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**Integrated Impact Assessment**

**Equality Screening and Rural Needs, Climate & Privacy Impact Assessment**

**Anti Bribery Policy**

**Please remember to send this document to** **equality@derrystrabane.com** **once completed**

Contents

[Part One: Policy Scoping 3](#_Toc141264646)

[Part Two : Equality Screening 10](#_Toc141264647)

[Part Three: Rural Needs Impact Assessment 26](#_Toc141264648)

[Part Four: Climate Change Screening 31](#_Toc141264649)

[Part Five: Privacy impact assessment screening questions 34](#_Toc141264650)

[Part Six - Approval and authorisation 35](#_Toc141264651)

# Part One: Policy Scoping

|  |
| --- |
| Please provide a short title which describes the activity being undertaken by the Public Authority that is subject to Equality Screening under Section 75 Act and Rural Needs Impact Assessment under Section 1(1) of the Rural Needs Act (NI) 2016. Anti Bribery policy and management arrangements. |
| Please tick as appropriate

|  |  |
| --- | --- |
| New Policy  |[ ]  Revised Policy |[x]
| Corporate Policy  |[ ]  Departmental Policy  |[ ]

 If Departmental, please specify which department  |
| 2b. Please indicate which category the activity specified in Question 1 above relates to.

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Policy** | **Strategy** | **Plan** |
|  |  |  |  |
| Developing a  |[ ] [ ] [ ]
| Adopting a |[ ] [ ] [ ]
| Implementing a |[ ] [ ] [ ]
| Revising a |[x] [ ] [ ]
| Designing a Public Service |[ ] [ ] [ ]
| Delivering a Public Service |[ ] [ ] [ ]

 |

|  |
| --- |
| 3a. Please describe the aims of the policyThis policy provides a coherent and consistent anti-bribery framework to enable the Council’s employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify and effectively report a potential breach.**3b. Are there any associated objectives of the policy? If so, what are they?**The Council requires all employees, including those permanently employed, temporary agency employees and contractors to:o Act honestly and with integrity at all times and to safeguard the Council’s resources for which they are responsible; ando Comply with the spirit as well as the letter of the laws and regulations of all jurisdictions in which the Council operates, in respect of the lawful and responsible conduct of activities. |
| Are there any Section75 groups which might be expected to benefit from the intended policy? If so, explain howNo |
| Who initiated or wrote the policy? Assurance Manager |
| Who is responsible for the implementation of the policy?Lead Assurance Officer |
| 7. Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?  If yes, are they  [ ]  Financial [x]  Legislative [ ]  Other, please specify  |
| 1. **Who are the internal/external stakeholders (actual or potential) that the policy will impact upon?**

|  |
| --- |
|[x]  Staff |
|[ ]  Service Users |
|[ ]  Other public sector organisations |
|[x]  Voluntary/Community/Trade Unions |
|[ ]  Other. Please specify |

 |
| 9. Is this policy associated with any other Council Policy(s)?Yes [x]  No [ ]  If yes, please state the related policy(s) below.Counter Fraud Policy, Raising Concerns Policy, Conflicts of Interest Policy, Local Government Code of Conduct, Gifts and Hospitality Policy, Employee Disciplinary Policy. |
| **10.** How does the policy contribute towards the achievement of the Council’s strategic objectives? The Anti-Bribery Policy forms part of the architecture of good governance which is linked to all four corporate plan improvement objectives. In the achievement of the objectives and priorities set out in the Corporate and Business Plans, Derry City and Strabane District Council will be exposed to various risks. The task of management is to respond to these risks so as to maximise the likelihood of achieving the objectives and priorities by managing the exposure to risk to an acceptable level. This policy will have a positive impact on the Council's commitment to be open and accountable. |
| 11. How does the Council interface with other bodies in relation to the implementation of this policy? The Council will work with Northern Ireland Audit Office to ensure that this policy is implemented effectively |

# Part Two: Equality Screening

**2.1 Available evidence**

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

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories. **Please add policy relevant information.**

|  |  |
| --- | --- |
| **Section 75 category**  | **Details of evidence/information** |
| **Religious belief**  | **According to data from the Census 2021 the breakdown detailing the religious belief profile of residents as a proportion of the whole population in the Derry City and Strabane District Council, compared to Northern Ireland is as follows[[1]](#footnote-1):** |
| **Political opinion**  | **Following the 2023 elections, the political makeup of the Council’s elected members was as follows:**

|  |  |
| --- | --- |
| **Sinn Féin** | **18** |
| **SDLP** | **10\*** |
| **DUP** | **5** |
| **UUP** | **3** |
| **IND** | **3** |
| **PBP** | **1** |

**\*Further to the election, two members of the SDLP became independent members in May 2024.** |
| **Racial group**  | **According to the Census 2021 statistics[[2]](#footnote-2) the total population of the Council area is 150,757. The majority of the population – 147,349 (97.74%) - is White. The ethnic profile of non-White residents of the Council area is as follows:**  |
| **Age**  | **According to Census 2021 data the age profile of the Derry and Strabane LGD area [[3]](#footnote-3) is as follows:**In the Multiple Deprivation Measure Report 2017 it shows that almost 16% of the population in the Council area have an equivalised income of 60% below than the NI median – of these households there are 21% in which there are children aged 15 and under living and 5.4% households where there are people aged 65 years and older living. |
| **Marital status**  | **The table below illustrates the marital status profile of the Derry and Strabane LGD:** |
| **Sexual orientation** | Analysis of the Census 2021 indicates that, of those aged 16 years and over 2.1% identified as lesbian, gay, bisexual or other. A further 7.6% did not state their sexual orientation. 90.3% said they were straight or heterosexual.[[4]](#footnote-4) The Rainbow Project have provided a number of qualitative contextual reasons why they believe studies, especially the census, aren’t fully reflective of actual figures. These include:1. Bisexual people, who are believed to be the largest part of the LGBTQIA+ community, are more likely to report as heterosexual, particularly those in opposite sex relationships, due to societal bi-erasure and biphobia.
2. Bisexual people are also more likely to end up in an opposite sex relationship in general due to societal homophobia, making their chances of the above even higher.
3. In more rural locations, and over the past 10+ years in particular with housing issues, more and more young adults are living with family for longer or moving back in. They may not be out to family, or may be out but just not accepted, therefore filling out the same form together forces them to closet themselves and record as heterosexual.
4. Covid-19 had a major impact on the LGBTQIA+ community, safety and isolation issues became much more significantly higher, and with many people being forced to move back in with family people who may have been out among their independent life, just not with family, where forced back into the closet.
5. Older adults who are LGBTQIA+ are much less likely to correctly report on forms as past societal expectations forced many to marry into a heterosexual relationship.
6. Safety is a big factor, people are terrified how data is used and LGBTQIA+ people are more likely to lie on forms for self-preservation, older adults in particular.
7. Housing concerns become a big factor in this. Although it is illegal for a landlord to evict a tenant on the grounds of them being LGB, even those out, may “act straight” around landlords, employers and other officials including census and other demographics forms.
8. Fear of hate crime towards LGBTQIA+ people drives some to mis-report for self-preservation.
9. Trust – there can be a lack of trust among LGBTQIA+ people on how census data is used.
 |
| **Men and women generally** |  |
| **Disability** | **According to statistics for Census day 2021 the health profile of the Council area was as follows[[5]](#footnote-5):** |
| **Dependant** | **According** **to statistics for Census day 2021 the caring profile for the Council area was as follows:[[6]](#footnote-6)**

|  |
| --- |
| **All Usual Residents aged 5 and over** |
|  | **All usual residents aged 5 and over** | **Provide no unpaid care** | **Provide 1-19 hrs unpaid care per week** | **Provide 20-34 hrs unpaid care per week** | **Provide 35-49 hrs unpaid care per week** | **Provide 50+ hrs unpaid care per week** |
| **Northern Ireland** | 1,789,348 | 1,567,13587.58% | 100,7775.63% | 24,6361.38% | 28,1091.57% | 68,6913.84% |
| **Derry City & Strabane** | 141,465 | 123,48787.29% | 7,1355.04% | 2,1781.54% | 2,6081.84% | 6,0574.28% |

Results for Census 2021 in Northern Ireland show that 52 children aged 5 years provide 1 or more hours of unpaid care per week. The proportion of carers in Northern Ireland is similar to the proportion of carers in Derry and Strabane. Carers are counted from age 5+. Results for Census 2021 in Northern Ireland show that 52 children aged 5 years provide 1 or more hours of unpaid care per week.  |

**2.2 Equality 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 policy/decision? **Specify details for each of the Section 75 categories**

|  |  |
| --- | --- |
| **Section 75 category**  | **Details of needs/experiences/priorities** |
| **Religious belief**  |  |
| **Political opinion**  |  |
| **Racial group**  | Staff from minority ethnic groups may not have an understanding of the council’s policy in this area. Information should be presented in an accessible format. |
| **Age**  |  |
| **Marital status**  |  |
| **Sexual orientation** |  |
| **Men and women generally** |  |
| **Disability** | Formats are not always accessible. All staff need to be equality aware and ensure that documentation can be provided in accessible formats. |
| **Dependants** |  |

* 1. **Screening questions**

|  |
| --- |
| **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?** |
| **Section 75 category** | **Details of policy impact** | **Level of impact? minor/major/****none** |
| **Religious belief** | The objectives of this policy is to ensure that best practice is applied consistently throughout Council to ensure accountability and transparency - this is applicable to all staff regardless of S75 grouping. | None. |
| **Political opinion**  |  |  |
| **Racial group**  |  |  |
| **Age** |  |  |
| **Marital status**  |  |  |
| **Sexual orientation** |  |  |
| **Men & women generally**  |  |  |
| **Disability** |  |  |
| **Dependants**  |  |  |

**2.4 Equality of Opportunity**

|  |
| --- |
| **Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?** |
| **Section 75 category**  | If **Yes**, provide details  | If **No**, provide reasons |
| **Religious belief** |  | Not Applicable as this policy is applied universally |
| **Political opinion**  |  |  |
| **Racial group**  |  |  |
| **Age** |  |  |
| **Marital status** |  |  |
| **Sexual orientation** |  |  |
| **Men & women generally**  |  |  |
| **Disability** |  |  |
| **Dependants** |  |  |

**2.5 Good Relations**

|  |
| --- |
| **Are there opportunities to better promote good relations between Section 75 equality categories through tackling prejudice and/or promoting understanding?** [ ]  **Yes** [ ]  **No****If Yes, the policy will be considered by a Designated Working Group**  |
| **Section 75 category**  | Not Applicable as this policy is applied universally |
| **Religious belief** |  |
| **Political opinion**  |  |
| **Racial group**  |  |

**2.6 Disability Duties**

|  |
| --- |
| **4. Is there evidence to suggest that this policy would promote positive attitudes towards people with a disability?** **Yes** [ ]  **No** [x]  |
| **If Yes, provide details of opportunities identified (including details of consultation with relevant stakeholders** |
|  |
| **5. Is there evidence to suggest that this policy would encourage the participation of people with a disability in public life?** **Yes** [ ]  **No** [x]  |
| **If Yes, provide details of opportunities identified (including details of consultation with relevant stakeholders**  |
|  |

**Additional considerations**

**Multiple identity**

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

Not Applicable as this policy is applied universally

**2.7 Screening Decision**

If the decision is **not to conduct an** **equality impact assessment**, please provide details of the reasons.

|  |
| --- |
| This policy will be applied to all S75 categories universally - This is a corporate policy which appears to have no differential impact on any of the Section 75 equality categories.  |

If the decision **is not to conduct an equality impact assessment** the public authority should consider if the policy should be mitigated or an alternative policy be introduced. Please provide details

|  |
| --- |
| This policy will be applied to all S75 categories universally - This is a corporate policy which appears to have no differential impact on any of the Section 75 equality categories.  |

If the decision is **to subject the policy to an equality impact assessment**, please provide details of the reasons.

|  |
| --- |
| This policy will be applied to all S75 categories universally - This is a corporate policy which appears to have no differential impact on any of the Section 75 equality categories.  |

**2.8 Mitigation**

When the public authority concludes that the likely impact is ‘minor’ and an equality impact assessment is not to be conducted, the public authority may 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.

Can the policy/decision be amended or changed or an alternative 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 policy.

|  |
| --- |
| Where necessary Derry City & Strabane District Council will ensure that all information relating to this policy is presented in an appropriate format to ensure staff are fully aware of their responsibilities in the effective implementation of this policy. |

**2.9 Monitoring Arrangements**

Provide details of the monitoring arrangements that will be in place to ensure that there are no adverse impacts as a result of the implementation of this policy.

This policy will be applied to all S75 categories universally - This is a corporate policy which appears to have no differential impact on any of the Section 75 equality categories.

# Part Three: Rural Needs Impact Assessment

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| --- |
| **3.1 Which definition of ‘rural’ is the Public Authority using in respect of the Policy, Strategy, Plan or Public Service?** |
|

|  |
| --- |
| Population Settlements of less than 5,000 (Default definition)  |[x]
| Other Definition (Provide details and the rationale below)  |[ ]
| A definition of ‘rural’ is not applicable  |[ ]

 |
| **Details of alternative definition of ‘rural’ used**  |
|  |
| **Rationale for using alternative definition of ‘rural’** |
|  |

**3.2 Understanding the impact of the Policy, Strategy, Plan or Public Service**

|  |
| --- |
| **3.2a Is the policy, strategy, plan or public service intended to impact upon people in rural areas?** |
|  **Yes** [ ]  **No** [x]  **If the response is No go to Section 3.2e** |
| **3.2b. Please explain how the Policy, Strategy, Plan or Public Service is intended to impact on people in rural areas** |
|  |
| **3.2c. If the Policy, Strategy, Plan or Public Service is intended to impact on people in rural areas differently from people in urban areas, please explain how it will impact people in rural areas differently** |
|  |
| **3.2d. Please indicate which of the following rural policy areas the Policy, Strategy, Plan or Public Service is intended to impact on** |
|

|  |
| --- |
| Rural Businesses |[ ]
| Rural Tourism |[ ]
| Rural Housing |[ ]
| Jobs or Employment in Rural Areas |[ ]
| Education or Training in Rural Areas |[ ]
| Broadband or Mobile Communications in Rural Areas |[ ]
| Transport Services or Infrastructure in Rural Areas |[ ]
| Health or Social Care Services in Rural Areas |[ ]
| Poverty in Rural Areas |[ ]
| Deprivation in Rural Areas  |[ ]
| Rural Crime or Community Safety |[ ]
| Rural Development  |[ ]
| Other (please state) |  |

 **(If the response to Section 3.2a was yes go to 3.3a)** |
| **3.2e Please explain why the Policy, Strategy, Plan or Public Service is not intended to impact on people in rural areas** |
| Not Applicable as this policy is applied universally regardless of whether the Council service is based in rural or urban area |

**3.3 Identifying the Social and Economic Needs of Persons in Rural Areas**

|  |
| --- |
| **3.3a Has the Public Authority taken steps to identify the social and economic needs of people in rural areas that are relevant to the Policy, Strategy, Plan or Public Service?** |
| **Yes** [ ]  **No** [x] **If the response is No Go to Section 3.3e** |
| **3.3b. Please indicate which of the following methods or information sources we used by the Public Authority to identify the social and economic needs of people in rural areas** |
|

|  |
| --- |
| **Consultation with Rural Stakeholders**  |[ ]
| **Consultation with Other Organisations** |[ ]
| **Published Statistics** |[ ]
| **Research Papers****Surveys or Questionnaires** |[ ]
| **Other Publications** |[ ]
| **Other Methods or Information Sources (include details)** | [ ]  |

 |
| **3.3c Please provide details of the methods and information sources used to identify the social and economic needs of people in rural areas including relevant dates, names of organisations, titles of publications, website references, details of surveys or consultations undertaken etc.**  |
|  |
| **3.3d. Please provide details of the social and economic needs of people in rural areas which have been identified by the Public Authority?** |
|  |
| **(If the response to Section 3.3a was Yes go to Section 3. 4a)****3.3e. Please explain why no steps were taken by the Public Authority to identify the social and economic needs of people in rural areas??** |
| This policy dictates how Council must ensure transparency and accountability in the delivery of its services - this is driven by legislation and therefore there is no requirement to assess the social and economic needs of the people in rural areas |

**3.4 – Considering the Social and Economic Needs of Persons in Rural Areas**

|  |
| --- |
| **3.4a. Please provide details of the issues considered in relation to the social and economic needs of people in rural areas identified by the Public Authority.**  |
| This policy is applied universally regardless of the social and economic needs of people in rural areas identified by the Public Authority. |

**3.5 – Influencing the Policy, Strategy, Plan or Public Service**

|  |
| --- |
| **3.5a. Has the development, adoption, implementation or revision of the Policy, Strategy or Plan, or the design or delivery of the Public Service, been influenced by the rural needs identified?**  |
|  **Yes** [ ]  **No** [x]  **If the response is No go to Section 3.5c** |
| **3.5b. Please explain how the development, adoption, implementation or revision of the Policy, Strategy or Plan, or the design or delivery of the Public Service, has been influenced by the rural needs identified** |
| This policy dictates a best practice in ensuring accountability and transparency in delivering Council services which is driven by legislation and therefore thas not been influenced by rural needs |
| **3.5c. Please explain why the development, adoption, implementation or revision of the Policy, Strategy or Plan, or the design or the delivery of the Public Service, has not been influenced by the rural needs identified** |
| As above. |

# Part Four: Climate Change Screening

**4.1 What impact will the policy/proposal/plan have on the reduction of greenhouse gas emissions?**

|  |
| --- |
| Beneficial impact (Reduce emissions) |[ ]
| A mixed impact (Good & Bad) |[ ]
| Negative impact (Harmful / increase emissions) |[ ]
| No impacts / Not applicable |[x]
| Don’t know |[ ]

**4.2 Does the policy/proposal/plan consider initiatives to reduce greenhouse gas emissions, e.g. sustainable transport, zero waste circular economy principles, renewable and efficient energy, and green infrastructure?**

Yes (please explain) [ ]

Not applicable.

No [x]

Not applicable [ ]

**4.3 Will the policy/proposal/plan be impacted by the effects of climate change e.g. flooding, sea level rise, heat stress, poor air quality, and habitat and biodiversity loss?**

Impacted [ ]

A mixed impact (Good & Bad) [ ]

Not Impacted [ ]

Not applicable [x]

Don’t know [ ]

**4.4 What impact will the policy/proposal/ plan have on the resilience to the adverse effects of climate change, e.g. flooding, sea level rise, heat stress, poor air quality, and habitat and**

**biodiversity loss?**

Beneficial impact (Improve resilience) [ ]

A mixed impact (Good & Bad) [ ]

Negative impact (Harmful / reduce resilience) [ ]

No impacts / Not applicable [x]

Don’t know [ ]

**4.5 Does the policy/proposal/ plan consider initiatives to reduce the adverse effects of climate change, e.g. avoid construction in flood risk areas, emergency and resilience planning measures, green infrastructure?**

Yes (please explain) [ ]

No [ ]

Not applicable [x]

**4.6 Does the policy/proposal /plan require further detailed assessment e.g. whole life carbon assessment, climate change risk analysis?**

Yes (please explain) [ ]

No [ ]

Not applicable [x]

# Part Five: Privacy impact assessment screening questions

These questions are intended to help decide whether a PIA is necessary. Answering ‘yes’ to any of these questions is an indication that a PIA would be a useful exercise.

|  |
| --- |
| * Will the project involve the collection of new information about individuals?
 |[ ]
| * Will the project compel individuals to provide information about themselves?
 |[ ]
| * Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
 |[ ]
| * Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
 |[ ]
| * Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.
 |[ ]
| * Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?
 |[ ]
| * Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be particularly private
 |[ ]
| * Will the project require you to contact individuals in ways which they may find intrusive?
 |[ ]

# Part Six - Approval and authorisation

**Conclusions**

(Details to be reflected in the relevant committee report.)

* The policy has been screened in for equality impact assessment.
* The development, adoption, implementation or revision of the policy or the design or delivery of the Public Service, has not been influenced by the rural needs identified in the impact assessment.
* The policy does not require further detailed assessment in terms of climate change and adaption
* The policy does not require further assessment in terms of data protection / privacy

|  |  |  |
| --- | --- | --- |
| **Screening / impact assessment completed by:**  | **Position/Job Title**  | **Date** |
| James Harrigan | Assurance Manager | 16th April 2025 |
|  |  |  |
|  |  |  |
| **Approved by:** |  |  |
| Denise McDonnell | Lead Assurance Manager  | 16th April 2025 |

Note: A copy of this questionnaire, for each policy screened should be ‘signed off’ and approved by a senior manager responsible for the policy, made easily accessible on the public authority’s website as soon as possible following completion and made available on request.

1. https://www.nisra.gov.uk/publications/census-2021-main-statistics-religion-tables [↑](#footnote-ref-1)
2. <https://www.nisra.gov.uk/publications/census-2021-bulk-download> [↑](#footnote-ref-2)
3. Ibid [↑](#footnote-ref-3)
4. <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-3-statistical-bulletin-sexual-orientation.pdf> (accessed 11/07/23) [↑](#footnote-ref-4)
5. <https://www.nisra.gov.uk/publications/census-2021-main-statistics-health-disability-and-unpaid-care-tables> [↑](#footnote-ref-5)
6. <https://www.nisra.gov.uk/publications/census-2021-main-statistics-health-disability-and-msD01unpaid-care-tables> – Table msD17 [↑](#footnote-ref-6)