



Department of
Health

An Roinn Sláinte

Mánnystrie O Poustie

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Draft Equality Screening, Disability Duties and Human Rights Assessment

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Part 1. Policy scoping

1.1 Information about the policy / decision

1.1.1 What is the name of the policy / decision?

The Firefighters' Pension Scheme (Amendment) Regulations (NI) 2026 – Proposed updates to member contribution structure

1.1.2 Is this an existing, revised or a new policy / decision?

This is a revised policy.

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

The proposals are seeking to ensure the Firefighters' Pension Scheme achieves the required yield of 13.2% of pensionable earnings. Based on the current member contribution rate structure the Government Actuary's Department (GAD) project the yield for the Firefighters' Pension Scheme, over the 2020 valuation period of 2024 to 2027, to be 13% pa. The Government now require that the target yield of 13.2% must be met. Several public sector pension schemes across NI are also running under yield and have also been asked to meet their target yield. The Department must now update the member contribution structure to address the yield shortfall.

The pay limits on each of the tiers have also not been revised since 1 April 2018 and therefore do not reflect the current pay scales. The need to meet yield therefore provides a valuable opportunity to:

- Update the member contribution structure to encourage scheme participation, reduce opt-outs and ensure a fair and equitable structure for all members.
- Ensure the member contribution structure is administratively sustainable.

The consultation is seeking the views of stakeholders to consider any potential changes to the current contribution structure ensuring the scheme design is reflective of the current labour market and will meet the overall member contribution target yield for the scheme in each valuation round.

1.1.4 If there are any Section 75 categories which might be expected to benefit from the intended policy, please explain how.

No

1.1.5 Who initiated or wrote the policy?

The policy update was developed and written by the DoH – Pension Policy.

1.1.6 Who owns and who implements the policy?

The Department of Health has the overall responsibility for the policy and its introduction. The Northern Ireland Fire and Rescue Service (NIFRS) is responsible for implementing provisions resulting from this policy revision.

1.2 Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision? If yes, are they

Financial

☐

Legislative

☐

Other

☐

No

1.3 Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

Staff

✓

Service users

Other public sector organisations

Voluntary/community/trade unions

✓

Other, please specify

✓

Firefighters who are members of the Northern Ireland Firefighters' Pension Schemes

Northern Ireland Fire and Rescue Service (NIFRS) who administer the scheme

Firefighter Trade Unions

1.4 Other policies with a bearing on this policy / decision. If any:

Policy	Owner(s) of the policy
None	

1.5 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.

Section 75 category	Details of evidence/information
Religious belief	Religion will have no bearing on uptake of the legislation
Political opinion	Political opinion will have no bearing on uptake of the legislation
Racial group	Ethnicity will have no bearing on uptake of the legislation
Age	Age will have no bearing on uptake of this legislation
Marital status	Marital status will have no bearing on uptake of the legislation
Sexual orientation	Sexual orientation will have no bearing on uptake of the legislation
Gender (Men and women generally)	The legislation will apply equally to people of either gender although due to the makeup of NIFRS firefighters, more males than females will be affected.
Disability (with or without)	The legislation will apply equally to people with a disability
Dependants (with or without)	Dependent status will have no bearing on uptake of the legislation

* Qualitative data – refers to the experiences of individuals related in their own terms, and based on their own experiences and attitudes. Qualitative data is often used to complement quantitative data to determine why policies are successful or unsuccessful and the reasons for this.

Quantitative data - refers to numbers (that is, quantities), typically derived from either a population in general or samples of that population. This information is often analysed either using descriptive statistics (which summarise patterns), or inferential statistics (which are used to infer from a sample about the wider population).

1.6 Needs, experiences and priorities

Taking into account the information recorded in 1.1 to 1.5, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision? Specify details for each of the Section 75 categories

Section 75 category	Details of needs/experiences/priorities
Religious belief	There is no evidence that different religions will have any different needs, experiences, priorities or issues in relation to the proposals.
Political opinion	There is no evidence that different political opinions will have any different needs, experiences, priorities or issues in relation to the proposals.
Racial group	There is no evidence that different racial groups will have any different needs, experiences, priorities or issues in relation to the proposals.
Age	There is no evidence that different age groups will have any different needs, experiences, priorities or issues in relation to the proposals.
Marital status	There is no evidence that different age groups will have any different needs, experiences, priorities or issues in relation to the proposals.
Sexual orientation	There is no evidence that those with different sexual orientation will have any different needs, experiences, priorities or issues in relation to the proposals.
Gender (Men and women generally)	There is no evidence that different age groups will have any different needs, experiences, priorities or issues in relation to the proposals.
Disability (with or without)	There is no evidence that people with disabilities will have any different needs, experiences, priorities or issues in relation to the proposals.
Dependants (with or without)	There is no evidence that those of different dependant status will have any different needs, experiences, priorities or issues in relation to the proposals.

Part 2. Screening questions

2.1 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	No impact on equality of opportunity.	None
Political opinion	No impact on equality of opportunity.	None
Racial group	No impact on equality of opportunity.	None
Age	One of the aims of the review is to ensure that the banding is fair to all members at each stage of their career.	None
Marital status	No impact on equality of opportunity.	None
Sexual orientation	No impact on equality of opportunity.	None
Gender (Men and women generally)	No impact on equality of opportunity.	None
Disability (with or without)	No impact on equality of opportunity.	None
Dependants (with or without)	No impact on equality of opportunity.	None

2.2 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
Religious belief	-	Religious belief has no impact on implementation of the proposals.
Political opinion	-	Political Opinion has no impact on implementation of the proposals.
Racial group	-	Racial Grouping has no impact on implementation of the proposals.
Age	-	Members' Age has no impact on implementation of the proposals.
Marital status	-	Marital status has no impact on implementation of the proposals.
Sexual orientation	-	Sexual Orientation has no impact on implementation of the proposals.
Gender (Men and women generally)	-	Gender has no impact on implementation of the proposals.
Disability (with or without)	-	Disability has no impact on implementation of the proposals.
Dependants (with or without)	-	Being a dependent has no impact on implementation of the proposals.

2.3 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
Religious belief	The policy will not impact on good relations.	None
Political opinion	The policy will not impact on good relations.	None
Racial group	The policy will not impact on good relations.	None

2.4 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
Religious belief	-	The amendments apply to amending member contributions for members of the Firefighters' Pension Scheme and are unaffected by Religious Belief
Political opinion	-	The amendments apply to amending member contributions for members of the Firefighters' Pension Scheme and are unaffected by Political Opinion
Racial group	-	The amendments apply to amending member contributions for members of the Firefighters' Pension Scheme and are unaffected by Racial Grouping

2.5 Additional considerations

Multiple identity

Provide details of data on the impact of the policy on people with multiple identities (e.g. minority ethnic people with a disability, women with a disability, young protestant men, and young lesbian, gay or bisexual persons). Specify relevant Section 75 categories concerned.

There are no potential impacts of the policy for persons within any Section 75 groups including people with multiple identities.

2.6 Was the original policy / decision changed in any way to address any adverse impacts identified either through the screening process or from consultation feedback? If so please provide details.

No. This screening will be reviewed based on consultation responses received.

Part 3. Screening decision

3.1 How would you summarise the impact of the policy / decision?

No impact
Minor impact
Major impact

✓

Consider mitigation (3.4 – 3.5)

3.2 Do you consider that this policy / decision needs to be subjected to a full Equality Impact Assessment (EQIA)?

Yes - screened in
No - screened out

✓

3.3 Please explain your reason for making your decision at 3.2.

The Firefighters' Pension Scheme proposed amendments to scheme regulations will not create any significant adverse impact on any of the Section 75 groups.

Mitigation

If you have concluded at 3.1 and 3.2 that the likely impact is ‘**minor**’ and an equality impact assessment is not to be conducted, you must consider mitigation (or scope for further mitigation if some is already included as per 2.6) to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

3.4 Can the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations?

Yes
No

✓

3.5 If you responded “**Yes**”, please give the **reasons** to support your decision, together with the proposed changes/amendments or alternative policy.

Part 4. Monitoring

Monitoring is an important part of policy development and implementation. Through monitoring it is possible to assess the impacts of the policy / decision both beneficial and adverse.

4.1 Please detail how you will monitor the effect of the policy / decision?

Information gathered from this consultation and similar consultations being carried out for the other Firefighters Pension Schemes in GB will be used to monitor any potential impact. Data in relation to scheme opt-outs will also be used to monitor the effect of the policy.

4.2 What data will you collect in the future in order to monitor the effect of the policy / decision?

The Northern Ireland Fire and Rescue Service is required to review the rate of opt outs from the firefighter pension schemes and this will be used to monitor the effect of the scheme.

Please note: - For the purposes of the annual progress report to the Equality Commission you may later be asked about the monitoring you have done in relation to this policy and whether that has identified any Equality issues.

Part 5. Disability Duties

5.1 Does the policy/decision in any way promote positive attitudes towards disabled people and/or encourage their participation in public life?

The legislation will not discourage people with a disability from participating in public life nor will it fail to promote positive attitudes towards disabled people

5.2 Is there an opportunity to better promote positive attitudes towards disabled people or encourage their participation in public life by making changes to the policy/decision or introducing additional measures?

There is no opportunity to promote positive attitudes towards disabled people or encourage their participation in public life by changing or introducing additional measures to the legislation

Part 6. Human Rights

6.1 Please complete the table below to indicate whether the policy / decision affects anyone's Human Rights?

ARTICLE	POSITIVE IMPACT	NEGATIVE IMPACT = human right interfered with or restricted	NEUTRAL IMPACT
Article 2 – Right to life			✓
Article 3 – Right to freedom from torture, inhuman or degrading treatment or punishment			✓
Article 4 – Right to freedom from slavery, servitude & forced or compulsory labour			✓
Article 5 – Right to liberty & security of person			✓
Article 6 – Right to a fair & public trial within a reasonable time			✓
Article 7 – Right to freedom from retrospective criminal law & no punishment without law.			✓
Article 8 – Right to respect for private & family life, home and correspondence.			✓
Article 9 – Right to freedom of thought, conscience & religion			✓
Article 10 – Right to freedom of expression			✓
Article 11 – Right to freedom of assembly & association			✓
Article 12 – Right to marry & found a family			✓
Article 14 – Prohibition of discrimination in the enjoyment of the convention rights			✓
1 st protocol Article 1 – Right to a peaceful enjoyment of possessions & protection of property			✓
1 st protocol Article 2 – Right of access to education			✓

6.2 If you have identified a likely negative impact who is affected and how?

No negative impacts were identified within the legislation.

At this stage we would recommend that you consult with your line manager to determine whether to seek legal advice and to refer to Human Rights Guidance to consider:

- whether there is a law which allows you to interfere with or restrict rights*
- whether this interference or restriction is necessary and proportionate*
- what action would be required to reduce the level of interference or restriction in order to comply with the Human Rights Act (1998).*

6.3 Outline any actions which could be taken to promote or raise awareness of human rights or to ensure compliance with the legislation in relation to the policy/decision.

No actions can be taken to promote or raise awareness of human rights or ensure compliance with the legislation in relation to the policy

Part 7 - Approval and authorisation

	Name	Grade	Date
Screened completed by	Jenna Allen	DP	31/10/2024
Approved by ¹	Siobhán McKelvey	G7	31/10/2024
Forwarded to E&HR Unit ²			10/04/26

Notes:

¹ The Screening Template should be approved by a senior manager responsible for the policy this would normally be at least Grade 7.

² When the Equality and Human Rights Unit receive a copy of the final screening it will be placed on the Department's website and will be accessible to the public from that point on. In addition, consultees who elect to receive it, will be issued with a quarterly listing all screenings completed during each three month period.