

Equality Impact Screening

Part 1 Scoping

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 from Human Resources. Staff should complete a form for each new or revised policy for which they are responsible.

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

Data Protection Policy

1.2 Is this an existing, revised or a new policy?

This is a revised policy, replacing a previous Management of Information Policy.

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

To ensure PBNI compliance with the incoming Data Protection Act 2018 (which brings EU requirements on GDPR and LED into UK law).

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

All section 75 categories will benefit from increased access to personal data, enhanced rights of consent, and more readily accessible access to enforcement of rights.

1.5 Who initiated or wrote the policy?

Gail McGreevy and Tom Haire

1.6 Which Dept. owns and who implements the policy?

Implementation factors

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

Yes

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

Service providers/contractors

1.9 Other policies with a bearing on this policy

- what are they?

IFreedom of Information policy; Information Assurance policy; Records Management Guidance and Procedures; Records Retention and Disposal Schedules.

- who owns them?

Evidence Base

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.

Section 75 category	Details of evidence/information																								
Religious belief	<p>Service User Data (Service Users Survey 2015)</p> <table data-bbox="469 1055 1145 1211"> <tr> <td>Religion</td> <td>Roman Catholic</td> <td>50%</td> </tr> <tr> <td></td> <td>Protestant</td> <td>35%</td> </tr> <tr> <td></td> <td>Other</td> <td>4%</td> </tr> <tr> <td></td> <td>None</td> <td>10%</td> </tr> </table> <p>Workforce figures (Oct 2016)</p> <table data-bbox="438 1312 1297 1435"> <thead> <tr> <th>Non-Deter</th> <th>Protestant</th> <th>Catholic</th> <th>Blank</th> </tr> </thead> <tbody> <tr> <td>18</td> <td>158</td> <td>189</td> <td>42</td> </tr> <tr> <td>4%</td> <td>39%</td> <td>46%</td> <td>10%</td> </tr> </tbody> </table>	Religion	Roman Catholic	50%		Protestant	35%		Other	4%		None	10%	Non-Deter	Protestant	Catholic	Blank	18	158	189	42	4%	39%	46%	10%
Religion	Roman Catholic	50%																							
	Protestant	35%																							
	Other	4%																							
	None	10%																							
Non-Deter	Protestant	Catholic	Blank																						
18	158	189	42																						
4%	39%	46%	10%																						

Political opinion

Service User Data on those who started an order in 2011/12 (last time surveyed for this information)

Political Opinion	PSRs N=2,917 (47%)	New Orders N=1,626 (44%)
Unionist	10%	11%
Nationalist	12%	12%
None	60%	58%
Other	2%	2%
Prefer Not To Say	17%	17%

Workforce Data (Oct 2016)

Unionist	Nationalist	Other	None	Prefer Not to Say	Blank
6	7	7	35	2	307
2%	2%	2%	10%	1%	84%

Racial group

Service User Data (Service Users Survey 2015)

Ethnicity	White	98%
	Other	2%

Workforce Data (Oct 2016)

White	Mixed Race	Not-Disclosed	Blank
355	2	2	5
98%	1%	1%	1%

Age	Service User Data (Service Users Survey 2015)				
	Age	18-24	26%		
		25-29	20%		
		30-39	25%		
		40-49	16%		
		50+	13%		
	Workforce Data (Oct 2016)				
	18-25	26-35	36-45	45-55	56+
	2	43	115	118	86
	1%	12%	32%	32%	24%
Marital status	Service User Data on those who started an order in 2011/12 (last time surveyed for this information)				
	Marital Status	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%		
	Workforce Data (Oct 2016)				
	Single	Married	Widowed/SP	Separated	
	92	210	3	8	
	25%	58%	1%	2%	
	Divorced	Cohabit	Not-Disclosed	Blank	
	10	30	4	7	
	3%	8%	1%	2%	
Sexual orientation	Service User Data on those who started an order in 2011/12 (last time surveyed for this information)				
	Sexual Orientation	PSRs N=2,914 (47%)	New Orders N=1,615 (44%)		
	Heterosexual/ Straight	99%	99%		
	Gay/ Lesbian	1%	1%		
	Bisexual	*	*		
	Workforce Data (Oct 2016)				
	Heterosexual	Bi-Sexual	Gay/Lesbian	Not-Disclosed	Blank
	301	1	3	9	50

	83%	0%	1%	2%	14%
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Men and women generally

Service user data (Service Users Survey 2015)

Gender	Male	88%
	Female	12%

Workforce Data (Oct 2016)

Male	Female	Total
106	258	364
29%	71%	100%

Disability

Service User Data (Service Users Survey 2015)

Disability	None	52%
	Mental Health Condition	35%
	Learning Disability / Difficulty	12%
	Long Term Illness	11%
	Physical Impairment	8%
	Other	4%
	Sensory Impairment	1%

Workforce Data (Oct 2016)

Yes	No
11	353
3%	97%

Dependants	Service User Data on those who started an order in 2011/12 (last time surveyed for this information)				
	Dependants	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%			
Workforce Data (Oct 2016)					
	A Child	Person with Disability	Elderly Person	Not-Disclosed	Blank
	144	7	6	8	199
	40%	2%	2%	2%	55%

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

Section 75 category	Details of needs/experiences/priorities
Religious belief	All section 75 categories will have the same needs, experiences and priorities in relation to information provision and data protection. All sections are treated identically by PBNI in its operation of data protection principles and law and no particular category would have any particular of differing needs or experiences.
Political opinion	As at Religious Belief (above).
Racial group	As at Religious Belief (above).
Age	As at Religious Belief (above).
Marital status	As at Religious Belief (above).
Sexual	As at Religious Belief (above).

orientation	
Men and women generally	As at Religious Belief (above).
Disability	As at Religious Belief (above).
Dependants	As at Religious Belief (above).

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? Minor Major None		
Section 75 category	Details of policy impact	Level of impact? Minor Major None
Religious belief	Improved rights of control of and access to personal information.	No equality impact in terms of religious belief.
Political opinion	As above.	No equality impact in terms of political opinion.
Racial group	As above.	No equality impact in terms of racial group.
Age	As above.	No equality impact in terms of age.
Marital status	As above.	No equality impact in terms of marital status.
Sexual orientation	As above.	No equality impact in terms of sexual orientation.
Men and women generally	As above.	No equality impact in terms of gender more generally.
Disability	As above.	No equality impact in terms of disability.
Dependants	As above.	No equality impact in terms of number of dependants.

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	Yes in the sense that the policy provides improved and equal rights for all section 75 categories.	
Political opinion	As above.	
Racial group	As above.	
Age	As above.	
Marital status	As above.	
Sexual orientation	As above.	
Men and women generally	As above.	
Disability	As above.	
Dependants	As above.	

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? Minor Major None		
Good relations category	Details of policy impact	Level of impact Minor Major None
Religious belief	There will be a continued sense of equality amongst all section 75 groups as improved rights apply to all, though nothing specifically linked to religious belief.	None in specific terms.
Political opinion	As above in terms of political opinion.	None in specific terms.
Racial group	As above in terms of racial group.	None in specific terms.

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 Yes , provide details	If No , provide reasons
Religious belief	Yes in the general sense that improved rights apply to all, though nothing specifically linked to religious belief.	
Political opinion	Yes in the general sense that improved rights apply to all, though nothing specifically linked to political opinion.	
Racial group	Yes in the general sense that improved rights apply to all, though nothing specifically linked to racial group.	

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).

No.

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

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: -

Part 3 Screening decision

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

I do not think that an EQIA is necessary. The policy is implementing a statutory requirement – the Data Protection Act 2018 - that PBNI will apply equally to all of its service users, service providers and staff.

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.

As above, the policy will be provided in a standard fashion according to statutory requirements. To ensure that it is applied properly and equally, all PBNI staff will receive briefing along with written instructions. Staff will also have written guidance material and telephone assistance as required.

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

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. 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.

There will be no requirement or indeed latitude to adopt an amended or alternative policy as the policy in question is to allow PBNI to comply with its statutory requirements under new legislation.

Date Screening Completed: 5 April 2018
Department Completing this Screening: Communications