



## Screening

### Policy scoping

#### Information about the policy

**Name of the policy** – Complaints Handling Procedure  
**Is this an existing, revised or a new policy?** Revised

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

The aim of the Complaints Handling Procedure is to ensure that ICRIR deals with any complaints raised as efficiently and fairly as possible, adopting a Trauma and Resiliency Informed Approach.

The policy has been revised to:

- Split the procedure into a version for service users and a version for staff;
- Introduce a two stage approach to complaints handling;
- Update to reflect current ICRIR structures.

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

Yes, the policy directly benefits all Section 75 categories as it:

- Provides all service users with a clear procedure to follow in making a complaint to ICRIR and sets out the actions that they can expect ICRIR to take in response.
- Complaints relating to discrimination based on any of the protected characteristics can be raised under the procedure.

#### Who initiated or wrote the policy?

The policy was reviewed by the ICRIR Chief of Staff who has oversight and line management responsibility for the complaints function.

#### 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?**

**Contributing factors:**

1. **Strong leadership and accountability:** Effective implementation by management and ensuring all staff are aware of their responsibilities under the policy will promote its success. Performance against our Complaints Handling Procedure will be monitored and reported regularly to the Audit and Risk Committee along with any lessons learned from those complaints.
2. **Regular review:** Regular review will help maintain its relevance and effectiveness.
3. **Staged approach:** The two stage approach in the updated policy will allow for the majority of complaints to be responded to by the relevant business area within a shorter time period.

## 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 Procedure sets out who can make a complaint.

Anyone who has or is engaging with the Commission in the course of its work as well as those who are not directly engaged with the Commission but are affected or likely to be affected by any action, inaction or decision by us.

## Other policies with a bearing on this policy

**What are they?**

- Policy on unreasonable, abusive and vexatious behaviour and complaints

**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:**

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.

## **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.

## **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.

## **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.

## **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.

## **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.

## **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.

## **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.

## **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.

## **Sources for gathering data:**

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

## **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?**

### **1. Age**

#### **Needs:**

- Accessible complaints processes and information in a range of formats.
- Clear communication and support throughout the complaints process.

- Timely responses, particularly for older service users who may have ongoing health concerns.

**Experiences:**

- Many service users are likely to be older individuals directly affected by Troubles-related incidents.
- Some may experience barriers associated with ageing, including reduced mobility, sensory impairments or digital exclusion.

**Priorities:**

- Fair and respectful treatment.
- Easy access to the complaints process.
- Confidence that complaints will be handled sensitively and efficiently.

## **2. Disability**

**Needs:**

- Reasonable adjustments and accessible formats.
- Alternative methods of communication where required.
- Trauma-informed and person-centred engagement.

**Experiences:**

- Some service users may live with physical, sensory, cognitive or mental health disabilities, including disabilities arising from Troubles-related harm.

**Priorities:**

- Accessible services.
- Equal treatment and participation.
- Assurance that disability-related concerns will be appropriately addressed.

## **3. Gender reassignment**

**Needs:**

- Respectful and inclusive treatment.
- Confidentiality regarding personal information.
- Protection from discrimination or harassment.

**Experiences:**

- Individuals may have concerns about disclosure of personal information or discriminatory treatment.

**Priorities:**

- Dignity, privacy and fairness.
- Confidence that complaints involving discrimination will be taken seriously.

## **4. Marriage and civil partnership**

**Needs:**

- Equal access to the complaints process regardless of marital or partnership status.

**Experiences:**

- Family and relationship circumstances may affect how individuals engage with the Commission.

**Priorities:**

- Fair treatment and recognition of family circumstances where relevant.

**5. Pregnancy and maternity****Needs:**

- Flexible communication methods and timescales where appropriate.
- Supportive engagement that recognises caring responsibilities.

**Experiences:**

- Pregnancy and caring responsibilities may create practical barriers to engagement.

**Priorities:**

- Accessible and responsive complaints handling.
- Protection from discriminatory treatment.

**6. Race (including colour, nationality, ethnic or national origin)****Needs:**

- Clear communication.
- Access to translation or interpretation where required.
- Culturally sensitive engagement.

**Experiences:**

- Individuals from minority ethnic communities may face language or cultural barriers.

**Priorities:**

- Equal access to services.
- Confidence that complaints involving discrimination will be appropriately investigated.

**7. Religion or belief****Needs:**

- An impartial and respectful complaints process.
- Assurance that religious beliefs will be respected.

**Experiences:**

- Given the historical context of the Troubles, some individuals may have heightened sensitivities regarding perceived bias.

**Priorities:**

- Fairness, neutrality and transparency.
- Confidence in the Commission's independence.

**8. Sex and sexual orientation****Needs:**

- Equal treatment regardless of sex or sexual orientation.
- Protection from discrimination and harassment.

**Experiences:**

- Some individuals may have concerns about stigma or discriminatory behaviour.

**Priorities:**

- Respectful engagement.
- Confidence that complaints can be raised safely and fairly.

**9. Political opinion (Northern Ireland specific)****Needs:**

- Assurance that complaints will be considered impartially.
- Confidence that political views will not influence outcomes.

**Experiences:**

- Given Northern Ireland's unique historical and political context, some individuals may be concerned about perceived bias.

**Priorities:**

- Independence, transparency and consistency in decision-making.
- Equal treatment irrespective of political opinion.

## 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**

3. **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**

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

### Additional considerations

**Multiple identity** – No negative impact identified.

## Part 3. Screening decision

### Screening outcome:

Decision: Screened out, proceed with policy.

## Mitigation

### Approval and authorisation

#### Screened by:

People Analyst

Chief of Staff

#### Approved by:

**Position/Job title:** Chief of Staff

**Date:** 16 July 2025