Equality and Human Rights Screening

Practice Direction: Use of WhatsApp for Work-Related Communication on work mobile phone devices

The Children's Court Guardian Agency for NI is required to address the 4 questions below in relation to all its policies. This template sets out a proforma to document consideration of each question.

1. 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)

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

3. 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)

4. 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 and Human Rights Information Bank on the BSO website: Equality Screening - Business Services Organisation (BSO) Website

1. INFORMATION ABOUT THE POLICY OR DECISION

1.1 Title of policy or decision

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1.2 Description of policy or decision:

- **What is it trying to achieve (aims and objectives)?**
- **How will this be achieved (key elements)?**
- **What the key constraints (for example financial, legislation or other)?**

This Practice Direction sets out interim guidance on the use of WhatsApp for work-related communication. It supports organisational standards in data protection, ICT security, and records management, and is intended to ensure safe, appropriate, and limited use of non-corporate messaging tools until a regional policy is in place.

Using Whatsapp for business-related communication can be a valuable tool. However, it also presents several significant risks in terms of confidentiality, security, none-compliance with statutory obligations and best practice in records management.

The practice direction sets out the Agency's conditions of use, highlighting data protection and legal considerations.

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

- CCGANI Employees
- CCGANI Self-Employed
- CCGANI Solicitor Panel
- Legal professionals
- HSCNI Trusts
- Children and young people, parents and carers.

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

- **What are they?**
  - Information Security Policy
  - Social Media Policy
  - Records Management Policy
  - Data Protection Act 2018
  - General Data Protection Regulation (GDPR)
  - HSC Code of Conduct
  - Conflict, Bullying and Harassment Policy
  - Disciplinary Policy
  - Violence and Aggression in the Workplace Policy
  - Raising a Concern in the Public Interest (Whistleblowing)

- **Who owns them?**
  - Children's Court Guardian Agency for NI
  - Department of Health

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, services users, staff side or other stakeholders.

- Census 2021
- Workforce Data (HRPTS)
- CCGANI workplace survey and focus groups the use of Whatsapp, September-November 2025
- NISC Guidance – Use of Non-Corporate Communication Channels
- WhatsAppening in the world of online communications?
- WhatsApp accessibility and features | RNIB | RNIB

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.

Category	What is the makeup of the affected group (%)? Are there any issues or problems? For example, a lower update that needs to be addressed or greater involvement of a particular group?
	Children's Court Guardian Agency staff data September 2025: Male 14.29% Female 85.71% **Population Profile** The population of Northern Ireland based on NISRA Census Data as at 2021 was 1,903,175

<table>
<tr><td></td><td>Males 936,131 (49.2%)
Females 967,044 (50.8%)

No questions relating to gender identity were asked in the NI Census.</td></tr>
<tr><td>Age</td><td>Children’s Court Guardian Agency staff data September 2025:

<table>
<tr><td>16-24</td><td>0.00%</td></tr>
<tr><td>25-29</td><td>1.30%</td></tr>
<tr><td>30-34</td><td>2.60%</td></tr>
<tr><td>35-39</td><td>10.39%</td></tr>
<tr><td>40-44</td><td>19.48%</td></tr>
<tr><td>45-49</td><td>11.69%</td></tr>
<tr><td>50-54</td><td>18.18%</td></tr>
<tr><td>55-59</td><td>22.08%</td></tr>
<tr><td>60-64</td><td>10.39%</td></tr>
<tr><td>>=65</td><td>3.90%</td></tr>
</table>

Population Profile

The population demographic by age within Northern Ireland (NISRA 2021)

<table>
<tr><td>0-4</td><td>113,820</td><td>6%</td></tr>
<tr><td>5-9</td><td>124,475</td><td>7%</td></tr>
<tr><td>10-14</td><td>136,918</td><td>7%</td></tr>
<tr><td>15-19</td><td>113,203</td><td>5.95%</td></tr>
<tr><td>20-24</td><td>111,386</td><td>5.85%</td></tr>
<tr><td>25-29</td><td>116,409</td><td>6.12%</td></tr>
<tr><td>30-34</td><td>126,050</td><td>6.62%</td></tr>
<tr><td>35-39</td><td>127.313</td><td>6.69%</td></tr>
<tr><td>40-44</td><td>122,163</td><td>6.42%</td></tr>
<tr><td>45-49</td><td>121,670</td><td>6.39%</td></tr>
<tr><td>50-54</td><td>130,967</td><td>6.88%</td></tr>
<tr><td>55-59</td><td>129,276</td><td>6.79%</td></tr>
<tr><td>60-64</td><td>113,049</td><td>5.94%</td></tr>
<tr><td>65-69</td><td>93,464</td><td>4.91%</td></tr>
<tr><td>70-74</td><td>83,467</td><td>4.39%</td></tr>
<tr><td>75-79</td><td>66,377</td><td>3.49%</td></tr>
<tr><td>80-84</td><td>43,776</td><td>2.30%</td></tr>
</table>
</td></tr>
</table>

	85-89	25,879	1.36
	90 and over	13,512	0.71

Religion

Children's Court Guardian Agency staff data September 2025:

Perceived Protestant	2.60%
Protestant	27.27%
Perceived Roman Catholic	2.60%
Roman Catholic	38.96%
Neither	0.00%
Perceived Neither	0.00%
Not assigned	28.57%

Population Profile from Census 2021:

42.31% of population from a Catholic background
37.36% of population from Protestant and other Christian background
20.33% of population from other religions, no religion or religion not stated

Political Opinion

Children's Court Guardian Agency staff data September 2025:

Broadly Nationalist	7.79%
Other	3.90%
Broadly Unionist	6.49%
Not assigned	67.53%
Do not wish to answer	14.29%

Population Profile (Census 2021)

Total NI Residents: 1,903,178

British only	606,263	31.86%
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

Children's Court Guardian Agency staff data September 2025:

Divorced	2.60%
Married/Civil Partnership	40.26%
Other	3.90%
Separated	0.00%
Single	10.39%
Unknown	42.86%
Widow/er	0.00%
Not Assigned	0.00%

Population Profile (Census 2021)

Total NI Residents (over the age of 16: 1,514,743

Single (never married)	576,708	38.07%
Married	690,509	45.59%
In a civil partnership	2,472	0.18%
Separated (bt still legally married or still legally in a civil partnership)	57,272	3.78%
Divorced or formerly I 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

Children's Court Guardian Agency staff data September 2025:

Yes	20.78%
Not assigned	67.53%
No	11.69%

Population Profile (Census 2021)

Total Households with dependent children 768,809

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	3.14
Three or more dependent children, youngest aged 12-18	3,519	0.46

Table 17: Provision of unpaid care (‘Provision of unpaid care' covers looking after, giving help or support to anyone because they have long-term physical or mental health conditions or illnesses, or problems related to old age. It excludes any activities carried out in paid employment.)

Northern Ireland All usual residents aged 5 and over 1,789,348
Percentage of usual residents aged 5 and over who provide:

No unpaid care 87.58%
1-19 hours unpaid care per week 5.63%
20-34 hours unpaid care per week 1.38%
35-49 hours unpaid care per week 1.57%
50+ hours unpaid care per week 3.84%

Disability

Children's Court Guardian Agency staff data September 2025

No	58.44%
Not assigned	40.26%
Yes	1.30%

NI Population Profile 2021 Census

Total NI Household 768,810

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

Children's Court Guardian Agency staff data September 2025:

Not assigned	64.94%
White	35.06%
Other	0.00%
Black African	0.00%
Indian	0.00%
Chinese	0.00%

Population Profiles (Census 2021)

Total NI Residents: 1,903,178

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

Children's Court Guardian Agency staff data September 2025:

Do not wish to answer	1.30%
Not assigned	67.53%
Opposite sex	29.87%
Both Sexes	0.00%
Same sex	1.30%

Population Profile (Census 2021):

Total NI Residents: 1,514,743

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%

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.

Category	Needs and Experiences
Gender	There are no specific needs identified in relation to this Section 75 category.
Age	Not all people may use or feel comfortable using Whatsapp to communicate, which could inadvertently exclude certain groups, such as older employees / members of the public who are less familiar with the technology.
Religion	There are no specific needs identified in relation to this

	Section 75 category.
Political Opinion	There are no specific needs identified in relation to this Section 75 category.
Marital Status	There are no specific needs identified in relation to this Section 75 category.
Dependent Status	There are no specific needs identified in relation to this Section 75 category.
Disability	The use of whatsapp may be beneficial for those with a disability e.g. sight impairment as it has accessibility features such as compatibility with screen readers like Talkback and VoiceOver.
Ethnicity	There are no specific needs identified in relation to this Section 75 category.
Sexual Orientation	There are no specific needs identified in relation to this Section 75 category.

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 policy or decision in order to promote equality of opportunity?

In developing the policy or decision what did you do or change to address the equality issues you identified?	**What do you intend to do in future to address the equality issues you identified?**
Age: The practice direction advises guardians are expected to exercise their judgement as to scenarios where corporate approved methods are not considered suitable. Employees who are less experienced using whatsapp may require additional assistance/training on its use.	This guidance is interim guidance until November 2026 or until supersede by regional policy at which time equality issues will be reconsidered.

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	N/A	N/A
Political Opinion	N/A	N/A
Ethnicity	N/A	N/A

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 categories 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 given reasons for your decisions:

It is not felt that a full EQIA will highlight any further issues with regards to equality of opportunity for the Section 75 groups.

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?	
How does the policy or decision currently encourage disabled people to participate in public life?	**What else could you do to encourage disabled people to participate in public life?**
Policy encourages participation by offering an accessible communication tool.	

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?	
How does the policy or decision currently promote positive attitudes towards disabled people?	**What else could you do to promote attitudes towards disabled people?**
Offers an accessible communication tool.	Further promote positive attitudes by highlighting accessibility features in staff training

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 and forced or compulsory labour.	No
Article 5: Right to liberty and security of person.	No
Article 6: Right to a fair and public trial within a reasonable time.	No
Article 7: Right to freedom from retrospective criminal law and no punishment without law.	No
Article 8: Right to respect for private and family life, home and correspondence.	No
Article 9: Right to freedom of thought, conscience and religion.	No
Article 10: Right to freedom of expression.	No
Article 11: Right to freedom of assembly and association.	No
Article 12: Right to marry and found a family.	No
Article 14: Prohibition of discrimination in the enjoyment of the convention rights.	No
1st protocol Article 1: Right to a peaceful enjoyment of possessions and protection of property.	No
1st 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**
N/A			

*It is important to speak to your line management 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.
Issue practice direction to all staff and makes staff aware of the practice direction in induction programmes.

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 or good relations, disability duties and human rights)?		
Equality & Good Relations	**Disability Duties**	**Human Rights**
N/A		

Approved Lead Officer: Jennifer Ferguson

Position: Head of Corporate Services

Date: 30/12/2025

Policy/Decisions Screened by: Sinéad Casey

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.

Any request for this document in another format or language will be considered.