

# **SECTION 75 POLICY SCREENING FORM**

# **Section 75 Statutory Equality Duties**

http://www.equalityni.org/S75duties

The promotion of equality of opportunity entails more than the elimination of discrimination. It may also require proactive measures to be taken to maintain and secure equality of opportunity.

Section 75 (1) requires the University in carrying out its functions, powers and duties to have *due regard to the need to promote equality of opportunity* between –

- persons of different religious belief, political opinion, racial group, age, marital status, or sexual orientation
- men and women generally
- persons with a disability and persons without persons with dependants and persons without.

Without prejudice to the obligations set out above, the University is also required to:

- a) have regard to the desirability of promoting good relations between persons of different
  - · religious belief
  - · political opinion; or
  - racial group
- b) meet legislative obligations under the Disability Discrimination Order.

#### What is a policy?

The Equality Commission for Northern Ireland state in their guidance<sup>1</sup> that the term 'policy' is used to denote any strategy, policy (proposed/amended/existing) or practice and/or decision, whether written or unwritten.

The University's Equality Scheme reflects the Equality Commission's definition of a policy and this should be applied in determining what needs to be screened.

If you are in doubt, please contact the Diversity and Inclusion Unit for advice. Equality screening guidance is also available at <a href="Queen's website">Queen's website</a> or by contacting the Diversity and Inclusion Unit.

# 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.

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

<sup>&</sup>lt;sup>1</sup> 'Section 75 of the Northern Ireland Act 1998, A Guide for Public Authorities' (April 2010), page 30. A policy may include planning decisions, service changes, corporate strategies, policy development, practices, guidelines, procedures and protocols; board papers

# A. Information about the policy

# Name of the policy to be screened and description

Multi-factor Authentication for access to digital services

Is this an existing, revised or a new policy? (please append policy to the screening form)

# **Existing**

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

Increase security of QUB users' accounts and protect user data and QUB resources by preventing account compromise and data breach

Are there any Section 75 categories which might be expected to benefit from the policy? If so, explain how.

No specific categories

Who initiated or wrote the policy?

Seamus Doyle, Director, Information Services

Directorate responsible for devising and delivering the policy?

Information Services

# Background to the Policy to be screened.

Include details of any pre-consultations/consultations which have been conducted and/or whether the policy has previously been tabled at the University's Operating Board or the Standing Committee of the Senate.

Multi-factor authentication (MFA) increases account security and significantly reduces the likelihood that an account will be compromised by a malicious actor. Consequences of account compromise can include personal data theft, financial losses, GDPR breaches, damage caused by ransomware, loss of account access, reputational damage to the University, phishing and spam, and increasing risk of further account compromise.

to provaccess had all expand the ITS been a	ing the cyber attack in February 2021, it was necessary to enable MFA on users' accounts ide additional protection against account compromise and prevent attackers gaining to critical digital services such as email, Office 365 and Citrix. An MFA pilot programme ready been conducted successfully within several Schools and Directorates and this was ded to all staff, students and alumni over a period of several months. During the rollout, Service Desk has pro-actively monitored and reported on any concerns, and the policy has mended where issues have been identified (for example, developing a procedure when a unable to access their MFA device).
B.	Implementation factors
Are t	Implementation factors here any factors which could contribute to/detract from the intended outcome of the policy?
If yes	s, are they
	financial
	legislative
	other, please specify:
C.	Main stakeholders affected
	are the internal and external stakeholders (actual or potential) that olicy will impact upon?
$\boxtimes$	staff
$\boxtimes$	service users
	other public sector organisations
	voluntary/community/trade unions
	other, please specify:

# D. Other policies with a bearing on this policy

<ul><li>what are they? (please list)</li><li>N/A</li></ul>
• who owns them? N/A

#### E. Available evidence

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

This means any data or information you currently hold in relation to the policy or have gathered during policy development. Evidence to inform the screening process may take many forms and should help you to decide who the policy might affect the most. It will also help ensure that your screening decision is informed by relevant data.

Section 75 category	Details of evidence/information
---------------------	---------------------------------

# Religious belief

Under Fair Employment legislation, the University has a statutory duty to monitor the religious composition of the workforce and applicants.

#### **QUB Staff Profile**

These statistics reflect our Workforce Composition by NI Community Background as at January 2022:

Community Backgroun	ď	
	No. of Staff	%
Not Known	45	1.04%
Non Determined	1196	27.51%
Protestant	1435	33.01%
Roman Catholic	<u>1671</u>	38.44%
Total	4347	100.00%

#### **QUB Student Profile**

Our Student HESA data for 2020-2021 shows our student profile by Religion:

Community Background	No. of Students	%
No Religion or Not Known	1443	10.7%
Other	130	0.9%
Protestant	4805	35.7%
Roman Catholic	<u>7100</u>	52.7%
Total	13,478	100.00%

#### Population Profile (Census 2011)

The population of Northern Ireland on Census Day 2011 was 1,810,863 and population profile by Religion was:

• 45.14% of population from a Catholic background;

	<ul> <li>48.36% of population from Protestant and other Christian background; and</li> <li>6.51% of population from other religions, no religion or religion not stated.</li> </ul>
Political	QUB Student Profile
opinion	We do not collect data in relation to student political opinion(s).  We do not make assumptions on student political opinion(s) based on student community background.

# Racial group

#### **QUB Staff Profile**

These statistics reflect our Workforce Composition by Ethnicity as at January 2022:

Ethnicity	No. of Staff %	
Not Known	236	5.43%
BAME	341	7.84%
<u>White</u>	<u>3770</u>	86.73%
Total	4347	100.00%

#### **QUB Student Profile**

These statistics reflect our Student HESA data for 2020-2021 by Ethnicity:

- 94.9% of our students identified as White; and
- 5.1% identified as Black Minority Ethnic (BME).

Of those students who identified as Black Minority Ethnic:

	No. of	
Ethnicity	Students	%
Asian	544	52.9%
Black	131	12.8%
Mixed	284	27.7%
<u>Other</u>	<u>68</u>	6.6%
Total	1027	100.00%

#### **Population Profile (Census 2011)**

The 2011 Northern Ireland Census recorded the following statistics regarding Ethnicity:

Ethnicity	No. of Usual Residents	%
White	1,742,231	96.21%
Chinese	6,338	0.35%
Irish Traveller	1,268	0.07%
Indian	6,157	0.34%

Pakistani		1,087	0.06%
Bangladeshi		543	0.03%
Other Asian		5,070	0.28%
Black Caribbean		362	0.02%
Black African 2,354	0.13% Black other	905	0.05%
Mixed		5,976	0.33%
Other		2,354	0.13%
Total	1,8	310,863	100.00%
Therefore, the broad etl 2011 was;	nnicity by population	on of North	ern Ireland
<ul><li>BAME: 1.79% (</li><li>White: 96.21%</li></ul>			

Not Known: 2.0% (36,217)

# Age

#### **QUB Staff Profile**

These statistics reflect our Workforce Composition by Age as at January 2022:

Age	No. of Staff	%
25-29	321	7.38%
30-34	608	13.99%
35-39	674	15.50%
40-44	718	16.52%
45-49	600	13.80%
50-54	550	12.65%
55-59	494	11.36%
60-64	248	5.71%
65+	85	1.96%
Under 25	49	1.13%
Total	4347	100.00%

#### **QUB Student Profile**

We reviewed our Student HESA data for 2020-2021 which showed:

- 84.5% of Queen's students were under 21 years of age; and
- 15.5% were over the age of 21.

#### **Population Profile (Census 2011)**

The population demographic by age within Northern Ireland recorded in the 2011 Northern Ireland Census recorded the following statistics regarding the age of the usual residents:

	No. of Usual		
Age	Residents	%	
Children (under 16)	379,376		20.95

Working age (16-64)	1,167,826	64.49
65-84	232,334	12.83
85+	31,328	1.73
Total	1,810,863	100.00%

#### Marital status

#### **QUB Staff Profile**

These statistics reflect our Workforce Composition by Marital Status as at January 2022:

daridary 2022.			
	No. of		
Marital Status	Staff	%	
Widowed	2	8	0.64%
Civil Partnership	4	0	0.92%
Separated	6	2	1.43%
Prefer not to say	8	9	2.05%
Divorced	12	5	2.88%
Other	15	5	3.57%
Not Known	18	1	4.16%
Single	135	8	31.24%
<u>Married</u>	<u>230</u>	<u>9</u>	<u>53.12%</u>
Total	4347	1	00.00%

#### **QUB Student Profile**

We reviewed our 2020-2021 Student HESA data which showed that:

- 86.1% of were single;
- 9.3% were married or in a civil partnership;
- 2.3% were cohabiting;
- 0.5% were divorced or civil partnership dissolved; 0.5% were separated (but still legally married); and 0.1% were widowed.

#### **Population Profile (Census 2011)**

The 2011 Northern Ireland Census recorded the following statistics regarding marital status of persons over the age of 16 within Northern Ireland:

No. of All usual residents	
aged 16 and over	%
517359	36.14%
680840	47.56%
1288	0.09%
56975	3.98%
78019	5.45%
97058	6.78%
	aged 16 and over 517359 680840 1288 56975 78019

Total	1,431,540	100.00%	

# Sexual orientation

#### **QUB Staff Profile**

These statistics reflect our Workforce Composition by Sexual Orientation as at January 2022:

	No. of Staff	
Sexual Orientation		%
Of either sex	59	1.4%
Of the same sex	151	3.5%
I do not wish to answer	424	9.8%
Not Known	528	12.1%
Of a different sex	<u>3185</u>	73.3%
Total	4347	100.00%

#### **QUB Student Profile**

The University does not collect data relating to the sexual orientation of its students.

#### Population Profile (Census 2011)

No official data is available. However, estimates for the LGBT+ population range from 0.3-10% using different sources. A commonly used estimate of LGB people in the UK, accepted by <u>Stonewall UK</u>, is approximately 5-7% of the population

# Men and women generally

#### **QUB Staff Profile**

These statistics reflect our Workforce Composition by Gender as at January 2022:

	No. of Staff			
Gender		%		
М	2371	54.54%		
F	1975	45.43%		
<u>U</u>	<u>1</u>	0.02%		
Total	4347	100.00%		

1 member of staff 'Prefer to self-describe' as either not having a gender identity or identify as trans.

Whilst these numbers are very small, it is recognised that there will be, like in the wider population, a greater proportion of trans or non-binary people who have chosen not to disclose their gender identity.

#### **QUB Student Profile**

	No. of	
Gender	Students	%
М	14,594	57.5%
F	10,767	42.4%
Other	3	0.1%

#### Total 25,364 100.00%

Our student profile data shows that 3 stu ents of the 25,364 in 2020-2021 academic year, prefer to select 'other' in regard to their gender identity. However, we recognise that there will likely b, like in the wider population, a greater proportion of our student population who do not identify as either Male or Female.

#### Population Profile (Census 2011)

Gender	No. of Usual Residents	%
М	887,323	49.0%
F	923,540	51.0%
Total	1,810,863	100.00%

# Disability

#### **QUB Staff Profile**

These statistics reflect our Workforce Composition by Disability as at January 2022:

Broad Disability	No. of Staff	%
Yes	377	8.7%
Not Known	996	22.9 %
<u>No</u>	<u>2974</u>	68.4%
Total	4347	100.00%

#### **QUB Student Profile**

We reviewed our Student HESA data for 2020-2021 which showed that:

- 85.5% of students had no known disability; and
- 14.5% of students reported having a disability.

#### **Population Profile (Census 2011)**

Long-term Health Problem or Disability	No. of Usual Residents	%
Yes	569,154	31.43%
No	1,241,709	68.57%
Total	1,810,863	100.00%

Dependants				
	QUB Staff Prof	<u>file</u>		
	These statistics 2022:	reflect our Workfo	orce Compo	osition by Dependants as at January
	Dependants	No. of Staff	%	
	No	1849	42.5%	
	Not Known	394	9.1%	
	Yes	2104	48.4%	
	Total	4347	100.00%	
	QUB Student F	<u>Profile</u>		
	We reviewed ou 2020	ur Student HESA o	data for	
	• 88.	2% of students ha	d no depen	-2021 which showed that:
		8% of students rep pendant(s	oorted havii	
	Population Pro	ofile (Census 201	<u>1)</u>	,.
	According to the 63,921 lone par population.	e 2011 Nor rents, 3.53% of the	Northern I	sus, in Northern Ireland there were

# F. Needs, experiences and priorities

Having looked at the data/information you have collected in the question above, what does this tell you are the needs, experiences and priorities for the people who fall into the groups below, in relation to your policy<sup>2</sup>? And what is the actual or likely impact on equality of opportunity for those affected by the policy. (See appendix 1 for information on levels of impact).

Section 75 category	Details of needs/experiences/priorities and details of policy impact	Level of Impact
Religious belief	No specific information in relation to this category.	None
Political opinion	No specific information in relation to this category.	None

\_

<sup>&</sup>lt;sup>2</sup> If you do not have enough data to tell you about potential or actual impacts you may need to generate more data to distinguish what groups are potentially affected by your policy.

Racial group	No specific information in relation to this category.	None
Age	Although it varies widely, some users in this category may prefer, or choose, not to use a smartphone and/or mobile app.	None

Marital status	No specific information in relation to this category.	None
Sexual orientation	No specific information in relation to this category.	None
Men and women generally	No specific information in relation to this category.	None
Disability	Users in this category may need to make use of assistive technologies when performing MFA, for example, screenreader, zoom, Face ID or voice control. They may also choose to use SMS text message or voice call for authentication.	Minor
	The recommended MFA smartphone app is compatible with accessibility features available on Apple and Android smartphones (e.g. screen-reader) and 1additional MFA methods (SMS text message and voice call) are available to users who are unable to use apps.	

Dependants	No specific information in relation to this category.	None
------------	---	------

# Part 2 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?			
Section 75 category	Issue	Minor/major/none?	
Religious belief	While there is no specific impact on equality of opportunity for this category, individual users may be unable to access a device to use for MFA	Minor	
Political opinion	While there is no specific impact on equality of opportunity for this category, individual users may be unable to access a device to use for MFA	Minor	

Racial group	While there is no specific impact on equality of opportunity for this category, individual users may be unable to access a device to use for MFA	Minor
Age	While there is no specific impact on equality of opportunity for this category, individual users may be unable to access a device to use for MFA	Minor
Marital status	While there is no specific impact on equality of opportunity for this category, individual users may be unable to access a device to use for MFA	Minor
Sexual	While there is no specific impact on equality of	Minor
orientation	opportunity for this category, individual users may be unable to access a device to use for MFA	

Men and women generally	While there is no specific impact on equality of opportunity for this category, individual users may be unable to access a device to use for MFA	Minor
Disability	Users in this category may need to make use of assistive technologies when performing MFA, for example, screenreader, zoom, Face ID or voice control. They may also choose to use SMS text message or voice call for authentication. However this will not prevent use of the service - the recommended MFA smartphone app is compatible with accessibility features available on Apple and Android smartphones (e.g. screen-reader) and that additional MFA methods (SMS text message and voice call) are available to users who are unable to use apps.  In addition, user may be unable to access a device to use for MFA.	Minor

Dependants	While there is no specific impact on equality of opportunity for this category, individual users may be unable to access	Minor
	may be unable to access a device to use for MFA	

2. Are there any actions which could be taken to reduce any adverse impact which has been identified or opportunities to better promote equality of opportunity?

Mitigating Measure

Section 75 category	Issue	Mitigating Measure
Religious belief	Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA  Additional support is available for all users of MFA and the loan scheme through the IT Service Desk.	Minor
Political opinion	Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA  Additional support is	Minor

	available for all users of MFA and the loan scheme through the IT Service Desk.	
Racial group	Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA  Additional support is available for all users of MFA and the loan scheme through the IT Service Desk.	Minor
Age	Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA  Additional support is available for all users of MFA and the loan scheme through the IT Service Desk.	Minor
Marital status	Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA  Additional support is available for all users of MFA and the loan scheme through the IT	Minor

	Service Desk.	
Sexual orientation	Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA  Additional support is available for all users of MFA and the loan scheme through the IT Service Desk.	Minor
Men and women generally	Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA  Additional support is available for all users of MFA and the loan scheme through the IT Service Desk.	Minor
Disability	Users in this category may need to make use of assistive technologies when performing MFA, for example, screenreader, zoom, Face ID or voice control. They may also choose to use SMS text message or voice call for authentication. However this will not prevent use of the service.	Minor

The recommended
Authenticator app
(Microsoft Authenticator)
supports assistive
technologies and the
service also allows users
who are unable to use
apps to set up
authentication via SMS
and voice call. Users can
set up multiple methods
of authentication if
required.

The recommended MFA smartphone app is compatible with accessibility features available on Apple and Android smartphones (e.g. screen-reader) and that additional MFA methods (SMS text message and voice call) are available to users who are unable to use apps.

In addition, if a user may be unable to access a device to use for MFA, a Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA.

	Additional support is available for all users of MFA and the loan scheme through the IT Service Desk.	
Dependants	Loan scheme has been implemented to provide access to devices for users who are unable to access a device for MFA  Additional support is available for all users of MFA and the loan scheme through the IT Service Desk.	Minor

# 3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Level of impact Details of policy impact Good minor/major/none relations category None N/A Religious belief N/A None Political opinion

	N/A	None
Racial		
group		

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?				
Good relations category	If <b>Yes</b> , provide details	If <b>No</b> , provide reasons		
Religious belief		Policy does not impact good relations		
Political opinion		Policy does not impact good relations		
Racial group		Policy does not impact good relations		

# **E** 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).

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

No specific impact on those with multiple identities.	
ino specific impact on those with multiple identities.	

F Disability Duties
Disability Duties
Consider whether the policy:
<ul> <li>a) Discourages disabled people from participating in public life and fails to promote positive attitudes towards disabled people.</li> <li>No. Minor impacts have been identified but the interoperability of the service with widely available assistive technologies means that users with disabilities will be able to use the service. For users who</li> </ul>
<ul> <li>choose not to use a smartphone and/or mobile app, alternative options are available.</li> <li>b) Provides an opportunity to better positive attitudes towards disabled people or encourages their participation in public life N/A</li> </ul>
Part 3. Screening decision
Through screening, an assessment is made of the likely impacts, either major, minor or none, of the policy on equality of opportunity and/or good relations for the relevant categories. Completion of screening should lead to one of the following three outcomes; please mark an x in the appropriate box:
☐ 'Screened out' i.e. the likely impact is none and no further action is

required

Screened out' with mitigation i.e. the likely impact is minor and measures will be taken to mitigate the impact or an alternative policy will be proposed	
☐ 'Screened in' for an equality impact assessment (EQIA) i.e. the likely impact is major and the policy will now be subject to an EQIA	
If the decision is not to conduct an equality impact assessment, please provide details of the reasons.	
Although minor impacts have been identified, it is considered that the mitigation in place will allow implementation of the policy without impact t stakeholders in any of the S75 categories.	0
If the decision is not to conduct an equality impact assessment, but the policy has minor equality impacts, please provide details of the reasons for this decision and of any proposed mitigating measures or proposed alternative policy.  Minor impacts have been identified but the interoperability of the service with widely available assistive technologies means that users with disabilities will be able to use the service. For users who choose not to use a smartphone and/or mobile app, alternative options are available. In addition, the implementation of a mobile phone loan service will ensure that any user who is unable to access a device of their own, will continue to have access to QUB digital services without impact.	
If the decision is to subject the policy to an equality impost	
If the decision is to subject the policy to an equality impact assessment, please provide details of the reasons.	
N/A	



# D Timetabling and prioritising

If the policy has been '**screened in**' for equality impact assessment 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	Click
Social need	Click
Effect on people's daily lives	Click
Relevance to the University's functions	

# E is the policy affected by timetables established by other relevant public authorities?

If yes, please provide details

Part 4. Monitoring
Effective monitoring will help the University identify any future adverse impact arising from the policy which may lead the University to conduct an equality impact assessment, as well as help with future planning and policy development.
Please detail how you will monitor the effect of the policy?
Any issues will be logged through the IT Service Desk and implementation team.  Issues will be evaluated for potential impact to users, and if escalated to the MFA necessary, additional mitigation will be put in place.
What data is required in the future to ensure effective monitoring of the policy?
Relevant data collected through user reporting via IT Service Desk.
Part 5 - Data Protection
If applicable, has legal advice been given due consideration?
Yes □ No □ N/A ⊠

Has due this polic		sidera	tion been given to information security in relation to
Yes	$\boxtimes$	No	

# Part 6 - Approval and authorisation

Screened by:	Position/Job Title	Date
	Helen Browne, Systems Analyst/Programmer	03/02/22
Approved by:		

A copy of the screening form, for each policy screened, should be 'signed off' and approved by the senior manager responsible for the policy

In instances where a screening decision concludes that an EQIA is required then the screening form should be countersigned by a Director.

There may at times be policy issues which fall within the scope of being novel, contentious or politically sensitive and could only be taken forward following consultation with the University's Operating Board and/or Standing Committee of the Senate. Where a policy screening highlights such issues the screening form must be signed off by the Director prior to proceeding to the University's Operating Board and/or the Standing Committee of the Senate.

Following ratification, a copy of the approved screening form, and associated policy must be forwarded to the Diversity and Inclusion Unit for publication on the University's website.

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

	Please provide details of any measures taken to enhance the level of engagement with individuals and representative groups as part of screening.
N/	A

- 2. In developing this policy 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 affected.

Issue: Some users may temporarily be unable to access a device for MFA

Outcomes: Users will be able to access digital services without interruption	
<ol> <li>Does this policy / decision include any measure(s) to improve to services including the provision of information in accessible formats? If so please provide a short summary.</li> </ol>	
N/A	

Change: Loan scheme implemented to provide access to devices

### **Appendix 1**

# Levels of Impact (Questions 6-9)

#### Introduction

In making a decision as to whether or not there is a need to carry out an equality impact assessment, you should consider the answers provided to the questions above.

In addition, the **screening questions** above further assist you in assessing your policy and must be completed. Some of these questions require you to assess the level of impact of the proposed policy on "equality of opportunity" and "good relations". The scale used when assessing this impact is either "None", "Minor" or "Major". The following paragraphs set out what each of these terms mean.

If your conclusion is <u>none</u> in respect of all of the Section 75 equality of opportunity and/or good relations categories, then you may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, you should give details of the reasons for the decision taken.

If your conclusion is <u>major</u> 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.

If your 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 introduce:

- measures to mitigate the adverse impact; or
- an alternative policy to better promote equality of opportunity and/or good relations.

# In favour of a '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.

# 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.

#### In favour of none

a) The policy has no relevance to equality of opportunity or good relations.

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.