**Lisburn & Castlereagh City Council**

**Section 75 Equality and Good Relations Screening template** (Oct 2022)

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

The Corporate Uniform Policy and Corporate Dress code policy were approved and introduced by the Council in 2019 to provide an improved awareness and understanding of the requirements from staff and improve consistency of approach in relation to uniform provision and dress code requirements.

The Corporate Uniform Policy detailed which staff were entitled to uniform provision, the uniform entitlement to be allocated and the frequency of provision of uniform to staff.

The Corporate Dress Code Policy detailed guidance to staff who are not required to wear uniform to ensure that acceptable standards are adhered to by all staff.

Feedback from some staff and Trade Union representatives have identified the following issues:

* The examples of clothing which are stated in the policy as not considered suitable are not subjective and not gender neutral.
* Some terms are too vague, e.g.: What is “smart professional dress”
* Challenges in relation to the monitoring and enforcement of the policy by Managers.

Prior to Covid 19 applicable staff were issued with a full allocation of uniform as per the Corporate Uniform Policy however as a result of Covid, the majority of staff were required to work from home until September 2022 and since then a hybrid working arrangement has been in place which has reduced the requirement for uniform provision.

During this time also, the contract for uniform provision expired and a business case for a procurement exercise to be undertaken was agreed by Corporate Services Committee in 2019 and the anticipated associated expenditure approved.

In 2023, when undertaking the estimates process a request was made to postpone the tender exercise and to review the Corporate Uniform and Corporate Dress code policies in order to reconsider the associated expenditure implications.

Further to consultation with HR, both original policies have been reviewed and it has been agreed to combine the two policies due to overlapping principles within each. The revised policy is attached for consideration.

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

**Corporate Dress Code/Uniform Policy**

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

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

The aims of the policy are as follows:

|  |
| --- |
| 1 To portray a professional image of the Council |
| 2 To assist in establishing the “identity” of the Council |
| 3 To assist members of the public in being able to identify staff |
| 4 To be cost-effective in meeting the above aims |

**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.**

Corporate uniforms are provided to designated staff who provide front line services which may include staff from all designated groups. The Corporate dress code policy is also applicable to all staff.

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

Central Support, Corporate Communications & Administration

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

Lisburn and Castlereagh City Council

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

**Yes**

Financial – there are budget constraints that need to be considered when providing Corporate uniform to staff.

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

**Staff**  - staff who are designated to wear corporate uniform and staff who are required to comply with the corporate dress code policy

**Service users**  - service users who interact with council staff

**Other public sector organisations** - n/a

**Voluntary/community/trade unions** – trade unions – consulted as part of the review of the policies – were also consulted when reviewed in 2019

**Other** – Elected members

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

|  |  |
| --- | --- |
| **Name of policy/strategy/plan** | **Who owns or implements?** |
| **LCCC Accounting Manual** | **LCCC Finance team** |
| **LCCC Equality Scheme and related policies** | **LCCC** |

**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.**

**Most up to date NISRA population data from Census 2021 (published 22/09/22)** [**Lisburn and Castlereagh Census Data**](https://explore.nisra.gov.uk/area-explorer-2021/N09000007/)

|  |  |
| --- | --- |
| **Section 75 Category** | **Details of evidence/information** |
| Religious Belief | The policy applies to all members of staff fairly and consistently irrespective of which equality group they belong to.  There is no evidence to suggest that the policy will lead to an adverse impact on any of the categories.  LCCC recognises the diversity of cultures, religions and disabilities and recognises that some staff may require modifications to the uniform provided for reasons arising from a disability. This will be accommodated where possible. It is also recognised that some staff may have specific medical conditions eg: allergic reactions to materials which will need to be address on an individual basis.  The dress code for any member of staff going through gender reassignment should be dealt with sensitively on an individual basis.  The policy is designed to take account of individual circumstances. |
| Political Opinion |
| Racial Group |
| Age |
| Marital Status |
| Sexual Orientation |
| Men & Women Generally |
| Disability |
| People with and without Dependants |

### 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**

|  |  |
| --- | --- |
| **Section 75 Category** | **Details of needs/experiences/priorities** |
| Religious Belief | The policy applies to all members of staff fairly and belief consistently and we do not feel it impacts on any particular section 75 category.  It is recognised that the policy may impact some groups who fall under section 75 categories, for example pregnant / menopausal / disabled / transgender employees (or future employees). We do not have specific monitoring data for many of these groups, but we still need to consider each, and it is useful to note that future monitoring of staff (and indeed the policy itself) would be beneficial when next revising this policy.  The policy is however designed to take account of individual circumstances.  The policy addresses the need for appropriate dress in the workplace whilst being sensitive to the needs of staff with protected characteristics and embracing differing backgrounds. This contributes to promoting equality and diversity in the workplace. |
| Political Opinion |
| Racial Group |
| Age |
| Marital Status |
| Sexual Orientation |
| Men & Women Generally |
| Disability |
| People with and without Dependants |

**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?**

|  |  |  |
| --- | --- | --- |
| **Section 75 Category** | **Details of likely impact – will it be positive or negative? If none anticipated, say none** | **Level of impact -** **major or minor\*** - see guidance below |
| Religious Belief | **N/A** | **None** |
| Political Opinion | **N/A** | **None** |
| Racial Group | **N/A** | **None** |
| Age | **N/A** | **None** |
| Marital Status | **N/A** | **None** |
| Sexual Orientation | **Negative** | **Minor** |
| Men & Women Generally | **Negative** | **Minor** |
| Disability | **Negative** | **Minor** |
| People with and without Dependants | **N/A** | **None** |

**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 as this action does belief not provide opportunities to promote equality amongst particular groups. |
| Political Opinion |  |
| Racial Group |  |
| Age |  |
| Marital Status |  |
| Sexual Orientation |  |
| Men & Women Generally |  |
| Disability |  |
| People with and without Dependants |  |

**Equality Action Plan 2021-2025 [new question]**

Does the activity/policy/project being screened relate to an action in the [Equality Action Plan 2021-2025](https://www.lisburncastlereagh.gov.uk/council/publications/equality-section-75/action-plans-equality-and-disability)? Yes/No If yes, specify which action.

**2(b) DDA Disability Duties (see Disability Action Plan 2021-2025) [new]**

Does this policy/activity present opportunities to contribute to the actions in our [Disability Action Plan](https://www.lisburncastlereagh.gov.uk/council/publications/equality-section-75/action-plans-equality-and-disability):

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

Yes/No [delete as appropriate] If yes, give details/specify which action.

**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?**

It is not anticipated that this policy will impact on good relations between people of different religious belief, political opinion or racial group as the policy does not differentiate towards any of these groups.

|  |  |  |
| --- | --- | --- |
| **Good Relations Category** | **Details of likely impact. Will it be positive or negative?** [if no specific impact identified, say none] | **Level of impact –** **minor/major\*** |
| Religious Belief | None | None |
| Political Opinion | None | None |
| Racial Group | None | None |

\*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?**

|  |  |  |
| --- | --- | --- |
| **Good Relations Category** | **IF Yes, provide details** | **If No, provide details** |
| Religious Belief |  | No |
| Political Opinion |  | No |
| Racial Group |  | No |

**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.**

* Council is aware that no one individual sits exclusively within just one of the designated groups. This has been given consideration in developing this policy and undertaking this screening exercise.

**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  **Screen out** – no equality impact assessment and no mitigation required [go to Monitoring section] |  |
| Option 2  **Screen out with mitigation** – 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] | We have identified that there may be an impact on a number of groups as recognised during the Screening process.  This has been taken into consideration regarding measures to mitigate the likely impact.  LCCC recognises the diversity of cultures, religions and disabilities and recognises that some staff may require modifications to the uniform provided for reasons arising for example from a disability, sexual orientation, pregnancy and menopausal related symptoms.  This will be accommodated where possible. It is also recognised that some staff may have specific medical conditions eg: allergic reactions to materials which will need to be address on an individual basis. |
| Option 3  **Screen in** for a full Equality Impact Assessment (EQIA)  [If option 3, complete timetabling and prioritising section below] |  |

**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?**

Yes – The Policy has been amended to reflect that those section 75 groups who may be impacted should be dealt with sensitively on an individual basis eg: disability, sexual orientation, pregnancy and menopausal related symptoms.

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.

**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? Yes/No. If yes, please provide details.

**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:

The policy will be reviewed annually with any feedback from staff and Trade Unions considered as part of the review.

**Part 5 - Approval and authorisation**

|  |  |  |
| --- | --- | --- |
|  | **Position/Job Title** | **Date** |
| Screened by: Stephanie Kelly | Administration Manager | 13.03.24 |
| Reviewed by: Annie Wilson | Equality Officer | 16.04.24 |
| **Approved by:** Frances Byrne | Head of Corporate Communications and Administration | 16.04.24 |

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:

1. The policy/project is significant in terms of its strategic importance;
2. 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;
3. 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;
4. 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;
5. The policy is likely to be challenged by way of judicial review;
6. The policy is significant in terms of expenditure.

Minor impact

1. The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
2. 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;
3. 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;
4. By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

No impact (none)

1. The policy has no relevance to equality of opportunity or good relations;
2. 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