**Equality Screening Template**

**Part 1- Policy Scoping**

The first stage of the screening process involves scoping the policy under consideration. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy, being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

Public authorities should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

**Information about the policy**

|  |  |
| --- | --- |
| **Name of Policy** | Career Break Policy |
| **Is it existing, revised or a new policy?** | Revised |
| **What is it trying to achieve?**  **(Intended aims/outcomes)** | Outlining the opportunity to take long term time off for personal reasons such as caring for a dependant, travel or education, without risk to employment status.  The aim of the policy is to offer a scheme which may help to maintain a good level of employee retention and/or assist in employee wellbeing. |
| **Are there any Section 75 categories which might be expected to benefit from the intended policy? If so, explain how.** | No particular categories are expected to benefit from this policy as the application process is eligible to all employees (dependent on tenure of service only) |
| **Who initiated or wrote the policy?** | HR Service Manager |
| **Who owns and who implements the policy?** | Human Resources |

**Implementation Factors**

|  |  |  |  |
| --- | --- | --- | --- |
| Yes | X | No |  |

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

If yes, are they: (Select all applicable)

|  |  |
| --- | --- |
|  | Financial |
|  | Legislative |
| X | Other – please specify: | Commercial purposes i.e. commercial effect of permitting someone a long-term break from their role and whether this would adversely impact the organisation |

**Main stakeholders affected**

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

|  |  |
| --- | --- |
| X | Staff |
|  | Service Users |
|  | Other Public Sector Organisations |
|  | Voluntary/ Community/ Trade Unions |
|  | Other – please specify: |  |

##### [Other policies with a bearing on this policy](#Onefour):

|  |
| --- |
| * Equal Opportunity Policy * Flexible Working Policy   The following are also applicable due to conditions relating to pension contributions whilst absent from work on a career break:   * Pension Policy Statement * Local Government Pension Scheme Regulations 2014 (NI) |

**Available Evidence**

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

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

|  |  |
| --- | --- |
| **Section 75 category** | **Details of evidence/information** |
| Religious belief | **Internal data register of employees who took a career break from Translink between 2017-2019**: 30 employees. The religious breakdown for those are:   |  |  |  | | --- | --- | --- | | Protestant | Roman Catholic | Other | | 16 | 13 | 1 |   There are a number unknown due to data not being available for employees on the register who have since left Translink employment.  **Employee Data from CoreHR of religious belief for those with less than 3 years service currently** (Total 749): This is approximately 17.6% of the total number of employees.   |  |  |  | | --- | --- | --- | | Protestant | Roman Catholic | Other | | 361 | 362 | 260 |   **Employee Data from CoreHR of religious belief for those who are currently on Fixed Term Contract** (Total 29): This is approximately 0.68% of the total number of employees.   |  |  |  | | --- | --- | --- | | Protestant | Roman Catholic | Other | | 9 | 8 | 12 | |
| Political opinion | This data is not specifically obtained, but the data of religious belief would be deemed a proxy for political opinion. |
| Racial group | No evidence available to indicate correlation between this category and requirement to request a Career Break. |
| Age | **Internal data register of employees who took a career break from Translink between 2017-2019** shows age ranges of successful applicants (30) as:   |  |  |  |  | | --- | --- | --- | --- | | 20-34 | 35-44 | 45-54 | 55+ | | 7 | 13 | 6 | 4 |   The majority of those obtaining career break are seen to be younger employees between the ages of 20-44 (20) which is approximately 67% of total applications for career break during that period.  The percentage of employees in the Translink workforce aged between 20-44 = 38.6%  **Employee data from CoreHR on the age of those who have less than 3 years’ service** currently (Total 749):   |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | | 16-34 | | 35-44 | | 45-54 | | 55+ | | | 278 | | 244 | | 168 | | 59 | | | M | F | M | F | M | F | M | F | | 225 | 53 | 208 | 36 | 143 | 25 | 52 | 7 |   **Employee Data from CoreHR of age for those who are currently on Fixed Term Contract** (Total 29):   |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | | 16-34 | | 35-44 | | 45-54 | | 55+ | | | 22 | | 3 | | 3 | | 1 | | | M | F | M | F | M | F | M | F | | 11 | 11 | 3 | 0 | 2 | 1 | 1 | 0 | |
| Marital status | **Internal data register of employees who took a career break from Translink between 2017-2019** does not provide full data regarding marital status (as this is an optional question on Fair Employment monitoring) of all those on the register. |
| Sexual orientation | No evidence available to indicate correlation between this category and requirement to request a Career Break. |
| Men and women generally | **Internal data register of employees who took a career break from Translink between 2017-2019** shows that the policy was applied to 28 males and 2 females.  Percentage of Translink male workforce = 0.76%  Percentage of Translink female workforce = 0.33%  **Internal Fair employment monitoring** data shows that gender breakdown for total number of employees is approximately:  Male: 3640 Female: 603  **Employee data from CoreHR on the gender of those who have less than 3 years’ service** currently (Total 749):  Male: 628 Female: 121  **Employee Data from CoreHR of gender for those who are currently on Fixed Term Contract** (Total 29):  Male: 17 Female: 12 |
| Disability | The reason for taking a career break is not noted by the HR department for centralised record, however, there are some notes made that indicate 2 of those detailed on **the internal register of employees who took a career break from Translink between 2017-2019** may have had a disability or an illness that may have seen them unable to work for a period of time.  Currently there are 67 employees in Translink having declared a disability on the Fair Employment monitoring (1.5% of total employee workforce).  No data is obtained regarding disability of any immediate family to employees, however there is information through case law relating to associated discrimination (See examples: **case law**: McLeod vs Royal Bank of Scotland (UK) or McKeith -v- Ardoyne Association (NI)). Information on this can also be found at:  <https://www.equalityni.org/ECNI/media/ECNI/News%20and%20Press/Articles/2017/Discrimination-by-Association-3May17.pdf>  **Employee data from CoreHR on disability of those who have less than 3 years’ service** currently (Total 749): 18 have declared a disability. This is 2.4% of those employees with <3 years’ service. It is 26.8% of the employee population that has declared a disability.  **Employee Data from CoreHR on disability for those who are currently on Fixed Term Contract** (Total 29): 1 employee has declared a disability |
| Dependants | No evidence available to indicate correlation between this category and requirement to request a Career Break.  Also, other policies are available such as Time Off for Dependants or the Parental Leave policy, which would reduce the likelihood of the Career Break policy being applicable to this category (generally). |

**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 for each of the Section 75 categories

|  |  |
| --- | --- |
| **Section 75 category** | **Details of needs/experiences/priorities** |
| Religious belief | The available data indicates similarly equal numbers of uptake of the career break policy by individuals with the two main religious beliefs considered in Northern Ireland. Therefore there is no information to identify this category as having any specific needs in relation to this policy and there is no criterion that restricts career break for religious belief and so has no impact on anyone of particular religion. |
| Political opinion | As appropriate religious belief would be seen to be a proxy of this category. |
| Racial group | There is no information to indicate that this category has any needs or priorities in relation to the Career Break policy. |
| Age | The available data indicates that more younger employees are utilising the career break policy than older employees. This may be due to the reasons of taking a career break such as travel or further education considerations to boost their career, or younger dependants needing assistance (although there are other policies that may assist with this requirement).  Additionally, as older employees are closer to age of retirement, they may feel less requirement to take a career break.  For those employees who do not meet the criteria to apply for a career break i.e. less than 3 years’ service or on a fixed term contract (FTC), younger age groups are impacted by not being able to avail of this policy.  69.7% of employees with less than 3 years’ service are aged between 16-44. This is (approx.) 12.3% of total employees.  86% of employees on a FTC are aged 16-44.  There is some overlap in the above figures i.e. employees who are engaged on a fixed term contract who have less than 3 years’ service. 12.9% of those with less than 3 years’ service and engaged on a FTC are aged between 16-44. These figures show a significant proportion of the younger employees who we can see are ‘more likely’ to apply for/request a career break are in categories of those who will be unable to make such an application due to the criterion of the policy. |
| Marital status | Reviewing the available data and given that typical reasons for taking a career break may include travel or further education, it is possible that employees who make a request for those reasons are more likely to have a marital status of single. However, the policy has no criterion that restricts career break for reasons of marital status and so it has no impact on this category. |
| Sexual orientation | There is no information to indicate that this category has any needs or priorities in relation to the Career Break policy. |
| Men and women generally | The data shows there are a much larger number of men having taking a career break in the data timeframe than women and even in comparison to the workforce ratios between men and women, there is a still higher percentage of the male workforce taking career breaks compared to women.  There is no clear information as to why this may be the case and there are no criterion that restricts career break specifically based on gender and so has no impact on either gender generally.  However, it is worth noting, that the data relating to gender for those with less than 3 years’ service shows that the males in this category account for 14.8% of the total male employee population and females account for 20% of the total female population of Translink. This again shows a significant number of employees (when considering the category of gender) are unable to avail of the policy and therefore this could be an impacting factor on why there are significantly less females who are utilising the policy.  There has also be consideration here for multiple categories for ‘younger female’ employees – see **Multiple categories section** for more information on this. |
| Disability | It is understood that an employee may wish to take a career break to receive treatment or recuperate from an illness or disability and the policy does acknowledgement requirement for its need on ‘compassionate grounds’. There is some data that would indicate that the career break policy has been utilised for this type of reason on at least 2 occasions within the 3 year period.  It is also worth noting that an employee may wish to take a career break to care for an immediate family member who is disabled and on considering approval for a career break request it is possible to ‘indirectly discriminate’ against a disability, even if not directly at the employee themselves (see Case law detailed in the evidence section).  The eligibility criteria where an employee must have 3 years’ service could impact those with a disability to avail of the Career break policy, as the data above shows that more than ¼ of employees who have declared a disability have under 3 years’ service and therefore would not be eligible to apply. However, it is likely that this figure is not accurate as many employees have not declared their disability.  Overall, there are no criterion that restricts a career break for purposes relating to a disability directly, however some mitigation may need to be considered if opportunity for career break (within 3 years employment tenure) may be required on grounds of reasonable adjustment for those with a disability.  Additionally, some consideration for mitigation within the policy may be required to review reasons for requesting the career break, to understand if there could be an impact of indirect discrimination/ associated discrimination, if someone wishes to take the break in order to care for a disabled relative. |
| Dependants | There is no information to indicate that this category has any needs or priorities in relation to the Career Break policy. |

**Part 2 - Screening Questions**

**Introduction**

In making a decision as to whether or not there is a need to carry out an equality impact assessment, the public authority should consider its answers to the questions 1-4 which are given on pages 66-68 of the Guide: <https://www.equalityni.org/S75duties>

Taking into account the evidence presented above, consider and comment on the likely impact on equality of opportunity and good relations for those affected by this policy, in any way, for each of the equality and good relations categories, by applying the screening questions given overleaf and indicate the level of impact on the group i.e. minor, major or none.

**Impact: Major / Minor / None**

If the public authority’s conclusion is **major** in respect of one or more of the Section 75 equality of opportunity and/or good relations categories, then consideration should be given to subjecting the policy to the equality impact assessment procedure.

**In favour of ‘MAJOR’ impact**

|  |  |
| --- | --- |
| **A** | The policy is significant in terms of its strategic importance; |
| **B** | Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them; |
| **C** | Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged; |
| **D** | Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities; |
| **E** | The policy is likely to be challenged by way of judicial review; |
| **F** | The policy is significant in terms of expenditure. |

If the public authority’s conclusion is **minor** in respect of one or more of the Section 75 equality categories and/or good relations categories, then consideration should still be given to proceeding with an equality impact assessment, or to:

* Measures to mitigate the adverse impact; or
* The introduction of an alternative policy to better promote equality of opportunity and/or good relations.

**In favour of ‘MINOR’ impact**

|  |  |
| --- | --- |
| **A** | The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible; |
| **B** | The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures; |
| **C** | Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people; |
| **D** | By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations. |

If the public authority’s conclusion is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then the public authority may decide to screen the policy out. If a policy is ‘screened out’ as having no relevance to equality of opportunity or good relations, a public authority should give details of the reasons for the decision taken.

**In favour of ‘NONE’**

|  |  |
| --- | --- |
| **A** | The policy has no relevance to equality of opportunity or good relations. |
| **B** | The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories. |

**Screening Questions**

|  |  |  |
| --- | --- | --- |
| **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 | | |
| Section 75 category | Details of policy impact | Level of impact? Minor/Major/None |
| Religious belief | There is no identified content that would affect a person’s religious belief in adhering to or applying the Career Break Policy. | None |
| Political opinion | There is no identified content that would affect a person’s political opinion in adhering to or applying the Career Break Policy. | None |
| Racial group | There is no identified content that would affect a person’s racial group in adhering to or applying the Career Break Policy. | None |
| Age | The data supports that this policy is likely to have more impact on younger employees, however there no content to restrict or limit its usage to the younger workforce. The criterion is balanced and reasonable across all age groups within the workforce. | None |
| Marital status | There is no identified content that would affect a person’s marital status in adhering to or applying the Career Break Policy. | None |
| Sexual orientation | There is no identified content that would affect a person’s sexual orientation in adhering to or applying the Career Break Policy. | None |
| Men and women generally | Whilst it appears that more men avail of the policy and a greater percentage of women have a service period that means that they do not meet the criteria to apply for a career break, there is no direct or unlawful impact caused by the policy and its eligibility criterion. Any residual impact seen is considered to be negligible. | None |
| Disability | There is no direct impact identified to any employee with a disability in adhering to or applying the career break policy, and the policy does already have some mitigations to promote equality of opportunity for those with a disability. However, as a reasonable adjustment, an employee with a disability who has less than 3 years’ service may be granted a career break. | None |
| Dependants | There is no impact identified to any employee with dependants in adhering to or applying for a career break. | None |

|  |  |  |
| --- | --- | --- |
| **2** Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories? | | |
| Section 75 category | If **Yes**, provide details | If **No**, provide reasons |
| Religious belief |  | No, as this policy has no impact on this group |
| Political opinion |  | No, as this policy has no impact on this group |
| Racial group |  | No, as this policy has no impact on this group |
| Age |  | No, as this policy has no impact on this group |
| Marital status |  | No, as this policy has no impact on this group |
| Sexual orientation |  | No, as this policy has no impact on this group |
| Men and women generally |  | No, as this policy has no impact on this group |
| Disability |  | No, as this policy has no impact on this group |
| Dependants |  | No, as this policy has no impact on this group |

|  |  |  |
| --- | --- | --- |
| **3** To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? minor/major/none | | |
| Good relations category | Details of policy impact | Level of impact Minor/Major/None |
| Religious belief | There is no identified content that would affect a person’s religious belief therefore no impact on good relations between those of different religious belief. | None |
| Political opinion | There is no identified content that would affect a person’s political opinion therefore no impact on good relations between those of different political opinion. | None |
| Racial group | There is no impact identified relating to racial group or good relations between different races. | None |

|  |  |  |
| --- | --- | --- |
| **4** Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group? | | |
| Good relations category | If **Yes**, provide details | If **No**, provide reasons |
| Religious belief |  | No, as this policy has no impact on this group |
| Political opinion |  | No, as this policy has no impact on this group |
| Racial group |  | No, as this policy has no impact on this group |

**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?  (For example: disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

|  |
| --- |
| Younger Women – (Specifically those who have less than 3 years’ service). This category shows that there are 89 females aged between 18-44 compared to that of 408 males [with <3 years service]. This is approximately 20% of total employees with less than 3 years’ service and 14.7% of the overall female employee population of Translink. |

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

|  |
| --- |
| On review of the data relating to the multiple category of ‘younger women’ it can be seen that whilst this appears to be a significant figure to be considered, it actually aligns as a very similar male-female ratio for the overall employee population in Translink: Approx. males 3640: females 603 (i.e. 14.2%). Therefore, there is no identified impact, as there is no criterion which affect age or gender within the policy and no additional data that supports a disproportionate effect on this multiple category. |

**Part 3 - Screening Decision**

If the decision is not to conduct an equality impact assessment, please provide details of the reasons.

|  |
| --- |
| No impact assessment required as no significant impact on any category was identified in relation to the Career Break Policy. |

If the decision is not to conduct an equality impact assessment the public authority should consider if the policy should be mitigated or an alternative policy be introduced.

|  |
| --- |
| Possible mitigation to be considered – See section **Mitigation** below for more information. |

If the decision is to subject the policy to an equality impact assessment, please provide details of the reasons.

|  |
| --- |
| N/A |

All public authorities’ equality schemes must state the authority’s arrangements for assessing and consulting on the likely impact of policies adopted or proposed to be adopted by the authority on the promotion of equality of opportunity. The Commission recommends screening and equality impact assessment as the tools to be utilised for such assessments. Further advice on equality impact assessment may be found in a separate Commission publication: Practical Guidance on Equality Impact Assessment.

**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?

If so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative policy.

|  |
| --- |
| Mitigation may be considered for points raised in the needs and experiences section for the category of those with disability. There have been 2 suggestions made for consideration to mitigate this policy for the category of disability:   1. For those wishing to take a career break on grounds of a disability, with less than 3 years’ service. A mitigation might be to expand the scope of ‘compassionate grounds’ within the eligibility criterion so that employees in this scenario would not face an application rejection solely based on length of service. 2. Identifying potential indirect discrimination/discrimination by association – this mitigation may be to add an additional example to those listed of possible reasons/scenarios why an employee may request a career break. This would highlight the possibility and create more awareness of Translink’s open view to consider this a valid reason to request a career break. |

**Timetabling and Prioritising**

Factors to be considered in timetabling and prioritising policies for equality impact assessment.

If the policy has been **‘screened in’** for equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

|  |  |
| --- | --- |
| **Priority Criterion** | **Rating (1-3)** |
| Effect on equality of opportunity and good relations |  |
| Social need |  |
| Effect on people’s daily lives |  |
| Relevance to a public authority’s functions |  |

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the public authority in timetabling. Details of the Public Authority’s Equality Impact Assessment Timetable should be included in the quarterly Screening Report.

Is the policy affected by timetables established by other relevant public authorities?

If yes, please provide details:

|  |
| --- |
| **N/A** |

**Part 4 - Monitoring**

Public authorities should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007).

The Commission recommends that where the policy has been amended or an alternative policy introduced, the public authority should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Effective monitoring will help the public authority identify any future adverse impact arising from the policy which may lead the public authority to conduct an equality impact assessment, as well as help with future planning and policy development.

**Part 5 - Approval and authorisation**

|  |  |  |  |
| --- | --- | --- | --- |
| **Policy Title:** | **Career Break policy** | **Version No:** | **3.2** |
| **Print Name** | **Signature** | **Position/Job Title** | **Date** |
| **Screened By:** | | | |
| Kerri Adams |  | HR Compliance & Governance Officer | 06/08/2020 |
| **Approved by:** | | | |
| Paula Ludlow |  | HR Services Manager | 16/08/20 |

Note: A copy of the Screening Template, for each policy screened should be ‘signed off’ and approved by a senior manager responsible for the policy, made easily accessible on the public authority’s website as soon as possible following completion and made available on request.

|  |  |  |
| --- | --- | --- |
| **Part** | **Part Title** | **Description** |
| **1** | **Policy Scoping** | Asks public authorities to provide details about the policy, procedure, practice and/or decision being screened and what available evidence you have gathered to help make an assessment of the likely impact on equality of opportunity and good relations |
| **2** | **Screening Questions** | Asks about the extent of the likely impact of the policy on groups of people within each of the Section 75 categories. Details of the groups consulted and the level of assessment of the likely impact. This includes consideration of multiple identity and good relations issues. |
| **3** | **Screening Decision** | Guides the public authority to reach a screening decision as to whether or not there is a need to carry out an equality impact assessment (EQIA), or tointroducemeasures to mitigate the likely impact, or the introduction of an alternative policy to better promote equality of opportunity and/or good relations. |
| **4** | **Monitoring** | Provides guidance to public authorities on monitoring for adverse impact and broader monitoring. |
| **5** | **Approval and Authorisation** | Verifies the public authority’s approval of a screening decision by a senior manager responsible for the policy. |

Policy Scoping

* + Policy
  + Available data

Screening Questions

* Apply screening questions
* Consider multiple identities

Screening Decision None/Minor/Major

Mitigate

Publish Template

Re-consider screening

Publish Template for information

Publish Template

EQIA

Monitor

**‘None’**

Screened out

**‘Major’**

Screened in for EQIA

**‘Minor’**

Screened out with mitigation

Concerns raised with evidence

Concerns raised with evidence re: screening decision