



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?

SCREENING TEMPLATE

See [Guidance Notes](#) for further information on the 'why' 'what' 'when', and 'who' in relation to screening, for background information on the relevant legislation and for help in answering the questions on this template.

(1) INFORMATION ABOUT THE POLICY OR DECISION

1.1 Title of policy or decision Complaints Policy

1.2 Description of policy or decision The PCC strives at all times to deliver high quality services in all aspects of its business and works to identify how improvements can be made on an on-going basis. The organisation recognises that sometimes things can go wrong and when this happens it is in everyone's best interest to resolve concerns and complaints at the earliest possible stage. This Policy is therefore designed to encourage early and local resolution of complaints at the front line but also puts in place a system to investigate and resolve complaints where local resolution has not worked, for whatever reason. The Policy aims to: <ul style="list-style-type: none">• Seek to resolve problems by informal means at an appropriate level wherever possible, and provide a straightforward and accessible means of resolution where informal means do not work;• Assist the PCC in improving its services by learning from the feedback, experiences and concerns of its stakeholders, customers and others;• Protect the rights and confidentiality of those who raise concerns with the PCC;• Ensure that senior management are informed of issues being raised through complaints so that services can be improved;• Provide consistent equal treatment of all persons who raise concerns through this Policy with the PCC.
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1.3 Main stakeholders affected (internal and external)

- Current PCC staff and Council members
- The Public
- All Public bodies

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

- Data Protection and Confidentiality Policies
- Information Governance Policy
- Records Management (Retention) Policy
- Equality Diversity and Inclusion Policy
- ICT Security 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 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%				
			Protestant or Other				
	Catholic (Note 1)	Christian	None	Other			

Religion/ Religion brought up in	46%	43%	2%	9%	
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	White	Other			
Ethnic Group	97%	3%			
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	British Only	Irish Only	Northern Irish Only	Other	
National Identity	32%	29%	20%	19%	
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	United Kingdom	Ireland	Other European countries	Other countries in the world	
Passports held	52.6%	32.3%	3.9%	1.6%	
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	English	Main language not English			
Main language	95.4%	4.6%			
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	Northern Ireland	Great Britain	Other EU Countries	Republic of Ireland	Other countries in the world
Country of birth	86.5%	4.8%	4%	2%	3%

PCC Staff	
Gender	Male 33.33%
	Female 66.67%
Age Group	16-24 0.00%
	25-29 2.38%
	30-34 9.52%
	35-39 11.90%
	40-44 11.90%

	45-49	14.29%	
	50-54	11.90%	
	55-59	19.05%	
	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	If someone raises a complaint regarding being treated unfavourably or discriminated against due to the fact that they are transgender it can be a very sensitive issue. Complaints staff will need to be able to deal with these complaints in a sensitive and appropriate manner as well as provide information and support on signposting and support mechanisms
Age	Individuals of a certain age (e.g. child and/or not of a sufficient age or understanding to make a complaint).
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	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.
Ethnicity	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.
Sexual Orientation	There are no identified different needs or experiences.

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 issues identified for multiple identities.

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>.</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)

Please tick:

Major impact	
Minor impact	x
No further impact	

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

Please tick:

Yes	
No	X

Please give reasons for your decisions.

For information and your consideration the advice given to BSO when screening the BSO complaints policy was that the recommendation is that “impacts are major and an EQIA is to be undertaken, in light of Regional Communication Support coming on stream in the near future – as it is, the BSO does not have enough information to conclude that the equality issues are appropriately addressed, in particular in the absence of engagement with Section 75 groups. Also, given that the ability to raise complaints are a vital aspect of equality of opportunity, these are two major criteria that would make an EQIA necessary.”

(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.	Yes
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
8	Yes	In relation to the accessibility of the process and in particular any information relating to it	PCC has a clear legal basis under article 6 and/or 9 of GDPR to investigate complaints. PCC also has a legal duty, as documented in law and its own policies, to safeguard and correctly process personal data.

** 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
Position: Business and Governance Manager
Head of Business Support
Date: 23 December 2024
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