Department of Finance
An Roinn Airgeadais
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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 our strategies and plans, policies, legislative developments; and new ways of working such as – the introduction, change or end of an existing service, procedure, policy etc.

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.

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

Department of Finance Complaints Handling Procedure (DoF CHP) Customer Guidance

b) Brief Description of the policy

The DoF Complaints Handling Procedure provides a standardised mechanism for members of the public to raise complaints regarding services delivered by the Department of Finance and organisations delivering services on its behalf. It sets out a two-stage complaints process, timescales, escalation routes and access arrangements.

c) Aims of the policy/ Rationale behind the changes

Provide a clear, accessible and transparent complaints process.
Ensure complaints are handled consistently and fairly.
Improve service delivery through learning from complaints.
Meet the complaints handling standards established by Northern Ireland Public Services Ombudsman (NIPSO).

d) Who will the policy affect?

Members of the public who use DoF services.
Representatives acting on behalf of service users.

DoF staff involved in complaint handling.
Contractors and service providers acting on behalf of DoF.

e) Is this a NICS wide policy?

No. The policy applies to the Department of Finance and relevant arm's length bodies and service providers.

f) Who will implement the policy?

Department of Finance business areas, designated complaints officers and complaint investigators.

g) Will this policy or revision address an existing inequality? Yes
If yes, please give details.

The policy promotes equitable access to complaint mechanisms by providing reasonable adjustments, alternative formats, representation arrangements and accessible communication methods for individuals who may otherwise experience barriers to participation.

h) Will this policy or revision benefit any Section 75 categories? Yes
If yes, please give details.

Particularly disabled people, those with communication difficulties, people requiring alternative formats or languages, older people, and individuals requiring representation or advocacy support.

i) Will this policy or revision have an adverse differential impact upon any of the Section 75 groupings? No.

No adverse differential impacts identified at screening stage.

The policy is designed to provide equal access to the complaints process and includes measures to support accessibility and inclusion.

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.

The screening has been informed by:

- The NIPSO Model Complaints Handling Procedure.
- The DoF Customer Complaints Guidance document.
- Equality and accessibility commitments contained within the procedure , including provision of information in alternative formats and languages, reasonable adjustments, support for individuals with communication needs and consideration of the accessibility requirements of people with disabilities
- Arrangements permitting advocacy, representation and support from carers or other representatives.

No specific consultation was undertaken in relation to the introduction of this procedure as it adopts the established NIPSO Model Complaints Handling Procedure. However, the screening assessment has considered the needs of all Section 75 groups.

Religious belief

No evidence of differential impact. Process applies equally regardless of religious belief.

- **Political opinion**

No evidence of differential impact. Complaints are accepted irrespective of political opinion.

- **Racial group**

Policy includes provision for information in alternative languages and formats which may assist minority ethnic communities.

- **Age**

Older and younger people may benefit from multiple access channels including telephone, email, written correspondence and advocacy support.

- **Marital status**

No evidence of differential impact.

- **Sexual orientation**

No evidence of differential impact.

- **Men & women generally**

No evidence of differential impact. The complaints process applies equally to all users.

- **Disability**

Positive impacts anticipated through reasonable adjustments, alternative formats, advocacy support and recognition of communication needs, including JAM Card users.

- **Dependents**

Positive impact possible where representatives can act on behalf of service users and carers can assist in accessing the process.

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

The operation of the complaints procedure will be monitored on an ongoing basis. Any equality-related issues identified through complaints, feedback, monitoring information or engagement with service users will be considered as part of future reviews of the procedure and associated screening assessments.

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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)

   Overall, the policy is expected to have a neutral to positive impact on equality of opportunity. The introduction of a clear and accessible complaints process should help ensure that all individuals are able to raise concerns and seek redress in a fair and consistent manner. No adverse impacts have been identified at this stage.

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories? Yes

   Yes. The policy provides opportunities to promote equality of opportunity through the provision of accessible complaints mechanisms, including reasonable adjustments, alternative formats, language support, advocacy and representation arrangements, and multiple methods of accessing the complaints process. These measures help ensure that individuals from a range of Section 75 groups can access and engage with the complaint's procedure on an equitable basis.

3. To what extent is the policy likely to impact upon good relations between people of different religious belief, political opinion or racial group? (none)

   None. While the policy includes measures such as alternative language provision and accessible formats to support equal access, it is not specifically aimed at influencing relationships between different religious, political or racial groups. Consequently, no impact on good relations has been identified.

4. Are there opportunities to better promote good relations between these three groups? (Yes/No)

   No. The policy is not specifically designed to promote good relations between people of different religious belief, political opinion or racial group. Its purpose is to provide a fair, consistent and accessible process for handling complaints. As the policy applies equally to all service users and does not target relations between these groups, no specific opportunities to promote good relations have been identified.

Are there likely impacts on Section 75 Categories?

- **Religious belief**: Policy applies consistently to all service users.

  What is the level of impact? None

- **Political opinion**: No differential treatment anticipated.

  What is the level of impact? None

- **Racial group**: Alternative language provision supports accessibility.

  What is the level of impact? Minor Positive

- **Age**: Multiple complaint channels increase accessibility.

  What is the level of impact? Minor Positive

- **Marital status**: No differential impact identified.

  What is the level of impact? None

- **Sexual orientation**: No differential impact identified.

  What is the level of impact? None

- **Men and women generally**: Equal application of procedures.

  What is the level of impact? None

- **Disability**: Reasonable adjustments and accessible formats available.

What is the level of impact? Minor Positive

- **Dependants**: Advocacy and representative arrangements support carers and dependants.

  What is the level of impact? Minor Positive

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).*

No adverse impacts identified for people with multiple identities. Individuals experiencing multiple barriers, for example disabled people from minority ethnic communities, may benefit from the reasonable adjustment and alternative format provisions incorporated within the guidance.

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

No specific evidence has been identified; however, the policy's accessibility measures are intended to support users regardless of overlapping protected characteristics.

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:

No mitigation measures are required as no adverse impacts have been identified.

However, DoF will:

- Monitor complaints and feedback regarding accessibility.
- Continue to provide information in alternative formats and languages on request.
- Ensure staff involved in complaint handling are aware of accessibility requirements and equality obligations.

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

Yes

The guidance explicitly commits the Department to making reasonable adjustments, providing information in accessible formats and supporting individuals with communication difficulties. It also references the JAM Card scheme.

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

Explain your assessment in full

Yes

Accessible complaints arrangements allow disabled individuals to engage with public services, challenge service failures and have their views considered on an equal basis with others.

Consideration of Human Rights

The Human Rights Act (HRA) 1998 brings the European Convention on Human Rights (ECHR) into UK law and it applies in N Ireland. Articles 3 and 4 are classified as “absolute” rights ie 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 which you consider the policy positively promotes human rights.

No adverse impacts identified against rights protected under the Human Rights Act.

The policy positively promotes:

- Access to administrative justice and fair consideration of complaints.
- Respect for private life through confidentiality and data protection provisions.
- Non-discrimination through accessible service design and reasonable adjustments.

The policy provides a transparent complaints mechanism, clear timescales, escalation arrangements and independent review through Northern Ireland Public Services Ombudsman (NIPSO).

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

None identified.

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:

The Department will monitor:

- Number and nature of complaints received.
- Requests for reasonable adjustments, interpretation or alternative formats.
- Complaints relating to accessibility of the complaints process.
- Complaints outcomes and trends.
- Any equality-related concerns raised through the complaints process.
- Feedback from representative organisations and advocacy groups where relevant.

Monitoring information will be reviewed annually by the policy owner and used to inform future revisions to the procedure

Section D - Formal Record of Screening Decision

Title of Proposed Policy / Decision being screened:

Department of Finance Complaints Handling Procedure (DoF CHP) Customer Guidance

I can confirm that the proposed policy / decision has been screened for (i) equality of opportunity, (ii) good relations disabilities duties and (iii) human rights issues

On the basis of the answers to the screening questions, I recommend that this policy / decision is –

* **Screened Out -** Mitigating Actions (minor impacts)

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

Screened Out – No EQIA Necessary

Reason

The policy is procedural in nature and applies equally to all service users. No adverse impacts on any Section 75 category have been identified. The policy contains several positive accessibility measures, including reasonable adjustments, alternative formats, advocacy support and accessible communication channels, which are likely to promote equality of opportunity, particularly for disabled people and those experiencing communication barriers.

Screening assessment completed by -

Name: Michelle Treacy
Grade: DP
Date: 09/11/2026

And approved by –

Name; Kerri Redmond
Grade: Grade 7
Date: 11/11/2026

Central Support Team Notified: 11/11/2026

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