

## **Lisburn & Castlereagh City Council**

### **Section 75 Equality and Good Relations Screening**

#### **Part 1. Information about the activity/policy/project being screened**

The CCTV & VSS Security Systems Policy details the operation, use and management of CCTV and Visual Security Systems owned and operated by the Council. It covers:

Monitoring and recording for crime prevention, public safety, health & safety, asset protection, traffic and access management, workplace complaints investigation, and protection of rights and freedoms.

Operation of CCTV systems in council buildings, parks, public realm, and facilities.

Compliance with UK GDPR, Data Protection Act 2018, Human Rights Act 1998, Surveillance Commissioner Codes of Practice, and the ICO Surveillance Camera Code of Practice.

Governance, operational procedures, data handling, DPIAs, and arrangements for complaints, subject access, and system management.

The policy explicitly excludes covert surveillance under RIPA and processing by competent authorities for criminal law enforcement.

#### **Name of the activity/policy/project**

CCTV & VSS

#### **Is this activity/policy/project – an existing one, a revised one, a new one?**

It is a new policy and previously operational site by site procedures existed

#### **What are the intended aims/outcomes the activity/policy/project is trying to achieve?**

To provide

- To comply with legislation and best practice
- To provide appropriate guidance for colleagues and all stakeholders
- To increase transparency
- To bring organisational cohesion and consistency in approach

**Who is the activity/policy/project targeted at and who will benefit? Are there any expected benefits for specific Section 75 categories/groups from this activity/policy/project? If so, please explain.**

The policy does not target any specific Section 75 groups. There may be incidental benefits for equality groups, However, this is not the main aim of the policy. To raise awareness to colleagues on management and responsibilities of CCTV.

**Who initiated or developed the activity/policy/project?**

LCCC Corporate management team.

**Who owns and who implements the activity/policy/project?**

Lisburn & Castlereagh City Council own the policy.

**Are there any factors which could contribute to/detract from the intended aim/outcome of the activity/policy/project? If yes, give brief details of any significant factors.**

Yes, a potential for non-compliance if colleagues are not adhering to policy.

**Who are the internal and external stakeholders (actual or potential) that the activity/policy/project will impact upon? Delete if not applicable**

Staff and managers responsible for CCTV & VSS management.

Users of council facilities, visiting council sites and public realm, inclusive of vehicle users.

Elected Members as decision makers.

**Other policies/strategies/plans with a bearing on this activity/policy/project**

Name of policy/strategy/plan	Who owns or implements?
Data Procurement Policy	Organisational Development & Innovation
Land & Property Asset Management Strategy	Regeneration & Growth

## Available evidence

**What evidence/information (qualitative and quantitative) have you gathered or considered to inform this activity/policy? Specify details for each Section 75 category.**

There has been a wide range of evidence used to inform the policy including requirements under UK GDPR and Data Protection Regulations 2018. Human Rights Act 1998.

Council operational needs inclusive of security incidents, health and safety and criminal matters in regard to seeking to mitigate future risk.

Benchmarking activity across other council and public sector management of CCTV & VSS in regard to best practice management.

Most up to date NISRA population data from Census 2021 (published 22/09/22) [Lisburn and Castlereagh Census Data](#)

Section 75 Category	Details of evidence/information
Religious Belief	According to the 2021 Census data, the population of Lisburn & Castlereagh City brought up in different religious backgrounds is as follows: <ul style="list-style-type: none"><li>• Catholic: 23.5%</li><li>• Protestant &amp; Other Christian: 65.6%</li><li>• Other religions: 1.2%</li><li>• None: 9.7%</li></ul>
Political Opinion	Local government elections 2023 – Elected members to LCCC: DUP (14); Alliance Party (13); UUP (6); Sinn Fein (4); SDLP (2); Independent (1).  Census data 2021 – British only 41%, Irish only 16%, Northern Irish only 21%, British & Irish only <1%, British & Northern Irish only 11%, Irish & Northern Irish only 2%, British, Irish & Northern Irish only 2%, Other national identities 6%.
Racial Group	Census data 2021 indicated around 6% of the LCCC population were born outside of the UK and Ireland.

	Applications to EU settlement scheme Aug 2018 to March 2021-3940. Applicants from range of nationalities. largest groups Polish, Lithuanian and Romanian. LCCC also has a small population of Syrian refugees. Furthermore, the Asylum Seeker population is increasing across Northern Ireland as a whole.
Age	LCCC population: 0-14 19% 15-39 30% 40-64 33% 65+ 18%
Marital Status	In relation to the council area, the Census indicated the following data for marital and civil partnerships: Single 33% Married or in a civil partnership 52% Separated 3% Divorced or formerly in a civil partnership 6% Widowed or surviving partner from a civil partnership 6%
Sexual Orientation	Straight or heterosexual 91% Gay, lesbian, bisexual or other sexual orientation 2% Prefer not to say or not stated 7%.
Men & Women Generally	The gender breakdown of the LCCC population reflects the national picture – 51% female; 49% male.  Northern Ireland has a small but growing number of people who identify as Trans (based on referrals to gender identity services and support groups) and it is likely that LCCC will have a small number of Trans residents.
Disability	Published data from the 2021 Census indicates that 32% of the population had one or more long term health conditions.
Dependants	People with dependants includes those who care for a child/child, older people and those with disabilities.

	Limited information on carers is available, however 2021 Census data indicates 14% of the council population reported providing some level of unpaid care and 31% of households have at least one dependant child.
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## 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 activity/policy/decision? Specify details for each of the Section 75 categories**

<b>Section 75 Category</b>	<b>Details of needs/experiences/priorities</b>
Religious Belief	No differential needs identified. All groups share a common interest in safety, privacy and lawful use of CCTV.
Political Opinion	No differential needs identified. All groups share a common interest in safety, privacy and lawful use of CCTV.
Racial Group	Needs may include clear and accessible signage, transparency in how footage is accessed and used, and availability of translated materials on request. There may be a priority for reassurance that CCTV is used fairly and does not lead to disproportionate surveillance.
Age	Needs may include accessible and easily understood signage, transparency in releasing data requests, and alternative formats on request (e.g. hard copy documentation). Older people and young people may prioritise reassurance around personal safety in public spaces.

Marital Status	No differential needs identified. All groups share a common interest in safety, privacy and lawful use of CCTV.
Sexual Orientation	No differential needs identified. Individuals may share a general priority for safety in public spaces and confidence that CCTV is operated in a non-discriminatory manner.
Men & Women Generally	Both Men and women share a common interest in safety, privacy and lawful use of CCTV. Priorities may include reassurance that CCTV contributes to public safety, is used appropriately, and respects privacy. Women in particular may prioritise visibility of CCTV in areas associated with personal safety concerns.
Disability	Needs may include accessible signage, transparency in releasing data requests, and information provided in alternative formats (e.g. Braille, Easy Read, large print). Some disabled people may prioritise CCTV as a reassurance measure in public spaces.
Dependants	People with dependants may prioritise CCTV as a means of enhancing safety in public areas used by children or vulnerable adults. Needs may include reassurance around appropriate use of footage and safeguarding considerations.

## Part 2. Screening questions

**1 What is the likely impact on equality of opportunity for those affected by this activity/policy, for each of the Section 75 equality categories?**

<b>Section 75 Category</b>	<b>Details of likely impact – will it be positive or negative? If none anticipated, say none</b>	<b>Level of impact - major or minor* - see guidance below</b>
Religious Belief	No specific differential impact anticipated. The policy applies equally regardless of religious	None

	belief and is focused on public safety and lawful monitoring.	
Political Opinion	No specific differential impact anticipated. CCTV operation is neutral and not linked to political opinion.	None
Racial Group	There may be a minor negative perceived impact if individuals feel concern about profiling or disproportionate surveillance. There may also be a positive impact, as some individuals may feel increased reassurance and safety in monitored public spaces.	Minor
Age	A minor negative impact may arise for older people or younger individuals if there are barriers to understanding CCTV usage or data protection rights. A positive impact may also be experienced through increased feelings of safety in public areas.	Minor
Marital Status	No specific differential impact anticipated. The CCTV policy applies equally regardless of marital status.	None
Sexual Orientation	No specific differential impact anticipated. The CCTV policy applies equally regardless of sexual orientation and does not involve the collection or processing of information relating to sexual orientation.	None

Men & Women Generally	A minor positive impact may be experienced through increased reassurance and perceived safety. Women, in particular, may feel safer in certain public environments.	Minor
Disability	A minor positive impact may arise where CCTV provides reassurance for disabled people in public spaces. A minor negative impact could occur if information or processes relating to CCTV are not fully accessible.	Minor
Dependants	A minor positive impact may be experienced by people with dependants, particularly parents or carers, through increased reassurance regarding safety in public areas used by children or vulnerable adults.	Minor

**2(a) Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?**

Section 75 Category	IF Yes, provide details	IF No, provide details
Religious Belief	No additional opportunities to promote equality of opportunity have been identified at this time. Existing measures, including clear and accessible signage (such as pictorial signage), availability of information in alternative formats on request, and transparent processes for accessing CCTV footage, already support equality of opportunity. These measures are addressed through existing mitigation	
Political Opinion		
Racial Group		
Age		
Marital Status		
Sexual Orientation		
Men & Women Generally		

Disability	and operational procedures rather than through the creation of new actions within this policy.
Dependants	

**2(b) Equality Action Plan 2021-2025**

Does the activity/policy/project being screened relate to an action in the Equality Action Plan 2021-2025? Yes/No If yes, specify which action.

No

**2(c) DDA Disability Duties (see Disability Action Plan 2021-2025)**

Does this policy/activity present opportunities to contribute to the actions in our Disability Action Plan:

- to promote positive attitudes towards disabled people?
- to encourage the participation of disabled people in public life?

No.

**3 To what extent is the activity/policy/project likely to impact on good relations between people of different religious belief, political opinion or racial group?**

<b>Good Relations Category</b>	<b>Details of likely impact. Will it be positive or negative? [if no specific impact identified, say none]</b>	<b>Level of impact – minor/major*</b>
Religious Belief	No specific impact on good relations anticipated. The CCTV policy applies equally regardless of religious belief and is not intended to monitor religious activity or expression.	None
Political Opinion	No specific impact on good relations anticipated. The CCTV policy is politically neutral and does not target or monitor lawful political activity.	None
Racial Group	A minor positive impact may arise through increased reassurance and perceived safety in public spaces. A minor negative perceived impact may occur if CCTV is	Minor

	viewed as contributing to concerns about disproportionate surveillance.	
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\*See Appendix 1 for details.

**4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?**

<b>Good Relations Category</b>	<b>IF Yes, provide details</b>	<b>If No, provide details</b>
Religious Belief		<p>No additional specific opportunities to promote good relations have been identified at this time.</p> <p>The CCTV policy applies equally across all groups and is intended to operate in a fair, transparent and proportionate manner.</p> <p>Existing measures, such as accessible signage, transparency around the purpose and use of CCTV, and established complaints and oversight mechanisms, support confidence and help minimise the risk of misunderstanding. These measures are addressed through existing policy safeguards rather than through new actions.</p>
Political Opinion		
Racial Group		

**Multiple identity**

**Provide details of any data on the impact of the activity/policy/project on people with multiple identities. Specify relevant Section 75 categories concerned.**

No specific data is currently available on the impact of the CCTV policy on people with multiple identities. The policy applies equally across all Section 75 categories and does not collect personal data relating to multiple characteristics.

Safeguards such as transparent operation, accessible signage, and alternative formats help support inclusivity for individuals with more than one protected characteristic. Relevant categories could include, for example, Racial group and Age, Disability and Gender, or Dependants and Age.

Any unforeseen issues will continue to be monitored and addressed as part of ongoing policy review.

### Part 3. Screening decision/outcome

Equality and good relations screening is used to identify whether there is a need to carry out a **full equality impact assessment** on a proposed policy or project.

There are 3 possible outcomes:

- 1) **Screen out** - no need for a full equality impact assessment and no mitigations required because no relevance to equality, no negative impacts identified or only very minor positive impacts for all groups. This may be the case for a purely technical policy for example.
- 2) **Screen out with mitigation** - no need for a full equality impact assessment but some minor potential impacts or opportunities to better promote equality and/or good relations identified, so mitigations appropriate. Much of our activity will probably fall into this category.
- 3) **Screen in for full equality impact assessment** – potential for significant and/or potentially negative impact identified for one or more groups so proposal requires a more detailed impact assessment. [See Equality Commission guidance on justifying a screening decision.]

**Choose only one of these** and provide reasons for your decision and ensure evidence is noted/referenced for any decision reached.

Screening Decision/Outcome	Reasons/Evidence
Option 1  <b>Screen out</b> – no equality impact assessment and no mitigation required [go to Monitoring section]	

<p>Option 2</p> <p><b>Screen out with mitigation</b> – some potential impacts identified but they can be addressed with appropriate mitigation or some opportunities to better promote equality and/or good relations identified [complete mitigation section below]</p>	<p>The CCTV policy is primarily operational, focused on safety and lawful processing of personal data. It applies uniformly across all Section 75 categories. There is no evidence of direct adverse impact on any Section 75 groups. Any potential perceived impacts can be mitigated through existing measures which support equality of opportunity.</p>
<p>Option 3</p> <p><b>Screen in</b> for a full Equality Impact Assessment (EQIA)</p> <p>[If option 3, complete timetabling and prioritising section below]</p>	

**Mitigation (Only relevant to Option 2) –**

**Can the activity/policy/project plan be amended or an alternative activity/policy introduced to better promote equality of opportunity and/or good relations?** If so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative activity/policy and ensure the mitigations are included in a revised/updated policy or plan.

No, the policy is operational and cannot be fundamentally changed without affecting its purpose. However, the following mitigation measures are in place to better promote equality of opportunity and good relations:

- Ensure all CCTV areas are clearly marked with visible signage, including pictorial signs, to support understanding for all groups, including those with literacy or language barriers.
- Provide training to staff so they can explain the CCTV policy clearly, respond to queries, and address any related concerns from the public.
- Maintain clear, public procedures for accessing CCTV footage and handling complaints, ensuring fairness and accountability.
- Make policy information and data request procedures available in alternative formats (e.g., large print, Braille, Easy Read) on request to support people with disabilities or other communication needs.

- Continue to review the policy and its operation periodically to ensure it remains proportionate, fair, and effective, and that any emerging equality issues are addressed promptly.

### **Timetabling and prioritising for full EQIA (only relevant to Option 3) N/A**

If the activity/policy has been ‘**screened in**’ for full equality impact assessment, give details of any factors to be considered and the next steps for progressing the EQIA, including a proposed timetable.

Is the activity/policy affected by timetables established by other relevant public authorities? No

### **Part 4. Monitoring**

Public authorities should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007).

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

**What will be monitored and how? What specific equality monitoring will be done? Who will undertake and sign-off the monitoring of this activity/policy and on what frequency?** Please give details:

Monitoring will include data protection requests and complaints, with attention to any trends by Section 75 group.

Compliance with the CCTV policy will be monitored at each operational facility to ensure it is applied consistently and lawfully.

Monitoring will be undertaken by the Head of Service responsible for each operational facility.

Overall compliance and review of the policy will rest with the Regeneration and Growth Directorate, led by the Assets Unit.

The policy and its implementation will be reviewed periodically, or as required, to ensure continued compliance with legislation, best practice, and any emerging equality considerations.

## Part 5 - Approval and authorisation

	<b>Position/Job Title</b>	<b>Date</b>
Screened by: Leeann Vincent	Head of Assets	15/01/2026
Reviewed by: Annie Wilson	Equality Officer	15/01/2026
<b>Approved by: Donal Rogan</b>	Director of Regeneration & Growth	

Note: On completion of the screening exercise, a copy of the completed Screening Report should be:

- approved and 'signed off' by a senior manager responsible for the activity/policy
- included with Committee reports, as appropriate
- sent to the Equality Officer for the quarterly screening report to consultees, internal reporting and publishing on the LCCC website
- shared with relevant colleagues
- made available to the public on request.

Evidence and documents referenced in the screening report should also be available if requested.

### Appendix 1 – Equality Commission guidance on equality impact

\*Major impact:

- a) The policy/project is significant in terms of its strategic importance;
- b) Potential equality matters 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.

#### 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.

#### No impact (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.

Updated Template @ Oct 2022