



Equality Screening, Disability Duties and Human Rights Assessment Template

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[Guidance on completion of the template can be found on the Equality Commission website at S75 screening template 2010 \(web access checked 230920\) .docx](#)

Part 1. Policy scoping

1.1 Information about the policy

Name of the policy:

Raising a Concern in the Public Interest (Whistleblowing) HSC Framework and Model Policy

Is this an existing, revised or a new policy?

Revised – This policy will be replacing the whistleblowing Policy currently in place within HSC organisations.

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

The Raising a Concern in the Public Interest (Whistleblowing) Framework and Model Policy document 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..

Are there any Section 75 categories which might be expected to benefit from the intended policy?

If so, explain how.

The policy is not expected to have a differential effect impact on any particular Section 75 category beyond the size of any particular demographic within HSC organisations and their patients. The intention is that this policy will have an equal be of benefit to all staff a broad range of staff, agency workers, contractors etc., volunteers and members of the public, within HSC.

Who initiated or wrote the policy?

DoH and HSC Trusts

Who owns and who implements the policy?

HSC

1.2 Implementation factors

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

None

1.3 Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon? (please delete as appropriate)

staff

service users

other public sector organisations

voluntary/community/trade unions

1.4 Other policies with a bearing on this policy

- what are they?

Legislation: Public Interest Disclosure (Northern Ireland) Order 1998

- who owns them?

N/A

1.5 Available evidence

What evidence/information (both qualitative and quantitative¹) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Religious belief evidence / information:

There is no evidence available that the policy will have a differential impact by religious belief.

Political Opinion evidence / information:

As above with Religious Belief,

Racial Group evidence / information:

There is no evidence available that the policy will have a differential impact by racial group. However any service user within HSC at facing issues in relation to accessing services due to their ethnicity may benefit from a more cohesive and coherent approach to dealing with raising a concern in the public interest.

Age evidence / information:

Departmental statistics show that there is a fairly even spread across age demographics between 25 and 59 with lower percentages representative above and below this age range. It is not anticipated that this policy will have any differential impact across the age groups. Age and age/gender breakdown below:

Age group	Count of staff in post	% of staff in post
< 25	3,698	4.8%
25 - 29	7,959	10.4%
30 - 34	9,946	12.9%
35 - 39	10,140	13.2%

¹ * Qualitative data – refers to the experiences of individuals related in their own terms, and based on their own experiences and attitudes. Qualitative data is often used to complement quantitative data to determine why policies are successful or unsuccessful and the reasons for this.

Quantitative data - refers to numbers (that is, quantities), typically derived from either a population in general or samples of that population. This information is often analysed either using descriptive statistics (which summarise patterns), or inferential statistics (which are used to infer from a sample about the wider population).

40 - 44	9,660	12.6%
45 - 49	9,457	12.3%
50 - 54	10,332	13.4%
55 - 59	8,858	11.5%
60 - 64	4,876	6.3%
65+	1,947	2.5%
Total	76,873	100.0%

Age group	Female	Male	% Female by age group	% Male by age group
< 25	2,980	718	4.9%	4.5%
25 - 29	6,432	1,527	10.6%	9.5%
30 - 34	7,812	2,134	12.8%	13.3%
35 - 39	8,021	2,119	13.2%	13.2%
40 - 44	7,666	1,994	12.6%	12.4%
45 - 49	7,431	2,026	12.2%	12.6%
50 - 54	8,191	2,141	13.5%	13.3%
55 - 59	6,955	1,903	11.4%	11.8%
60 - 64	3,794	1,082	6.2%	6.7%
65+	1,515	432	2.5%	2.7%
Total	60,797	16,076	100.0%	100.0%
	79%	21%		

HSC Statistics in relation to registered patients by HSC Trusts for 2021 broken down by age shows the majority demographic spread between 5 and 64 with lower percentage representation above and below these age groups. It is not anticipated that this policy will have any differential impact across the age groups. Age breakdown of registered patients below:

Age group	Count of registered patients by Trusts in 2021	% of registered patients by Trusts in 2021
0-4	112,053	5.6%
5 -15	283,058	14.1%

16 - 44	758,660	37.8%
45 - 64	525,400	26.2%
65 - 74	178,878	8.9%
75 - 84	109,871	5.5%
85+	39,017	1.9%
Total	2,006,937	100.0%

Marital Status evidence / information:
As above with Religious Belief.

Sexual Orientation evidence / information:

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.

Men & Women generally evidence / information:

Departmental statistics show that a significant majority of the workforce within HSC are female (79%). 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. Breakdown by Gender below:

Gender	Count of staff in post	% of staff in post
Female	60,797	79%
Male	16,076	21%
Total	76,873	100%

HSC Statistics in relation to registered patients by HSC Trusts for 2021 broken down by gender shows no significant difference (males at 50.4% and females at 49.6%). Any potential impact this policy may have would be a positive impact

across patients of both genders. Gender breakdown of registered patients below:

Gender	Count of registered patients by Trusts in 2021	% of registered patients by Trusts in 2021
Female	996,296	49.6%
Male	1,010,641	50.4%
Total	2,006,937	100%

Disability evidence / information:

There is no evidence available that the policy will have a differential impact by disability, however, as at Sexual Orientation above, people with a disability may be less inclined to raise a complaint, or to be aware of the processes involved due to accessibility issues with documentation.

Dependants evidence / information:

As above with Religious Beliefs.

1.6 Needs, experiences and priorities

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 of the needs, experiences and priorities for each of the Section 75 categories below:

Religious belief

No evidence of specific need has been identified.

Political Opinion

As above with Religious Belief.

Racial Group

As above with Religious Belief

Age

As above with religious Belief.

Marital status

As above with Religious Belief.

Sexual orientation

As above with Religious Belief

Men and Women Generally

As above with Religious Belief

Disability

As above with Religious Belief

Dependants

As above with Religious Belief.

Part 2. Screening questions**2.1 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**

Details of the likely policy impacts on Religious belief: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Political Opinion: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Racial Group: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Age: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Marital Status: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Sexual Orientation:

What is the level of impact? None

Details of the likely policy impacts on Men and Women: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Disability: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Dependants:

What is the level of impact? None

Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories? No

Detail opportunities of how this policy could promote equality of opportunity for people within each of the Section 75 Categories below:

Religious Belief - It is not anticipated the policy will promote equality of opportunity for this category. The Raising a Concern in the Public Interest (Whistleblowing) HSC Framework and Model Policy document 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.

Political Opinion – As above with religious Belief

Racial Group - It is not anticipated the policy will not directly promote equality of opportunity for this category, however, the Raising a Concern in the Public Interest (Whistleblowing) Framework and Model Policy document 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. Staff or service users from an ethnic Minority background may benefit from a more cohesive and coherent approach to dealing with raising a concern in the public interest through the implementation of this policy.

Age – As above with Religious Belief.

Marital Status – As above with Religious Belief.

Sexual Orientation – It is not anticipated the policy will not directly promote equality of opportunity for this category, however, the Raising a Concern in the Public Interest (Whistleblowing) Framework and Model Policy document 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. Staff or service users of all sexual orientations may benefit from a more cohesive and coherent approach to dealing with raising a concern in the public interest through the implementation of this policy.

Men and Women generally - As above with Religious Belief.

Disability - It is not anticipated the policy will not directly promote equality of opportunity for this category, however, the Raising a Concern in the Public Interest (Whistleblowing) Framework and Model Policy document 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. Staff or service users from with disabilities may benefit from a more cohesive and coherent approach to dealing with raising a concern in the public interest through the implementation of this policy.

Dependants - As above with Religious Belief.

2.2 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?

Please provide details of the likely policy impact and determine the level of impact for each of the categories below i.e. either minor, major or none.

Details of the likely policy impacts on Religious belief: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Political Opinion: (insert text here)

What is the level of impact? None

Details of the likely policy impacts on Racial Group: (insert text here)

What is the level of impact? None

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

Detail opportunities of how this policy could better promote good relations for people within each of the Section 75 Categories below:

Religious Belief - It is not anticipated the policy will promote equality of opportunity for good relations between these categories. The Raising a Concern in the Public Interest (Whistleblowing) HSC Framework and Model Policy document 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.

Political Opinion – As above with Religious Beliefs.

Racial Group - As above with Religious Beliefs.

2.5 Additional considerations

Multiple identity

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?

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) HSC Framework and Model Policy document 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. It will apply to all individuals equally regardless of category.

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

2.6 Was the original policy / decision changed in any way to address any adverse impacts identified either through the screening process or from consultation feedback. If so please provide details.

N/A

Part 3. Screening decision

3.1 Would you summarise the impact of the policy as; No Impact/ Minor Impact/ Major Impact?

No Impact

3.2 Do you consider that this policy/ decision needs to be subjected to a full equality impact assessment (EQIA)?

An equality impact assessment (EQIA) is unnecessary. The Raising a Concern in the Public Interest (Whistleblowing) Framework and Model Policy document 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.

3.3 Please explain your reason.

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.

3.4 Mitigation

When the public authority concludes that the likely impact is 'minor' and an equality impact assessment is not to be conducted, the public authority may consider mitigation to 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?

No. 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

3.5 Timetabling and prioritising

N/A

Part 4. Monitoring

Monitoring is an important part of policy development and implementation. Through monitoring it is possible to assess the impacts of the policy / decision both beneficial and adverse.

4.1 Please detail how you will monitor the effect of the policy / decision?

Effectiveness of the raising a concern in the Public Interest (Whistleblowing) Framework and Model Policy will be measured through monitoring and reporting of concerns raised and dealt with by HSC organisations.

4.2 What data will you collect in the future in order to monitor the effect of the policy / decision?

Effectiveness of the raising a concern in the Public Interest (Whistleblowing) Framework and Model Policy will be measured through monitoring and reporting of concerns raised and dealt with by HSC organisations.

Please note: - *For the purposes of the annual progress report to the Equality Commission you may later be asked about the monitoring you have done in relation to this policy and whether that has identified any Equality issues.*

Part 5. Disability Duties

5.1 Does the policy/decision in any way promote positive attitudes towards disabled people and/or encourage their participation in public life?

The Raising a Concern in the Public Interest (Whistleblowing) HSC Framework and Model Policy will potentially benefit disabled people by facilitating a process through which they can access to raise concerns in relation to the quality of services provided to them service users, including disabled people, within HSC organisations.

5.2 Is there an opportunity to better promote positive attitudes towards disabled people or encourage their participation in public life by making changes to the policy/decision or introducing additional measures?

N/A

Part 6. Human Rights

6.1 Does the policy / decision affects anyone's Human Rights?

Details of the likely policy impacts on Article 2 – Right to life: (insert text here)

What is the impact? Positive / ~~Negative (human right interfered with or restricted)~~ / ~~Neutral~~ (circle as appropriate)

Details of the likely policy impacts on Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment: (insert text here)

What is the impact? Positive / ~~Negative~~ / ~~Neutral~~ (circle as appropriate)

Details of the likely policy impacts on Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 5 – Right to liberty & security of person: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 6 – Right to a fair & public trial within a reasonable time: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 7 – Right to freedom from retrospective criminal law & no punishment without law: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 8 – Right to respect for private & family life, home and correspondence: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 9 – Right to freedom of thought, conscience & religion: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 10 – Right to freedom of expression: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 11 – Right to freedom of assembly & association: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 12 – Right to marry & found a family: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on Article 14 – Prohibition of discrimination in the enjoyment of the convention rights: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on 1st protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

Details of the likely policy impacts on 1st protocol Article 2 – Right of access to education: (insert text here)

What is the impact? ~~Positive~~ / ~~Negative~~ / Neutral (circle as appropriate)

6.2 If you have identified a likely negative impact who is affected and how?

At this stage we would recommend that you consult with your line manager to determine whether to seek legal advice and to refer to Human Rights Guidance to consider:

- *whether there is a law which allows you to interfere with or restrict rights*
- *whether this interference or restriction is necessary and proportionate*
- *what action would be required to reduce the level of interference or restriction in order to comply with the Human Rights Act (1998).*

6.3 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/decision.

Part 7 - Approval and authorisation

Screened by:	Position/Job Title	Date
Eddy Dickson	Deputy Principle	09.06.2022
Approved by:		
Copied to EHRU:		

The Screening Template is 'signed off' and approved by a senior manager responsible for the policy (at least Grade 7), made easily accessible on the public authority's website as soon as possible following completion and made available on request.

ADDITIONAL INFORMATION TO INFORM THE ANNUAL PROGRESS REPORT TO THE EQUALITY COMMISSION

**(PLEASE NOTE : THIS IS NOT PART OF THE SCREENING TEMPLATE BUT MUST BE
COMPLETED AND RETURNED WITH THE SCREENING)**

1. Please provide details of any measures taken to enhance the level of engagement with individuals and representative groups. Please include any use of the Equality Commissions guidance on consulting with and involving children and young people.

None

2. In developing this policy / decision were any changes made as a result of equality issues raised during :

- (a) pre-consultation / engagement;
- (b) formal consultation;
- (c) the screening process; and/or
- (d) monitoring / research findings.

If so, please provide a brief summary including how the issue was identified, what changes were made, and what will be the expected outcomes / impacts for those effected.

N/A

3. Does this policy / decision include any measure(s) to improve access to services including the provision of information in accessible formats? If so please provide a short summary.

This policy lays out governance and a process for raising a concern in the public interest across all HSC organisations which could aid in improving access to these services.

Thank you for your co-operation.
Equality and Human Rights Unit.