



Equality Screening Form

AVC Investment Policy

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Guidance

- **Text in bold provides guidance.**
- **The text boxes can be extended as required.**
- **Further advice on equality impact assessment may be found in the Equality Commission publication ‘Practical Guidance on Equality Impact Assessment’.**

Introduction

1. Under section 75 of the Northern Ireland Act 1998, NILGOSC is required to have due regard to the need to promote equality of opportunity:
 - between person of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
 - between men and women generally;
 - between persons with a disability and persons without; and,
 - between persons with dependants and persons without.

Without prejudice to the obligations set out above, NILGOSC is also required to:

- have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group; and
 - meet legislative obligations under the Disability Discrimination Order.
2. A list of all the main groups identified as being relevant to each of the Section 75 categories is provided at Appendix A.
 3. This form should be read in conjunction with the Equality Commission's revised Section 75, "A Guide for Public Authorities" April 2010 which is available on the Equality Commission website (www.equalityni.org).
 4. Staff should complete a form for each **new or revised policy** for which they are responsible (see page 6 for a definition of policy in respect of Section 75).
 5. The purpose of screening is to identify those policies that are likely to have an impact on equality of opportunity and/or good relations and so determine whether an equality impact assessment (EQIA) is necessary. Screening should be introduced at an early stage when developing or reviewing a policy.
 6. The lead role in the screening of a policy should be taken by the policy decision-maker who has the authority to make changes to that policy and should involve in the screening process:
 - other relevant team members;
 - those who implement the policy;
 - staff members from other relevant work areas; and
 - key stakeholders.

A flowchart which outlines the screening process is provided at Appendix B.

7. The first step in the screening process is to gather evidence to inform the screening decisions. Relevant data may be either quantitative or qualitative or both (this helps to indicate whether or not there are likely equality of opportunity and/or good relations impacts associated with a policy). Relevant information will help to clearly demonstrate the reasons for a policy being either 'screened in' for an EQIA or 'screened out' from an EQIA.
8. The absence of evidence does not indicate that there is no likely impact but, if none is available, it may be appropriate to consider subjecting the policy to an EQIA.
9. Screening provides an assessment of the likely impact, whether 'minor' or major', of the policy on equality of opportunity and/or good relations for the relevant categories. In some instances, screening may identify the likely impact to be none.
10. The Commission has developed a series of four questions, included in Section 3 of this screening form with supporting sub-questions, which should be applied to all policies as part of the screening process. They identify those policies that are likely to have an impact on equality of opportunity and/or good relations. Guidance on completion of these questions and on reaching a decision as to whether an EQIA is required is provided at Appendix C.
11. Completion of screening should lead to one of the following three outcomes. The policy has been:
 - 'screened in' for equality impact assessment;
 - 'screened out' with mitigation or an alternative policy proposed to be adopted; or
 - 'screened out' without mitigation or an alternative policy proposed to be adopted.
12. The Commission recommends that a policy is 'screened in' for equality impact assessment if the likely impact on **good relations** is 'major'. While there is no legislative requirement to engage in an EQIA in respect of good relations, this does not necessarily mean that EQIAs are inappropriate in this context.

Screening Form

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 set out the aims and objectives of the policy being screened.

It is important to remember that Section 75 duties apply to internal policies (relating to people who work for NILGOSC) as well as external policies (relating to those who are, or could be, served by NILGOSC).

1.1 Title of policy/decision

Annual Voluntary Contributions (AVC) Investment Policy

1.2 Type of Policy Development

This is an Existing Policy. The policy is reviewed on an annual basis and updated if required. Prior to October 2020, it was last updated in July 2019.

1.3 Description of policy/decision

- **What is it trying to achieve? (aims/objectives)**
- **How will this be achieved? (key elements)**
- **What are the key constraints? (e.g. financial, legislative)**

Policy objective and how it will be achieved:

- The purpose of the AVC Investment Policy is to set out how NILGOSC will maintain and manage the investments of the AVC scheme.
- The policy is updated to reflect changes in: legislation; best practice; and available funds administered by NILGOSC's AVC providers: Prudential Assurance Company and Utmost Life and Pensions.

Constraints:

- Key constraints are NILGOSC resources, changes in best practice or new legislation.

1.4 Are there any Section 75 categories which might be expected to benefit from the intended policy? **(If so, explain which categories and how)**

N/A

1.5 Main stakeholders affected

Who are the main internal and external stakeholders (actual or potential) that the policy will impact upon? (Please tick relevant boxes)

Scheme Members	<input checked="" type="checkbox"/>
Pensioners	<input checked="" type="checkbox"/>
Committee Members	<input checked="" type="checkbox"/>
NILGOSC staff	<input type="checkbox"/>
Trade Unions	<input type="checkbox"/>
Voluntary/Community organisations	<input type="checkbox"/>
Other public sector organisations	<input type="checkbox"/>
Other (please specify below)	<input type="checkbox"/>

1.6 What factors could contribute to, or detract from, the intended aims/outcomes of the policy? **(Please tick relevant boxes)**

None	<input type="checkbox"/>
Legislative	<input checked="" type="checkbox"/>
Financial	<input checked="" type="checkbox"/>
Other (please specify below)	<input type="checkbox"/>

1.7 Who is responsible for:

(a) Devising and writing the policy (**NILGOSC/DoE/Government Dept/EU/Other**)

- NILGOSC – The Investment Services Manager

(b) Implementing and owning the policy

- The Investment Services Manager is responsible for making changes to the policy and any changes are approved by the Senior Management Team. Should there be any significant changes, the policy will be brought to the Committee for review.

1.8 Other policies/decisions with a bearing on this policy/decision

- **What are they?**
- **Who owns them?**
- **Are there any linkages to other NI departments/Non departmental public bodies?**

- Local Government Pension Scheme (Management and Investment of Funds) Regulations (Northern Ireland) 2000 (as amended) – The Department of the Environment
- The Statement of Investment Principles – NILGOSC
- The Statement of Responsible Investment – NILGOSC
- Availability of funds administered by NILGOSC's AVC providers - Prudential Assurance Company and Utmost Life and Pensions.

2. Evidence

Evidence to help inform the screening process may take many forms. NILGOSC should ensure that its screening decision is informed by relevant data.

2.1 What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? (Specify details for each of the Section 75 categories, where appropriate)

Section 75 Category	Details of Evidence/Information
Religious Belief	<p>The AVC Investment Policy is drafted in accordance with Local Government Pension Scheme (Management and Investment of Funds) Regulations (Northern Ireland) 2000 (as amended) and various best practice and corporate governance codes.</p> <p>The purpose of the AVC Investment Policy is to set out how NILGOSC will maintain and manage the investments in the AVC scheme.</p> <p>There is no available relevant data in relation to this category that would suggest an adverse impact.</p>
Political Opinion	As above
Racial Group	As above
Age	As above
Marital Status	As above
Sexual Orientation	As above
Men and Women Generally	As above
Disability	As above
Dependants	As above

2.2 Taking into account the evidence gathered at 2.1, what are the needs, experiences and priorities of each of the categories in relation to this particular policy? (Specify details for each of the Section 75 categories, where appropriate)

Section 75 Category	Needs/Experiences/Uptake/Priorities
Religious Belief	There is no available relevant data to suggest the AVC Investment Policy will have adverse effects on the needs, experiences or priorities of persons in this category.
Political Opinion	As above
Racial Group	As above
Age	As above
Marital Status	As above
Sexual Orientation	As above
Men and Women Generally	As above
Disability	As above
Dependants	As above

3. Screening Questions

In making a decision as to whether or not there is a need to carry out an equality impact assessment (EQIA), NILGOSC should consider its answers to the following screening questions. Further information on completing this section and helping to decide whether an EQIA will be required is provided at Appendix C.

3.1 What is the likely impact of this policy on equality of opportunity for each of the Section 75 equality categories? (* Please tick relevant boxes)

Section 75 Category	None*	Minor*	Major*	Details of policy impact/level of impact?
Religious Belief	√			<p>NILGOSC recognises that the AVC Investment Policy does not take into account potential investment restrictions on religious grounds.</p> <p>Members independently choose which funds to invest their money in from the fund range available. NILGOSC's AVC Scheme (administered by Prudential Assurance Company) includes the Islamic Global Equity Index Fund and LGIM Ethical Global Equity Index Fund.</p> <p>There is no available relevant data to suggest that there will be a likely impact on the equality of opportunity for this category.</p>
Political Opinion	√			
Racial Group	√			
Age	√			
Marital Status	√			
Sexual Orientation	√			
Men and Women Generally	√			
Disability	√			
Dependants	√			

3.2 Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories? (* Please tick relevant boxes)

Section 75 Category	No*	Yes*	Provide Details
Religious Belief	√		
Political Opinion	√		
Racial Group	√		
Age	√		
Marital Status	√		
Sexual Orientation	√		
Men and Women Generally	√		
Disability	√		
Dependants	√		

3.3 To what extent is the policy likely to impact on good relations between: people of different religious belief, political opinion, or racial group? (* Please tick relevant boxes)

Good Relations Category	No impact*	Minor impact*	Major impact*	Details of policy impact?
Religious Belief	√			
Political Opinion	√			
Racial Group	√			

3.4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group? (* Please tick relevant boxes)

Good Relations Category	No*	Yes*	Provide Details
Religious Belief	√		
Political Opinion	√		
Racial Group	√		

3.5 Additional Considerations – Multiple Identities

Generally speaking, people can fall into more than one Section 75 category. Please provide details of data on the impact of the policy on people with multiple identities. Specify the relevant Section 75 categories concerned.

(Are there any potential impacts of the policy on people with multiple identities? eg. Disabled minority ethnic children, school age mothers, Protestant boys, Catholic girls, young lesbian, gay and bisexual people, etc?)

Not applicable to the AVC Investment Policy.

4. Screening Decision

Select appropriate option 1-3:

- 1 To carry out a Full Equality Impact Assessment due to significant/major equality issues identified for one or more of the nine equality groups.

OR

- 2 Not to conduct an equality impact assessment. There is a minor impact on one or more of the equality of opportunities and/or good relations categories but mitigation/alternative policies will offset the minor adverse impact(s).

OR

- 3 Not to conduct an equality impact assessment because no equality issues have been identified.

Please provide details which support the decision

The decision reached is Option 3 (“Not to conduct an equality impact assessment because no equality issues have been identified”) for the following reason:

- There is no data to suggest that the AVC Investment Policy will adversely impact any persons in any of the section 75 categories.

If the Decision was:

- 1:** *Proceed to Section 5.*
2: *Proceed to Section 6.*
3: *Proceed to Section 7.*

5. Timetabling and Prioritising

5.1 If the policy has been ‘screened in’ for equality impact assessment, then please answer the following questions to determine its priority.

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.

Criterion	Priority Rating
Effect on equality of opportunity and good relations	N/A
Social need	N/A
Effect on people’s daily lives	N/A
Relevance to a public authority’s functions	N/A
TOTAL	N/A

Note: The total rating score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist NILGOSC with timetabling. Details of NILGOSC’s EQIA Timetable will be included in the Quarterly Screening Report.

5.2 If the policy is affected by timetables established by other relevant public authorities, please provide details.

N/A

6. Mitigation

If you conclude that the likely impact is '**minor**' and an equality impact assessment is not to be conducted, you should 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.

6.1 Why and how will the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations?

N/A

7. Monitoring

Effective monitoring will help identify any future adverse impact arising from the policy, as well as help with future planning and policy development.

7.1 Please detail what data you will collect in the future in order to monitor the effect of the policy on any of Section 75 equality categories.

Not applicable to the AVC Investment Policy.

8. Disability Discrimination

8.1 Please state if the policy/decision in any way discourages persons with disabilities from participating in public life or fails to promote positive attitudes towards persons with disabilities.

The AVC Investment Policy does not in any way, discourage persons with disabilities from participating in public life or fail to promote positive attitudes towards persons with disabilities.

8.2 Please state if there is an opportunity to better promote positive attitudes towards persons with disabilities or encourage participation in public life by making changes to the policy/decision or introducing additional measures.

No such opportunities noted.

8.3 Please detail what data you will collect in the future in order to monitor the effect of the policy with reference to the disability duties.

Not applicable to the AVC Investment Policy

SCREENING FLOWCHART

Example groups relevant to the Section 75 categories for Northern Ireland purposes

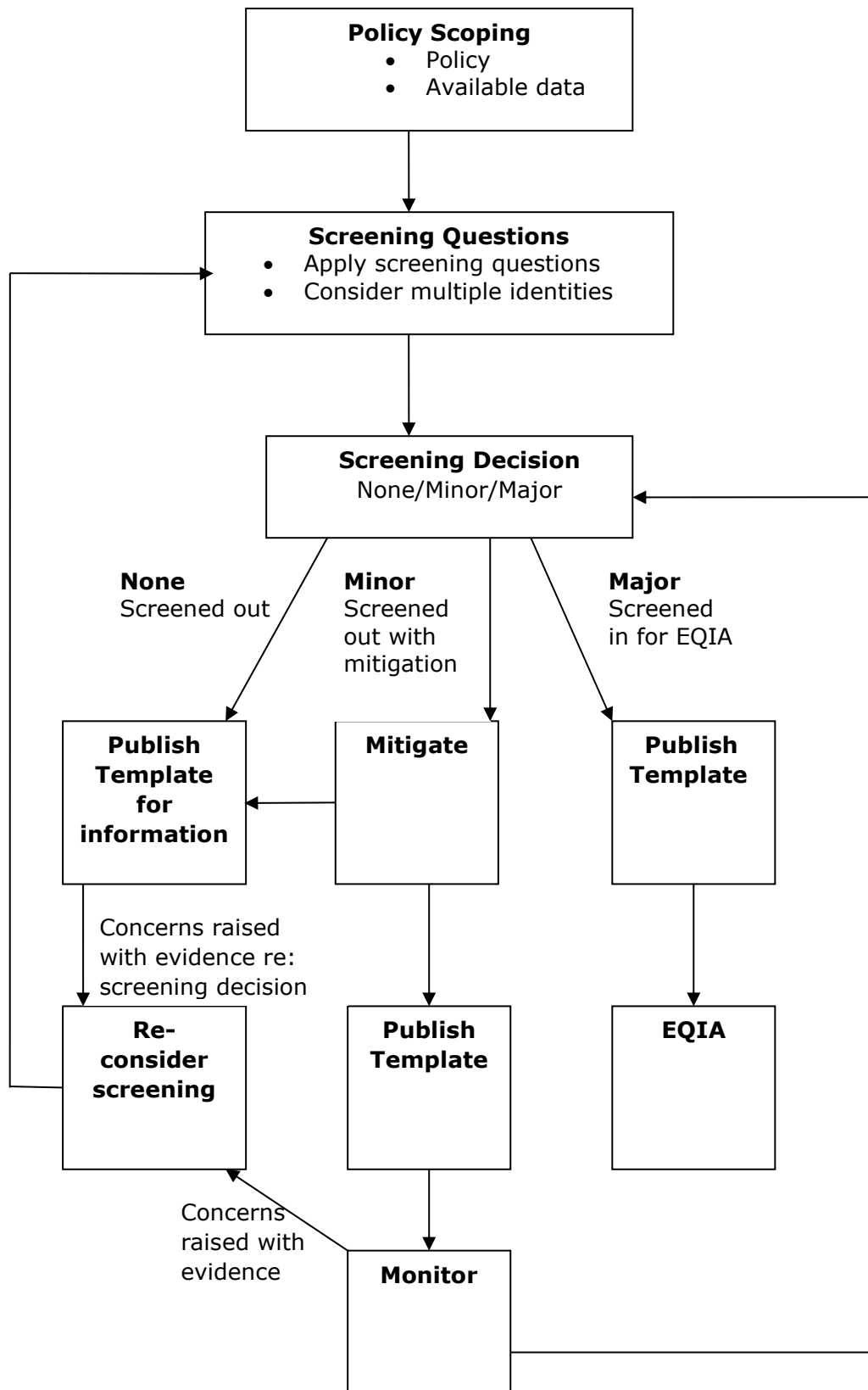
Please note, this list is for illustration purposes only, it is not exhaustive.

Category	Example groups
Religious belief	Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths. For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment & Treatment (NI) Order</i> ¹ . Therefore, “religious belief” also includes any <i>perceived</i> religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “ <i>similar philosophical belief</i> ”.
Political opinion ²	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls).
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientation	Bisexual people; heterosexual people; gay or lesbian people.

¹ See Section 98 of the Northern Ireland Act 1998, which states: “*In this Act...“political opinion” and “religious belief” shall be construed in accordance with Article 2(3) and (4) of the Fair Employment & Treatment (NI) Order 1998.*”

² *ibid*

SCREENING FLOWCHART



Extract from the Equality Commission Guidance:

Making the decision to carry out an EQIA

In making a decision as to whether or not there is a need to carry out an equality impact assessment, the NILGOSC should consider its answers to the 4 screening questions set out in section 3.

If NILGOSC's conclusion is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then the public authority may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, a public authority should give details of the reasons for the decision taken.

If NILGOSC's 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 NILGOSC's 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:

- Introduce measures to mitigate the adverse impact; or
- the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

Indicators in favour of a 'major' impact

The policy is significant in terms of its strategic importance and

- a) 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;
- b) 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;
- c) 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;
- d) The policy is likely to be challenged by way of judicial review;
- e) The policy is significant in terms of expenditure.

Indicators 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.

Indicators 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.

Taking into account the evidence presented above, consider and comment on the likely impact on equality of opportunity and good relations for those affected by this policy, in any way, for each of the equality and good relations categories, by applying the screening questions in section 3 and indicate the level of impact on the group i.e. minor, major or none.