



Screening

Policy scoping

Information about the policy

Name of the policy – Personnel and Recruitment Vetting Policy

Is this an existing, revised or a new policy? New

What is it trying to achieve? (intended aims/outcomes)

This policy sets out the mandatory recruitment and personnel vetting requirements for all individuals who have, or may have, access to sensitive information, government assets, or security-restricted sites within ICRIR. It ensures compliance with Cabinet Office guidance, HMG Personnel Security Controls, and United Kingdom Security Vetting (UKSV) requirements.

Are there any S75 categories which might be expected to benefit from the intended policy? If so, explain how.

The policy promotes equality of opportunity for:

- **Disability:** The policy commits to reasonable adjustments during vetting and recruitment, ensuring accessibility and fairness.
- **Religious Belief:** The policy emphasises impartiality and respect and ensures no bias in vetting or recruitment based on religious background
- **Political Opinion:** The impartiality clause and objective vetting criteria help prevent discrimination based on political views.

Who initiated or wrote the policy?

The Policy was written by the ICRIR Head of Security.

Who owns and who implements the policy?

The Commission owns the policy, reflecting its organisational values and compliance with legal frameworks such as the Equality Act 2010 and Northern Ireland's equality legislation.

Implementation factors

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

- Regular review will help maintain its relevance and effectiveness.
- Inconsistent application across departments or roles could detract from fairness.

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon? (please delete as appropriate) staff service users other public sector organisations, voluntary/community/trade unions, other, please specify:

The policy applies to the following groups:

- Staff
- Potential candidates applying to roles at ICRIR

Other policies with a bearing on this policy

What are they?

Pre Employment Checks Policy

Declaration Of Interest Policy

Recruitment Principles

Who owns them?

The Commission owns our policies.

Available evidence

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

1. Age:

Northern Ireland's workforce generally reflects an aging population, with approximately 18% of the population being over 65 and about 20% under 15. In the public sector, the average age of employees is typically between 35–55. Age-related issues in employment could include older employees facing challenges in adapting to new technologies or younger employees feeling underrepresented in leadership roles.

Surveys from sources like the Northern Ireland Statistics and Research Agency (NISRA) show concerns about intergenerational fairness and

age-based discrimination in the workplace, including opportunities for younger workers to access training and promotions, and challenges older workers may face when adapting to evolving work practices.

ICRIR has the remit to investigate deaths and serious injuries related to the Troubles/Conflict in the period between 1 January 1966 and 10 April 1998 which caused serious physical or mental harm.

A victim or survivor can request that the Commission investigates an incident involving a serious injury to them.

A close family member of the deceased can ask the Commission to investigate an incident involving a death.

Given the time period in which these deaths or serious crimes occurred, Requesting Individuals are likely to be older than the general population.

Within ICRIR, a proportion of staff are semi-retired or have retired from previous employment.

The policy prohibits age discrimination and applies vetting consistently across employment types.

2. Disability:

According to the NISRA, around 21% of Northern Ireland's population lives with a disability. This percentage increases with age. Requesting Individuals who have themselves suffered serious harm as a result of a serious injury related to the Troubles / Conflict will be more likely than the general public to be living with a disability.

Within the ICRIR workforce approximately 15% have declared a disability.

The policy commits to reasonable adjustments during vetting and recruitment, ensuring accessibility and fairness.

3. Gender Reassignment:

Data on individuals who have undergone or are undergoing gender reassignment is scarce due to privacy concerns. However, estimates suggest that around 1% of the UK population identifies as transgender or non-binary.

The policy affirms adherence to the Equality Act 2010, which prohibits discrimination based on gender reassignment in recruitment and vetting.

4. Marriage and Civil Partnership:

The most recent Northern Ireland Census shows a declining trend in marriage rates, with more people opting for civil partnerships or remaining single.

Northern Ireland Census 2021 data shows a decline in marriage rates, with 42% of adults married, 11% divorced, and an increasing number of people opting for civil partnerships or remaining single.

The policy ensures neutral treatment regardless of relationship status

5. Pregnancy and Maternity:

Northern Ireland typically sees around 23,000 births annually, with significant policy efforts around maternity leave and returning to work. The UK Government's Annual Population Survey indicates that 75% of women in Northern Ireland return to work after maternity leave, but disparities in career progression remain.

The policy promotes flexible vetting timelines and reasonable adjustments to support those with caring responsibilities

6. Race (Including Colour, Nationality, and Ethnic or National Origin):

Around 98% of Northern Ireland's population identifies as white, with 2% belonging to minority ethnic groups (e.g., Black, Asian, Mixed). The 2021 Census data also revealed growth in the minority ethnic population. Within the time period in which the deaths and serious harm which the ICRIR can investigate occurred, the percentage of the population which identifies as white was even higher.

The policy includes a commitment to non-discrimination and compliance with equality legislation.

7. Religion or Belief:

Northern Ireland is traditionally split between those identifying as Protestant (around 42%) and Catholic (about 41%), with increasing numbers identifying as having no religion or other religions.

The policy emphasises impartiality and respect, which is critical in Northern Ireland's post-conflict context.

8. Sex and Sexual Orientation:

Sexual orientation data indicates around 2% of the population identifies as LGB (Lesbian, Gay, Bisexual) based on NISRA's Continuous Household Survey.

The policy assures confidentiality and non-discrimination.

9. Political Opinion (Northern Ireland Specific):

The political landscape in Northern Ireland is unique, with political opinions often aligning with religious or national identity. Political affiliations in Northern Ireland often correlate with religious and national identity, with Unionists (typically Protestant) and Nationalists (typically Catholic) making up the largest groups. However, no precise statistics on political opinions are routinely collected due to sensitivities surrounding this information.

The policy emphasises impartiality and respect, which is critical in Northern Ireland's post-conflict context.

Sources for Gathering Data:

- Northern Ireland Statistics and Research Agency (NISRA)
- Equality Commission for Northern Ireland (ECNI)
- UK Office for National Statistics (ONS)
- Internal Equality Data

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?

The ICRIIR recruitment and vetting policy is designed to promote fairness, transparency, and security, and it supports the needs of various Section 75 groups. People with disabilities benefit from reasonable adjustments and accessible processes, while individuals of different religious beliefs, political opinions, and racial backgrounds are protected through impartial and objective vetting standards. The policy also ensures equal treatment across age, gender, sexual orientation, marital status, and caring responsibilities, helping to foster an inclusive and respectful recruitment environment aligned with Northern Ireland's equality legislation.

Part 2. Screening questions

Introduction

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

Details of the likely policy impacts on **Religious belief**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **Political Opinion**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **Racial Groups**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **age**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **Marital Status**:

Details of impact? Minor / Major / **None**

Details of the likely policy impacts on **Sexual Orientation**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **Men and Women**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **disability**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **Dependants**:

What is the level of impact? Minor / Major / **None**

2. **Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?** **Yes/No**

The policy is already designed to apply universally and consistently regardless of background or identity. It does not introduce barriers or exclusions for any Section 75 category, and its implementation is not expected to result in unequal treatment. Therefore, no further opportunities to promote equality of opportunity have been identified within the scope of this specific policy.

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

Details of the likely policy impacts on **Religious belief**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **Political Opinion**:

What is the level of impact? Minor / Major / **None**

Details of the likely policy impacts on **Racial Groups**:

What is the level of impact? Minor / Major / **None**

3. **Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?** **No**

Additional considerations

None identified.

Part 3. Screening decision

Screening Outcome:

Decision: Screened out, proceed with policy.

Based on the screening, there is no indication that the policy will negatively impact any Section 75 category. Instead, it supports ethical conduct and public confidence.

Mitigation

Approval and authorisation

Screened by: Head of Security

Date: 15.10.25

Screened by: People Analyst

Date: 15.10.25

TLT/ ELT Approval Date: 03.11.25