#### Lisburn & Castlereagh City Council

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

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

This screening relates to the Council's revised Data Protection Policy.

The Data Protection Policy serves as our strategic framework for managing, sharing and protecting the personal data we hold and receive in line with the Data Protection Act (2018) and UK General Data Protection Regulations (UK GDPR).

It sets out a number of procedures to help inform and guide staff who manage data, as well as information that seeks to assist when things go wrong.

The process of identifying the areas for inclusion in the Data Protection Policy has been driven through SIRO and developed through a number of internal workshops, consultation with the All-Council Information Governance Group, and the council's own Information Governance Working Group. The Corporate Management Team (CMT) have also provided detailed guidance during the development of the policy

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

Lisburn & Castlereagh City Council Data Protection Policy.

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

This is a revised version of the existing Data Protection Policy which was introduced in 2018 and revised at regular intervals since then It serves as one of the core documents to manage & inform personal data within the council.

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

The aim of the Data Protection Policy is to provide a source document for Members, Officers and the general public that sets out how personal data is shared, managed, stored, used and protected within the council. It also aims to provide guidance to those seeking to access data held by the council, as well as assistance to council officers and managers in managing any personal data they may hold.

## 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 Data Protection Policy does not target any specific Section 75 groups, but there may be incidental benefits for particular equality groups, as the policy has been developed after a wide-ranging internal consultation process. However, this is not the main aim of the policy.

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

The development of the policy was overseen by the Director of Organisational Development & Innovation.

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

The policy is owned by Lisburn & Castlereagh City Council.

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

Yes

#### If yes, give brief details of any significant factors.

Given the long-range reach of the policy, it is impossible to predict at this point what may act for or against the policy and the guidance set out therein. However, government have not indicated in any real sense any agenda to revise or review the Data Protection Act for this Parliament, so it is thought that any changes or factors that may impact the policy are likely to be minimal. Should this position look likely to change, our position will be revised.

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

**Staff:** All staff, but particularly those working regularly with or processing personal data, managers, Heads of Service and Directors.

**Service users:** All those who live, work, or visit the Lisburn & Castlereagh City Council area.

**Other public sector organisations:** All regional government departments and their agencies; Other Councils within Northern Ireland, the Irish Republic & the UK more generally.

**Voluntary/community/trade unions:** All voluntary & community groups and organisations that operate within the LCCC area; All Trade Unions that represent staff, contractors, and others who engage with the council in the course of their employment.

**Other:** All elected members, delivery partners, contractors and employees or representatives of other bodies who engage with the council; All citizens of the LCCC area.

Name of policy/strategy/policy	Who owns or implements?
Departmental Policies	Each Director & HoS within each Directorate.
Community Policy	Director of Leisure & Community Wellbeing.
LCCC Equality Scheme	Director of Organisational Development & Innovation.
LCCC Code of Governance	Director of Finance & Corporate Services
Lisburn & Castlereagh City Council Business Continuity Policy	Director of Environmental Health
Lisburn & Castlereagh City Council Corporate Risk Register	Director of Environmental Health
Lisburn & Castlereagh City Council Data Protection Policy	Director of Finance & Corporate Services

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

#### 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

Section 75 Category	Mid-Year Pop	<b>Details of evidence/information</b> Mid-Year Population Estimates 2019 & 2021 – District Electoral Areas			
	DEA	Population - Census 2019	% 2019	Population Census 2021	% 2021
	Killultagh	21450	14.6	22,013	14.8
	Downshire West	17110	11.6	17,190	11.5
	Lisburn North	23050	15.7	23,449	15.7
	Lisburn South	23610	16.0	24,321	16.3
	Downshire East	16720	11.3	16,746	11.2
	Castlereagh South	24010	16.3	23,488	15.8
	Castlereagh East	20860	14.2	21,899	14.7
		146,810		149,106	100
	Source: NISRA/NINIS				
Religious Belief	According to the 2021 Census data, the population of Lisburn & Castlereagh City brought up in different religious backgrounds is as follows:				

	• Catholic: 23.5%	
	Protestant & Other Christian: 65.6%	
	Other religions: 1.2%	
	• None: 9.7%	
	This data reflects a predominantly Protestant and Other Christian population in the area.	
Political Opinion	There is an established correlation of 0.87 between religion and political opinion. In this instance the majority political opinion being Unionist	
Racial Group	Using the same 2021 Census/boundary data indicates that 4.2% of the population were from an ethnic minority group	
Age	In 2021, the total population of Lisburn & Castlereagh City Council area was <b>148,965</b>	
	. The age distribution was as follows:-	
	• <b>0-14 years</b> : 18.5%	
	• <b>15-24 years</b> : 12.1%	
	• <b>25-44 years</b> : 26.2%	
	• <b>45-64 years</b> : 25.1%	
	• <b>65 years and over</b> : 18.1%	
Marital Status	In 2021, the marital status of the population in Lisburn & Castlereagh City Council area was:-	
	• Single (never married or never registered a same-sex civil partnership): 34.5%	
	• Married: 50.2%	
	• Separated: 3.1%	
	• Divorced: 7.2%	
	• Widowed: 5.0%	

Sexual Orientation	The 2021 Census data for Lisburn & Castlereagh City Council area does not provide specific figures for sexual orientation. However, according to broader data from the Office for National Statistics (ONS), approximately <b>1.2%</b> of the population in Northern Ireland identified as Lesbian, Gay, or Bisexual
Men & Women Generally	<ul> <li>In 2021, the population of Lisburn &amp; Castlereagh</li> <li>City Council area was 148,965. The gender</li> <li>distribution was:-</li> <li>Men: 49.18% (73,255)</li> </ul>
	• Women: 50.82% (75,710)
Disability	In 2021, <b>17.5%</b> of the population in Lisburn & Castlereagh City Council area reported having a disability. This includes individuals with various types of disabilities.
People with and without Dependants	In 2021, the population of Lisburn & Castlereagh City Council area was divided as follows:-
	With dependants: 50.2%
	Without dependants: 49.8%
	This data highlights a nearly even split between those with and without dependants in the area.

#### 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	No needs identified
Political Opinion	No needs identified
Racial Group	There may be a need to translate information for those who do not have English as a first language.
Age	No needs identified.
Marital Status	No needs identified.
Sexual Orientation	No needs identified.
Men & Women Generally	No needs identified.
Disability	Disabled people may require information to be made available in accessible formats, such as braille, easy read etc.
People with and without Dependants	No needs identified.

#### 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?

No impact identified beyond a mild positive impact in terms of providing and protecting personal data.

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		
Political Opinion		
Racial Group		
Age		

Marital Status	No impact identified.
Sexual Orientation	
Men & Women Generally	
Disability	
People with and without	
Dependants	

\* See Appendix 1 for details.

### 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				
Political Opinion				
Racial Group				
Age	No opportunity for the promotion of equality of opportunity for people within the S 75 equality categories beyond the moderate benefit of all groups being made aware of the processes and procedures being utilised and applied equally.			
Marital Status				
Sexual Orientation				
Men & Women Generally				
Disability				
People with and without				
Dependants				

#### Equality Action Plan 2021-2025

Does the activity/policy/project being screened relate to an action in the Equality Action Plan 2021-2015? Yes/No If yes, specify which action/s.

S. 1.1, 1.2, 2.1, 3.4, 6.1 & 6.2

#### 2(b) 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 2021-2025 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?

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	
Political Opinion	None	
Racial Group	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		There are no
Political Opinion		opportunities to better promote good relations
Racial Group		between people in these groups.

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.

The Council recognises that no individual sits exclusively within just one of the designated groups. As a consequence, it is envisaged that the positive impacts of the Data Protection Policy will spread across all section 75 categories.

#### 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:

- 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.
- 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	The Data Protection Policy has only a
Screen out – no equality impact assessment and no mitigation required [go to Monitoring section]	minor positive impact on all groups
Option 2	Not applicable
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]	
Option 3	Not applicable.
Screen in for a full Equality Impact Assessment (EQIA)	
[If option 3, complete timetabling and prioritising section below]	

#### Mitigation (Only relevant to Option 2)

Not applicable

# Can the activity/policy/project policy 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 policy.

Not Applicable

#### Timetabling and prioritising for full EQIA (only relevant to Option 3)

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.

Not applicable.

Is the activity/policy affected by timetables established by other relevant public authorities? Yes/No. If yes, please provide details. Not applicable.

#### 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 policy making 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 be carried out via the production of statistics on a regular basis for presentation at IGWG. This will be carried out by the DPO who will also monitor the make up of interactions with those seeking and providing data.

#### Part 5 - Approval and authorisation

	Position/Job Title	Date
Screened by:	Paul McMinn	20.03.2025
Reviewed by:	Annie Wilson	02.04.25
Approved by:	dilore Bat	25.03.25

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