

Equality and Human Rights Screening Template

The Patient and Client Council is required to address the 4 questions below in relation to all its policies.

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)

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

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)

Are there opportunities to better promote good relations between people of a different religious belief, political opinion or racial group?

As part of the audit trail documentation needs to be made available for all policies and decisions examined for equality and human rights implications. The screening template is a pro forma to document consideration of each screening question.

For information (evidence, data, research etc.) on the Section 75 equality groups see the Equality Portal - [Screening Resources & Evidence](#).

For advice and support on screening contact:

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2JA
Tel: 028 9536 3961

SCREENING TEMPLATE

(1) INFORMATION ABOUT THE POLICY OR DECISION

1.1 Title of policy or decision
Your Right To Raise A Concern (Whistleblowing)

1.2 Description of policy or decision
<p>The PCC Your Right To Raise A Concern (Whistleblowing) Framework and Model Policy document has been developed to set out the accountability and governance within HSC organisations to encourage people to engage with the process for raising a concern and ensure they feel safe while doing so. Following the publication of this new Framework and Model Policy (PCC revised the existing Whistleblowing Policy and Procedure accordingly.</p> <p>The aim of this policy is to promote a culture of openness, transparency and learning in line with the HSC shared values. The policy sets expectations of our managers to listen to concerns, take them seriously and act to resolve a concern, either through providing information which gives assurance or acting to resolve the concern.</p> <p>The policy provides guidance on the most appropriate route and policy to follow in event of a complaint. The Raising a Concern in the Public Interest (Whistleblowing) Framework and Model Policy, DoH Equality Impact Assessment and Rural Needs Impact Assessment are found: https://www.health-ni.gov.uk/publications/raising-concern-public-interest-whistleblowing-hsc-framework-and-model-policy</p>

1.3 Main stakeholders affected (internal and external)
This policy applies to the following groups: <ul style="list-style-type: none">• staff of PCC and Council members including permanent and temporary staff;

- agency staff;
- The Public and all Public Bodies

1.3 Other policies or decisions with a bearing on this policy or decision

Regionally:

Legislation: Public Interest Disclosure (Northern Ireland) Order 1998. Owner: N/A

Locally:

- Data Protection and Confidentiality Policies
- Information Governance Policy
- Complaints Policy
- Freedom of Information Policy
- Risk Management Policy
- GMGR

(2) CONSIDERATION OF EQUALITY AND GOOD RELATIONS ISSUES AND EVIDENCE USED

2.1 Data gathering

What information did you use to inform this equality screening? For example previous consultations, statistics, research, Equality Impact Assessments (EQIAs), complaints. Provide details of how you involved stakeholders, views of colleagues, service users, staff side or other stakeholders.

Section 75 data in relation to PCC staff

2.2 Quantitative Data

Who is affected by the policy or decision? Please provide a statistical profile. Note if policy affects both staff and service users, please provide profile for both. Also give consideration to multiple identities.

Date of data - Sept 2023.

Category	<i>What is the makeup of the affected group? (%) Are there any issues or problems? For example, a lower uptake that needs to be addressed or greater involvement of a particular group?</i>						
NI: IN PROFILE - POPULATION							
Population Profile (% population unless stated), 2021 Census							
	0-15	16-24	25-34	35-44	45-54	55-64	65+
Age	19%	12%	13%	13%	13%	13%	17%
	F		M				
Sex	51%		49%				
	Cathol ic (Note 1)	Protes tant or Other	None	Other			

	Christi an				
Religion/ Religion brought up in	46%	43%	2%	9%	
	White		Other		
Ethnic Group	97%	3%			
	British Only	Irish Only	North ern Irish Only	Other	
National Identity	32%	29%	20%	19%	
	Unite d Kingd om	Irelan d	Other Europ ean countr ies	Other count ries in the world	
Passports held	52.6%	32.3%	3.9%	1.6%	
	Englis h	Main langu age not Englis h			
Main language	95.4%	4.6%			
	North ern Irelan d	Great Britai n	Other EU Count ries	Repub lic of Irelan d	Other count ries in the world
Country of birth	86.5%	4.8%	4%	2%	3%

	PCC Staff
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Gender	Male	33.33%
	Female	66.67%
Age Group	16-24	0.00%
	25-29	0.00%
	30-34	11.90%
	35-39	9.52%
	40-44	9.52%
	45-49	19.05%
	50-54	9.52%
	55-59	21.43%
	60-64	11.90%
	>=65	7.14%
Community Background	Perceived Protestant	2.38%
	Protestant	9.52%
	Perceived Roman Catholic	2.38%
	Roman Catholic	38.10%
	Neither	9.52%
	Perceived Neither	0.00%
	Not assigned	38.10%
Marital Status	Divorced	4.76%
	Mar/CP	21.43%
	Other	2.38%
	Separat	0.00%
	Single	14.29%
	Unknwn	57.14%
	Widw/R	0.00%
	Not assigned	0.00%
Ethnicity	Not assigned	69.05%
	White	30.95%
	Other	0.00%
	Black African	0.00%
	Indian	0.00%
	Chinese	0.00%
Disability	No	26.19%
	Not assigned	66.67%
	Yes	7.14%
Dependents	Yes	14.29%
	Not assigned	76.19%
	No	9.52%

Sexual Orientation	Do not wish to answer	7.14%
	Not assigned	69.05%
	Opposite sex	23.81%
	Both Sexes	0.00%
	same sex	0.00%
Political Opinion	Broadly Nationalist	14.29%
	Other	7.14%
	Broadly Unionist	0.00%
	Not assigned	71.43%
	Do not wish to answer	7.14%

2.3 Qualitative Data

What are the different needs, experiences and priorities of each of the categories in relation to this policy or decision and what equality issues emerge from this? Note if policy affects both staff and service users, please discuss issues for both. Also give consideration to multiple identities (such as single parents for example).

Category	Needs and Experiences
Gender	Statistics show that a significant majority of the workforce is female. There is no evidence available that the policy will have a differential impact by gender, However, any potential implementation of the policy may be particularly beneficial to women working within HSC in relation to raising a concern in the public interest.
Age	It is not anticipated that this policy will have any differential impact across the age groups.
Religion	There are no identified different needs or experiences.
Political Opinion	There are no identified different needs or experiences.
Marital Status	There are no identified different needs or experiences.
Dependent Status	There are no identified different needs or experiences.
Disability	There is no evidence available that the policy will have a differential impact by disability, however, as at Sexual Orientation [below], people with a disability may be less inclined to raise a

	<p>concern/complaint/whistleblowing issue, or to be aware of the processes involved due to accessibility issues with documentation.</p> <p>Complaints staff may be unsure of how to communicate with people who have certain disabilities including receiving complaints via BSL/ISL.</p>
Ethnicity	<p>Service users or staff whose first language is not English may find it more difficult to submit a complaint due to documentation being provided in English. They may also struggle to fully understand responses that are made in English.</p>
Sexual Orientation	<p>There is no evidence available that the policy will have a differential impact by sexual orientation, however, there are indications that LGBT+ may be more reluctant to complain/ draw attention to themselves when accessing healthcare, being 'too afraid of being seen as causing trouble'. The legislation that underpins this policy provides for legal protection for anyone who raises a concern in the public interest meaning that if the individual is treated less favourably or victimised they can take a case to an Industrial Tribunal.</p>

2.4 Multiple Identities

Are there any potential impacts of the policy or decision on people with multiple identities? For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people.

There are no further identified different needs or experiences on the basis of the 9 Equality groups.

While acknowledging that most people will fall under more than one identity, it is not anticipated the policy will impact directly on people with multiple identities. The Raising a Concern in the Public Interest (Whistleblowing) Policy and Procedure is being developed to set out the accountability and governance within

PCC to encourage people to engage with the process for raising a concern and ensure they feel safe while doing so. It will apply to all individuals equally regardless of category.

2.5 Making Changes

Based on the equality issues you identified in 2.2 and 2.3, what changes did you make or do you intend to make in relation to the policy or decision in order to promote equality of opportunity?

<i>In developing the policy or decision what did you do or change to address the equality issues you identified?</i>	<i>What do you intend to do in future to address the equality issues you identified?</i>
<p>Transgender complaints – Complaints staff will be trained on transgender issues in order to appropriately respond in a sympathetic and empathetic way and also to signpost the individual to support mechanisms and sources of further support.</p> <p>Age – make it clear in the policy that an advocate can be a parent, guardian or advocate to make the complaint on their behalf.</p> <p>Disability –Service users or staff who have certain disabilities may find it more difficult to submit a complaint or receive a response. Complaints staff may be unsure of how to communicate with people who have certain disabilities including receiving complaints via BSL/ISL.</p> <p>Ethnicity - In line with BSO’s accessible formats policy where possible, documentation will be provided in a variety of languages and consideration will be given towards interpreting support.</p>	<p>Overall, staff training is an important element so that staff are appropriately able to deal with any difficult complaints/situations/conversations in relation to the groups</p>

2.6 Good Relations

What changes to the policy or decision – if any – or what additional measures would you suggest to ensure that it promotes good relations? (refer to guidance notes for guidance on impact)

<i>Group</i>	<i>Impact</i>	<i>Suggestions</i>
Religion	None identified.	
Political Opinion	None identified.	
Ethnicity	None identified.	

(3) SHOULD THE POLICY OR DECISION BE SUBJECT TO A FULL EQUALITY IMPACT ASSESSMENT?

A full equality impact assessment (EQIA) is usually confined to those policies or decisions considered to have major implications for equality of opportunity

How would you categorise the impacts of this decision or policy? (refer to guidance notes for guidance on impact)

Do you consider that this policy or decision needs to be subjected to a full equality impact assessment?

Please tick:

Major impact	
Minor impact	
No further impact	x

Please tick:

Yes	
No	X

Please give reasons for your decisions.

An equality impact assessment (EQIA) is unnecessary. The Raising a Concern in the Public Interest (Whistleblowing) Policy and Procedure is being developed to set out the accountability and governance within HSC organisations to encourage people to engage with the process for raising a concern and ensure they feel safe while doing so. The principles in relation to dealing with concerns raised in the public interest within HSC organisations outlined in the policy is purely technical with no impact in particular on any one S75 category. This policy is purely a technical process document in relation to measures all HSC organisations will take in dealing with concerns raised in the public interest and therefore does not apply or impact the Section 75 categories or require mitigation in this respect.

(4) CONSIDERATION OF DISABILITY DUTIES

4.1 In what ways does the policy or decision encourage disabled people to participate in public life and what else could you do to do so?

<i>How does the policy or decision currently encourage disabled people to participate in public life?</i>	<i>What else could you do to encourage disabled people to participate in public life?</i>
There are no opportunities identified.	

4.2 In what ways does the policy or decision promote positive attitudes towards disabled people and what else could you do to do so?

<i>How does the policy or decision currently promote positive attitudes towards disabled people?</i>	<i>What else could you do to promote positive attitudes towards disabled people?</i>
None identified	

(5) CONSIDERATION OF HUMAN RIGHTS

5.1 Does the policy or decision affect anyone's Human Rights? Complete for each of the articles

ARTICLE	Yes/No
Article 2 – Right to life	No
Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment	No
Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour	No
Article 5 – Right to liberty & security of person	No
Article 6 – Right to a fair & public trial within a reasonable time	No
Article 7 – Right to freedom from retrospective criminal law & no punishment without law	No
Article 8 – Right to respect for private & family life, home and correspondence.	No
Article 9 – Right to freedom of thought, conscience & religion	No
Article 10 – Right to freedom of expression	No
Article 11 – Right to freedom of assembly & association	No
Article 12 – Right to marry & found a family	No
Article 14 – Prohibition of discrimination in the enjoyment of the convention rights	No
1 st protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property	No
1 st protocol Article 2 – Right of access to education	No

*If you have answered no to all of the above please move on to **Question 6** on monitoring*

5.2 If you have answered yes to any of the Articles in 5.1, does the policy or decision interfere with any of these rights? If so, what is the interference and who does it impact upon?

List the Article Number	Interfered with? Yes/No	What is the interference and who does it impact upon?	Does this raise legal issues?*
			Yes/No

** It is important to speak to your line manager on this and if necessary seek legal opinion to clarify this*

5.3 Outline any actions which could be taken to promote or raise awareness of human rights or to ensure compliance with the legislation in relation to the policy or decision.

None identified

(6) MONITORING

6.1 What data will you collect in the future in order to monitor the effect of the policy or decision on any of the categories (for equality of opportunity and good relations, disability duties and human rights)?

Equality & Good Relations	Disability Duties	Human Rights

Approved Lead Officer: Fionnuala Murphy
Business and Governance Manager

Position: _____

Date: 20 January 2025

Policy/Decision Screened by: Fionnuala Murphy

Please note that having completed the screening you are required by statute to publish the completed screening template, as per your organisation’s equality scheme. If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, you will need to review the screening decision.

**Please forward completed template to:
Equality.Unit@hscni.net**

Any request for the document in another format or language will be considered.
Please contact: Equality.Unit@hscni.net