



Screening

Policy scoping

Information about the policy

Name of the policy – Pre Employment Checks Policy

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

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

This policy aims to ensure all prospective employees undergo appropriate checks to verify identity, legal status, safeguarding, and suitability for sensitive roles.

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 includes a Medical History Questionnaire and provisions for Occupational Health assessments. It explicitly commits to making reasonable adjustments during recruitment and employment, in line with the Disability Discrimination Act 1995 (Northern Ireland). This promotes inclusion and equal access to employment.
- **Age** - The policy's structured and transparent approach to vetting and health assessments helps ensure older applicants are treated fairly and assessed appropriately.
- **Race/Ethnicity** - The policy outlines clear procedures for overseas criminal record checks and right to work verification. By following Home Office guidance and applying checks proportionately, it helps mitigate risks of indirect discrimination against non-UK nationals or ethnic minorities.
- **Sex/Gender** - The policy acknowledges maternity-related needs and commits to equality under the Equality Act 2010. This supports fair treatment of women, particularly around pregnancy, maternity leave, and return-to-work considerations.
- **Dependents** - The policy's flexibility in onboarding and reasonable adjustments may support candidates with caring responsibilities, promoting work-life balance and access to employment.

Who initiated or wrote the policy?

The Policy was written by the ICRIR Head of HR Operations.

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?

- **Review** - Regular review will help maintain its relevance and effectiveness.
- **Clear Communication** - Transparent guidance for candidates and staff helps build trust and ensures consistent application.
- **Training for Hiring Managers** - Equips staff to apply checks fairly and sensitively, especially around disability, overseas vetting, and data protection.
- **Robust Data Protection Measures** - Enhances candidate confidence and ensures compliance with UK GDPR.
- **Monitoring and Evaluation** - Tracking outcomes by Section 75 category helps identify and address any unintended disparities.

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?

Vetting 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 pre employment checks 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 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.

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 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 ICRIR 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.

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

Overseas criminal record checks and right to work verification may disproportionately affect individuals from minority ethnic backgrounds or non-UK nationals. If not applied transparently and proportionately, this could lead to perceptions of unfair treatment, potentially affecting trust and good relations. However, the policy includes safeguards such as adherence to Home Office guidance and data protection principles to mitigate this risk.

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

No, the policy is designed to promote fairness, transparency, and security, and it supports the needs of various Section 75 groups. As it 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.

Additional considerations

None identified.

Part 3. Screening decision

Screening Outcome: Screened out
Decision: proceed with policy.

Minor impact identified - Overseas checks may disproportionately affect non-UK nationals

Mitigation

Impact mitigated as the policy includes safeguards such as adherence to Home Office guidance and data protection principles to mitigate any risk to overseas candidates. The policy is designed to apply universally and consistently.

Approval and authorisation

Screened by: Head of HR Operations
Date: 1 May 2026

Screened by: People Analyst
Date: 1 May 2026

Approved by: Director of People and Culture
Date: 11 May 2026