**Equality Screening Form**

**INTRODUCTION**

The information contained in this Equality Screening Form has been extracted from the Equality Commission for Northern Ireland’s Guide for Public Authorities (2010). Additional information about the 5 parts of the form and a flowchart to demonstrate the process of completion is detailed in [**Appendix 1**](#Appendix1) of the form.

This template document and further guidance can be found by clicking the following link - [www.equalityni.org/S75duties](https://www.equalityni.org/S75duties)

**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** | Equality, Diversity and Inclusion Strategy |
| **Is it existing, revised or a new policy?** | Existing |[ ]  New |[x]  Revised |[ ]
| **If revised, please outline main updates:** |  |
| **What is it trying to achieve?** **(Intended aims/outcomes)** | The Strategy is an extension of Translink’s Equality scheme aimed to focus on actions for Translink employees |
| **Are there any Section 75 categories which might be expected to benefit from the intended policy? If so, explain how.**  | The strategy is intended to benefit all section 75 categories. Specific actions in relation to gender and disability will benefit these categories |
| **Who initiated or wrote the policy?**  | HR & Corporate Services |
| **Who owns and who implements the policy?** | HR & Corporate Services  |

**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)

|  |
| --- |
|[x]  Financial |
|[x]  Legislative |
|[ ]  Other – please specify:  |  |

**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 |
|[x]  Voluntary/ Community/ Trade Unions |
|[ ]  Other – please specify: |  |

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

|  |
| --- |
| * Equality Scheme
* Disability Action Plan
 |

**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 | Translink conducted a detailed analysis of their employee demographics to understand and identify priority areas for action. In terms of religious belief the breakdown for Translink overall is as follows: 54.5% Protestant and 44.6% Roman Catholic (based on the most recent Fair Employment return data submitted in May 2020).Review of findings from Translink’s Audit of Inequalities completed during 2020 was also taken into consideration. The report can be found following this link [audit-of-inequalities-final-for-consultation.pdf (azureedge.net)](https://trn-prd-cdn-01.azureedge.net/mediacontainer/medialibraries/translink/publications-and-documents/nithc/reports/audit-of-inequalities-final-for-consultation.pdf)Review of the current Census data was also used to understand Translink’s demographic detail in context: [2011 Census - Key Statistics for Northern Ireland - Statistics Bulletin (nisra.gov.uk)](https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/2011-census-results-key-statistics-statistics-bulletin-11-december-2012.pdf)Translink will continue to monitor progress through the annual Fair Employment Monitoring Returns and the Annual Section 75 Progress Report. |
| Political opinion | Translink do not collect data on political opinion. Any relevant findings from the audit of inequalities (link above) were considered. |
| Racial group | The current Census data indicates that 1.8% of the usual NI population belonged to minority Ethnic groups. Translink conducted a detailed analysis of their employee demographics to understand and identify priority areas for action. In terms of Racial Group, Translinks representative data indicate 0.5% of Translink employees belong to an ethnic minority. Translink also reviewed findings in the audit of inequalities findings (reference above) to identify any appropriate actions.The EDI strategy outlines plans to improve the overall diversity of applications and ways to improve the inclusive culture in Translink. It is anticipated these actions will have a benefit for all section 75 categories. |
| Age | Translink conducted analysis of their demographic information. Translink has a workforce that is spread in all age categories. The largest population are aged between 46 and 55, accounting for 35.2% of Translink staff. Only 16.8% of staff are aged at 35 or under.Translink reviewed the Equality Commission for NI’s Key Inequalities Statement in Employment (May 2018) to understand Translink’s data in context. The report highlighted those aged 18-24 years old have higher unemployment rates than those aged 25 and over. It also identified that those aged 50-64 years old are less likely to be in employment and are more likely to be economically inactive than those aged 25-49 years old.The EDI strategy outlines plans to improve the overall diversity of applications and ways to improve the inclusive culture in Translink. It is anticipated these actions will have a benefit for all section 75 categories. |
| Marital status | Translink collect data on marital status at application stage however the data for every employee is incomplete, data is missing for 63% of employees. Of the remain 37%, the majority are either single or married or in a civil partnership (19% and 135, respectively).  |
| Sexual orientation | Historically this data was not collected, therefore data is missing on 68% of employees. Applicants to Translink are asked to select what their sexual orientation is. Of the remaining 32% of employees, 30% have a sexual orientation to the opposite sex. Translink also reviewed relevant information regarding the experiences of the LGBT community. Specifically the National LGBT report ([National LGBT Survey: Summary report (publishing.service.gov.uk)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722314/GEO-LGBT-Survey-Report.pdf)) highlighting the inequal experiences those in the LGBT community face. In addition, to understand the experience of the LGBT community in the workplace a review of the ‘LGBT in Britain – Work’ conducted by Stonewall was completed ([lgbt\_in\_britain\_work\_report.pdf (stonewall.org.uk)](https://www.stonewall.org.uk/system/files/lgbt_in_britain_work_report.pdf)). The EDI strategy outlines plans to improve the overall diversity of applications and specific ways to improve the inclusive culture in Translink for the LGBT community.  |
| Men and women generally | Females make up 14.3% of employees in Translink and Males make up 85.7% of employees. For the last reporting period Females made up 20.1% of applications and 22.1% of appointments.We reviewed data from the current census report to understand Translink’s demographic data in context. We have identified that Translink is underrepresented in comparison with the general NI population data.The EDI strategy identifies key actions with regard to improving the diversity of applicant pools and continuing to develop Translink’s culture that will have a direct positive benefit for this section 75 category. Specific actions have been identified to attract more female into male dominated roles. |
| Disability | Translink continues to monitor the proportion of those in the workforce with a disability. This data is collected at application stage and therefore is unlikely to reflect the true picture of the workforce makeup. The highest category is ‘not known’ (76%). Of the remaining 24%, 21% do not have a disability, 1.6% have a disability and 2% would ‘prefer not to say.’ The applicant data suggests that the majority of applicants did not have a disability (89%), 3.4% of applicants and 1.4% of those appointed had a disability.The current census data was also reviewed, it indicated that 21% of the NI population had a long-term health problem or disability that limited their day-to-day activities. The Equality Commission’s Key Inequalities in Employment Statement (2018) also highlighted the employment gap between people with and without disabilities and the prejudice that those with a disability face in the workplace.The EDI strategy identifies key action with regard to improving the diversity of applicant pools and continuing to develop Translink’s culture that will have a direct positive benefit for this section 75 category. Specific actions have been identified to improve Translink’s representation with regard to disability. |
| Dependants | Translink collects data at application stage to identify those with dependents. Information is missing for 69% of employees. For the remaining 31%, 19% have dependents and 11% do not.The EDI strategy outlines plans to improve the overall diversity of applications and ways to improve the inclusive culture in Translink. It is anticipated these actions will have a benefit for all section 75 categories. |

**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 | Those of different religious beliefs are likely to have the same needs regarding an EDI Strategy i.e. to be treat fairly and be included. Translink’s demographic profile suggests those with a Protestant Community Background are slightly more represented in the workforce, however this is only 2.1% away from the NI target range.The attraction approaches to increase the diversity of applicants, as well as the plans to develop an inclusive culture will address the needs of those with various religious beliefs. |
| Political opinion | Those of different political opinions are likely to have the same needs regarding an EDI Strategy i.e. to be treat fairly and be included. Those of differing political opinions are not likely to be impacted by or have different needs for this policy. |
| Racial group | Those of different racial groups are likely to have the same needs regarding an EDI Strategy i.e. to be treat fairly and be included. Translink’s representative data suggests that the attraction approaches to increase the diversity of applicants, as well as the plans to develop an inclusive culture will address the needs of those in different racial groups. |
| Age | Those in this category are likely to have the same needs regarding an EDI Strategy i.e. to be treat fairly and be included. Translink has representation in all age categories, with a higher proportion in the age group over 46. The attraction approaches to increase the diversity of applicants, as well as the plans to develop an inclusive culture will address the needs of those of various ages. |
| Marital status | Those of different marital status are likely to have the same needs regarding an EDI Strategy i.e. to be treat fairly and be included. Those of differing marital status are not likely to be impacted by or have different needs for, this policy. |
| Sexual orientation | Those of different sexual orientation are likely to have the same needs regarding an EDI Strategy i.e. to be treated fairly and be included. Translink has representation in all ‘sexual orientation’ categories, with a highest proportion is in the ‘unknown category.’ Specific actions have been identified in the EDI strategy to address LGBT inclusion in Translink.  |
| Men and women generally | The majority of Translink’s employees work in ‘male dominated’ industries e.g. Engineering, Bus Driving etc. Translink’s representative data suggests that whilst there has been annual incremental increase in female representation for a number of years, females are still underrepresented in almost all divisions and levels. The EDI strategy will focus activity on attracting more females to apply for roles in Translink and also developing a culture to understand and develop females in the workplace. |
| Disability | Data is ‘unknown’ for most employees regarding this category. The Evidence section outlines that whilst it is likely the number of employees that have a disability is likely to be higher than 1.6%, Translink could adopt a more proactive strategy to improve this representation. The attraction approaches to increase the diversity of applicants, consider workplace schemes, as well as the plans to develop an inclusive culture will address the needs of those with a disability. |
| Dependants | Those who have or do not have dependents are likely to have the same needs regarding an EDI Strategy i.e. to be treat fairly and be included. Those within this category are not likely to be impacted by or have different needs for, this 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: [Guide for Public Authorities April 2010](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/S75GuideforPublicAuthoritiesApril2010.pdf)

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 - 4**

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| --- |
| **Screening 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 |
| Section 75 category | Details of policy impact | Level of impact? Minor/Major/None |
| Religious belief | Minor + impact to this group. The plans within the strategy aim to increase diversity and inclusion within Translink that will have potential positive impacts for this Section 75 category. | Minor |
| Political opinion | The plans within this strategy aim to increase diversity and inclusion within Translink, it is not anticipated there will be any specific impacts for this section 75 category. | None |
| Racial group | Minor + impact to this group. The plans within the strategy aim to increase diversity and inclusion within Translink that will have potential positive impacts for this Section 75 category. | Minor |
| Age | Minor + impact to this group. The plans within the strategy aim to increase diversity and inclusion within Translink that will have potential positive impacts for this Section 75 category. | Minor |
| Marital status | The plans within this strategy aim to increase diversity and inclusion within Translink, it is not anticipated it there will be any specific impacts for this section 75 category. | None |
| Sexual orientation | Minor + impact to this group. The plans within the strategy aim to increase diversity and inclusion within Translink that will have potential positive impacts for this Section 75 category.  | Minor |
| Men and women generally | Minor + impact to this group. The plans within the strategy aim to increase diversity and inclusion within Translink that will have potential positive impacts for this Section 75 category. | Minor |
| Disability | Minor + impact to this group. The plans within the strategy aim to increase diversity and inclusion within Translink that will have potential positive impacts for this Section 75 category. | Minor |
| Dependants | The plans within this strategy aim to increase diversity and inclusion within Translink, it is not anticipated it there will be any specific impacts for this section 75 category. | None |

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| --- |
|  **Screening Question** **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 |  | The EDI strategy is designed to improve diversity and inclusion in Translink. No additional opportunities have been identified to better promote equality of opportunity. |
| Political opinion |  | The EDI strategy intends to improve overall diversity and inclusion throughout Translink, however it is not anticipated that those in this category require specific actions. |
| Racial group |  | The EDI strategy is designed to improve diversity and inclusion in Translink. Ongoing review of relevant internal and external data will take place to identify and monitor the impact on this group. |
| Age |  | The EDI strategy is designed to improve diversity and inclusion in Translink. No additional opportunities have been identified to better promote equality of opportunity. |
| Marital status |  | The EDI strategy intends to improve overall diversity and inclusion throughout Translink, however it is not anticipated that those in this category require specific actions. |
| Sexual orientation |  | The EDI strategy is designed to improve diversity and inclusion in Translink. Specific plans to improve the culture for LGBT+ staff have already been identified. |
| Men and women generally |  | The EDI strategy is designed to improve diversity and inclusion in Translink. Specific plans to improve representation and the culture for females have already been identified. |
| Disability |  | The EDI strategy is designed to improve diversity and inclusion in Translink. Specific plans to improve representation of those with a disability have already been identified. |
| Dependants |  | The EDI strategy intends to improve overall diversity and inclusion throughout Translink, however it is not anticipated that those in this category require specific actions. |

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| --- |
| **Screening Question** **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 | The intention of the EDI strategy is to make improvements to Translink’s diversity and inclusive culture. This is likely to result in improvements in good relations in this category. | Minor |
| Political opinion | Whilst the plans within the EDI strategy will promote an inclusive culture for all employees, it is anticipated that there will be an indirect benefit to those in this category. | Minor |
| Racial group | The intention of the EDI strategy is to make improvements to Translink’s diversity and inclusive culture. This is likely to result in improvements in good relations in this category. | Minor |

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| --- |
| **Screening Question 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 |  | The EDI strategy is designed to improve diversity and inclusion in Translink. No additional opportunities have been identified to better promote good relations in this category. An ongoing review of data and policy impact will take place in order to identify any further opportunities. |
| Political opinion |  | The EDI strategy intends to improve overall diversity and inclusion throughout Translink, however it is not anticipated that those in this category require specific actions. |
| Racial group |  | The EDI strategy is designed to improve diversity and inclusion in Translink. An ongoing review of data and policy impact will take place in order to identify any further opportunities. |

**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).

|  |
| --- |
| None anticipated |

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

|  |
| --- |
| N/a |

**PART 3 - SCREENING DECISION**

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

|  |
| --- |
| Translink’s equality scheme action plan and audit of inequalities is currently out to consultation. The EDI strategy actions are outlined within this information. This screening exercise was conducted to ensure additional consideration of the equality impacts of delivering key employee related initiatives. Findings from the Audit of Inequalities consultation exercise will be reviewed and any appropriate changes to the EDI strategy will be made.  |

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**.

|  |
| --- |
| No mitigations or changes in policy have been identified. |

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

|  |
| --- |
|  Not applicable. |

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.

|  |
| --- |
| Not applicable. |

**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  | Choose an item. |
| Social need | Choose an item. |
| Effect on people’s daily lives | Choose an item. |
| Relevance to a public authority’s functions | Choose an item. |

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:

|  |
| --- |
|  |

**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.

|  |
| --- |
| Translink will provide bi-annual updates on the EDI strategy progress to the Translink Executive Team.Review of the Equality Scheme and Action Plans through the Section 75 report will also be utilised. As well as annual reporting to the Equality Commission for NI. |

**PART 5 - APPROVAL AND AUTHORISATION**

|  |  |  |  |
| --- | --- | --- | --- |
| **Policy Title:** | **Equality, Diversity and Inclusion Strategy** | **Version No:** | **1** |
| **Print Name** | **Signature** | **Position/Job Title**  | **Date** |
| **Screened By:** |
| Cara Woods | CWoods | Equality and Diversity Advisor | 14/01/21 |
| **Approved by:** |
| Paula Logue |  | HR Manager | 21/01/21 |

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.

**APPENDIX 1**

|  |  |  |
| --- | --- | --- |
| **Part**  | **Part Title** | **Description** |
| **1** | [**Policy Scoping**](#Part1) | 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**](#Part2) | 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**](#Part3) | 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**](#Part4) | Provides guidance to public authorities on monitoring for adverse impact and broader monitoring. |
| **5** | [**Approval and Authorisation**](#Part5) | 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