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DoF Screening template

Screening is the first of two methods by which the necessary level of “regard” is demonstrated as being paid to the statutory equality goal, as set out in Section 75 of the Northern Ireland Act 1998. The DoF Equality Scheme commits us to screening our policies. This includes strategies and plans, policies, legislative developments, and new ways of working, such as introducing, changing or ending an existing service, procedure or policy.

This screening template is designed to help business areas consider the likely equality and human rights impacts of their proposed decisions on different groups of customers, service users, staff and visitors.

Detailed information about the Section 75 equality duties and what they mean in practice is available on the Equality Commission’s website:
http://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/S75GuideforPublicAuthoritiesApril2010.pdf

A copy of the Screening Template, for each policy screened, should be ‘signed off’ and approved by a senior manager responsible for the policy, made accessible on the DoF website as soon as possible following completion and made available in alternative formats on request.

All Section 75 consultees should be advised of the screening exercise once the final policy decision has been taken.

The screening template has 4 sections to complete. These are:

Section A - details about the policy / decision that is being screened.

Section B - 4 key questions that require you to outline the likely impacts on equality groups, and all supporting evidence.

Section C - 4 key questions in relation to obligations under the Disability Discrimination Order and the Human Rights Act.

Section D - the formal record of the screening decision.

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SECTION A

Information about the policy

This 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 on a step-by-step basis.

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

Is this a new or revised policy?

New

a) Name of the policy

Recruitment and Retention Allowance (RRA) for Internal Auditor staff in Internal Audit Services, DoF.

b) Brief Description of the policy

Proposal to introduce a time-limited, non-pensionable Recruitment and Retention Allowance (RRA) for Internal Auditor staff.

c) Aims of the policy / rationale behind the changes

The allowance aims to address demonstrable recruitment and retention difficulties evidenced in the business case by aligning total reward more closely with external market rates for external auditor roles. The allowance will be paid monthly, pro-rated, with clear role-based eligibility and a formal review within three years in line with NICS HR Handbook Chapter 8.32.

d) Who will the policy affect?

Directly affected are Internal Auditor staff who meet the defined role eligibility criteria. The proposal does not affect public-facing services.

e) Is this a NICS-wide policy?

The policy is NICS-wide in the sense that, if there were other Internal Auditor staff across the NICS who met the defined role eligibility criteria, the allowance would be open to them. However, currently only eligible Internal Audit staff are expected to qualify for this allowance.

f) Who will implement the policy?

Internal Audit Services and NICSHR/HRConnect; policy oversight by People & Organisational Development (People & OD), Department of Finance.

g) Will this policy or revision address an existing inequality? No
If yes, please give details.

h) Will this policy or revision benefit any Section 75 categories? No
If yes, please give details.

i) Will this policy or revision have an adverse differential impact upon any of the Section 75 groupings? Yes/No. If yes, please give details. No

Section B

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? Set out all evidence below along with details of the different Section 75 groups you have met and / or consulted with to help inform your screening assessment. Please also provide details of priorities and needs identified for each Section 75 group.

Screening is based on information available here: Equality Statistics for the Northern Ireland Civil Service - 2026 | Northern Ireland Statistics and Research Agency, and on internal NICS information on the composition of the Internal Audit group.

Source: Equality analysis workbook by People & OD.

Sex profile

Grade	Sex	Internal Audit	General Service
DP	Female	45%	49.7%
	Male	55%	50.3%
G7	Female	57.14%	52.3%
	Male	42.86%	47.7%

Age profile

Grade	Age band	Internal Audit	General Service
DP	16–24	0%	0.0%
	25–34	0%	5.1%
	35–44	25%	26.0%
	45–54	35%	36.0%
	55–64	30%	29.8%
	65+	10%	3.1%
G7	16–24	0%	0.0%
	25–34	0%	1.9%
	35–44	28.57%	25.1%

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	45–54	28.57%	42.5%
	55–64	42.86%	28.4%
	65+	0%	2.1%

Community background profile

Grade	Community background	Internal Audit	General Service
DP	Protestant	30%	47.1%
	Catholic	70%	48.5%
	Unknown	0%	4.4%
G7	Protestant	71.43%	46.0%
	Catholic	28.57%	48.2%
	Unknown	0%	5.8%

If you have no evidence held, outline how you will obtain it:

The data supplied is extracted from reports provided by the NI Statistics & Research Agency and based on staff data held on the HR system. Staff have been reminded to update their disability, sexual orientation and dependent status data.
No targeted consultation with Section 75 groups has been undertaken at this stage; however, normal engagement with recognised trade unions will provide an opportunity to raise equality-related issues.

Screening questions

There are 4 essential screening questions:

1. What is the likely impact on equality of opportunity for those affected by this policy, for each of the nine Section 75 categories? (minor/major/none)

   None to minor, based on available evidence.

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories? (yes/no)

   No

3. To what extent is the policy likely to impact upon good relations between people of different religious belief, political opinion or racial group?

   No direct interactions with the public are affected. No differential impacts are anticipated on good relations between people of different religious belief, political opinion or racial group in the workplace context. Standard dignity at work policies apply.

4. Are there opportunities to better promote good relations between these groups?

   No further opportunities have been identified beyond applying the policy consistently, maintaining existing dignity at work protections and monitoring for any emerging issues.

Are there likely impacts on Section 75 Categories?

Religious belief: NICS does not hold employee data by religious belief, so community background has been used as the closest available proxy. The data shows some variation between the Internal Audit cohort and the wider NICS General Service population at DP and G7 grades. This should be interpreted cautiously because the Internal Audit cohort is small and small headcount changes can result in large percentage movements.
The proposal does not select staff by community background and contains no criteria linked to religious belief, political opinion or community background. Eligibility is based solely on the Internal Auditor role and the recruitment and retention difficulties evidenced in the business case. The allowance will apply consistently to all eligible staff, regardless of community background.
Any differential impact is therefore assessed as minor and incidental, rather than a result of the policy design. The allowance is role-based, time-limited, non-

pensionable and subject to review, with monitoring in place to identify any emerging adverse impact. Likely impact: minor/no adverse impact requiring EQIA at this stage.

Political opinion: NICS does not gather data on staff political opinion. No impacts are envisaged.

Racial group: NICS does not hold employee data by racial group, but does hold ethnicity data. Ethnicity data are missing for 7.9% of staff. Of those with recorded data, 0.9% were from ethnic minorities.
No Internal Audit-specific ethnicity data is available. On the basis of available evidence, no differential impact has been identified, but this should be kept under review through monitoring. Likely impact: none to minor.

Age: The age profile shows some variation between Internal Audit and the wider NICS General Service population at DP and G7 grades. Internal Audit staff are mainly concentrated in the 35–64 age bands. DP staff are broadly aligned with the General Service profile across most age bands, with some variation in the 65+ category, while G7 shows some variation, including a higher proportion of G7 staff aged 55–64. These figures should be interpreted cautiously because of the small Internal Audit cohort.
The proposal does not select or exclude staff by age and contains no age-related eligibility criteria. Eligibility is based solely on the Internal Auditor role and evidenced recruitment and retention pressures. Any age-related differences are therefore considered incidental to the existing composition of the eligible cohort, rather than a feature of the policy design.
The allowance is targeted, time-limited, non-pensionable, paid pro-rata and subject to formal review. These safeguards reduce the risk of unintended age-related impact and allow outcomes to be monitored. Likely impact: minor/no adverse impact requiring EQIA at this stage.

Marital status: NICS data on marital status are missing or unknown for 6.8% of staff. Of those with recorded data, 38.9% are single and 53.9% are married. No Internal Audit-specific data is available and no link has been identified between marital status and eligibility. Likely impact: none to minor.

Sexual orientation: Sexual orientation data are missing for 58.7% of NICS staff, so the recorded profile may not represent the whole NICS. No Internal Audit-specific data is available and no link has been identified between sexual orientation and eligibility. Likely impact: none to minor.

Men and women generally: The profile tables do not indicate a material adverse differential impact by sex across the eligible grades. The allowance is role-based, supported by market evidence, time-limited and subject to review. Likely impact: none to minor.

Disability: Disability data are missing for 39% of NICS staff. Some 6.5% of all staff are recorded as disabled, which should be treated as a minimum figure.

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No Internal Audit-specific disability data is available and no link has been identified between disability and eligibility. Payment will be pro-rated for part-time working, with no attendance-related conditions proposed. Likely impact: none to minor.

Dependants: Data on dependants are missing for 56.8% of NICS staff. Of those with recorded data, 63.7% identify as having dependants. No Internal Audit-specific data is available. The allowance is pro-rated and neutral to working patterns, so staff with caring responsibilities are not disadvantaged. Likely impact: none to minor.

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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).*

The Internal Audit cohort covers DP and G7 grades. The profile tables show some variation between Internal Audit staff and the wider NICS General Service population across sex, age and community background. These differences should be interpreted with caution given the small numbers in the Internal Audit cohort. In relation to sex, female representation is broadly comparable at DP level and slightly higher at G7 level; conversely, male representation is broadly comparable at DP level and slightly lower at G7 level. The age profile is concentrated mainly in the 35–64 age bands, with DP staff broadly aligned with the General Service profile across most age bands but showing some variation in the 65+ category, and with some variation at G7 level. Community background figures also show grade-level variation, including a higher Protestant profile at G7 and a higher Catholic profile at DP when compared with General Service. However, eligibility for the allowance is determined solely by role and evidenced labour-market factors, not by any personal characteristic or combination of characteristics. On that basis, no compounded adverse impact on people with multiple identities is identified.

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

None available.

Mitigation

When the public authority concludes that the likely impact is 'minor' and an equality impact assessment is not to be conducted, the public authority may consider mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Alternatively, there may already be policies in place which would mitigate any adverse impact identified.

Mitigation measures proposed:

<u>Considered alternatives</u>
The business case considered doing nothing and applying different allowance levels. The proposed approach balances effectiveness and affordability while minimising the equality footprint through a time-limited allowance and review.

Objective justification and proportionality
Business case evidence demonstrates the legitimate aim (addressing role-specific market scarcity) and the necessity of an allowance as the minimum effective intervention. Mitigations include keeping the allowance non-pensionable, time-limited and reviewed within three years.

Tight eligibility and scope control
Eligibility is based strictly on role and criteria within Internal Audit Services, so all staff performing the same Internal Audit role and meeting the defined criteria are included, while staff outside the role scope are not inadvertently included or excluded.

Working pattern neutrality
Payment is monthly and pro-rated for all part-time and partial-month changes to avoid indirect discrimination for staff with caring responsibilities or disability-related adjustments.

Section C

DoF also has legislative obligations to meet under the Disability Discrimination Order and the Human Rights Act . The following questions relate to these two areas.

Consideration of Disability Duties

Does the proposed policy / decision provide an opportunity for DoF to better **promote positive attitudes** towards disabled people?

Explain your assessment in full

Neutral. The allowance is role-based, and payment rules are neutral and pro-rated. No attendance-related conditions are proposed. No direct interactions with the public are affected. The policy does not provide a specific opportunity to promote positive attitudes towards disabled people beyond the workplace context; standard dignity at work policies apply.

Does the proposed policy / decision provide an opportunity to actively **increase the participation** by disabled people in public life?

Explain your assessment in full

Neutral. The allowance is role-based, payment rules are neutral and pro-rated, and no attendance-related conditions are proposed. The policy is an internal staffing measure and does not directly provide an opportunity to increase the participation of disabled people in public life. Existing disability-related workplace protections and reasonable adjustment processes will continue to apply.

Consideration of Human Rights

The Human Rights Act (HRA) 1998 brings the European Convention on Human Rights (ECHR) into UK law and applies in Northern Ireland. Articles 3 and 4 are classified as “absolute” rights, i.e. the State can never withhold or take away these rights. All others are either “qualified” or “limited”. Further information is available via the following link.

http://www.nicshumanrightsguide.com/

Indicate any potential *adverse impacts* that the policy / decision may have in relation to human rights issues.

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		Adverse Impact (delete as appropriate)
Right to Life	**Article 2**	No
Prohibition of torture, inhuman or degrading treatment	**Article 3**	No
Prohibition of slavery and forced labour	**Article 4**	No
Right to liberty and security	**Article 5**	No
Right to a fair and public trial	**Article 6**	No
Right to no punishment without law	**Article 7**	No
Right to respect for private and family life, home and correspondence	**Article 8**	No
Right to freedom of thought, conscience and religion	**Article 9**	No
Right to freedom of expression	**Article 10**	No
Right to freedom of peaceful assembly and association	**Article 11**	No
Right to marry and to found a family	**Article 12**	No
The prohibition of discrimination	**Article 14**	No
Protection of property and enjoyment of possessions	**Protocol 1 Article 1**	No
Right to education	**Protocol 1 Article 2**	No
Right to free and secret elections	**Protocol 1 Article 3**	No

Please indicate any ways in which you consider the policy positively promotes human rights.

N/A

Please explain any adverse impacts on human rights that you have identified.

None

If you have identified any adverse impacts on human rights through this screening you must complete a Human Rights Impact Assessment: https://www.executiveoffice-ni.gov.uk/publications/human-rights-impact-assessment-proforma.

Monitoring Arrangements

Public authorities should consider the guidance contained in the Commission's Monitoring Guidance for Use by Public Authorities (July 2007): http://www.equalityni.org/ECNI/media/ECNI/Publications/Employers%20and%20Service%20Providers/S75MonitoringGuidance2007.pdf

The Commission recommends that where the policy has been amended or an alternative policy introduced, the public authority should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Effective monitoring will help the public authority identify any future adverse impact arising from the policy which may lead the public authority to conduct an equality impact assessment, as well as help with future planning and policy development.

Please detail proposed monitoring arrangements below:

NICS requires a three-yearly review of RRAs, which provides an opportunity to examine evidence, including joiners, leavers and destination data where available, that might change the balance of considerations in this screening; for example, evidence that the allowance is not improving recruitment or retention against the trajectory set out in the business case.

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Section D - Formal Record of Screening Decision

Title of Proposed Policy / Decision being screened:
Recruitment and Retention Allowance (RRA) for Internal Auditor staff in Internal Audit Services, DoF.
I can confirm that the proposed decision has been screened for (i) equality of opportunity, (ii) good relations, (iii) disability duties and (iv) human rights issues.

On the basis of the answers to the screening questions, I recommend that this decision is – * **Screened Out** – No EQIA necessary (no or minor impacts)

Provide a brief note to explain how this decision was reached:

On the basis of the evidence and mitigations set out above, the proposal is screened out for EQIA at this time, subject to monitoring and formal review.

The screening identifies no significant adverse equality impacts. Potential indirect impacts are minor, objectively justified by labour-market factors, and capable of mitigation through monitoring and review. The proposal pursues a legitimate aim (addressing role-specific market scarcity) through a proportionate, time-limited allowance with clear eligibility, monthly pro-rated payment and formal review within three years.

Monitoring arrangements are in place to validate outcomes and identify any emerging adverse impact.

Screening assessment completed by -

Name: Jill O'Neill
Grade: DP
Date: 10 August 2026

And approved by –

Name: Alison Welsh
Grade: G7
Date: 15/09/26

Central Support Team Notified

Equality Contacts advised

Screening uploaded to DoF website