

Equality, Good Relations and Human Rights Screening Template

*****Completed Screening Templates are public documents and will be posted on the Trust's website*****

See 'Equality, Good Relations and Human Rights Screening Guidance Notes' (on SharePoint) for further background information on the relevant legislation and for help in answering the questions on this template.

(1) Information about the Policy/Proposal

(1.1) Name of the policy/proposal

Health and Social Care Northern Ireland, Occupational Therapy Professional Guidance For the Provision of Environmental Adaptations

(1.2) Is this a new, existing or revised policy/proposal?

Revised policy

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

This document provides guidance to Health and Social Care NI (HSCNI) Occupational Therapy Services regarding the clinical assessment and prescription of environmental adaptations. Such adaptations are prescribed by Occupational Therapy in order to enable the service user to maximise functional independence and minimise the impact of their disability upon their daily occupational performance.

The premise of this guidance is firmly based upon the comprehensive and robust Occupational Therapy assessment, clinical reasoning, option appraisal and professional decision making to inform appropriate interventions which may include the prescription of environmental adaptation

(1.4) Are there any Section 75 categories which might be expected to benefit from the intended policy/proposal?

The guidance will be of particular benefit to those service users with a disability.

Cognisance must be given towards the service users preferred options and principles of equity, equality, best interest of service user, least restrictive practices and deprivation of liberty safeguards.

The Occupational Therapist can only assess and make prescriptions for essential facilities for service users who are registerable under the Chronically Sick Disabled Persons Act.

(1.5) Who owns and who implements the policy/proposal - where does it originate, for example DoH, HSCB, the Trust?

The proposal is owned by the Health and Social Care Regional Occupational Therapy Service. The Proposal has the support of the Housing and Health Lead at the Department of Health and will be endorsed and implemented by each Trust.

The SHSCT Occupational Therapy service will be responsible for implementation/ operation of this guidance.

(1.6) Are there any factors that could contribute to/detract from the intended aim/outcome of the policy/proposal/decision? (Financial, legislative or other constraints?)

Staff not being aware of the guidance.
Trust governance procedures not being followed.

(1.7) Who are the internal and external stakeholders (actual or potential) that the policy/proposal/decision could impact upon? (E.g. staff, service users, other public sector organisations, trade unions, professional bodies, independent sector, voluntary and community groups etc.)

The main stakeholders that this guidance will impact on are:

- Occupational Therapy staff
- Service users and carers
- Northern Ireland Housing Executive.
- Other stakeholders include Trust Estates departments, Public Health Agency and SPPG.

(1.8) Other policies with a bearing on this policy/proposal (for example regional policies) - what are they and who owns them?

- Interdepartmental Housing Adaptations Design Toolkit (Department of Health, Department for Communities)
- Statutory responsibilities are reflected in the Memorandum of Understanding 2017 - Department of Health (DOH) and Department of Communities
- Chronically Sick and Disabled Persons (Northern Ireland) Act 1978

CSDPA places the Statutory Duty to identify the need for housing adaptations for service users on the HSCNI Trusts

[Chronically Sick and Disabled Persons \(Northern Ireland\) Act 1978 \(legislation.gov.uk\)](#)

- Disabled Persons (Northern Ireland) Act 1989

[Disabled Persons \(Northern Ireland\) Act 1989 \(legislation.gov.uk\)](#)

- The Manual Handling Operations Regulations 1992.

[The Manual Handling Operations Regulations 1992 \(legislation.gov.uk\)](#)

- Health and Personal Social Service order (NI) 1972

[Health and Personal Social Services \(Northern Ireland\) Order 1972 \(legislation.gov.uk\)](#)

- The NHS and Community Care Act 1990

[National Health Service and Community Care Act 1990 \(legislation.gov.uk\)](#)

- The Housing (NI) Order 2003

[The Housing \(Northern Ireland\) Order 2003 \(legislation.gov.uk\)](#)

- Health and safety at work order (NI) 1978

[Health and Safety at Work \(Northern Ireland\) Order 1978 \(legislation.gov.uk\)](#)

- Disability Discrimination Act 1995

[Disability Discrimination Act 1995 \(legislation.gov.uk\)](#)

- Carers (Recognition and Services) Act 1995

[Carers \(Recognition and Services\) Act 1995 \(legislation.gov.uk\)](#)

- The Children Order (NI) 1995 – Schedule 2

[The Children \(Northern Ireland\) Order 1995 \(legislation.gov.uk\)](#)

- The Human Rights Act 1998 and European Convention on Human Rights and Fundamental Freedoms

[Human Rights Act 1998 \(legislation.gov.uk\)](#)

- Mental Health (NI) Order

[The Mental Health \(Northern Ireland\) Order 1986 \(legislation.gov.uk\)](#)

- The Mental Capacity (deprivation of Liberty) (Amendment) Regulations (Northern Ireland) 2020

[The Mental Capacity \(Deprivation of Liberty\) \(Amendment\) Regulations \(Northern Ireland\) 2020 \(legislation.gov.uk\)](#)

- Royal College of Occupational Therapists, Professional Standards for Occupational Therapy practice, conduct and ethics.

[Professional standards for occupational therapy practice, conduct and ethics - RCOT](#)

- Local Trust governance procedures

(2) Available evidence

Evidence to help inform the screening process may take many forms. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? *NB: Specify the details for each of the Section 75 categories for any staff affected, the Trust Workforce, any patients/clients affected and the Trust general population in the following tables **if appropriate**.*

2.1 Staff Affected by this Policy/Proposal / 2.2 Composition of Southern Trust Workforce (please contact the Equality Unit on 028 375 64152 to ensure the figures below are the most recent)

Section 75 Group	Southern Trust Workforce Profile as at 1 January 2024	Percentage
Gender	Female	85.1%
	Male	14.9%
Religion	Protestant	34.2%
	Roman Catholic	56.2%
	Neither	9.6%
Political Opinion	Broadly Unionist	9.1%
	Broadly Nationalist	9.8%
	Other	7.6%
	Do Not Wish To Answer/Not Known	73.6%
Age	16-24	8.1%
	25-34	23.3%
	35-44	27.2%
	45-54	20.6%
	55-64	17.2%
	65+	3.7%
Marital Status	Single	32.5%
	Married	55.8%
	Not Known	11.7%
Dependent Status	Caring for a Child/Children / Dependant Older Person / Person With a Disability	15.3%
	None	31.2%
	Not Known	53.5%
Disability	Yes	2.5%
	No	73.9%
	Not Known	23.6%
Ethnicity	Bangladeshi	0.01%
	Black African	0.36%
	Black Caribbean	0.01%
	Black Other	0.03%
	Chinese	0.09%
	Filipino	0.54%
	Indian	1.16%
	Irish Traveller	0.02%
	Mixed Ethnic	0.2%
	Pakistani	0.15%
	White	74.29%
	Not Known	23.15%
Sexual Orientation towards:	Opposite Sex	57.2%
	Same Sex	1.1%
	Same and Opposite Sex	0.3%
	Do Not Wish To Answer/Not Known	41.4%

2.3 Patients / Clients Affected

(complete as far as possible with information available to you)

Section 75 Group	Make up of Patients/Clients Affected	Percentage
Gender	Female	50.2
	Male	49.8
Religion	Protestant	35.5
	Roman Catholic	57.0
	Other	7.5
Political Opinion	Broadly Unionist	Not collected
	Broadly Nationalist	
	Other	
	Do Not Wish To Answer/Not Known	
Age	0-15	22.5
	16-24	10.2
	25-44	26.5
	45-64	25.2
	65-84	13.8
	85+	1.8
Marital Status	Single	28.1
	Married/Civil Partnership	37.7
	Other/Not Known	34.2
Caring Responsibility	Caring for a Child/Children/Dependant Older Person/Person(s) With a Disability	25.8% care for a dependent child/children
	None	
	Not Known	
Disability	Yes	21.8
	No	78.2
	Not Known	
Ethnicity	Bangladeshi	0.4
	Black African	0
	Black Caribbean	0.4
	Black Other	0
	Chinese	0.4
	Filipino	0.3
	Indian	0.1
	Irish Traveller	0.2
	Mixed Ethnic	0.3
	Pakistani	0.8
	White	0.1
	Not Known	0.1
		0.2
	0.1	
	96.5	
Sexual Orientation towards:	Opposite Sex	69.8
	Same Sex	1.1
	Same and Opposite Sex	29.1
	Do Not Wish To Answer/Not Known	

2.4 Southern Trust's Area Population Profile – Census 2021

(NB: in some instances you may need to be more specific and use local District Council areas – please contact the Equality Unit on 028 375 64152).

Section 75 Group	Trust's Area Population Profile (Population of 358,034)	Percentage
Gender	Female	50.2
	Male	49.8
Religion	Protestant	35.5
	Roman Catholic	57.0
	Other	7.5
Political Opinion	Not collected	
Age	0-15	22.5
	16-24	10.2
	25-44	26.5
	45-64	25.2
	65-84	13.8
	85+	1.8
Marital Status (aged 16+ years)	Single	28.1
	Married/Civil Partnership	37.7
	Other	34.2
Dependent Status	Caring for a dependent Child/Children	25.8% care for a dependent child/children
Disability	Yes	21.8
	No	78.2
Ethnicity	Asian Other	0.4
	Bangladeshi	0
	Black African	0.4
	Black Caribbean	0
	Black Other	0.4
	Chinese	0.3
	Filipino	0.1
	Indian	0.2
	Irish Traveller	0.3
	Mixed Ethnic Group	0.8
	Arab	0.1
	Roma	0.1
	Other	0.2
	Pakistani	0.1
White	96.5	
Sexual Orientation	Heterosexual	69.8
	LGBTQ+	1.1
	Not Stated	29.1

(3) Needs, experiences and priorities

- (3.1) Taking into account the information above what are the different needs, experiences and priorities of each of the Section 75 categories and for both service users and staff.
(NB: Use relevant statistical and qualitative data to complete the table below)

Section 75 Category	Details of Needs, Experiences and Priorities	
	Staff	Service Users
Gender	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not negatively impact on any section 75 group.	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively impact on any section 75 group.
Age	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not negatively impact on any section 75 group.	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively impact on any section 75 group.
Religion	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not negatively impact on any section 75 group.	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively impact on any section 75 group.
Political Opinion	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not negatively impact on any section 75 group.	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively impact on any section 75 group.
Marital Status	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not negatively impact on any section 75 group.	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively impact on any section 75 group.
Dependent Status	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not negatively impact on any section 75 group.	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively impact on any section 75 group.
Disability	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively

Section 75 Category	Details of Needs, Experiences and Priorities	
	Staff	Service Users
	negatively impact on any section 75 group.	impact on any section 75 group.
Ethnicity	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not negatively impact on any section 75 group.	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively impact on any section 75 group.
Sexual Orientation	This guidance will affect all Community Occupational Therapy staff working with a housing adaptations remit. It will not negatively impact on any section 75 group.	This guidance will be applicable to all service users who are registerable under the Chronically Sick Disabled Persons Act. It will not negatively impact on any section 75 group.

(3.2) Provide details of how you have involved stakeholders, views of colleagues, service users and staff etc when screening this policy/proposal.

Several regional meetings have taken place with Occupational Therapy Staff Groups across the region including staff from Adult Community, Learning Disability and Children's Services along with all the Occupational Therapy Professional Leads for each Trust.

The Housing and Health Liaison officer from the Department of Health/ Northern Ireland Housing executive has also been consulted.

The document will be circulated to service user groups, NIHE and Estates departments for comment/ consultation prior to implementation.

(4) Screening Questions

You now have to assess whether the impact of the policy/proposal is major, minor or none. You will need to make an informed judgement based on the information you have gathered.

(4.1) What is the likely impact of equality of opportunity for those affected by this policy/proposal, for each of the Section 75 equality categories?			
Section 75 category	Details of policy/proposal impact		Level of impact? Minor/major/none
	Staff	Service Users	
Gender	All section 75 categories are expected to benefit from this guidance equally	All section 75 categories are expected to benefit from this guidance equally	Minor positive
Age	All section 75 categories are expected to benefit from this guidance equally	As Above	Minor positive
Religion	All section 75 categories are expected to benefit from this guidance equally	As Above	Minor positive
Political Opinion	All section 75 categories are expected to benefit from this guidance equally	As Above	Minor positive
Marital Status	All section 75 categories are expected to benefit from this guidance equally	As Above	Minor positive
Dependent Status	All section 75 categories are expected to benefit from this guidance equally	As Above	Minor positive
Disability	All section 75 categories are expected to benefit from this guidance equally	As Above	Minor positive
Ethnicity	All section 75 categories are expected to benefit from this guidance equally	As Above	Minor positive
Sexual Orientation	All section 75 categories are expected to benefit from this guidance equally	As Above	Minor positive

(4.2) Are there opportunities to better promote equality of opportunity for people within Section 75 equality categories?	
Section 75 category	Please provide details
Gender	<p>The Trust remains committed to embracing diversity, promoting good relations and challenging sectarianism and racism to ensure service users and staff enjoy equality of opportunity and access to health and social care in a welcoming and safe environment.</p> <p>The Trust has an ongoing strategy of staff training and engagement</p> <p>Also see 7.2 for consideration and mitigation</p>
Age	As above
Religion	As above
Political Opinion	As above
Marital Status	As above
Dependent Status	As above
Disability	As above
Ethnicity	As above
Sexual Orientation	As above

(4.3) To what extent is the policy/proposal 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/proposal impact	Level of impact Minor/major/none
Religious belief	Guidance applies to all categories	None The Trust has in place its Good Relations statement which is displayed on staff and service user notice boards.
Political opinion	Guidance applies to all categories	None The Trust has in place its Good Relations statement which is displayed on staff and service user notice boards.

Racial group	Guidance applies to all categories and interpreters will be provided as required	None The Trust has in place its Good Relations statement which is displayed on staff and service user notice boards.
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(4.4) Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?	
Good relations category	Please provide details
Religious belief	<p>The Trust remains committed to embracing diversity, promoting good relations and challenging sectarianism and racism to ensure service users and staff enjoy equality of opportunity and access to health and social care in a welcoming and safe environment.</p> <p>The Trust has an ongoing strategy of staff training and awareness raising.</p> <p>The e-learning module “Equality, Good Relations and Human Rights: Making a difference” ‘Making a Difference’ and “Every Conversation Matters” are available for staff. On the basis of the information available, there is nothing to indicate that these changes would engender any adverse impact in regard to the promotion of good relations.</p>
Political opinion	As above
Racial group	<p>As above and additionally: As indicated previously, it is important that the Trust continues to translate essential information. Trust staff are cognisant of the ethical reasons for ensuring that patients who are not proficient in English as a first or second competent language are provided with telephone interpreting or face-to-face interpreting to facilitate effective and safe communication.</p> <p>The promotion of Good Relations is an integral part of the Trust’s commitment to improve the health and wellbeing of all our staff and in line with our People Framework 2022 - 2025 we strive to ensure that all staff irrespective of religion, race or political opinion feel safe, welcomed and comfortable in work.</p>

(5) Consideration of Disability Duties

(5.1) How does the policy/proposal encourage disabled people to participate in public life and
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promote positive attitudes towards disabled people?

- The Trust is committed to ensuring equality of opportunity for all service users and staff in terms of disability and complies with all relevant Disability legislation, including the Disability Discrimination Act 1995 and the United Nations Convention on the Rights of People with Disabilities.
- The Trust Disability Action Plan 2018 -2023 and the Disability Equality Policy are aimed at encouraging disabled people to participate in public life and promote positive attitudes towards disabled people.
- Consideration has been given to the profile of staff and/or service users affected by the proposal including those with a disability.
- All staff must complete mandatory training on equality, human rights and good relations which includes awareness of disability duties. As this is available on LMS platform

(6) Consideration of Human Rights

The Trust has a duty to act compatibly and must take Human Rights considerations into account in its day-to-day functions/activities.

(6.1) How does the policy/proposal impact on Human Rights?
Complete for each of the articles

Article	Positive impact	Negative impact = human right interfered with or restricted	Neutral impact
Article 2 – Right to life	x		
Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment	x		
Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour			x
Article 5 – Right to liberty & security of person	x		
Article 6 – Right to a fair & public trial within a reasonable time			x
Article 7 – Right to freedom from retrospective criminal law & no punishment without law			x
Article 8 – Right to respect for private & family life, home and correspondence.	x		
Article 9 – Right to freedom of thought, conscience & religion			x
Article 10 – Right to freedom of expression			x

Article	Positive impact	Negative impact = human right interfered with or restricted	Neutral impact
Article 11 – Right to freedom of assembly & association	x		
Article 12 – Right to marry & found a family			x
Article 14 – Prohibition of discrimination in the enjoyment of the convention rights			x
1st protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property			x
1st protocol Article 2 – Right of access to education	x		

Please note: If you have identified potential negative impact in relation to any of the Articles in the table above, speak to your line manager and/or Equality Unit on tel: 028 375 64151. It may also be necessary to seek legal advice.

(6.2) Please outline any actions you will take to promote awareness of human rights and evidence that human rights have been taken into consideration in decision making processes.

Positive impacts have been identified for Articles 2, 3, 5, 8 and 11 and 1st Protocol Article 2.

Adaptations within the guidance are prescribed by Occupational Therapists in order to enable the service user to maximise functional independence and minimise the impact of their disability upon their daily occupational performance. Housing adaptations facilitate individuals to access their local community, live inclusively as part of a family unit and reduce risk within their home environment.

- The Trust is committed to the protection and promotion of Human Rights in all aspects of its work. The Human Rights Act 1998 gives effect in UK Law to the European Convention on Human Rights and requires legislation to be integrated so far as possible in a way that is compatible with the Convention rights. It also makes it unlawful for a public body to act incompatibly with the Convention rights.

- The e-learning module on Equality, Diversity, Human Rights and Good Relations is promoted alongside face to face training programmes available.

(7) Screening Decision

(7.1) Given the answers in Section 4 of this template, how would you categorise the impacts of this decision or policy/proposal? *(Please tick one option below and list your reasons for the decision in 7.2 below)*

Major impact		EQIA Required? <i>(Delete as appropriate)</i>	
		Yes	No
Minor impact	✓ positive	Mitigation Required	Alternative Policy Required
		Yes/No	Yes/No
No impact		Screened Out	

(7.2) Please give reasons for your decision and detail any mitigation or alternative policies considered.

The Trust has carried out an Equality Screening of the proposal and identified a positive impact on the protected category of those service users with a disability.

Adaptations within the guidance are prescribed by Occupational Therapists in order to enable the service user to maximise functional independence and minimise the impact of their disability upon their daily occupational performance. Housing Adaptations facilitate individuals to access their local community, live inclusively as part of a family unit and reduce risk within their home environment.

The Trust is committed to ongoing review of this policy and to monitoring for potential adverse and positive impact to any of the Section 75 equality categories as the Guidelines are implemented.

(7.3) Do you consider the policy/proposal needs to be subjected to ongoing screening? NB: for strategies/policies that are to be put in place through a series of stages – screen at various stages during implementation.

Yes	
No	✓

(8) Monitoring

(8.1) Please detail how you will monitor the effect of the policy/proposal for equality of opportunity and good relations, disability duties and human rights?

- Ongoing conversations and feedback from staff using the guidelines
- Feedback from Service Users, families and carers
- Feedback from Trust Estates, NIHE, Grants Department, Housing Associations etc
- Complaints and compliments received

Approved Lead Officer: Julie Smyth

Position: Head of Occupational Therapy and Reablement Services

Email: Julie.smyth@southerntrust.hscni.net

Telephone No: 028 3756 6119 / 07557676063

Date: 03/01/2024

Policy/proposal screened by: Julie Smyth

Please forward completed screening template to Equality.Unit@southerntrust.hscni.net for inclusion in the Trust's Policy Screening Reports which are uploaded to the Trust's website.