

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 guidance¹ 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 [Queen's website](#) 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).

¹Section 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

Personal Development Review (PDR) Policy

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

New policy

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

PDR will enable employees to own and drive forward their career and development plans and in turn their contribution to the University.

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

If so, explain how.

Yes, all section 75 categories are expected to benefit from the policy.

Who initiated or wrote the policy?

Reward and Performance, People and Culture Directorate

Directorate responsible for devising and delivering the policy?

People and Culture Directorate, QUB

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.

The People and Culture Strategy, People First, is committed to "Empowering Excellence....Building Commitment" and in response to feedback from staff we have developed a new Personal Development Review (PDR) process.

The Staff Forum and Senior Manager's Team were consulted with on the changes to the then appraisal process. Following this, the Appraisal and Academic Career Pathways Group (AACPG) and Appraisal Sub-Group (ASG) were established to

review options and propose a final solution. The working groups included a range of stakeholders from across the University.

In January 2019 UEB agreed to proceed with a review of the then appraisal process. The final proposal was approved by UEB in June 2019.

The final policy (attached) will be tabled at UEB in September 2019 for ratification.

The People and Culture Directorate will also formally consult with Trade Union Representatives.

B. Implementation factors

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

If yes, are they

- financial?
- legislative?
- other?(please specify) comprehensive communication plan to ensure staff are engaged with the new process_____

C. Main stakeholders affected

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

- staff
- service users
- other public sector organisations
- voluntary/community/trade unions
-

other, please specify _ Potential applicants

D. Other policies with a bearing on this policy

- what are they? (please list)
 - Corporate Plan
 - People and Culture Strategy ‘People First’.
 - Equality and Diversity Policy
 - Tiered Recognition Policy
 - Academic Progression Policy

- who owns them?
 - Corporate Plan (Institutional Policy)
 - People and Culture Strategy ‘People First’ (People and Culture Directorate)
 - Equality and Diversity Policy (People and Culture Directorate)
 - Tiered Recognition Policy (People and Culture Directorate)
 - Academic Progression Policy (People and Culture Directorate)

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	

	Composition of QUB workforce (religion)	August 2019
	Protestant	34.9%
	Roman Catholic	39.6%
	Non determined	25.3%
	Unknown	0.2%
Political opinion	No evidence or information identified that would have an impact.	
Racial group	Composition of QUB workforce (broad ethnic group)	August 2019
	Ethnic	7%
	White	88.5%
	Unknown	4.5%
	Age	

Composition of QUB workforce (age- 5 year bands)	August 2019
20-24	1.5%
25-29	8.7%
30-34	14.3%
35-39	17.5%
40-44	15.1%
45-49	14.2%
50-54	12.2%
55-59	9.8%
60-64	5.3%
65+	1.5%
Composition of QUB workforce (age- 10 year bands)	August 2019
20-29	10.2%
30-39	31.8%

	40-49	29.3%
	50-59	22.0%
	60+	6.8%
Marital status	Composition of QUB workforce (Marital status) August 2019	
	Civil partnership	0.9%
	Divorced	2.8%
	Married	5.34%
	Not specified	2.1%
	Other	3.4%
	Separated	1.5%
	Single	32.1%
	Widowed	0.5%
	Unknown	3.5%

Sexual orientation	Composition of QUB workforce (Sexual Orientation)		August 2019
	I do not wish to answer		11.6%
	Of a different sex		70.3%
	Of either sex		0.9%
	Of the same sex		3.2%
	Unknown		13.9%
Men and women generally	Composition of QUB workforce (Gender)		August 2019
	Male		46.2%
	Female		53.8%
Disability	Composition of workforce (Disability)		August 2019

	Disability	7.3%
	No disability	78.1%
	Unknown	19.6%
Dependants		
	Composition of workforce (Dependants)	August 2019
	Yes	44.5%
	No	45.7%
	Unknown	9.8%

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 policy²? 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
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² 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.

Religious belief	<p>The University is committed to the promotion of equality of opportunity and is an equal opportunities employer.</p> <p>The policy will potentially have a positive impact on all staff, including on the grounds of religious belief.</p>	Minor and positive
Political opinion	As above but with regard to political opinion.	Minor and positive
Racial group	As above but with regard to racial group.	Minor and positive
Age	As above but with regard to age.	Minor and positive
Marital status	As above but with regard to marital status.	Minor and positive
Sexual orientation	As above but with regard to sexual orientation.	Minor and positive
Men and women generally	As above but with regards to gender.	Minor and positive
Disability	As above but with regard to disability.	Minor and positive
Dependants	As above but with regard to dependants.	Minor and positive

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	The policy is likely to have a positive impact on equality of opportunity for all staff, including on the grounds religious belief.	Minor and positive
Political opinion	The policy is likely to have a positive impact on equality of opportunity for all staff, including on the grounds of political opinion.	Minor and positive
Racial group	The policy is likely to have a positive impact on equality of opportunity for all staff, including on the grounds of racial group.	Minor and positive
Age	The policy is likely to have a positive impact on equality of opportunity for all staff, including on the grounds of age.	Minor and positive
Marital status	The policy is likely to have a positive impact on equality of opportunity for all staff, including on the	Minor and positive

	grounds of marital status.	
Sexual orientation	The policy is likely to have a positive impact on equality of opportunity for all staff, including on the grounds sexual orientation.	Minor and positive
Men and women generally	The policy is likely to have a positive impact on equality of opportunity for all staff, including on the grounds of gender.	Minor and positive
Disability	The policy is likely to have a positive impact on equality of opportunity for all staff, including on the grounds of disability or long term condition.	Minor and positive
Dependants	The policy is likely to have a positive impact on equality of opportunity for all staff, including those with dependants or caring responsibilities.	Minor and positive

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?

Section 75 category	Issue	Mitigating Measure
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Religious belief	N/A	None
Political opinion	N/A	None
Racial group	Yes, the policy has been reviewed and the Principles amended, section 3.7, to reflect that consideration should be given to the contribution that staff have made through service on University networks and advisory groups, for example the QUB BAME and International Staff Network, iRise.	Minor and positive
Age	Yes. A Frequently Asked Questions document will be developed which will provide further guidance on approaching retirement age.	Minor and positive
Marital status	N/A	None
Sexual orientation	Yes, the policy has been reviewed and the Principles amended, section 3.7, to reflect that consideration should be given to the contribution that staff have made through service on	Minor and Positive

	University networks and advisory groups, for example the QUB LGBT+ Staff Network, PRISM.	
Men and women generally	<p>Yes, the policy has been reviewed and the Principles amended, section 3.7, to reflect that consideration should be given to the contribution that staff have made through service on University networks and advisory groups, for example Athena SWAN Champions.</p> <p>The Guidance document has been amended to reflect that individual circumstances that have impacted on an individual's ability to meet priorities within the annual review period should also include absences relating to gender reassignment.</p> <p>A Frequently Asked Question section will be developed which will provide further guidance on the process when someone is on maternity leave.</p>	Minor and positive
Disability	Yes. The guidance has been amended to state that the University	Minor and positive

	<p>recognises that there may be individual circumstances that have impacted on an individual's ability to meet priorities within the annual review period. Circumstances may include absences due to sickness due to disability, mental health or long term condition. The Guidance has also been amended to state that the review provides an opportunity for the reviewer and reviewee to discuss any reasonable adjustments that may be required to facilitate learning and development.</p> <p>The Guidance makes it clear that Priorities and Development Goals may be carried over to the next review period but care must be taken to overburden the employee on their return to work and that the priorities and development goals must be achievable.</p>	
Dependants	Yes. The Guidance has been amended to state that the University recognises that there may be individual circumstances that have impacted on an	Minor and positive

	<p>individual's ability to meet priorities within the annual review period. Circumstances may include absences maternity/paternity/parental leave or other family related leave, for example career break or absences relating to caring responsibilities.</p> <p>The Guidance makes it clear that Priorities and Personal Development Goals may be carried over to the next review period but care must be taken to overburden the employee on their return to work and that the priorities and development goals must be achievable.</p>	
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3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?		
Good relations category	Details of policy impact	Level of impact minor/major/none
Religious belief	N/A	None
Political opinion	N/A	None

Racial group	N/A	None
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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 Policy encourages staff to take ownership of their own personal development and career and will provide equality of opportunity regardless of religious beliefs.
Political opinion		The Policy encourages staff to take ownership of their own personal development and career and will provide equality of opportunity regardless of political opinions.
Racial group		The Policy encourages staff to take ownership of their own personal development and career and will provide equality of opportunity regardless of race, ethnicity or nationality.

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.

We do not hold data which would indicate the potential impact of the policy on people with multiple identities. This would require further analysis for whom the policy may impact on an intersectional level including young and older people with disabilities, women with dependants/ caring responsibilities etc.

F Disability Duties

Disability Duties

Consider whether the policy:

- a) Discourages disabled people from participating in public life and fails to promote positive attitudes towards disabled people.
No. The University is an equal opportunities employer. The Policy encourages all staff to take ownership of their own personal development and career, and as such can request a PDR meeting with their Reviewer at any stage.
- b) Provides an opportunity to better positive attitudes towards disabled people or encourages their participation in public life.
Yes. This policy and guidance will raise awareness of the range of opportunities for learning and development available that will meet the needs of all staff. The guidance has also been amended to state that the review provides an opportunity for the reviewer and reviewee to discuss any reasonable adjustments that may be required to facilitate learning and development.

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.

The policy has been reviewed and although no adverse impacts have been identified mitigations have been added in respect of racial group, sexual orientation, gender, age, disability and dependants.

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.

See above.

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	Click

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?

During the initial year, we will monitor staff engagement through the uptake for reviewer and reviewee training, feedback and website traffic. Focus Groups will also be held following the annual process to determine to effect of the policy. Information from the Staff Survey in regards to staff engagement will also be relevant.

What data is required in the future to ensure effective monitoring of the policy?

Staff survey results, website traffic data, learning and development uptake.

Part 5 - Data Protection


If applicable, has legal advice been given due consideration?

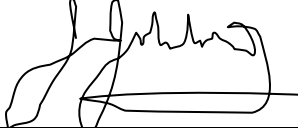
Yes No N/A

Has due consideration been given to information security in relation to this policy?

Yes No

Part 6 - Approval and authorisation

Screened by:	Position/Job Title	Date
Elaine Coleman 	Reward Manager	15.11.19

Approved by:		
Joyce Johnston 	Head of Reward and Performance	15.11.19

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

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

To ensure senior leaders are bought in to the new process, the new process will be presented to Faculty Executive Boards, Faculty Operating Boards and the Registrar's Group. The HR Business Partners will also engage with Schools and Directorates through their regular sweeps.

There is a comprehensive communication plan in place to ensure a successful launch of the new process, with ongoing comms during the annual cycle.

To increase capability a comprehensive suite of learning and development tools (such as face-to-face training, online guides, etc) will be available for reviewers and reviewees, this will continue to be enhanced during the year.

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.

During the screening process some equality issues were identified for the following section 75 categories of staff: racial group; age; sexual orientation, gender, disability; and dependants. This has been mitigated with the policy revised to include sections 7.1 – 7.4.

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

The Policy document will be uploaded to the website as a pdf so it can be enlarged.

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 **none** 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 **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.

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.