



Northern Ireland
Assembly

Section 75 Equality Screening - Internal Communications Strategy

Annex D

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 Assembly Commission 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 Commission 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 Commission's Equality Scheme reflects the Equality Commission's definition of a policy and this should be applied in determining what needs to be screened. The Equality Scheme states:

“In the context of Section 75, 'policy' is very broadly defined and it covers all the ways in which we carry out or propose to carry out its functions in relation to Northern Ireland. In respect of this equality scheme, the term policy is used for any (proposed/amended/existing) strategy, policy initiative or practice and/or decision, whether written or unwritten and irrespective of the label given to it, e.g. 'draft', 'pilot', 'high level' or 'sectoral'.”

If you are in doubt, please contact the Equality and Good Relations Unit for advice. Equality Screening guidance notes are also available on Assist.

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

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 to 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.

Policy Details

Name of the policy to be screened/description:

Revised Internal Communications Strategy 2021-23

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

Revised draft Strategy

What is it trying to achieve? (brief outline of intended aims/outcomes of the policy)

Developing a highly engaged, motivated and responsive Secretariat is key to achieving the outcomes set out in the Assembly Commission's (the Commission) Corporate Plan 2019-2023. Effective communication and engagement are recognised as being a major contributor to the achievement of an organisation's Vision and Values.

The Commission's Annual Plan 2021-22 cites three outcomes and milestones to be achieved this year. They are:

- a. Identify opportunities in business areas to celebrate success and implement ways in which to recognise achievement throughout the organisation;
- b. Develop a plan to promote and embed our Values; and
- c. Undertake consultation on the draft Internal Communications Strategy (which includes a plan to develop a Values campaign) to be finalised and a Values Plan to be approved by SMG.

The development of a revised Internal Communications Strategy and subsequent staff consultation exercise is designed to achieve those three outcomes and milestones.

The aim of this Internal Communications Strategy is to link communication activity to Assembly Commission-wide activities, initiatives and projects to develop an engaged workforce who will meet the opportunities and challenges of the organisation.

The work of internal communications and the Internal Communications Strategy supports the overall delivery of the Assembly Commission's Corporate Strategy 2018 – 2023 and Corporate Plan 2019 – 2023.

The Internal Communications Strategy embeds the core Assembly Values of **Professionalism, Respect, Impartiality and integrity** by using every platform and opportunity to communicate our core messages, create meaningful Values content and amplifying that across all our communications channels.

The Strategy is based on four themes:

- a. The value of two-way conversations and listening to your views;
- b. The importance of understanding how we communicate together as an organisation;
- c. The need to improve our existing internal communications channels and platforms; and
- d. How a refreshed perspective will help us develop meaningful and authentic stories.

The Internal Communications Strategy will be underpinned by detailed annual action plans designed to improve how we plan, deliver and evaluate our internal communications activity.

Our approach to internal communications will continue to be staff focused, innovative and joined up.

Are any of the Section 75 categories which might be expected to benefit from the intended policy/decision? Please explain how.

This policy aims to offer equality of opportunity for all staff.

Who initiated or wrote the policy?

Liz Beaton – Internal Communications Officer

Directorate responsible for devising and delivering the policy?

Parliamentary Services

Was consultation carried out as part of this screening exercise?

Yes No

Consultation was carried out with ICG, TUS, and staff.

Background to the Policy to be screened.

Include details of any pre-consultations/consultations which have been conducted and whether the policy has previously been tabled at SMG/Assembly Commission meetings.

In October, 2020, SMG considered and agreed a draft Internal Communications Strategy for consultation with Trade Union Side (TUS) and staff (SMG16525).

In January 2021, the Communications Office began a two-stage consultation process on the draft Internal Communications Strategy. Stage One included meetings with the Internal Communications Group (ICG) and TUS in early 2021. Stage Two involved the delivery of “Let’s Talk” Internal Communications sessions in June 2021 using the Menti platform together with an online version of the Menti survey between June and July. In total, 107 members of staff took part in the consultation.

In October 2021, SMG approved the high-level feedback of the “Let’s Talk” Internal Communications sessions (SMG17413); and they were published in the [October edition of the Staff Newsletter](#) and [October Note to Staff](#).

The consultation process has helped us understand where we are with internal communications in the organisation, where we want to be and how to get there. The findings of the consultation have informed the shape and direction of the revised Internal Communications Strategy, draft Action Plan and draft Values Plan.

The revised Internal Communications Strategy has been informed by a robust consultation process involving Let’s Talk sessions, conversations and discussions and an online survey with a range of colleagues including SMG, Heads of Business, ICG, TUS and staff. The process has helped us understand where we are, where we want to be and how get there.

The consultation was discussed at the following SMG meetings;

- ‘Implementation of the Internal Communications Strategy 2020-2023’ considered by SMG on 23 October, 2020 (SMG16419);
- ‘Updated Draft Internal Communications Strategy’ considered by SMG on 20 November, 2020 (SMG16525);
- ‘Update on the Implementation of the Draft Internal Communications Strategy’ considered by SMG on 27 May, 2021 (SMG17121);
- ‘Feedback on consultation on the draft Internal Communications Strategy with staff and TUS’ considered by SMG on 22 October, 2021 (SMG17413);
- ‘Internal Communications Quarterly Update’ considered by SMG on 22 October 2021 (SMG17414).

Implementation factors

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

Yes No

If yes, are they

- Financial
- Legislative
- Other, please specify: [Click here to enter text.](#)

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 : [Click here to enter text.](#)

Other policies with a bearing on this policy

What are these policies and who owns them? Please list:

The Internal Communications Strategy will support the People aspect of the Assembly Commission's Corporate Plan 2019-2023 through a Values Plan, identifying opportunities to celebrate success and through a programme of employee engagement.

In addition, the Internal Communications Strategy will also align to HR's new Health and Well-being Framework and to the new Learning and Development Strategy.

Consideration of available data/research (*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.

What evidence/information (both qualitative and quantitative) do you hold to inform your decision making process? For example, is there any evidence of higher or lower participation or uptake by different groups?

Section 75 category	Details of evidence/information
Religious belief	There is a mixture of religious beliefs amongst Assembly staff, however the Internal Communications Strategy will not refer to religious beliefs so therefore this is not applicable.
Political opinion	There is a mix of political opinion amongst Assembly staff, however the Internal Communications Strategy will not refer to political opinion so therefore this is not applicable.
Racial group	The Internal Communications Strategy will not refer to race.
Age	45% of Assembly staff are aged 50+.
Marital status	The Internal Communications Strategy will not refer to marital status.
Sexual orientation	The Internal Communications Strategy will not refer to sexual orientation.
Men and women generally	The 2021 Staff Survey is due to launch this month and will provide us with up to date statistics.
Disability	9% of staff have a disability.
Dependants	The most recent data on this issue is the COVID-19 Well-being and Communications Survey results from June 2020, which highlighted that a number of staff have dependents /caring responsibilities while they were working from home during lockdown.

Current Assessment of Impact

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? 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	Given the sensitivity of religious beliefs, internal communications will not highlight or show support for any belief.	None
Political opinion	Given the sensitivity of the political landscape, internal communications will not highlight or show support for any political party.	None
Racial group	The policy will not favour any racial group over another. It will be race neutral.	None
Age	With a high proportion of staff aged 50 and over, the needs and support of staff at different age groups will differ.	Minor
Marital status	The policy will be neutral in terms of marital status.	None
Sexual orientation	The policy will be neutral in terms of sexual orientation.	None
Men and women generally	<p>Men and women working in Usher Services do not have access to a PC. Instead they share a limited number of computers in Room 375. This means that they do not always get access to information in a timely manner.</p> <p>Staff at AG8 and within Parliamentary Services show disengagement. Overall there was an average staff response rate of 63.1% for the COVID-19 Wellbeing and Communications Survey. However, AG8s had the lowest grade response rate of 42.9%</p>	Minor

	and Parliamentary Services had the lowest Directorate response rate of 59.5%. This was also evident within the 2019 Staff Survey. The survey generated an average response rate of 79% but those at AG8 grade (55%) and those within Parliamentary Services (76%) showed the least engagement at grade and Directorate levels.	
Disability	Those with a visual or hearing impairment may not be able to access internal communications easily and in a timely manner.	Minor
Dependants	There will be a need for flexibility in the delivery of communications to accommodate those working from home and caring for others. Any new or amended COVID-19 restrictions would likely have an impact on staff with dependents, and therefore the communications to them.	Minor

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.

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	None applicable.	None
Political opinion	None applicable.	None
Racial group	None applicable.	None

Age	With a large proportion of Assembly staff aged 50+, internal communications will need to be supportive and inclusive across all members of staff so that they feel valued/represented.	Minor
Marital status	None applicable.	None
Sexual orientation	None applicable.	None
Men and women generally	<p>The men and women working in Usher Services may feel isolated or disengaged as a result in the limitations with access to information.</p> <p>Staff at grades AG8 and those within Parliamentary Services may not acknowledge or review information in a timely manner meaning that important information is missed.</p>	Minor
Disability	Those with a visual or hearing impairment may have difficulty in accessing internal communications.	Minor
Dependants	Those with dependents/caring responsibilities may need to access information at different times or in different formats to ensure that information is not missed.	Minor

2 Are there any actions which could be taken to reduce or mitigate any adverse impact which has been identified or opportunities to better promote equality of opportunity for people within the section 75 categories?		
Section 75 category	Issue	Mitigating Measure
Religious belief	None applicable.	None
Political opinion	None applicable.	None
Racial group	None applicable.	None
Age	With a large proportion of Assembly staff aged 50+, internal communications will need to be supportive and inclusive across all members of staff so that they feel valued/represented.	To work with HR to deliver supportive wellbeing and inclusive communications for all staff.
Marital status	None applicable.	None
Sexual orientation	None applicable.	None
Men and women generally	The men and women working in Usher Services may feel isolated or disengaged as a result in the limitations with access to information. Staff at grades AG8 and those within Parliamentary Services may not acknowledge or review information in a timely manner	Minor. Hard copies of the staff Newsletter are distributed to the Usher Services team; they have been guest contributors to the newsletter; are regular contributors to well-being comms.

	meaning that important information is missed.	
Disability	9% of staff have a disability.	To provide accessibility of information across the AssIST intranet site. Page content is checked via the accessibility tool to determine improvements and errors. Accessibility guidance will be provided to assist those with visual or hearing impairments.
Dependants	The COVID-19 Wellbeing and Communications Survey results highlighted that a number of staff have dependents /caring responsibilities while they were working from home during lockdown.	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? minor/major/none		
Good relations category	Details of policy impact	Level of impact minor/major/none
Religious belief	No impact.	None
Political opinion	No impact.	None

Racial group	No impact.	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?		
Section 75 category	If Yes, provide details	If No, provide reasons
Religious belief		Not applicable to internal communications.
Political opinion		Not applicable to internal communications.
Racial group		Not applicable.

Consultation

Tell us about who you have talked to about your proposals, either internally or externally and who you have formally or informally consulted, to help you decide if the policy needs further equality investigation?

Consultation has been carried out with the Equality Unit, and with HR on the categories of people likely impacted and to discuss the proposed mitigating measures. The draft Internal Communications Strategy 2020-2023 was also the subject of a consultation exercise with staff, ICG and TUS.

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, providing that the minor mitigations are implemented as noted above, the policy will not discourage disabled people from participating in internal communications.
- b) Provides an opportunity to better positive attitudes towards disabled people or encourages their participation in public life.
By addressing the proposed mitigations as highlighted above, the proposal will mean that staff with limited visual or hearing impairments, can engage with the programme of internal communications, encouraging involvement where applicable.

Additional considerations

Multiple identities

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).

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

Potential impacts on people with multiple identities could include staff with limited visual or hearing who also have dependents. The likely impacts that this could have on the policy include less time to access important information. Mitigations could include seeking feedback on content and channels to provide an evidence base and rationale for any additional accessibility requirements.

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.

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 there are minor impacts noted, and based on the mitigating measures detailed, there will not be a need to conduct an equality impact assessment.

The mitigating measures proposed to address the minor equality impacts include:

- Ensuring content is available in hard copy for those who need it.
- Constantly seek and act on staff feedback where we can.
- To work with HR to deliver supportive wellbeing and inclusive communications for all staff.
- To continue to improve accessibility of information on AssISt

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

[Click here to enter text.](#)

Timetabling and prioritising for EQIA

Complete this section only if your business area/directorate plans to conduct two or more EQIAs.

Factors to be considered in timetabling and prioritising policies for equality impact assessment.

If the policy has been '**screened in**' for equality impact assessment, then please 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 a public authority's functions	Click

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment.

Is the policy affected by timetables established by other relevant public authorities?

Yes No

If yes, please provide details

[Click here to enter text.](#)

Part 4 Monitoring

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

The Equality Commission for NI (ECNI) recommends that where a policy has been amended or an alternative policy introduced, the public authority should monitor more broadly for adverse impact.

See ECNI Monitoring Guidance for use by Public Authorities (July 2007) pages 9-10, paragraphs 2.13 – 2.20

Please detail how you will monitor the effect of the policy?

The effectiveness of the policy will be reviewed via surveys: Staff – bi-annually survey) and quarterly staff pulse surveys. Google Analytics will also help to measure the effectiveness of email communications in driving staff to the AsslSt intranet pages.

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

Staff survey results, based on a high proportion of staff responding.

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
Liz Beaton	Internal Communications Officer	22 November 2021
Approved by:		
Susie Brown	Head of Communications	22 November 2021

The policy lead should sign and date the policy under the 'screened by' heading. It should then be countersigned by an approver. The Approver should be the senior manager responsible for the policy which would normally be Head of Business. In instances where a screening decision concludes that an EQIA is required then the screening form should be countersigned by the Director instead of the Head of Business.

There are of course a range of issues which may fall within the scope of being novel, contentious or politically sensitive and could only be taken forward following consultation with the Assembly Commission. Where policy screening highlights novel, contentious or politically sensitive issues, once approved by the Director, should be forwarded to the Clerk/Chief Executive for review, prior to proceeding to SMG and the Assembly Commission.

A copy of the completed screening template and any other relevant associated documentation should be forwarded to the Equality Manager.

ADDITIONAL INFORMATION TO INFORM THE ANNUAL 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.

The Revised Internal Communications Strategy takes a staff-led approach to internal communications. New ideas to enhance the level of engagement include:-

- A Guest Contributor Process has been developed to include all staff in conversations (from all Business Areas) to come up with suggestions and ideas to create stories for the Staff Newsletter.
- Two new digital engagement platforms have been introduced to allow staff to feedback anonymously, in real time.
- All creative ideas for content will consider accessibility guidance eg subtitles for videos for those with hearing impairments, the amount of information contained in an infographic and font size.

2. In developing this policy / decision 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.

Staff feedback during the formal consultation provided evidence to inform and shape the revised Strategy. Four themes emerged from the consultation:

- The value of two-way conversations and listening to your views;
- The importance of understanding how we communicate together as an organisation;
- The need to improve our existing internal communications channels and platforms; and
- How a refreshed perspective will help us develop meaningful and authentic stories.

This new approach to internal communications is staff-led, innovative and joined up.

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.

No

Appendix 1

Screening Questions

Introduction

In making a decision as to whether or not there is a need to carry out an equality impact assessment, you should consider your answers 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:

- measures to mitigate the adverse impact; or
- the introduction of 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.
- 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.