



Screening

Policy scoping

Information about the policy

Name of the policy – Raising a Concern Policy

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

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

The aim of the policy is to set out for staff and others the way in which they can raise any concerns they may have about a possible danger, professional misconduct or financial malpractice, illegality or wrongdoing that might affect Requesting Individuals, colleagues, or the ICRIR itself. The aim of this policy is to promote a culture of openness, transparency and learning in line with the ICRIR shared values.

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 staff and others with a clear procedure to follow in raising any concerns they may have.

Who initiated or wrote the policy?

The Policy was reviewed by the ICRIR Chief of Staff.

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 Raising a Concern Policy will be monitored and reported regularly to the Audit and Risk Committee along with any lessons learned from concerns raised.
2. **Regular review:** Regular review will help maintain its relevance and effectiveness.

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:

- Those employed by or who were previously employed by the ICRIR, including permanent, temporary and bank staff;
- Staff in training/placements working within the ICRIR;
- Independent contractors engaged to provide services;
- Volunteers;
- Agency staff;
- Board Members;
- In certain circumstances members of the public.

Other policies with a bearing on this policy

What are they?

- Grievance Procedure
- Fraud Policy
- Complaints Handling Procedure

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.

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:

- Clear and accessible information on how to raise a concern.
- Multiple reporting routes to accommodate different communication preferences.
- Assurance that concerns will be handled confidentially and fairly.

Experiences:

- Younger staff may feel less confident challenging established practices or senior colleagues.
- Older staff may have concerns about raising issues that could affect workplace relationships.

Priorities:

- A safe reporting environment.
- Protection from victimisation or retaliation.
- Confidence that concerns will be taken seriously.

2. Disability

Needs:

- Reasonable adjustments and accessible reporting mechanisms.
- Alternative communication formats where required.
- Support throughout the process where appropriate.

Experiences:

- Individuals with disabilities may face barriers in reporting concerns if processes are not fully accessible.
- Individuals may be more vulnerable to discrimination, harassment or disadvantage.

Priorities:

- Equal access to the policy.
- Confidentiality and support.
- Confidence that concerns will be addressed appropriately.

3. Gender reassignment**Needs:**

- An inclusive and respectful reporting environment.
- Protection of privacy and personal information.
- Freedom from discrimination and harassment.

Experiences:

- Individuals may be reluctant to raise concerns due to fear of discrimination or unwanted disclosure of personal information.
- Concerns may arise regarding confidentiality where personal information is shared.

Priorities:

- Confidentiality.
- Fair treatment.
- Confidence that concerns will be handled impartially.

4. Marriage and civil partnership**Needs:**

- Assurance that concerns will be considered fairly regardless of marital or civil partnership status.
- Access to clear and confidential reporting procedures.
- Protection from discrimination or victimisation.

Experiences:

- Individuals may have concerns about personal circumstances becoming known unnecessarily through workplace processes.
- Some may be balancing work and family responsibilities while engaging with formal procedures.

Priorities:

- Fair and consistent treatment.
- Confidentiality.

- Confidence in the reporting process.

5. Pregnancy and maternity

Needs:

- Accessible reporting routes for employees who are pregnant or on maternity leave.
- Appropriate support and flexibility throughout the process.
- Assurance that concerns can be raised without adverse consequences.

Experiences:

- Employees who are absent from work due to maternity leave may feel less aware of workplace support mechanisms.
- Some individuals may be concerned that raising concerns could negatively affect career progression.

Priorities:

- Protection from victimisation.
- Equal access to the policy.
- Fair and timely handling of concerns.

6. Race

Needs:

- An inclusive and culturally sensitive reporting environment.
- Access to information in formats that meet individual needs where appropriate.
- Confidence that concerns regarding discrimination or harassment will be addressed appropriately.

Experiences:

- Individuals from minority ethnic backgrounds may be reluctant to raise concerns due to fear of discrimination or lack of confidence in organisational processes.
- Language or cultural differences may create barriers to reporting concerns.

Priorities:

- Equal access and fair treatment.
- Confidentiality and protection from retaliation.
- Confidence that concerns will be handled objectively and impartially.

7. Religion or belief

Needs:

- A reporting process that respects religious beliefs and practices.
- Assurance that concerns will be considered without bias.
- Access to confidential and impartial support.

Experiences:

- Individuals may be concerned about raising issues involving religious beliefs or practices.
- Some may fear damage to workplace relationships if concerns are raised.

Priorities:

- Respect and dignity.
- Fair and impartial treatment.
- Protection from victimisation.

8. Sex and sexual orientation

Needs:

- Equal access to reporting mechanisms and support.
- Confidence that concerns relating to discrimination, bullying or harassment will be addressed effectively.
- A safe and respectful environment in which to raise concerns.

Experiences:

- Men and women may experience workplace concerns differently and may have different levels of confidence in reporting issues.
- Some individuals may fear adverse consequences from raising concerns.
- Individuals may be concerned about unwanted disclosure of their sexual orientation.

Priorities:

- Equality of treatment.
- Confidentiality and support.
- Confidence in the integrity of the process.

9. Political opinion (Northern Ireland specific)

Needs:

- Protection from bias linked to political history of affiliation
- Protection of privacy and confidentiality.
- Confidence that concerns will be dealt with fairly and sensitively.

Experiences:

- Concerns about being treated fairly and impartially regardless of actual or perceived political opinion.

Priorities:

- Confidentiality.
- Fair and respectful treatment.
- Protection from victimisation and discrimination.

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?** **Yes/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: 11 January 2026