



NIFRS Policy Development Framework

Section 75 & Schedule 9 of the Northern Ireland Act 1998
SCREENING REPORT

October 2015

Protecting Our Community



Part 1: Policy Scoping

The first stage of the screening process involves scoping the policy or policy area. 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.

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

Information about the policy

Name of the policy or policy area:

NIFRS Policy Development Framework

Is this an existing, revised or a new policy/policy area?

Existing	Revised	New
		✓

Brief Description

NIFRS policies are formal statements that set out NIFRS official position in relation to Service Delivery and other related matters. The NIFRS Policy Development Framework has been designed to support NIFRS in the delivery of a high quality effective service through a consistent approach to development and review of corporate policies etc

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

The purpose of the Framework based on good practice and self-evaluation comprises overarching principles, procedures and guidelines used for the development, continuous monitoring and formal review of NIFRS Policies.

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

YES	NO	N/A
✓		

If YES, explain how.

The Policy Framework at Section 8 Document Management point 8.1 refers to accessibility of documents for different audiences. In Appendix 1 Policy Development and Review Cycle reference is made to the need for Consultation including Section 75 Screening.

Who initiated or wrote the policy?

Hazel Kelly, Corporate Services Manager, on behalf of the Director of Planning, Performance & Governance

Who owns and who implements each element of the policy?

The Director of Planning, Performance and Governance is the custodian of the NIFRS Policy Development Framework.

Implementation of this Framework is carried out by:-

- Policy Officer(s)/Working Group
- Chairs of Policy Working Groups
- Corporate Management Team
- Board Members

Implementation factors

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

YES	NO	N/A
✓		

If YES, are they

Financial: YES (If YES, please detail)

Contributing factors:-

- Financial – Available Business Case approval and budget allocation.
- Best practice- in terms of the overarching principles, clear procedures and guidelines used to develop the framework and Policy.
- Staff buy-in and understanding of responsibilities and expectations.

Detracting factors:-

- Financial – the introduction of efficiency savings may negatively impact on NIFRS Risk Management Framework and Policy.
- Lack of Business Case approval and limited or no budgetary allocation.
- Lack of clear guidance and buy-in from staff.
- Lack of resources allocated to monitoring compliance.
- Poorly worded Policy.

Legislative: Y / N (If YES, please detail)

Contributing factors:-

Not applicable.

Other, please specify:

NIFRS is required to ensure the highest levels of corporate governance in all of its activities

Main stakeholders affected

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

Staff:

All Directors, Managers and employees involved in developing and/or reviewing NIFRS policies, procedures and protocols have responsibilities to adhere to the requirements of the NIFRS Policy Development Framework. This also includes NIFRS Board Members who are responsible for ratification of draft policies and proposed changes to existing policies. In addition to this, Members of NIFRS Board may participate in policy development, either acting as Chairs or as Members of policy working groups.

Service users:

The NIFRS Policy Development Framework is predominantly an internal reference document. It is designed to provide overarching principles, procedures and guidance for the development, continuous monitoring and formal review of NIFRS policies. The Framework also applies to the development/review of frameworks, strategies and policies relating to operational service delivery and community protection.

Other public sector organisations:

Department of Health is the sponsoring body for NIFRS with responsibility for ensuring that NIFRS has a statutory appointed Board and funding is in place to fulfil the duties outlined in the Fire Services (Northern Ireland) Order 2006

Voluntary/community/trade unions:

The recognised bodies in NIFRS are included as consultees in relation to the NIFRS Policy Development Framework.

Other, please specify:

Not applicable

Other policies with a bearing on this policy

What are they and who owns them?

The NIFRS Policy Development Framework should be read in conjunction with the NIFRS Corporate Identity Guidelines covering Policy/Procedure/Guidance document layouts and pro-forma. Review and update of the NIFRS Corporate Identity Guidelines is the responsibility of the Corporate Communications Unit within the Planning, Performance and Governance Directorate.

NIFRS Section 75 Equality Scheme and guidance on screening are also relevant when considering the Policy Development Framework.

Available evidence

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

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

Section 75 Category	Details of Evidence/Information
Men and Women generally Persons with disabilities and persons without Religious belief, political opinion Racial group	<p>To ensure that equality is mainstreamed into the development of the NIFRS Policy Development Framework, the Corporate Services Manager carried out initial equality screening on a proposed draft document. This involved completing a preliminary screening questionnaire and considering the Section 75 profile of the workforce.</p> <p>As part of the screening process, the lead officer identified the relevant stakeholders and also factors that would contribute to or detract from successful implementation of the Framework.</p> <p>The Section 75 profile of the NIFRS workforce in terms of the equality categories indicated that women remain significantly under-represented at only 10% of total employees and, in particular amongst the uniformed category. It is also evident that minority ethnic groups and people with disabilities are also under-represented. In relation to community background, 55% of employees are Protestant, 40% are Roman Catholic and 5% are from an 'Other' background.</p> <p>An internal and external consultation exercise took place during 5 November 2015 to 29 January 2016. The Policy Development Framework was issued alongside the NIFRS Information Risk Management Framework and Policy.</p> <p>The consultation process involved communication to all employees signposting them to the Policy Development Framework consultation document and questionnaire. The consultation exercise was also circulated electronically to the NIFRS Section 75 consultee list and was promoted on the NIFRS website, along with downloadable documents and consultation questionnaire.</p>

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
Persons with disabilities and persons without	<p>The NIFRS Policy Development Framework is predominantly an internal document, applicable to all employees.</p> <p>In relation to accessibility of NIFRS information, the Policy Development Framework contains a commitment to ensure that the Framework will be reviewed periodically in accordance with Section 75 equality obligations and best practice. It will also be subject to a general review every 3 years. The Framework also gives a commitment in relation to making corporate publications and information accessible in alternative formats, where reasonable.</p> <p>At the time of initial screening no other specific needs were identified for any of the Section 75 groups. One response was received during the consultation process, from the Fire Brigades Union (FBU). The FBU advised it was satisfied that the document did not adversely impact on the protected groups under Section 75. It also noted the commitment that Policy Officers/Chairs of Working Groups would engage with representatives from Key Stakeholder Groups and also that training programmes will be developed and delivered.</p> <p>No further consultation responses were received. No different needs, experiences or priorities were identified, over and above meeting accessible information needs for persons with disabilities, as already identified during the Framework development stage.</p>

Part 2: Screening Questions

Introduction

1. If the conclusion is **none** in respect of all of the Section 75 categories, then you may decide to screen the policy **out**. If a policy is 'screened out', you should give details of the reasons for the decision taken.
2. If the conclusion is **major** in respect of one or more of the Section 75 categories, then consideration should be given to subjecting the policy to an EQIA.
3. If the conclusion is **minor** in respect of one or more of the Section 75 categories, then consideration should still be given to proceeding with an EQIA, or to measures to mitigate the adverse impact; or an alternative policy.

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 hence it would be appropriate to conduct an EQIA;
- 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 among 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.
- 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.

Taking into account the earlier evidence, consider and comment on the likely impact on equality of opportunity / good relations for those affected by this policy, by applying the following screening questions and the impact on the group i.e. minor, major or none.

Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? Minor/Major/None		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
Religious belief	None identified	None
Political opinion	None identified	None
Racial / ethnic group	None identified	None
Age	None identified	None
Marital status	None identified	None
Sexual orientation	None identified	None
Men and women generally	None identified	None
Disability	None identified	None
Dependants	None identified	None

2 Are there opportunities to better promote equality of opportunity for people within any of the Section 75 categories?		
Section 75 Category	If Yes, provide details	If No, provide reasons
<p>Men and Women generally</p> <p>Persons with disabilities and persons without</p> <p>Religious belief, political opinion</p> <p>Racial group</p>		<p>One consultation response was received with no significant adverse impacts for any of the S75 groups identified. However, it is recognised that women remain significantly under-represented in the NIFRS workforce at only 10% of total employees and, in particular amongst the uniformed category.</p> <p>Also, it is evident that minority ethnic groups and people with disabilities are also under-represented. In relation to community background, 55% of employees are Protestant, 40% are Roman Catholic and 5% are from an 'Other' background.</p> <p>The NIFRS Policy Development Framework will be periodically reviewed under S75 and subject to general review every 3 years.</p> <p>Whilst no direct impact on equality of opportunity has been recognised as a result of the Framework, the levels of under-representation within the workforce will continue to be considered as part of any review process.</p> <p>The sole consultation response received (from the FBU) noted the commitment that Policy Officers/Chairs of Working Groups would engage with representatives from Key Stakeholder Groups and also that training programmes will be developed and delivered.</p>

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	Not applicable.	None
Political opinion	Not applicable.	None
Racial group	Not applicable.	None

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
	Not applicable.	The Policy Development Framework itself has no direct relevance to equality of opportunity or good relations. However, specific corporate policies relating to equality, inclusion and good relations will be developed/reviewed under the guidance outlined in the Policy Development Framework

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).

Not applicable

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

Not applicable

Part 3: Screening Decision

In light of your answers to the previous questions, do you feel that the policy should:
(please underline one):

- 1. Not be subject to an EQIA (with no mitigating measures required)**
- 2. Not be subject to an EQIA (with mitigating measures /alternative policies to be written)**
- 3. Be subject to an EQIA**

If 1. or 2. (i.e. not be subject to an EQIA), please provide details of the reasons why:

[1] The NIFRS Policy Development Framework is not subject to a full Equality Impact Assessment as no significant adverse impacts for any of the Section 75 groups have been identified during screening and stakeholder consultation. There is no direct relevance to equality of opportunity or good relations. However, NIFRS has committed to ensuring that policy development is subject to the guidance provided within the Policy Development Framework and this includes any policies relating specifically to equality, inclusion and good relations.

If 2. (i.e. not be subject to an EQIA), in what ways can identified adverse impacts attaching to the policy be mitigated or an alternative policy be introduced?

Not applicable

In light of these revisions, is there a need to re-screen the revised/alternative policy at a future date? ~~YES~~ / NO

If YES, when & why?
Not applicable

If 3. (i.e. to conduct an EQIA), please provide details of the reasons:

Not applicable

Timetabling and Prioritising EQIA

If 3. is the policy affected by timetables established by other relevant public authorities? YES / NO

If YES, please provide details:

No EQIA is required. The Policy Development Framework is timetabled for review periodically (in relation to S75) and every 3 years generally.

Please answer the following questions to determine priority for timetabling the EQIA. 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 EQIA.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	n/a
Social need	n/a
Effect on people's daily lives	n/a
Relevance to a public authority's functions	n/a

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for EQIA. This list of priorities will assist you in timetabling the EQIA. Details of your EQIA timetable should be included in the quarterly Section 75 report.

Proposed date for commencing EQIA: n/a

Any further comments on the screening process and any subsequent actions?

None

Part 4: Monitoring

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development. You 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, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

The Policy Development Framework is timetabled for review periodically (in relation to S75) and every 3 years generally.
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Part 5: Approval and Authorisation

Screened by:	Position/Job Title	Date
Hazel Kelly	Corporate Services Manager	October 2015
Approved by:		
Liz Cuddy	Director of Planning, Performance & Governance	October 2015
Referred to HR Manager (Equality, Inclusion & Legal):		October 2015

