

## 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 [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).

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<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

Social Media Policy for Staff \_\_\_\_\_

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

Revised \_\_\_\_\_

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

This policy applies to all staff who are using social media on behalf of Queen's University Belfast.

It also applies to those people operating on behalf of the University, such as contractors, agency staff, freelancers, temporary staff and visiting academics. In this instance, the manager overseeing the individual, team, agency or organization will be responsible for making them aware of this policy.

The aim of this policy is to ensure all staff use social media in a way that will not negatively impact on our followers, students, staff, partnerships or brand. Therefore, the protection of all Section 75 categories is a priority within the policy and is highlighted in the Equality and Diversity section of the policy.

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

If so, explain how.

All- see above

Who initiated or wrote the policy?

Social Media, Information Services

Directorate responsible for devising and delivering the policy?

Marketing, Recruitment, Communications and Internationalisation. (MRCI)

### **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 previous version of the policy was passed by the University in 2013.

The revised policy has been subject to consultation with Faculty Recruitment Hubs, Human Resources, Strategic Marketing and Communication, Diversity and Inclusion Unit, Legal and Public Engagement. Departments have been consulted about the policy, with the key areas being asked to contribute to sections relating to their remit.

The Policy has been tabled and passed at the University's Operating Board.

### **B. Implementation factors**

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

None known.

If yes, are they

financial?

legislative?

other?( please specify) \_\_\_\_\_

### **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 Members of the public; social media users
- 

#### D. Other policies with a bearing on this policy

- what are they? (please list)  
[Grievance and Disciplinary Procedures](#), [Code of Conduct](#), [University's Computer Resources](#) - Acceptable Use Policy and other Security Policies, [JANET Acceptable Use Policy](#), [Equality and Diversity Policy](#), [Bullying and Harassment Complaints Procedure](#), [Trans Equality policy](#) [Social Media House Rules](#), [Brand Guidelines](#), [Data Protection Policy](#), eSafety Guidance.

- who owns them?

Code of Conduct: People and Culture Directorate

Computer Resources: Information Services

JANET Acceptable Use Policy: Information Services

Equality and Diversity Policy: Diversity and Inclusion Unit

Bullying and Harassment Complaints Procedure: People and Culture

Directorate

Social Media House Rules: Strategic Marketing and Communication

Grievance and Disability Procedures: People and Culture Directorate

Brand Guidelines: Strategic Marketing and Communication

Data Protection Policy: Information Compliance Unit

eSafety Guidance: Legal Unit

Computer Resources: Information Services

Trans Equality Policy: People and Culture Directorate

Brand Guidelines: Strategic Marketing and Communication

#### 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.

<b>Section 75 category</b>	<b>Details of evidence/information</b>											
Religious belief	<table border="1"> <thead> <tr> <th data-bbox="464 857 935 1008">Composition of QUB workforce (religion)</th> <th data-bbox="935 857 1390 1008">Year-February 2017</th> </tr> </thead> <tbody> <tr> <td data-bbox="464 1008 935 1115">Protestant</td> <td data-bbox="935 1008 1390 1115">38.0%</td> </tr> <tr> <td data-bbox="464 1115 935 1296">Roman Catholic</td> <td data-bbox="935 1115 1390 1296">42.0%</td> </tr> <tr> <td data-bbox="464 1296 935 1478">Non determined</td> <td data-bbox="935 1296 1390 1478">20.0%</td> </tr> <tr> <td data-bbox="464 1478 935 1585">Unknown</td> <td data-bbox="935 1478 1390 1585">0.2%</td> </tr> </tbody> </table>		Composition of QUB workforce (religion)	Year-February 2017	Protestant	38.0%	Roman Catholic	42.0%	Non determined	20.0%	Unknown	0.2%
Composition of QUB workforce (religion)	Year-February 2017											
Protestant	38.0%											
Roman Catholic	42.0%											
Non determined	20.0%											
Unknown	0.2%											
Political opinion	No evidence or information identified that would have an impact.											
Racial group												

	Composition of QUB workforce (broad ethnic group)	Year-February 2017
	Ethnic	5.8%
	White	90.0%
	Unknown	3.2%
Age	Composition of QUB workforce (age- 5 year bands)	Year-February 2017
	20-24	0.7%
	25-29	8.5%
	30-34	14.0%
	35-39	19.0%
	40-44	14.8%
	45-49	13.7%
	50-54	13.5%
	55-59	9.2%

	60-64	5.1%	
	65+	1.4%	
	Composition of QUB workforce (age- 10 year bands)		Year –February 2017
	20-29	9.2%	
	30-39	33.0%	
	40-49	28.5%	
	50-59	22.7%	
	60+	6.6%	
	<p>ONS data suggests that social networking is widespread in all age groups, up to and including those aged 55 to 64, where 51% of adults reported use. 91% of adults aged 16-24 years were more likely to use social networking. 23% of adults aged over 65 used social networking.<sup>2</sup></p>		
	Marital status		
Composition of QUB workforce (Marital status)		Year –February 2017	

<sup>2</sup> Office for National Statistics ‘Internet Access- Households and Individuals: 2016.’ 4 August 2016, pg 7.



	Civil partnership	1.1%
	Divorced	2.9%
	Married	54.6%
	Not specified	2.4%
	Other	2.5%
	Separated	1.5%
	Single	31.9%
	Widowed	0.5%
	Unknown	2.5%
Sexual orientation	Composition of QUB workforce (Sexual Orientation)	
	Year –February 2017	
	I do not wish to answer	13.8%
	Of a different sex	66.3%
	Of either sex	0.6%
	Of the same sex	2.5%

	Unknown	16.8%
Men and women generally	Composition of QUB workforce (Gender)	Year-February 2017
	Male	46.7%
	Female	53.3%
	ONS data in 2016 showed that from the majority of internet activities surveyed, there is little difference in the proportion of men and women carrying out the activities. <sup>3</sup>	
Disability	Composition of QUB workforce (Disability)	Year-February 2017
	Disability	6.6%
	No disability	78.1%
	Unknown	15.3%
Data suggests that those with a long standing illness or disability are less likely to be users of social media (55.3%) than those who do not have a long standing illness or disability (77%). <sup>4</sup>		

<sup>3</sup> Office for National Statistics 'Internet Access- Households and Individuals: 2016.' 4 August 2016, pg 7.

<sup>4</sup> Department for Media, Culture and Sport 'Taking part focus on: Social Media' April 2016, p 11.

Dependants	Composition of QUB workforce (Dependants)		Year-February 2017
	Yes		43.0%
	No		43.9%
	Unknown		13.1%

### 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>5</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	The Social Media policy makes it clear that accounts affiliated with the University must not use social media to post and/or	Minor & Positive

<sup>5</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.

	condone or support any offensive or discriminatory comments on the grounds of religious belief. Furthermore, the use of Social Media to promote and raise awareness of various events of religious significance has the potential to have a positive impact and demonstrate the University's commitment to actively promoting equality of opportunity and respecting cultural diversity.	
Political opinion	As above with regards to political opinion. The policy has the potential to have a positive impact.	Minor & Positive
Racial group	The policy is explicit in that Social Media accounts affiliated with the University must not use social media to post and/or condone or support offensive or discriminatory comments or express racist views. Furthermore, the use of Social Media to promote and raise awareness of cultural events has the potential to have a positive impact and demonstrate the University's commitment to actively promoting equality of opportunity and respecting cultural diversity.	Minor & Positive
Age	As above but with regards to age.	Minor & Positive
Marital status	N/A	None.

<p>Sexual orientation</p>	<p>The Social Media policy makes it clear that accounts affiliated with the University must not use social media to post and/or condone or support offensive or discriminatory comments or express homophobic or transphobic views. Furthermore, the use of Social Media to promote and raise awareness of LGBT+ events has the potential to have a positive impact and demonstrate the University's commitment to actively promoting equality of opportunity.</p>	<p>Minor &amp; Positive</p>
<p>Men and women generally</p>	<p>The Social Media policy makes it clear that accounts affiliated with the University must not use social media to post and/or condone or support offensive or discriminatory comments or to express sexist views. Furthermore, the use of Social Media to promote and raise awareness of events related to gender equality has the potential to have a positive impact and demonstrate the University's commitment to actively promoting equality of opportunity.</p>	<p>Minor &amp; Positive</p>
<p>Disability</p>	<p>The Social Media policy makes it clear that accounts affiliated with the University must not use social media to post and/or condone or support offensive discriminatory views on the grounds of disability. Furthermore, the use of Social Media to promote events relating to disability awareness has the potential to have a positive impact and demonstrate the University's commitment to actively promoting equality of opportunity.</p>	<p>Minor &amp; Positive</p>

Dependants	The use of Social Media to promote and raise awareness of events related to carers and those with dependants (e.g children or parents) has the potential to have a positive impact and demonstrate the University's commitment to actively promoting equality of opportunity.	Minor & Positive

## Part 2 Screening questions

<b>1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories?</b>		
Section 75 category	Issue	Minor/major/none?
Religious belief	There should be a likely positive impact on equality of opportunity for students and staff from all religious backgrounds. This also extends to the public including visitors, service users and prospective applicants to the University.	Minor & Positive
Political opinion	There should be a likely positive impact on equality of opportunity for students and staff with different political	Minor & Positive

	opinions. This also extends to the public including visitors, service users and prospective applicants to the University.	
Racial group	There should be a likely positive impact on equality of opportunity for students and staff from all racial groups. This also extends to the public including visitors, service users and prospective applicants to the University.	Minor & Positive
Age	As above with regards to age	Minor & Positive
Marital status	N/A	None.
Sexual orientation	There should be a likely positive impact on equality of opportunity for students and staff from the LGBT+ community. This also extends to the public including visitors, service users and prospective applicants to the University.	Minor & Positive
Men and women generally	There should be a likely positive impact on equality of opportunity	Minor & Positive

	between men and women generally.	
Disability	There should be a likely positive impact on equality of opportunity for staff and students with a disability.	Minor & Positive
Dependants	There should be a likely positive impact for members of staff and students who have dependants.	Minor & 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
Religious belief	N/A	None
Political opinion	N/A	None
Racial group	N/A	None
Age	N/A	None
Marital status	N/A	None



Sexual orientation	N/A	None
Men and women generally	N/A	None
Disability	<p>Staff members may require reasonable adjustments, such as training, to ensure they can access social media in order to use it for their role.</p> <p>The audience may require reasonable adjustments to access the content within the social media activity</p>	<p>Those requiring adjustments to use social media as part of their role should be assessed by the University and the appropriate measures put in place to ensure accessibility.</p> <p>The audience's accessibility should be protected by having videos subtitled and photographs given a description for audio readers, where reasonable, possible and appropriate.</p>
Dependants	N/A	None

**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	The policy states that accounts affiliated with the University must not be used to post/and or endorse offensive or discriminatory comments or expressing on the grounds of religious belief. The	Minor & Positive

	policy is likely to have a positive impact on good relations.	
Political opinion	As above	Minor & Positive
Racial group	The policy states that accounts affiliated with the University must not be used to post/and or endorse offensive or discriminatory comments or expressing racist views, the policy is likely to have a positive impact on good relations.	Minor & Positive

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	Yes. Due to the policy, the University's social media accounts should be a safe space for people to discuss religious beliefs and promote awareness of events.	
Political opinion	Yes. Due to the policy, the University's social media accounts should be a safe space for people to discuss politics and promote awareness of events.	
Racial group	Yes. Due to the policy, the University's social media accounts should be a safe	

	space to support, promote and raise awareness of cultural and diversity events.	
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## **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, LGBT and disability, international students and staff and LGBT, 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.  
By offering reasonable adjustments to improve accessibility, the policy will encourage staff members and students with disabilities to participate in public life.
- b) Provides an opportunity to better positive attitudes towards disabled people or encourages their participation in public life.

The policy has been designed to make sure our social media activity supports equality and diversity, by including an Equality and Diversity section within the policy. In doing so our social media activity will support positive attitudes towards disabled people, for

example in promoting awareness raising and other events via our social media platforms.

### 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 potentially a number of positive impacts for most of the section 75 groups. Appropriate steps and mitigation has been put in place for persons with disabilities including reasonable adjustments to ensure they can access social media. Those requiring adjustments to use social media as part of their role will be assessed by the University and the appropriate measures put in place to ensure accessibility.

The audience's accessibility will be protected by having videos subtitled and photographs given a description for audio readers, where reasonable, possible and appropriate

A paragraph entitled "Reasonable Adjustment for Disability" will be included in the policy, resulting it in meeting all needs of the screening.

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.

As above and the policy has been reviewed and steps to mitigate any potential adverse impacts have been introduced to the policy.

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

[Click here to enter text.](#)

## 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

No.
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## **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?**

A regular audit of the University's social media accounts is carried out each year. This will highlight any adverse impact. Insights and learnings from this will guide future planning and policy development.

We will review any informal/formal complaints/issues raised.

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

As above

## **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

<b>Screened by:</b>	<b>Position/Job Title</b>	<b>Date</b>
Stephen Baxter-Crawford	Social Media Manager	23-10-19
<b>Approved by:</b>		
Jamie Armstrong	Head of Strategic Marketing & Communications	23-10-19

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.

In addition to email contact all those asked to consult on the policy were spoken to in person or via the telephone in order to encourage engagement in the process.

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.

A paragraph entitled "Reasonable Adjustment for Disability" will be included in the policy.

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.

Yes, the policy states that if it is required in another format, due to accessibility needs, it can be requested via Strategic Marketing and Communications.

## 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.

