

Equality and Human Rights Screening Template

The BSO 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](#).

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

Business Services Organisation (BSO) Complaints Policy

1.2 Description of policy or decision

- **what is it trying to achieve? (aims and objectives)**
- **how will this be achieved? (key elements)**
- **what are the key constraints? (for example, financial, legislative or other)**

BSO’s Complaints Policy sets out how BSO should deal with complaints raised by service users, former service users and/or staff in certain circumstances. It outlines for staff a consistent procedure on how complaints relating to BSO, its actions and decisions are to be handled and how the monitoring of complaints processes and outcomes relating to BSO should be undertaken. These procedures reflect the new arrangements for dealing with complaints, and should be read in conjunction with The Northern Ireland Public Services Ombudsman Model Complaints Handling procedure. The proper handling of complaints, suggestions or queries is a fundamental responsibility of BSO. Complaints will be dealt with promptly, sympathetically and constructively.

BSO is cognisant of the legal and ethical duty to protect the confidentiality of the service user’s information. The legal requirements are set out in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Additional requirements are detailed in the Human Rights Act 1998 and the common law duty of confidence must also be observed. In addition to this due consideration must also be given to Data (Use and Access) Act 2025 (DUAA) which is newly introduced legislation that updates and clarifies aspects of UK GDPR and the DPA 2018.

1.3 Main stakeholders affected (internal and external)

For example, staff, actual or potential service users, other public sector

organisations, voluntary and community groups, trade unions or professional organisations or private sector organisations or others

- (i) Members of the Public – Service Users/Former Service Users
- (ii) Staff
- (iii) Community, Voluntary Organisations, or Politicians (MLAs, MPs, Councillors), acting as advocates

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

- **what are they?**
- **who owns them?**

This policy is based on the Northern Ireland Public Services Ombudsman (NIPSO) Model Complaints Handling Procedure, effective from 1st January 2026. This policy should also be read in conjunction with BSO's suite of Information Governance Policies, and in particular:

- Information Governance Policy
- Information Security Policy
- Information Risk Policy
- Data Protection & Confidentiality Policy

(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.

To inform this equality screening, statistics were gathered from a range of different websites that contained relative data. To inform the BSO staff data I engaged with the HR department to obtain the data provided below which was the most recent BSO staff data. Websites that information was obtained from were:

<https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/MYE20-Bulletin.PDF>

<http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2015/general/3415.pdf>

<https://www.ark.ac.uk/nilt/2021/Background/ORIENT2.html>

<https://www.nisra.gov.uk/publications/census-2021-main-statistics-for-northern-ireland-phase-3>

<http://www.gires.org.uk>

https://www.carersuk.org/media/vgrlxkcs/soc22_final_web.pdf

I have availed of contacts through Interpreting Service to identify the top 5 languages used in NI and will have complaints guidance translated into these languages. Top 5 was determined based on data from Interpreting Services of the interpreting requests for different ethnicities.

Contact has also been made directly to organisations such as Carers UK, Disability Action, RNIB, BDA, Age NI, Bryson Intercultural and GenderJamNI to detail the role of the Business Services Organisation and gather information on what these organisations feel would create a barrier to the community groups they represent, making a complaint with our organisation. As yet I have not received return contact from any of these organisations to gather the relevant information to enable me to take any relevant actions that may be required.

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.

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>	
	Population NI	BSO Staff
Gender	<p>Census 2021</p> <p>Male – 50.81% Female – 49.19%</p> <p><u>Transgender</u></p> <p>Research suggests for the Northern Ireland population as a whole:</p> <ul style="list-style-type: none"> • 140-160 individuals are affiliated with transgender groups • 120 individuals have presented with Gender Identity Dysphoria • There are more trans women than trans men living in Northern Ireland. <p>The Gender Identity Research and Education Society (GIREs) estimate the number of gender nonconforming employees and service users, based on the information that GIREs assembled for the Home Office (2011) and subsequently updated (2014):</p> <ul style="list-style-type: none"> • gender variant to some degree 1% • have sought some medical care 0.025% • having already undergone transition 0.015% <p>A report published by the Rainbow Project (O'Hara, 2013), based on research conducted with more than 500 individuals that identified as "LGB&T," found that the respondents reported common experiences of invisibility, homophobia/transphobia, and a range of violence from threats to physical violence,</p>	<p>Sept 2025</p> <p>Male – 47.34% Female – 52.66%</p>

	whether direct or indirect.																													
Age	0-14 – 19% 15-39 – 31% 40-64 – 32% 65+ - 17%		16-24 – 4.21% 25-29 – 9.72% 30-34 – 11.15% 35-39 – 14.44% 40-44 – 13.88% 45-59 – 13.70% 50-54 – 12.54% 55-59 – 11.66% 60-64 – 6.48% 65+ - 2.22%																											
Religion	<div>Census 2021<table><tr><th colspan="2">Total Ni Residents 1903178</th><th>Percentage</th></tr><tr><td>Catholic</td><td>805,151</td><td>42</td></tr><tr><td>Presbyterian Church in Ireland</td><td>316,103</td><td>17</td></tr><tr><td>Church of Ireland</td><td>219,788</td><td>12</td></tr><tr><td>Methodist Church in Ireland</td><td>44,728</td><td>2</td></tr><tr><td>Other Christian (including Christian related)</td><td>130,377</td><td>7</td></tr><tr><td>Other religions</td><td>25,519</td><td>1</td></tr><tr><td>No religion</td><td>330,983</td><td>17</td></tr><tr><td>Religion not stated</td><td>30,529</td><td>2</td></tr></table></div>		Total Ni Residents 1903178		Percentage	Catholic	805,151	42	Presbyterian Church in Ireland	316,103	17	Church of Ireland	219,788	12	Methodist Church in Ireland	44,728	2	Other Christian (including Christian related)	130,377	7	Other religions	25,519	1	No religion	330,983	17	Religion not stated	30,529	2	Perceived Protestant – 1.71% Protestant – 24.25% Perceived Roman Catholic – 1.43% Roman Catholic – 36.46% Neither – 6.39% Perceived Neither – 0.05% Not Assigned – 29.71%
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	British only	606,263	31.86%		Nationalist – 3.56% Broadly Unionist – 3.42% Other – 4.53% Not Assigned – 82.55% Do no wish to answer – 5.92%
	Irish only	554,415	29.13%		
	Northern Irish only	376,444	19.78%		
	British and Irish only	11,768	0.62%		
	British and Northern Irish only	151,327	7.95%		
	Irish and Northern Irish only	33,581	1.76%		
	British, Irish and Northern Irish only	28,050	1.47%		
	Other	141,327	7.43%		
Marital Status	Census 2021				Divorced – 1.53% Mar/CP – 32.53% Other – 1.02% Separated – 0.28% Single – 10.50% Unknown – 53.40% Widow/R – 0.56% Not Assigned 0.19%
	Total Ni Residents (over the age of 16) 1,514,743		Percentage		
	Single (never married or never registered a civil partnership)	576,708	38.07%		
	Married	690,509	45.59%		
	In a civil partnership	2,742	0.18%		
	Separated (but still legally married or still legally in a civil partnership)	57,272	3.78%		
	Divorced or formerly in a civil partnership which is now legally dissolved	91,128	6.02%		
	Widowed or surviving partner from a civil partnership	96,384	6.36%		
Dependent Status	Census 2021				Yes – 11.06% No – 7.45% Not Assigned – 81.49%
	Total Households with dependent children 768,809		Percentage		
	No children in household	423,956	55.14		
	No dependent children in household/All children in household non-dependent	120,314	15.65		
	One dependent child aged 0-4	27,233	3.54		
	One dependent child aged 5-11	21,123	2.75		
	One dependent child aged 12-18	39,203	5.10		

	Two dependent children, youngest aged 0-4	32,598	4.24	
	Two dependent children, youngest aged 5-11	36,534	4.75	
	Two dependent children, youngest aged 12-18	18,532	2.41	
	Three or more dependent children, youngest aged 0-4	24,120	3.14	
	Three or more dependent children, youngest aged 5-11	21,677	2.82	
	Three or more dependent children, youngest aged 12-18	3,519	0.46	
Disability	Census 2021			Yes – 1.90% No – 31.47% Not Assigned – 66.64%
	Total NI Households 768,810		Percentage	
	No residents have a limiting long-term health problem or disability	423,945	55.14%	
	1 resident has a limiting long-term health problem or disability	258,537	33.63%	
	2 or more residents have a limiting long-term health problem or disability	86,328	11.23%	
Ethnicity	Census 2021			Not Assigned – 77.09% White – 22.30% Other - <10% Black African – 0.05% Indian - 0.28% Chinese – 0.05% Filipino – 0.05%
	Total Ni Residents 1903178		Percentage	
	White	1,837,575	96.55	
	Irish Traveller	2,609	0.14	
	Roma	1,529	0.08	
	Indian	9,881	0.52	
	Chinese	9,495	0.50	
	Filipino	4,451	0.23	
	Pakistani	1,596	0.08	
	Arab	1,817	0.10	
	Other Asian	5,244	0.28	
	Black African	8,069	0.42	
	Black Other	2,963	0.16	
	Mixed	14,382	0.76	
	Other ethnicities	3,568	0.19	

Sexual Orientation	Census 2021			Do not wish to ans – 1.34% Not Assigned – 82.28% Opposite Sex – 15.50% Same Sex – 0.69% Both Sexes – 0.19%
	Total Ni Residents (16 and over) 1514743		Percentage	
	Straight or heterosexual	1,363,859	90.04	
	Gay or lesbian	17,713	1.17	
	Bisexual	11,306	0.75	
	Other sexual orientation	2,597	0.17	
	Prefer not to say	69,307	4.58	
	Not stated	49,961	3.30	

BSO Complaints Statistics:

A survey has been introduced in an attempt to gather relevant equality data from complainants. Completion of this survey is at the discretion of the complainant; therefore, the current data is insufficient to draw any conclusions in any of the section 75 groups.

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 consider multiple identities (such as single parents for example).

Category	Needs and Experiences
Gender	There is no data to suggest that there are specific needs or experiences arising within this category, as this procedure provides clear guidance on the management and processes for Complaints with the service in which BSO provides. Complainants are treated with respect and dignity regardless of their gender, race, political beliefs, religion, disability, sexual orientation or marital & dependent status. Their complaints are processed in confidence and with sensitivity.
Age	Individuals of a certain age (e.g child and/or not of a sufficient age or understanding to make a complaint) may have difficulty in availing of the complaints policy.
Religion	As per Gender
Political Opinion	As per Gender
Marital Status	As per Gender
Dependent Status	<p>According to Carers UK – When asked if they had made a complaint, just under 24% had complained about a health service 76% had not made a complaint.</p> <p>When asked if they felt that they would make a complaint, 56% said very likely or likely and the remainder said unlikely or very unlikely. The main barrier was that they felt that complaining would make little difference.</p> <p>32% of carers said they would be worried about the consequences of making a complaint about either a health service or a social care service</p>
Disability	Individuals with sight and hearing problems will have specific requirements with regards to communication of the policy. Also, those with learning difficulties may require additional support in order to get an understanding of how the policy works and the processes involved and how to raise a complaint. Service users living and working with a disability may also be reluctant to bring forward a complaint due to the physical and emotional energy required, as well as lower confidence levels.
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 is no data to suggest that there are specific needs or experiences arising within this category, as this procedure provides clear guidance on the management and processes for Complaints with the service in which BSO provides.
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2.4 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><u>Age:</u></p> <p>The Complaints Policy now provides provision for a parent, guardian or advocate to make the complaint on their behalf.</p> <p><u>Disability:</u></p> <p>Ensure that this policy is in accessible formats for e.g. size 14 for those who are partially sighted and consideration given to all those with disabilities. All other easy read formats offered to those who may require. Also, all staff are to be made aware of the policy, though such avenues as Awareness Sessions and online training.</p> <p>Updating of the complaints section of BSO website to include complaint guidance. The website has capability to read out the information contained and also contain guidance in larger font.</p> <p>Complaints handling guidance has also been developed for staff to ensure they are equipped to deal with and manage a complaint that may be received. This document also contains information on key support services that staff can direct a complainant to</p>	<p><u>Disability:</u></p> <p>In line with BSO's Accessible Formats Policy, BSO will provide alternative formats on request to meet the needs of people with a disability who may need information in an accessible format. BSO will also consider the need to provide some support to those wishing to make a complaint, and/or signpost them to an advocacy services such as the Patient Client Council, who could assist them through the complaint process.</p> <p>The BSO also intend on having a complaints guidance sign language video developed and guidance in easy read format to ensure the process is accessible to service users with hearing and learning difficulties.</p> <p>Responses will be provided according to any preferred format expressed by the complainant, including easy read for people who have a learning</p>

<p>for additional support.</p> <p><u>Ethnicity:</u></p> <p>Updating of the complaints section of BSO website to include complaint guidance which also has capability to translate into the preferred language of the complainant.</p> <p>Avail of contacts within the BSO Interpreting Service to accept complaints & provide responses to complaints in the complainant's native language.</p> <p>Complaints handling guidance has also been developed for staff to ensure they are equipped to deal with and manage a complaint that may be received. This document also contains</p>	<p>disability and, braille and large formats for those who are blind or partially sighted.</p> <p>For all issues identified under Section 75 it is important that this policy is shared with all, and targeted with the section 75 groups. Therefore, communication is key when this policy is released. BSO will continue to gather data where possible in regards to complaints and gather equality data in order to monitor the progress of this policy and procedure</p> <p>To ensure the on-going effectiveness of this policy and procedure, a review will be undertaken at regular intervals, and not more than 3 years from the date of implementation.</p> <p>Once the relevant supporting organisation returns correspondence we will work to ensure action is taken to remove any barrier to this Sec 75 group accessing our complaints procedure</p> <p><u>Ethnicity:</u></p> <p>For all issues identified under Section 75 it is important that this policy is shared with all, and targeted with the section 75 groups. Therefore, communication is key when this policy is released. BSO will continue to gather data where possible in regards to complaints and gather equality data in order to monitor the progress of this policy and procedure</p>
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information on key support services that staff can direct a complainant to for additional support.	<p>To ensure the on-going effectiveness of this policy and procedure, a review will be undertaken at regular intervals, and not more than 3 years from the date of implementation.</p> <p>Once the relevant supporting organisation returns correspondence we will work to ensure action is taken to remove any barrier to this Sec 75 group accessing our complaints procedure</p>
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2.5 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)

Group	Impact	Suggestions
Religion	The Business Services Organisation (BSO) is committed to providing equality of opportunity, and strives to promote a good and harmonious environment where every employee & service user is treated with respect and dignity and in which no one feels threatened or intimidated because of his or her age, disability, marital or civil partnership status, political opinion, race, religious belief, sex (including gender reassignment), sexual orientation, with dependants or without dependants	<p>Ensure that this policy is shared and promoted throughout the organisation and wider public to ensure every section 75 group can access the BSO complaints policy.</p> <p>In order to feel valued and listened to, should they have a complaint about a BSO service, that there is prompt resolution of issues that may arise and to prevent future recurrence through lessons learnt and on-going monitoring arrangements.</p>
Political Opinion	As above	As above

Ethnicity	As Above	As above

(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.

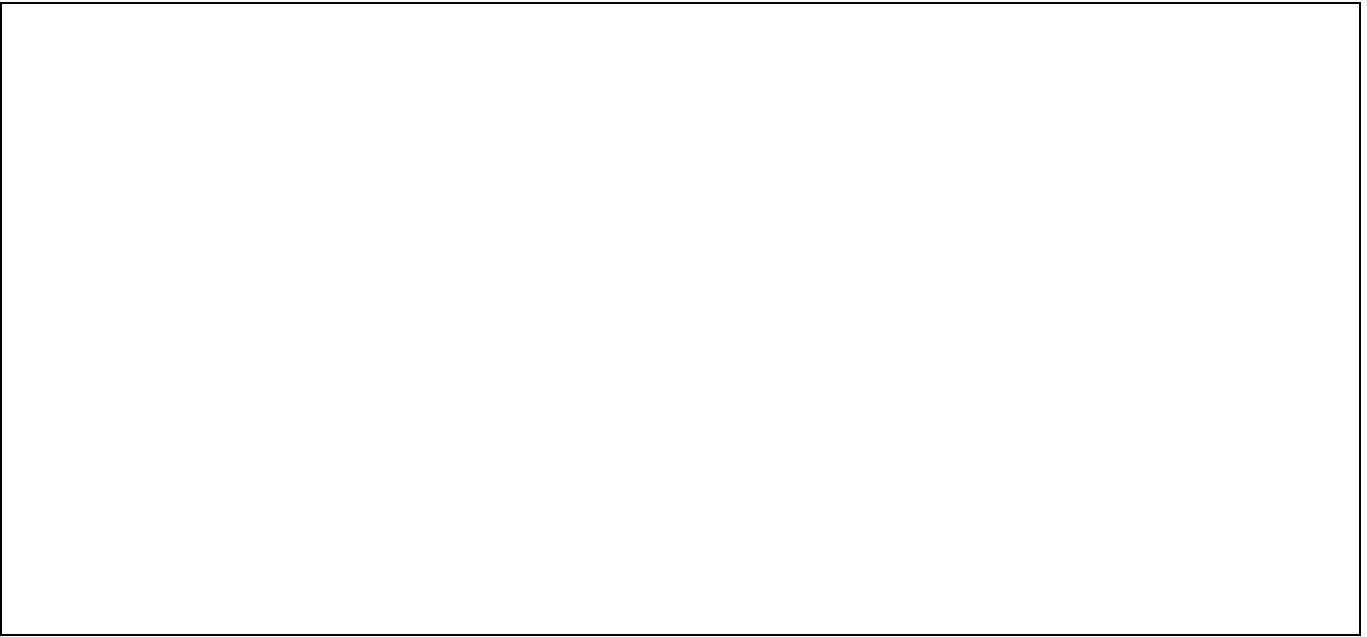
Issues for any of the Section 75 groups highlighted in this screening have been mitigated against. Implementation of this policy will give support and offer an avenue for those service users to explore should the need arise to raise a complaint.

The BSO will monitor its implementation.

BSO's mission is "to provide high quality business services which support our customers to improve health and wellbeing". Its aims are to:

- Deliver high quality, valued services
- Develop our services in partnership with our customers
- Demonstrate continuous improvement in pursuit of excellence
- Help our people excel at what we do

BSO's Complaints Policy is a fundamental aspect of the above. Due consideration has been given to those individuals within Section 75, of the Northern Ireland Act (1998), particularly those from a different ethnic background and those who have disabilities.



(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>
Not Applicable	Not Applicable

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>
Disability is a key equality category covered by this policy. Reasonable adjustments will be considered for service users with disability to ensure their needs are met in the outworking's and practical application of the policy in line with related BSO policy.	<p>Further engagement in Tapestry Network, focus groups, Awareness sessions</p> <p>Once the relevant supporting organisation returns correspondence we will work to ensure action is taken to remove any barrier to this Sec 75 group accessing our complaints procedure. Engagement with the voluntary/community sector will be ongoing and undertaken as part of the monitoring of the implementation and outworking of the Complaints Policy and that this will help inform any required actions to be taken.</p>

(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
Article 8	Yes	Any complaints will need to be investigated, and this necessitates sharing correspondence (etc.) with relevant business units of BSO, as well as potentially with other organisations (including advocacy and support groups). Article 8 also involved in relation to the accessibility of the process and in particular any information relating to it.	No. BSO has a clear legal basis under article 6 and/or 9 of GDPR to investigate complaints. BSO 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.

Human rights are promoted by having a transparent and accessible complaints procedure in place.



(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
<p>BSO currently monitors the level and type of complaints</p> <p>The nature of complaints is already captured and reported on within BSO.</p> <p>An anonymous survey is issued with any formal response and will attempt to collect equality related information to help us identify if any group(s) of service users are finding difficulty in accessing our process.</p> <p>Once the relevant supporting organisation returns correspondence we will work to ensure action is taken to remove any barrier to this Sec 75 group accessing our complaints procedure. This work will be ongoing and undertaken as part of the monitoring of the implementation and outworking of the Complaints Policy and that this will help inform any required actions to be taken.</p>	<p>Complaints documentation will be made available in a variety of formats on request, which will be monitored and reviewed</p> <p>An anonymous survey is issued with any formal response and will attempt to collect equality related information to help us identify if any group(s) of service users are finding difficulty in accessing our process.</p> <p>Once the relevant supporting organisation returns correspondence we will work to ensure action is taken to remove any barrier to this Sec 75 group accessing our complaints procedure. This work will be ongoing and undertaken as part of the monitoring of the implementation and outworking of the Complaints Policy and that this will help inform any required actions to be taken.</p>	<p>Not applicable</p>

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Approved Lead Officer: Darren Sessions

Position: Complaints & Whistleblowing Manager

Date: 31/10/2025

Policy/Decision Screened by: Thomas O'Hanlon

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 the Equality Unit:

Equality Unit|BSO|James House|2-4 Cromac Avenue|Belfast|BT7 2JA
 Tel: 028 9536 3961