2011/12		
	<b>Age</b>	PSRs* N=6,172 (100%)	New Orders N=3,660 (100%)
	Under 18	4%	4%
	18-19	9%	11%
	20-24	26%	29%
	25-29	18%	19%
	30-39	21%	19%
	40-49	15%	13%
	50-59	6%	5%
	60 +	2%	1%
<b>Marital status</b>	Marital Status Profile: Persons on whom PSRs completed and Orders Made: 2011/12		
	<b>Marital Status</b>	PSRs N=2,958 (48%)	New Orders N=1,635 (45%)
	Single (Never Married)	70%	77%
	Married	16%	12%
	Separated	7%	5%
	Divorced	6%	5%
	Widowed	1%	1%
<b>Sexual orientation</b>	Sexual Orientation Profile: Persons on whom PSRs completed and Orders Made: 2011/12		
	<b>Sexual Orientation</b>	PSRs N=2,914 (47%)	New Orders N=1,615 (44%)
	Heterosexual/ Straight	99%	99%
	Gay/ Lesbian	1%	1%
	Bisexual	*	*
<b>Men and women generally</b>	Gender Profile: Persons on whom PSRs completed and Orders Made: 2011/12		
	<b>Gender</b>	PSRs N=6,172 (100%)	New Orders N=3,660 (100%)

	Female	15%	14%
	Male	85%	86%
<b>Disability</b>	Disability Profile: Persons on whom PSRs completed and Orders Made: 2011/12		
	<b>Disability</b>	PSRs N=2,964 (48%)	New Orders N=1,647 (45%)
	None	63%	66%
	Mental Health Condition	22%	21%
	Physical Impairment	9%	7%
	Long Term Illness	6%	5%
	Learning Disability/ Autism	5%	4%
	Sensory Impairment	1%	1%
Other	4%	4%	
<b>Dependants</b>	Dependants Profile: Persons on whom PSRs completed and Orders Made: 2011/12		
	<b>Dependants</b>	PSRs N=2,993 (48%)	New Orders N=1,658 (45%)
	None	53%	56%
	Child/ Children	45%	42%
	Person with disability	2%	2%
	Elderly Person	2%	1%

## Needs, experiences and priorities

**1.11** Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision? Specify details for each of the Section 75 categories

<b>Section 75 category</b>	<b>Details of needs/experiences/priorities</b>
<b>Religious belief</b>	No specific need identified
<b>Political opinion</b>	No specific need identified
<b>Racial group</b>	No specific need identified

<b>Age</b>	No specific need identified
<b>Marital status</b>	No specific need identified
<b>Sexual orientation</b>	No specific need identified
<b>Men and women generally</b>	No specific need identified
<b>Disability</b>	Those with learning disabilities will be offered assistance with completion of the written aspects of making a complaint and all reports will be hand delivered and read to the complainant.
<b>Dependants</b>	Under certain circumstances dependants are able to raise a complaint on behalf of a PBNI service user

## Part 2 Equality Screening Questions

### SCREENING QUESTIONS

- 2.1** In making a decision as to whether or not there is a need to carry out an equality impact assessment, consider questions 2.5 -2.8 listed below.
- 2.2** If the conclusion is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then the decision may to screen the policy out. If a policy is ‘screened out’ as having no relevance to equality of opportunity or good relations, give details of the reasons for the decision taken.
- 2.3** If the conclusion is **minor** 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:
- i.measures to mitigate the adverse impact; or
  - ii.the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

**2.4** If the conclusion is **major** 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.

## 2.5 Equality Impact

What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? <b>Minor   Major   None</b>		
Section 75 category	Details of policy impact	Level of impact? Minor   Major   None
Religious belief	This policy may act as a formal/informal channel through which equality issues can be raised and resolved as soon as possible	Minor
Political opinion	As above	Minor
Racial group	As above	Minor
Age	As above	Minor
Marital status	As above	Minor
Sexual orientation	As above	Minor
Men and women generally	As above	Minor
Disability	As above	Minor

Dependants	As above	Minor
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## 2.6 Promotion of Equality

Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?		
Section 75 category	If Yes, provide details	If No, provide reasons
Religious belief		The complaints policy can be used to raise equality issues. PBNI is proactive in seeking complaints and resolving complaints at the earliest opportunity and are of the view that this policy supports equality of opportunity.
Political opinion		See above
Racial group		See above
Age		See above
Marital status		See above
Sexual orientation		See above
Men and women generally		See above
Disability		See above



Dependants		See above
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## 2.7 Good Relation Impact

To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? <b>Minor   Major   None</b>		
Good relations category	Details of policy impact	Level of impact <b>Minor   Major   None</b>
Religious belief	This policy is capable of having a positive impact on Good Relations	Minor
Political opinion	This policy is capable of having a positive impact on Good Relations	Minor
Racial group	This policy is capable of having a positive impact on Good Relations	Minor

## 2.8 Promotion of Good Relations

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons
Religious belief	This policy could be used to raise issues that impact on good relations	
Political opinion	This policy could be used to raise issues that impact on good relations	
Racial group	This policy could be used to raise issues that impact on good relations	

## Additional considerations

### Multiple identities

**2.9** 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 women; young Protestant men; and young lesbians, gay and bisexual people).

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

The majority of PBNI's clients are younger men however no specific issues have been identified for this age group.

**2.11** Is there an opportunity through this policy for PBNI to promote positive attitudes towards disabled people or encourage the participation of disabled people in public life?

**Yes**

**No**

If answered yes detail how this will be achieved: -

Indirectly though offering an opportunity for people to complain about attitudes that do not promote positive attitudes.

## Part 3 Screening decision

**3.1** If the decision is not to conduct an equality impact assessment, please provide details of the reasons.

The screening of PBNI's revised complaints policy has not identified any significant equality concerns.

**3.2** If the decision is not to conduct an equality impact assessment consider if the policy should be mitigated or an alternative policy be introduced.

Not applicable

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

Not applicable

### Mitigation

**3.4** When the likely impact is 'minor' an equality impact assessment is not to be conducted, mitigation may lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

**3.5** Can the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations and if so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative policy.

Not applicable