**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** | Overpayment Policy |
| **Is it existing, revised or a new policy?** | Existing |[x]  New |[ ]  Revised |[ ]
| **If revised, please outline main updates:** |  |
| **What is it trying to achieve?** **(Intended aims/outcomes)** | To explain the process around Translink claiming back money which has been overpaid to employees in error.  |
| **Are there any Section 75 categories which might be expected to benefit from the intended policy? If so, explain how.**  | No specific categories intended to benefit. |
| **Who initiated or wrote the policy?**  | HR Services Manager |
| **Who owns and who implements the policy?** | Human Resources |

**Implementation Factors**

|  |  |
| --- | --- |
| Yes |[ ]  No |[x]

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

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

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

**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. The following document should help you source data - [Section 75 - Evidence Signposting Guide](https://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/Public%20Authorities/S75DataSignpostingGuide.pdf)

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 from fair employment monitoring for employees** (4242) shows that there is breakdown of religious belief for the following:

|  |  |  |
| --- | --- | --- |
| Protestant | Roman Catholic | Other |
| 2311 | 1849 | 82 |
| 54.4% | 43.6% | 2% |

 |
| Political opinion | There is no data captured regarding political opinion, and often religious belief would be taken as proxy for this category.  |
| Racial group | Internal data from fair employment monitoring shows the following figures regarding racial groups of employees:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| White | Indian | Black African | Mixed Ethnic | Pakistani | Other | Prefer not to say | Blank answers |
| 4076 | 1 | 3 | 4 | 1 | 13 | 3 | 141 |
| 96% | <1% | <1% | <1% | <1% | <1% | <1% | 3% |

NI Census 2011: <https://www.nisra.gov.uk/sites/nisra.gov.uk/files/publications/2011-census-results-key-statistics-northern-ireland-report-11-december-2012.pdf>The census data shows that 98% of the NI population is considered to be of white ethnicity, with all other racial groups at less than 1% of the population. |
| Age | **Internal Fair employment monitoring** data shows the following approximate figures for age groups of Translink employees (4242):

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 16-24 | 25-34 | 35-44 | 45-54 | 55+ |
| 95 | 538 | 1020 | 1456 | 1133 |
| 2.23% | 12.68% | 24.04% | 34.32% | 26.7% |

A report by CIPD about the ageing workforce indicates that approximately 30% of the typical UK workforce are aged 55+:<https://www.cipd.co.uk/knowledge/work/trends/ageing-workforce-report>**Internal employee data** shows the following breakdown of employees working part time:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 16-24 | 25-34 | 35-44 | 45-54 | 55+ |
| 6 | 9 | 44 | 50 | 215 |

 |
| Marital status | **Internal Fair employment monitoring** data shows the following approximate figures for marital status of Translink employees (4242): It should be noted this is not a mandatory question and this record is taken from start of employment, thus the status could change during employment with no requirement to inform/update HR or the system.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Married/ Civil Partnered | Co-Habiting | Single (Never married) | Other | No Answer |
| 557 | 142 | 788 | 81 | 2674 |
| 13.1% | 3.3% | 18.6% | 1.9% | 63% |

 |
| Sexual orientation | **Internal Fair employment monitoring** data shows the following approximate figures for sexual orientation of Translink employees (4242): It should be noted this is not a mandatory question.

|  |  |  |  |
| --- | --- | --- | --- |
| A different sex | Same sex | Both | No Answer |
| 1268 | 51 | 4 | 2919 |
| 30% | 1% | <1% | 68% |

Data from Office for National Statistics shows that in Northern Ireland, the percentage of people identifying themselves as LGB in 2018 was 1.2%. [https://www.ons.gov.uk/peoplepopulationandcommunity](https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2018) |
| Men and women generally | **Internal Fair employment monitoring** data shows the following breakdown by gender for employees:

|  |  |
| --- | --- |
| Male | Female |
| 3639 | 603 |
| 85% | 15% |

**Internal employee data** shows the following breakdown of genders working part time:

|  |  |
| --- | --- |
| Male | Female |
| 2176% | 10718% |

 |
| Disability | **Internal Fair employment monitoring** data shows the following breakdown of employees who have declared whether or not they have a disability:

|  |  |  |
| --- | --- | --- |
| No Disability | Disability | No Answer |
| 872 | 67 | 3303 |
| 20.55% | 1.57% | 77.86% |

Policy has an appendix added - Code Of Practice On The Employment Of People With DisabilitiesData from Office of National Statistics which details that NI had an employment rate for disabled people of 37. [https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandemploymentuk/2019)  |
| Dependants | **Internal Fair employment monitoring** data shows the following approximate breakdown of employees who have declared whether or not they have dependants:It should be noted this is not a mandatory question and this record is taken from start of employment, thus the status could change during employment with no requirement to inform/update HR or the system.

|  |  |  |
| --- | --- | --- |
| Yes | No | No Answer |
| 811 | 484 | 2947 |
| 19% | 11% | 70% |

 |

**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 | An overpayment could occur for any employee. The employee figures above show a relatively equal split between these religious beliefs therefore it is reasonable to assume there is no minority within Translink that would be impacted more significantly under the terms of this policy.  |
| Political opinion | There is no data recorded regarding political opinion but is typically viewed in proxy with religious belief within NI. |
| Racial group | As seen in the data above, the predominant racial group of employees in Translink is white. However, this is line with census data of the general NI population. However, there is no evidence to suggest that any particular racial group would be impacted more significantly under the terms of this policy. |
| Age | As shown by the data, over 60% of the Translink workforce is aged over 45+ and aligns similarly well to CIPD data about approximate expectations of the older age range continuing in work. Older employees aged 35+ appear to be more likely to work part-time hours which may have an impact on how long it takes to repay any overpayments due to reduced income. However, there is no evidence to suggest that older employees would be impacted more significantly under the terms of this policy and any repayment schedule would be suited to individual circumstances. |
| Marital status | The data available shows a very similar split between married/civil partnered and co-habiting couple compared to that of employees who are single or other. However, there is no evidence to suggest that any particular marital status would be impacted more significantly under the terms of this policy. |
| Sexual orientation | The data available shows a very similar split between those employees who identify with a sexual orientation towards those of the same sex, compared to that of the national statistics i.e. respectively 1:1.2%. However, there is no evidence to suggest that employees who identify with any particular sexual orientation would be impacted more significantly under the terms of this policy. |
| Men and women generally | The data shows a significantly higher ratio of men to women employees. However, the data shows a higher proportion of females work part time and who may be more impacted if there was an overpayment due to reduced earnings. However, there is no evidence to suggest that any particular gender would be impacted more significantly under the terms of this policy and any repayment schedule would be suited to individual circumstances.  |
| Disability | It can be seen that those employees with a disability are in the minority in Translink and this is typical across employment rates of disabled people in the UK. Someone with a disability may need more time off than someone without therefore their average weekly earnings may be lower unless in receipt of company sick pay. However, there is no evidence to suggest that disabled employees would be impacted more significantly under the terms of this policy and any repayment schedule would be suited to individual circumstances. |
| Dependants | The data available is very limited and subject to change throughout an employees tenure with Translink. However, there is no evidence to suggest that employees with or without dependants would be impacted more significantly under the terms of 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**

|  |
| --- |
| **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 | There is no content to affect a person’s religious belief when applying this policy. | None |
| Political opinion | There is no content to affect a person’s political opinion when applying this policy. | None |
| Racial group | There is no content to affect a person’s racial group when applying this policy. | None |
| Age | The policy could have an impact on older employees who are working part time hours and therefore they may require a longer period to repay an overpayment. | Minor |
| Marital status | There is no content to affect a person’s marital status when applying this policy. | None |
| Sexual orientation | There is no content to affect a person’s sexual orientation when applying this policy. | None |
| Men and women generally | The policy could have an impact on those working part time hours and therefore they may require a longer period to repay an overpayment. | Minor |
| Disability | The policy could have an impact on those with a disability and therefore they may require a longer period to repay an overpayment. | Minor |
| Dependants | There is no content to affect a person’s dependants status when applying this policy. | None |

|  |
| --- |
|  **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 |  | No, as the policy has no impact on this category. |
| Political opinion |  | No, as the policy has no impact on this category. |
| Racial group |  | No, as the policy has no impact on this category. |
| Age |  | No, an employee of any age may work part time so the policy is not likely to be more detrimental to any particular age group |
| Marital status |  | No, as the policy has no impact on this category. |
| Sexual orientation |  | No, as the policy has no impact on this category. |
| Men and women generally |  | No, both male and female employees may work part-time so the policy is not likely to be more detrimental to one or the other gender. |
| Disability |  | No, there is a section on the application of the policy which can be reviewed for those with a disability and consideration made in relation to duration for reimbursement of the overpayment. |
| Dependants |  | No, as the policy has no impact on this category. |

|  |
| --- |
| **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 |  There is no content to affect a person’s religious belief when applying this policy.  | None |
| Political opinion | There is no content to affect a person’s political opinion when applying this policy. | None |
| Racial group | There is no content to affect a person’s racial group when applying this policy. | None |

|  |
| --- |
| **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 |  | No, as the policy has no impact on this category. |
| Political opinion |  | No, as the policy has no impact on this category. |
| Racial group |  | No, as the policy has no impact on this category. |

**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).

|  |
| --- |
| No multiple identity categories have been identified |

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.

|  |
| --- |
| No, as this policy has little to no impact on any category.  |

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**.

|  |
| --- |
| There is mitigation within the application of the policy in relation to:* total amount to be recovered
* how overpayment is to be recovered
* frequency of repayments
* amount of each repayment
* date repayment to commence
* any additional arrangements, e.g. reduction in salary to appropriate level

So consideration can be given to the duration over which to repay the overpayment. |

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.

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

**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:

|  |
| --- |
| **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.

|  |
| --- |
| *If applicable, please comment on how you will monitor the impact of this policy.* |

**PART 5 - APPROVAL AND AUTHORISATION**

|  |  |  |  |
| --- | --- | --- | --- |
| **Policy Title:** | **Overpayments Policy** | **Version No:** | **1.3** |
| **Print Name** | **Signature** | **Position/Job Title**  | **Date** |
| **Screened By:** |
| Kerri Adams | Text, letter  Description automatically generated | HR Compliance & Governance Officer | April 2023 |
| **Approved by:** |
| Paula Ludlow |  | HR Services Manager | April 2023 |

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