



Equality Screening Template

Dignity at Work Policy

1. Introduction

- 1.1. The Commission has a statutory duty to screen all draft policies to determine the potential level of impact in terms of the promotion of equality of opportunity and good relations.
- 1.2. In line with our Equality Scheme, each screening template is published on our website (www.cvsni.org) and a quarterly screening report is circulated to consultees highlighting the findings of recent screening exercises.
- 1.3. This screening template follows the format recommended by the Equality Commission for Northern Ireland in the Section 75 guidance to public authorities (published in 2008). It comprises five elements:
 - Policy scoping
 - Screening questions
 - Screening decision
 - Monitoring
 - Approval and authorisation

2. Comments and queries

- 2.1. Any comments or queries in relation to this screening template should be addressed to:

Head of Corporate Services
Commission for Victims and Survivors
Equality House
7-9 Shaftesbury Square
Belfast
BT2 7DP

Email: commission@cvsni.org
Tel. 028 9031 1000

Access to information

This document has been developed in Arial 12 point with 1.25 spacing. As part of our commitment to promoting equality of opportunity and good relations, we want to ensure that everyone is able to access the documents we produce. This document can therefore be made available in alternative formats on request.

3. Policy scoping

- 3.1. This section provides details about the policy being screened and what available evidence has been gathered to help make an assessment of the likely impact on equality of opportunity and good relations.

Information about the policy

- 3.2. The policy under consideration is the Dignity at Work Policy which sets out:

- the type of behavior that may affect dignity at work
- provides examples of unacceptable behavior
- What staff can do if they feel their dignity at work has been affected
- What staff members can do if they are advised that their conduct is offensive
- What staff can do if they witness offensive conduct
- Procedures for dealing with complaints under the policy
- Procedures that apply to complaints outside the scope of the policy
- An outline of statutory rights
- An outline of Anti-Discrimination and other Legislation
- Personal Liability
- The rights and responsibilities of all staff, managers and supervisors, Carecall, Harassment Contact Officers, Investigating Officer and the Equal; Opportunities Officer.

- 3.3. The Commission has developed this policy taking account of guidance published by, among others, the Information Commissioner's Office and the Office of the NI Ombudsman. The policy also takes account of good practice examples, including the policies of the NI Civil Service.

- 3.4. The policy will benefit people in all Section 75 categories.

Objectives of the policy

- 3.5. The objective of the policy is to make staff aware of the types of behaviour that might cause offence, to highlight the sources of information and assistance which are available and the procedures for dealing with inappropriate behaviour.
- 3.6. There are separate Informal and Formal procedures for resolving complaints under this policy.

- 3.7. The policy is deliberately broad in scope and addresses any form of unwanted, unreasonable and offensive conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. Conduct shall be regarded as having this effect only if, having regard to all the circumstances and in particular the complainant's perception, it should be reasonably considered as having that effect.
- 3.8. The Policy is clear that all staff have a role in creating and sustaining a working environment in which individuals are treated with dignity and respect.

Implementation factors

- 3.9. The policy does not supersede or diminish in any way the rights which employees may have to pursue a complaint through the Office of the Ombudsman for NI or take other legal action. However, the law requires internal procedures to be exhausted before complaints are pursued outside the organisation.
- 3.10. The Commission is committed to making adequate resources available to fulfill the aims of the policy.

Main stakeholders affected

- 3.11. The policy will impact upon staff, including all full time and part time employees, temporary employees, agency staff, student placements and volunteers.

Available evidence

- 3.12. Evidence has been gathered to inform this policy from the following sources:
- best practice examples of codes of conduct, including those of the NI Civil Service;
 - fair employment monitoring data on the composition of the Commission workforce.

4. Needs, experiences and priorities

S75 category	Details of needs/experiences/priorities
Religious belief	<p>The Commission has a very small workforce. Fair employment monitoring shows that, at 1 January 2017, there were 11 staff in post. 8 staff came from a Protestant community background, 2 from a Roman Catholic community background and 1 whose community background could not be determined.</p> <p>It is essential that both main communities are satisfied that complaints about alleged improper behavior will be dealt with objectively and without prejudice. The Dignity at Work Policy is clear that managers and supervisors have a duty to implement this policy and to make every effort to ensure that unwanted, unreasonable and offensive behaviour does not occur.</p>
Political opinion	<p>The Dignity at Work Policy provides a list that offers guidance as to the common forms of unwanted, unreasonable and offensive conduct dealt with under this policy.</p> <p>This includes bullying, harassment, victimisation, discrimination and unreasonable or offensive conduct which focuses on political opinion.</p> <p>It does not impose a blanket ban on political activity – for example, in terms of membership of a political party – but allows Line Managers to take a common sense approach to each situation on its own merits. The Policy ensures that staff will raise such issues with their Line Manager.</p>

Racial group	<p>Good practice dictates that the Commission should take into account the needs of people for whom English is not their first language. The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>
Age	<p>The Dignity at Work Policy provides a list that offers guidance as to the common forms of unwanted, unreasonable and offensive conduct dealt with under this policy.</p> <p>This includes bullying, harassment, victimisation, discrimination and unreasonable or offensive conduct which focuses on a person's age. The Policy ensures that staff will raise such issues with their Line Manager.</p>
Marital status	<p>The Dignity at Work Policy provides a list that offers guidance as to the common forms of unwanted, unreasonable and offensive conduct dealt with under this policy.</p> <p>This includes bullying, harassment, victimisation, discrimination and unreasonable or offensive conduct which focuses on a persons marital status. The Policy ensures that staff will raise such issues with their Line Manager..</p>
Sexual orientation	<p>The Dignity at Work Policy provides a list that offers guidance as to the common forms of unwanted, unreasonable and offensive conduct dealt with under this policy.</p> <p>This includes bullying, harassment, victimisation, discrimination and unreasonable or offensive conduct which focuses on a persons sexual orientation. The Policy ensures that staff will raise such issues with their Line Manager.</p>

<p>Men and women generally</p>	<p>Fair employment monitoring shows that, at 1 January 2017, there were 11 staff in post - 6 staff were female and 5 male. The Dignity at Work Policy provides a list that offers guidance as to the common forms of unwanted, unreasonable and offensive conduct dealt with under this policy.</p> <p>This includes bullying, harassment, victimisation, discrimination and unreasonable or offensive conduct which focuses on whether or not someone identifies as a man or a woman. The Policy ensures that staff will raise such issues with their Line Manager and enables a formal complaint to be made through the appropriate procedures.</p> <p>It is not anticipated that men and women will have different needs in relation to the Code of Conduct.</p>
<p>Disability</p>	<p>The Dignity at Work Policy provides a list that offers guidance as to the common forms of unwanted, unreasonable and offensive conduct dealt with under this policy.</p> <p>This includes bullying, harassment, victimisation, discrimination and unreasonable or offensive conduct which focuses on a persons disability. The Policy ensures that staff will raise such issues with their Line Manager.</p> <p>Good practice dictates that the Commission should take into account the needs of disabled people in relation to the complaints procedure (where the disability affects the person's ability to communicate). The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>
<p>Dependants</p>	<p>The Dignity at Work Policy provides a list that offers guidance as to the common forms of unwanted, unreasonable and offensive conduct dealt with under this policy.</p> <p>This includes bullying, harassment, victimisation, discrimination and unreasonable or offensive conduct which focuses on a persons requirements to care for dependants. The Policy ensures that staff will raise such issues with their Line Manager.</p>

5. Screening questions

5.1. This section considers the extent of the likely impact of the policy on groups of people within each of the Section 75 categories in relation to the promotion of equality of opportunity and good relations. The analysis relates to four specific screening questions and includes an assessment of the level of the likely impact.

Impact on equality of opportunity

5.2. 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	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>This allows for the consideration of any religious dress requirements. This will ensure that staff will raise such issues with their Line Manager.</p>	Minor
Political opinion	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>It does not impose a blanket ban on political activity – for example, in terms of membership of a political party – but allows</p>	Minor

	<p>Line Managers to take a common sense approach to each situation on its own merits. The Policy ensures that staff will raise such issues with their Line Manager ensures that staff will raise such issues with their Line Manger.</p>	
Racial group	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>The Policy allows for the consideration of any cultural dress requirements. This will ensure that staff will raise such issues with their Line Manager.</p> <p>The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>	Minor
Age	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>The Dignity at Work Policy details a list, which while not exhaustive, provides guidance as to the common forms of unwanted, unreasonable and offensive behaviour or conduct dealt with under this policy.</p> <p>This will ensure that staff will raise such issues with their Line Manager.</p>	Minor

	The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.	
Marital status	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>The Dignity at Work Policy details a list, which while not exhaustive, provides guidance as to the common forms of unwanted, unreasonable and offensive behaviour or conduct dealt with under this policy.</p> <p>This will ensure that staff will raise such issues with their Line Manager.</p> <p>The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>	Minor
Sexual orientation	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>The Dignity at Work Policy details a list, which while not exhaustive, provides guidance as to the common forms of unwanted, unreasonable and offensive behaviour or conduct dealt with under this policy.</p> <p>This will ensure that staff will raise such</p>	Minor

	<p>issues with their Line Manager.</p> <p>The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>	
Men and women generally	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>The Dignity at Work Policy details a list, which while not exhaustive, provides guidance as to the common forms of unwanted, unreasonable and offensive behaviour or conduct dealt with under this policy.</p> <p>This will ensure that staff will raise such issues with their Line Manager.</p> <p>The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>	Minor
Disability	<p>The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p> <p>The Commission has a very small workforce and it is anticipated that any member of staff who has difficulty making a complaint would be assisted to do so.</p>	Minor
Dependants	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all</p>	Minor

	<p>employees can give of their best.</p> <p>The Dignity at Work Policy details a list, which while not exhaustive, provides guidance as to the common forms of unwanted, unreasonable and offensive behaviour or conduct dealt with under this policy.</p> <p>This will ensure that staff will raise such issues with their Line Manager.</p> <p>The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>	
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Opportunities to better promote equality of opportunity

5.3. 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
All	<p>The Commission will monitor all requests and complaints under the Dignity at Work Policy in both quantitative and qualitative terms. This information may be used to identify opportunities to further promote equality of opportunity in the future.</p>	

Impact on good relations

5.4. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?
minor/major/none

Good relations category	Details of policy impact	Level of impact? minor/major/none
All	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>The Dignity at Work Policy details a list, which while not exhaustive, provides guidance as to the common forms of unwanted, unreasonable and offensive behaviour or conduct dealt with under this policy.</p> <p>This will ensure that staff will raise such issues with their Line Manager.</p> <p>The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>	Minor

Opportunities to better promote good relations

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

Good relations category	If Yes , provide details	If No , provide reasons
All	<p>The policy ensures staff are aware the Commission is committed to equality of opportunity and to creating and sustaining an environment where everyone is treated with respect and dignity, free from any form of inappropriate behaviour, and one in which all employees can give of their best.</p> <p>The Dignity at Work Policy details a list, which while not exhaustive, provides guidance as to the common forms of unwanted, unreasonable and offensive behaviour or conduct dealt with under this policy.</p> <p>This will ensure that staff will raise such issues with their Line Manager.</p> <p>The Policy allows for concerns or issues to be expressed verbally and does not require a written statement.</p>	

6. Screening decision

6.1. The screening process has identified that the policy has the potential to have a minor adverse impact on all Section 75 categories.

6.2. In most cases, the adverse impact involves the staff member raising an issue with their Line Manager and discussing the most appropriate course of action, which the Commission considers is a reasonable approach.

- 6.3. The Commission has a very small workforce and it is anticipated that any member of staff who has difficulty making a complaint would be assisted to do so. The policy allows for the complainant to be accompanied by a Trade Union official, other employee or friend during meetings relating to the investigation of the complaint. The policy also provides information on where to obtain advice from external organisations once the internal procedure has been exhausted.
- 6.4. The Commission therefore does not consider that it would be beneficial to carry out an equality impact assessment.
- 6.5. As the policy has been developed in line with best practice examples, including the policies of the NI Civil Service, the Commission considers that all relevant issues have been taken into consideration and that no further mitigating actions are necessary at this time.

7. Monitoring

- 7.1. The Commission will monitor all requests and complaints under the Code of Conduct in both quantitative and qualitative terms. Full written records will be kept of complaints received, investigations undertaken and conclusions reached. This information may be used to identify further opportunities to promote equality of opportunity. All information will be handled appropriately in accordance with the Data Protection Act.

8. Authorisation and approval

Screened by:	Position/Job Title	Date
Craig Gartley	Head of Corporate Services	10/02/17
Approved by:		
John Beggs	Secretary to the Commission	13/02/17

Note: A copy of this Screening Template will be made easily accessible on the Commission's website as soon as possible following completion and made available on request.