Whistleblowing Policy Screening Template

The NIGALA is required to address the 4 questions below in relation to all its policies. This template sets out a proforma to document consideration of each question.

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

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

To what extent is the policy likely to impact on good relations between people of a different religious belief, political opinion or racial group? (minor/major/none)
Are there opportunities to better promote good relations between people of a different religious belief, political opinion or racial group?
1.1 Title of policy or decision
Whistleblowing Policy

1.2 Description of policy or decision
- what is it trying to achieve? (aims and objectives)
- how will this be achieved? (key elements)
- what are the key constraints? (for example financial, legislative or other)

This policy sets out how NIGALA staff and contractors can raise a concern known as “whistleblowing”. The purpose of this Policy is to advise staff of the procedures for raising concerns in the workplace which staff witness as an individual, particularly where those concerns relate to unlawful conduct, financial malpractice or dangers to the public or the environment, or other serious malpractice.

The aims of the Policy
- To encourage staff to feel confident in raising concerns and to question and act upon concerns about practice.
- To provide avenues for staff to raise concerns in confidence and receive feedback on any action taken.
- To ensure that staff receive a response to concerns and are aware of how to pursue them if not satisfied.
- To reassure staff that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made any disclosure which is in the public interest.

1.3 Main stakeholders affected (internal and external)
For example staff, actual or potential service users, other public sector organisations, voluntary and community groups, trade unions or professional organisations or private sector organisations or others

- The policy applies to all employees, (including those designated as casual hours, temporary, agency, authorised volunteers or work experience), self employed contractors working for NIGALA and Board Members who have witnessed untoward events/practices.
1.4 Other policies or decisions with a bearing on this policy or decision
- what are they?
- who owns them?
NIGALA Grievance Policy
NIGALA Complaints Policy
NIGALA Fraud Policy
NIGALA Harassment Policy
Public Interest Disclosure (NI) Order 1998 (PIDO) which provides employment protection for whistleblowing.
DHSSPSNI circular HSS (F) 07/2009 required all HSC bodies to ensure they have whistleblowing procedures in place.
2.1 Data gathering

What information did you use to inform this equality screening? For example previous consultations, statistics, research, Equality Impact Assessments (EQIAs), complaints. Provide details of how you involved stakeholders, views of colleagues, service users, staff side or other stakeholders.

2.2 Quantitative Data

Who is affected by the policy or decision? Please provide a statistical profile. Note if policy affects both staff and service users, please provide profile for both.

<table>
<thead>
<tr>
<th>Category</th>
<th>What is the makeup of the affected group? ( %) Are there any issues or problems? For example, a lower uptake that needs to be addressed or greater involvement of a particular group?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender</td>
<td>This policy applies to all 72 members of staff consisting of 7 SMT, 45 Guardians includes full/ part time, office based, remote workers, 20 Corporate Services and NIGALA currently has 10 self employed member. Also applicable to the NIGALA Board members.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Gender</th>
<th>No. of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>62</td>
</tr>
<tr>
<td>Male</td>
<td>10</td>
</tr>
<tr>
<td>Total</td>
<td>72</td>
</tr>
</tbody>
</table>

Board Members

<table>
<thead>
<tr>
<th>Gender</th>
<th>No of Board Members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>1</td>
</tr>
<tr>
<td>Male</td>
<td>3</td>
</tr>
<tr>
<td>Total</td>
<td>4</td>
</tr>
</tbody>
</table>

HSC Workforce Census March 2013 (DHSSPS): Female 81%, Male 19%.
Northern Ireland population (2011 Census): Female 51%, Male: 49%.
Reed et al. 2009: 8/100000 (115) transgender people in NI.
- 140-160 individuals are affiliated with transgender groups
- 120 individuals have presented with Gender Identity Disphoria
- there are more trans women than trans men living in Northern Ireland.

### Age

**Age Range for Guardians**

<table>
<thead>
<tr>
<th>Age Range</th>
<th>No. of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>16-24</td>
<td>1</td>
</tr>
<tr>
<td>25-29</td>
<td>3</td>
</tr>
<tr>
<td>30-34</td>
<td>6</td>
</tr>
<tr>
<td>35-39</td>
<td>7</td>
</tr>
<tr>
<td>40-44</td>
<td>11</td>
</tr>
<tr>
<td>45-49</td>
<td>16</td>
</tr>
<tr>
<td>50-54</td>
<td>15</td>
</tr>
<tr>
<td>55-59</td>
<td>11</td>
</tr>
<tr>
<td>60-64</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>72</strong></td>
</tr>
</tbody>
</table>

Census 2011 figures report the 16-64 age group represents just under 65% of the total NI population.

### Religion

**Religion within Guardian ad Litem**

<table>
<thead>
<tr>
<th>Religion</th>
<th>No of Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Neither</td>
<td>1</td>
</tr>
<tr>
<td>Not assigned</td>
<td>1</td>
</tr>
<tr>
<td>Perceived Protestant</td>
<td>4</td>
</tr>
<tr>
<td>Perceived Roman Catholic</td>
<td>4</td>
</tr>
<tr>
<td>Protestant</td>
<td>22</td>
</tr>
<tr>
<td>Roman Catholic</td>
<td>40</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>72</strong></td>
</tr>
</tbody>
</table>

45.1% of the population from a Catholic background, 48.4% of the population from Protestant and other Christian background. 0.9% of population from other religions. 5.6% of population no religion or religion not stated (2011 Census).

### Political Opinion

Of those eligible to vote in the NI Assembly election of 2011, 43.21% voted for a Unionist candidate as a first preference, 41.18% voted for a Nationalist/Republican candidate as a first preference and approximately 15% voted for other candidates as a first preference.

### Marital Status

2011 Census figures report 48% of the resident population aged 16 and over are married, whilst 36% are single, 0.1% are registered in same-sex
civil partnerships, 9.4% are divorced, separated or formerly in same-sex partnership and 6.8% are either widowed or a surviving partner.

<table>
<thead>
<tr>
<th>Dependent Status</th>
<th>2011 Census figures report 12% of the resident population provide unpaid care to family members, friends, neighbours, and 34% of households contain dependent children.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability</td>
<td>2011 Census figures report 21% of the population regard themselves as having a disability or long-term health problem which has an impact on their day to day activities.</td>
</tr>
<tr>
<td>Ethnicity</td>
<td>2011 Census figures report 1.8% of the resident population belong to a minority ethnic group, with 3.1% stating their first language is not English.</td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>NI population estimate is 1 in 10 Lesbian, Gay or Bisexual.</td>
</tr>
</tbody>
</table>

2.3 Qualitative Data

What are the different needs, experiences and priorities of each of the categories in relation to this policy or decision and what equality issues emerge from this? Note if policy affects both staff and service users, please discuss issues for both.

<table>
<thead>
<tr>
<th>Category</th>
<th>Needs and Experiences</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender</td>
<td>No issues</td>
</tr>
<tr>
<td>Age</td>
<td>No issues</td>
</tr>
<tr>
<td>Religion</td>
<td>No issues</td>
</tr>
<tr>
<td>Political Opinion</td>
<td>No issues</td>
</tr>
<tr>
<td>Marital Status</td>
<td>No issues</td>
</tr>
<tr>
<td>Dependent Status</td>
<td>No issues</td>
</tr>
<tr>
<td>Disability</td>
<td>Consideration will be given to requests for the provision of information in accessible formats</td>
</tr>
<tr>
<td>Ethnicity</td>
<td>Consideration will be given to requests for the provision of information in languages other than English No issues</td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>No issues</td>
</tr>
</tbody>
</table>

2.4 Multiple Identities

Are there any potential impacts of the policy or decision on people with multiple identities? For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people.
2.5 Making Changes

Based on the equality issues you identified in 2.2 and 2.3, what changes did you make or do you intend to make in relation to the policy or decision in order to promote equality of opportunity?

<table>
<thead>
<tr>
<th>In developing the policy or decision what did you do or change to address the equality issues you identified?</th>
<th>What do you intend to do in future to address the equality issues you identified?</th>
</tr>
</thead>
<tbody>
<tr>
<td>This policy document was developed in response to the DHSSPSNI circular requiring all HSC bodies to ensure they have whistleblowing procedures in place.</td>
<td>No issues of significant impact have been identified</td>
</tr>
</tbody>
</table>

2.6 Good Relations

What changes to the policy or decision – if any – or what additional measures would you suggest to ensure that it promotes good relations? (refer to guidance notes for guidance on impact)

<table>
<thead>
<tr>
<th>Group</th>
<th>Impact</th>
<th>Suggestions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Religion</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Political Opinion</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Ethnicity</td>
<td>N/A</td>
<td>Requests for the provision of information in languages other than English will be considered.</td>
</tr>
</tbody>
</table>
(3) SHOULD THE POLICY OR DECISION BE SUBJECT TO A FULL EQUALITY IMPACT ASSESSMENT?
A full equality impact assessment (EQIA) is usually confined to those policies or decisions considered to have major implications for equality of opportunity.

How would you categorise the impacts of this decision or policy? (refer to guidance notes for guidance on impact)

Please tick:

<table>
<thead>
<tr>
<th>Impact Type</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major impact</td>
<td></td>
</tr>
<tr>
<td>Minor impact</td>
<td></td>
</tr>
<tr>
<td>No further impact</td>
<td>X</td>
</tr>
</tbody>
</table>

Please give reasons for your decisions.
Having considered the aim of this policy, I am satisfied that there is no scope to promote equality of opportunity or good relations. The policy sets out the organisation’s whistleblowing policy and has no impact on the section 75 categories.

Do you consider that this policy or decision needs to be subjected to a full equality impact assessment?

Please tick:

<table>
<thead>
<tr>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>
(4) CONSIDERATION OF DISABILITY DUTIES

4.1 In what ways does the policy or decision encourage disabled people to participate in public life and what else could you do to do so?

<table>
<thead>
<tr>
<th>How does the policy or decision currently encourage disabled people to participate in public life?</th>
<th>What else could you do to encourage disabled people to participate in public life?</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

4.2 In what ways does the policy or decision promote positive attitudes towards disabled people and what else could you do to do so?

<table>
<thead>
<tr>
<th>How does the policy or decision currently promote positive attitudes towards disabled people?</th>
<th>What else could you do to promote positive attitudes towards disabled people?</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>
5.1 Does the policy or decision affect anyone’s Human Rights?
Complete for each of the articles

<table>
<thead>
<tr>
<th>ARTICLE</th>
<th>Yes/No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Article 2 – Right to life</td>
<td>No</td>
</tr>
<tr>
<td>Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment</td>
<td>No</td>
</tr>
<tr>
<td>Article 4 – Right to freedom from slavery, servitude &amp; forced or compulsory labour</td>
<td>No</td>
</tr>
<tr>
<td>Article 5 – Right to liberty &amp; security of person</td>
<td>No</td>
</tr>
<tr>
<td>Article 6 – Right to a fair &amp; public trial within a reasonable time</td>
<td>No</td>
</tr>
<tr>
<td>Article 7 – Right to freedom from retrospective criminal law &amp; no punishment without law</td>
<td>No</td>
</tr>
<tr>
<td>Article 8 – Right to respect for private &amp; family life, home and correspondence.</td>
<td>No</td>
</tr>
<tr>
<td>Article 9 – Right to freedom of thought, conscience &amp; religion</td>
<td>No</td>
</tr>
<tr>
<td>Article 10 – Right to freedom of expression</td>
<td>No</td>
</tr>
<tr>
<td>Article 11 – Right to freedom of assembly &amp; association</td>
<td>No</td>
</tr>
<tr>
<td>Article 12 – Right to marry &amp; found a family</td>
<td>No</td>
</tr>
<tr>
<td>Article 14 – Prohibition of discrimination in the enjoyment of the convention rights</td>
<td>No</td>
</tr>
<tr>
<td>1st protocol Article 1 – Right to a peaceful enjoyment of possessions &amp; protection of property</td>
<td>No</td>
</tr>
</tbody>
</table>
If you have answered no to all of the above please move on to **Question 6 on monitoring**

**5.2** If you have answered yes to any of the Articles in 5.1, does the policy or decision interfere with any of these rights? If so, what is the interference and who does it impact upon?

<table>
<thead>
<tr>
<th>List the Article Number</th>
<th>Interferred with? Yes/No</th>
<th>What is the interference and who does it impact upon?</th>
<th>Does this raise legal issues?* Yes/No</th>
</tr>
</thead>
</table>

*It is important to speak to your line manager on this and if necessary seek legal opinion to clarify this*

**5.3** Outline any actions which could be taken to promote or raise awareness of human rights or to ensure compliance with the legislation in relation to the policy or decision.
(6) MONITORING

6.1 What data will you collect in the future in order to monitor the effect of the policy or decision on any of the categories (for equality of opportunity and good relations, disability duties and human rights)?

<table>
<thead>
<tr>
<th>Equality &amp; Good Relations</th>
<th>Disability Duties</th>
<th>Human Rights</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Approved Lead Officer: Declan McAllister

Position: Corporate Services Manager

Date: 10th March 2014

Policy/Decision Screened by: Declan McAllister

Please note that having completed the screening you are required by statute to publish the completed screening written assurance, as per your organisation’s equality scheme. If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, you will need to review the screening decision.

If you require this document in an alternative format (such as large print, Braille, disk, audio file, audio cassette, Easy Read or in minority languages to meet the needs of those not fluent in English) please contact:

Mr Declan McAllister
NIGALA
Centre House
79 Chichester Street
Belfast
BT1 4JE
Tel – 028 90316550
Declan.mcallister@nigala.hscni.net