



Equality Scheme for Radius Housing

**Drawn up in accordance with Section 75 and Schedule 9 of the
Northern Ireland Act 1998**

Radius Housing
Radius House
38-52 Lisburn Road
Belfast

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Please note: Foreword and Appendices 3 and 4 form part of this equality scheme.

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Foreword

Section 75 of the Northern Ireland Act 1998 (the Act) requires public authorities, in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations across a range of categories outlined in the Act.

In our equality scheme we set out how Radius Housing proposes to fulfil the Section 75 statutory duties.

We will commit the necessary resources in terms of people, time and money to make sure that the Section 75 statutory duties are complied with and that the equality scheme is implemented effectively, and on time.

We commit to having effective internal arrangements in place for ensuring our effective compliance with the Section 75 statutory duties and for monitoring and reviewing our progress.

We will develop and deliver a programme of communication and training with the aim of ensuring that all our staff and board members are made fully aware of our equality scheme and understand the commitments and obligations within it. We will develop a programme of awareness raising for our consultees on the Section 75 statutory duties and our commitments in our equality scheme.

We, the Chair and Chief Executive of Radius Housing, are fully committed to effectively fulfilling our Section 75 statutory duties across all our functions (including service provision, employment and procurement) through the effective implementation of our equality scheme.

We realise the important role that the community and voluntary sector and the general public have to play to ensure the Section 75 statutory duties are effectively implemented. Our equality scheme demonstrates how determined we are to ensure there are opportunities, for people affected by our work, to positively influence how we carry out our functions in line with our Section 75 statutory duties. It also offers the means whereby persons directly affected by what they consider to be a failure, on our part, to comply with our equality scheme, can make complaints.

On behalf of Radius Housing and our staff we are pleased to support and endorse this equality scheme which has been drawn up in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998 and Equality Commission guidelines.

Signed:



Diana Fitzsimons
Chair

Signed:



John McLean
Chief Executive

Date: 22 October 2018

Chapter 1 Introduction

Section 75 of the Northern Ireland Act 1998

1.1 Section 75 of the Northern Ireland Act 1998 (the Act) requires Radius Housing to comply with two statutory duties:

Section 75 (1)

In carrying out our functions relating to Northern Ireland we are required to have due regard to the need to promote equality of opportunity between

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation
- men and women generally
- persons with a disability and persons without
- persons with dependants and persons without

Section 75 (2)

In addition, without prejudice to the obligations above, in carrying out our functions in relation to Northern Ireland we are required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

“Functions” include the “powers and duties” of a RSHP¹. This includes our employment and procurement functions. Please see below under “Who we are and what we do” for a detailed explanation of our functions.

How we propose to fulfil the Section 75 duties in relation to the relevant functions of Radius Housing

1.2 Schedule 9 4 (1) of the Act requires Radius Housing as a designated RSHP to set out in an equality scheme how it proposes to fulfil the duties imposed by Section 75 in relation to its relevant functions. This equality scheme is intended to fulfil that statutory requirement. It is both a statement of our arrangements for fulfilling the Section 75 statutory duties and our plan for their implementation.

1.3 Radius Housing is committed to the discharge of its Section 75 obligations in all parts of our organisation and we will commit the necessary available resources in terms of people, time and money to

¹ Section 98 (1) of the Northern Ireland Act 1998.

ensure that the Section 75 statutory duties are complied with and that our equality scheme can be implemented effectively.

Who we are and what we do

About Registered Social Housing Providers in Northern Ireland

A Registered Social Housing Provider (RSHP) is an independent voluntary organisation dedicated to helping people obtain good, affordable housing which meets their needs. A significant proportion of the work they do assists the government in the delivery of much-needed public services but they are not public bodies.

In April 2004 RSHPs in Northern Ireland came within the jurisdiction of the Commissioner for Complaints by virtue of Article 146 of The Housing (NI) Order 2003. As a result of this RSHPs were designated as public authorities for the purposes of Section 75 of the Northern Ireland Act 1998.

RSHPs are regulated by the Department for Communities (DfC). They work closely with the DfC and the Northern Ireland Housing Executive (NIHE) to deliver housing and related services. Some also provide care and /or support services so they work with the relevant public authorities for the health sector too. As a result of this situation, RSHPs must adhere to a wide range of policies and procedures which have been developed and are owned by a public authority or government department. In such cases providers must operate the policy of another body and have little or no scope to change that policy. For example, RSHPs are the main delivery vehicle for the Social Housing Development Programme but need is determined by the NIHE and DfC develops the programme which is then managed by the Housing Executive. So whilst RSHPs may bid to deliver part of that programme they have no powers to shape the programme or establish where new social housing should be built.

In establishing their action plans RSHPs have therefore been mindful of the need to focus on measures where they have greatest ability to effect change. Where appropriate, potential inequalities identified that are outside the remit of the RSHPs will be referred to the relevant public body.

About Radius Housing

Radius Housing provides housing, care and support to over 33,000 homes. We are a social enterprise employing over 1,100 people and managing 12,000 properties in 80 towns across Northern Ireland. Radius has a social housing presence in all 11 council areas, serviced by a regional office network spanning Belfast, Holywood, Ballymena, Newry and Londonderry.

Radius Housing was established in April 2017 following merger between Fold Housing and Helm Housing and draws on over 80 years' combined experience to make a positive impact on housing and communities into the future.

Radius Housing has key strategic relationships with the DfC, and the NIHE, as detailed above. Joint Management Partnerships are in place with the following voluntary bodies and Health and Social Care Trusts to ensure provision of high quality housing and support services:

- Belfast Charitable Society
- Belfast HSC Trust
- Care Circle
- Citrah
- Depaul Ireland
- Extern
- FHASS (First Housing Aid and Support Services)
- Inspire
- MACs
- Mencap
- Northern HSC Trust
- Praxis
- Presbyterian Board of Social Witness
- Prospects
- Salvation Army
- Simon Community
- South Eastern HSC Trust
- Southern HSC Trust
- Threshold
- Western HSC Trust

Radius is a member of the Northern Ireland Federation of Housing Associations (NIFHA), and currently employs 1,100 people. There is

a voluntary Board of Management comprising 15 members which presently meets monthly.

The Tenants' Forum comprises democratically elected tenant representatives from Radius Housing Area Panels. We also have a tenant Board member who also sits on Board Committees.

Chapter 2 Our arrangements for assessing our compliance with the section 75 duties (Schedule 9 4 (2) (a))

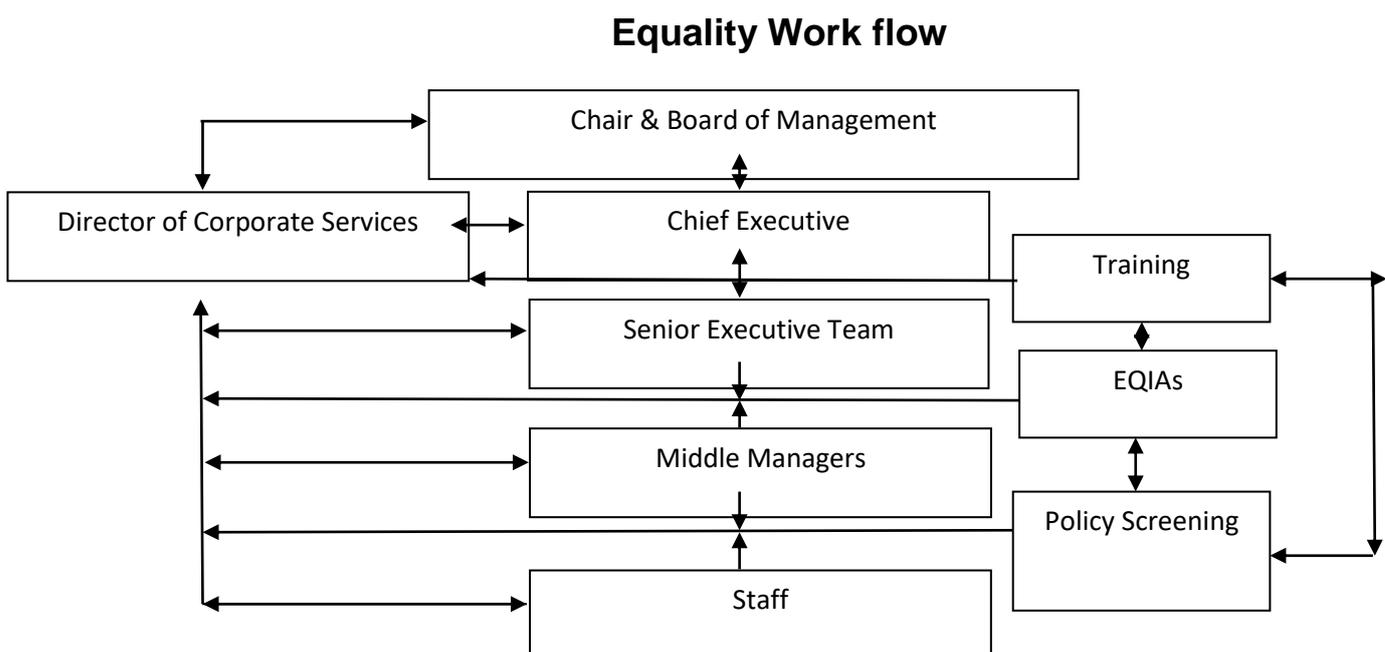
2.1 Some of our arrangements for assessing our compliance with the Section 75 statutory duties are outlined in other relevant parts of this equality scheme [please see Chapter 3 *Consulting*; Chapter 4 *Our arrangements for assessing, monitoring and publishing the impact of policies, and*; Chapter 8 *Our Complaints Procedure*]

In addition we have the following arrangements in place for assessing our compliance:

Responsibilities and reporting

2.2 We are committed to the fulfilment of our Section 75 obligations in all parts of our work.

2.3 Responsibility for the effective implementation of our equality scheme lies with the Chief Executive. The Director of Corporate Services is accountable to Radius Housing in the capacity of Equality Manager for the development, implementation, maintenance and review of the equality scheme in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998, including any good practice or guidance that has been or may be issued by the Equality Commission.



2.4 If you have any questions or comments regarding our equality scheme, please contact in the first instance the Director of Corporate Services at the address given below and we will respond to you within 20 working days:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel: 0330 123 0888
Fax: 028 9033 0402
Typetalk: 18001 028 9032 0485
Email: equality@radiushousing.org

2.5 Objectives and targets relating to the statutory duties will be integrated into our strategic and operational business plans².

2.6 Employees' job descriptions and performance plans reflect their contributions to the discharge of the Section 75 statutory duties and implementation of the equality scheme. The personal performance plans are subject to appraisal in the annual performance review.

2.7 Radius Housing prepares an annual report on the progress we have made on implementing the arrangements set out in this equality scheme to discharge our Section 75 statutory duties (Section 75 annual progress report).

The Section 75 annual progress report will be sent to the Equality Commission by 31 August each year and will follow any guidance on annual reporting issued by the Equality Commission.

Progress on the delivery of Section 75 statutory duties will also be included in our organisational annual report.

² See Appendix 4 'Timetable for measures proposed' and section 2.11 of this equality scheme.

2.8 The latest Section 75 annual progress report is available on our website:

www.radiushousing.org

or by contacting:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel: 0330 123 0888
Fax: 028 9033 0402
Typetalk: 18001 028 9032 0485
Email: equality@radiushousing.org

2.9 Radius Housing will liaise closely with the Equality Commission to ensure that progress on the implementation of our equality scheme is maintained.

2.10 Radius Housing is committed to further developing an action plan to promote equality of opportunity and good relations. This action plan which is referred to in Appendix 6 to this equality scheme has been refined and further developed as part of the consultation process. It will continue to be updated during the life of the scheme.

Action plan

2.11 The action measures that will make up our action plan are relevant to our functions. They have been developed and prioritised on the basis of the previous audit of inequalities. The audit of inequalities gathered and analysed information across the Section 75 categories³ to identify the inequalities that exist for our service users and those affected by our policies⁴.

³ See section 1.1 of this equality scheme for a list of these categories.

⁴ See section 4.1 of this equality scheme for a definition of policies.

2.12 Action measures will be specific, measurable, linked to achievable outcomes, realistic and time bound. Action measures will include performance indicators and timescales for their achievement.

2.13 We will develop any action plans for a period of between one and five years in order to align them with our corporate and business planning cycles. Implementation of the action measures will be incorporated into our business planning process.

2.14 We will seek input from our stakeholders and consult on our action plan before we send it to the Equality Commission and thereafter when reviewing the plan as per 2.16 below.

2.15 We will monitor our progress on the delivery of our action measures annually and update the action plan as necessary to ensure that it remains effective and relevant to our functions and work.

2.16 Radius Housing will inform the Commission of any changes or amendments to our action plan and will also include this information in our Section 75 Annual Progress Report to the Commission. Our Section 75 Annual Progress Report will incorporate information on progress we have made in implementing our action plans.

2.17 Once finalised, our new action plan will be available from:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel: 0330 123 08888
Fax: 028 9033 0402
Typetalk: 18001 028 9032 0485
Email: equality@radiushousing.org
Website: www.radiushousing.org

If you require it in an alternative format please contact us using the details provided above.

Chapter 3 Our arrangements for consulting

(Schedule 9 4. (2) (a)) - on matters to which a duty (S75 (1) or (2)) is likely to be relevant (including details of the persons to be consulted).

(Schedule 9 4. (2) (b)) on the likely impact of policies adopted or proposed to be adopted by us on the promotion of equality of opportunity.

3.1 We recognise the importance of consultation in all aspects of the implementation of our statutory equality duties. We will consult on our equality scheme, action measures, equality impact assessments and other matters relevant to the Section 75 statutory duties.

3.2 We are committed to carrying out consultation in accordance with existing and developing good practice and the following principles (as contained in the Equality Commission's guidance '*Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)*')

3.2.1 All consultations will seek the views of those directly affected by the matter/policy, the Equality Commission, representative groups of Section 75 categories, other public authorities, voluntary and community groups, our staff and their trades unions and such other groups who have a legitimate interest in the matter, whether or not they have a direct economic or personal interest.

Initially all consultees (see Appendix 3), as a matter of course, will be notified (by email or post) of the matter/policy being consulted upon to ensure they are aware of all consultations. Thereafter, to ensure the most effective use of our and our consultees' resources, we will take a targeted approach to consultation for those consultees that may have a particular interest in the matter/policy being consulted upon and to whom the matter/policy is of particular relevance. This may include for example regional or local consultations, sectoral or thematic consultation etc.

Throughout each formal consultation exercise the relevant documents will also be available, in a range of formats including hard copies, directly from Radius Housing.

3.2.2 Consultation with all stakeholders will begin as early as possible. We will engage with affected individuals and representative groups to identify how best to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these. Methods of consultation could include:

- Face-to-face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires / Surveys
- Information/notification by email with an opportunity to opt in/opt out of the consultation
- Telephone consultations.

This list is not exhaustive and we may develop other additional methods of consultation more appropriate to key stakeholders and the matter being consulted upon.

3.2.3 We will consider the accessibility and format of every method of consultation we use in order to remove barriers to the consultation process. Specific consideration will be given as to how best to communicate with children and young people, people with disabilities (in particular people with learning disabilities) and minority ethnic communities. We take account of existing and developing good practice, including the Equality Commission's guidance *Let's Talk Let's Listen – Guidance for public authorities on consulting and involving children and young people (2008)*.

RSHPs provide services to a wide range of people however based on Radius Housing's tenant profile we give specific consideration to:

- single people;
- families;
- people whose first language is not English;
- older people, and;
- people with disabilities.

Information will be made available, on request, in alternative formats⁵, in a timely manner, usually within 15 working days. We will ensure that such consultees have equal time to respond.

3.2.4 Specific training is provided to those facilitating consultations to ensure that they have the necessary skills to communicate effectively with consultees.

3.2.5 To ensure effective consultation with consultees⁶ on Section 75 matters, we will develop a programme of awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by undertaking the following:

- Meetings with Board of Management
- Meetings with tenants
- Meetings with staff
- Meetings with Joint Management Partners
- Public consultation exercise
- Availability of information on website

3.2.6 The consultation periods will last for a minimum twelve weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view. However, in exceptional circumstances when this timescale is not feasible (for example implementing EU Directives or UK wide legislation, meeting Health and Safety requirements, addressing urgent public health matters or complying with Court judgements), we may shorten timescales to eight weeks or less before the policy is implemented. We may continue consultation thereafter and will review the policy as part of our monitoring commitments⁷.

Where, under these exceptional circumstances, we must implement a policy immediately, as it is beyond our authority's control, we may consult after implementation of the policy, in order to ensure that any impacts of the policy are considered.

3.2.7 If a consultation exercise is to take place over a period when consultees are less able to respond, for example, over the summer or

⁵ See Chapter 6 of our equality scheme for further information on alternative formats of information we provide.

⁶ Please see Appendix 3 for a list of our consultees.

⁷ Please see below at 4.27 to 4.31 for details on monitoring.

Christmas break, or if the policy under consideration is particularly complex, we will give consideration to the feasibility of allowing a longer period for the consultation.

3.2.8 We are conscious of the fact that affected individuals and representative groups may have different needs. We will take appropriate measures to ensure full participation in any meetings that are held. We will consider for example the time of day, the appropriateness of the venue, in particular whether it can be accessed by those with disabilities, how the meeting is to be conducted, the use of appropriate language, whether a signer and/or interpreter is necessary, and whether the provision of childcare and support for other carers is required.

3.2.9 We make all relevant information available to consultees in appropriate formats to ensure meaningful consultation. This includes detailed information on the policy proposal being consulted upon and any relevant quantitative and qualitative data.

3.2.10 In making any decision with respect to a policy adopted or proposed to be adopted, we take into account any assessment and consultation carried out in relation to the policy.

3.2.11 We provide feedback to consultees in a timely manner. A feedback report is prepared which includes summary information on the policy consulted upon, a summary of consultees' comments and a summary of our consideration of and response to consultees' input. The feedback is provided in formats suitable to consultees. (Please see also 6.3)

3.3 A list of our consultees is included in this equality scheme at Appendix 3. It can also be obtained from our website at:

www.radiushousing.org

or by contacting:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel: 0330 123 0888
Fax: 028 9033 0402
Typetalk: 18001 028 9032 0485
Email: equality@radiushousing.org
Website: www.radiushousing.org

3.4 Our consultation list is not exhaustive and is reviewed on an annual basis to ensure it remains relevant to our functions and policies.

We welcome enquiries from any person/s or organisations wishing to be added to the list of consultees. Please use the contact details at 3.3 (above) to provide your contact details and have your areas of interest noted or have your name/details removed or amended. Please also inform us at this stage if you would like information sent to you in a particular format or language.

3.5 In consulting we will take cognisance of ODI guidance on accessible consultation events for people with a disability <http://www.officefordisability.gov.uk/iod/channels/events.php> and the Department for Business, Enterprise and Regulatory Reform Code of Conduct on Consultation (2008) <http://www.berr.gov.uk/files/file47158.pdf>.

Chapter 4 **Our arrangements for assessing, monitoring and publishing the impact of policies**

(Schedule 9 4. (2) (b); Schedule 9 4. (2) (c);
Schedule 9 4. (2) (d); Schedule 9 9. (1); Schedule 9 9.(2))

Our arrangements for assessing the likely impact of policies adopted or proposed to be adopted on the promotion of equality of opportunity (Schedule 9 4. (2) (b))

4.1 In the context of Section 75, 'policy' is very broadly defined and it covers all the ways in which we carry out or propose to carry out our functions in relation to Northern Ireland. In respect of this equality scheme, the term policy is used for any (proposed/amended/existing) strategy, policy initiative or practice and/or decision, whether written or unwritten and irrespective of the label given to it, eg, 'draft', 'pilot', 'high level' or 'sectoral'.

4.2 In making any decision with respect to a policy adopted or proposed to be adopted, we take into account any assessment and consultation carried out in relation to the policy, as required by Schedule 9 9. (2) of the Northern Ireland Act 1998.

4.3 Radius Housing uses the tools of **screening** and **equality impact assessment** to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will also follow Equality Commission guidance:

- the guidance on screening, including the screening template, as detailed in the Commission's guidance '*Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)*' and
- on undertaking an equality impact assessment as detailed in the Commission's guidance '*Practical guidance on equality impact assessment (February 2005)*'.

Screening

4.4 The purpose of screening is to identify those policies that are likely to have an impact on equality of opportunity and/or good relations.

4.5 Screening is completed at the earliest opportunity in the policy development/review process. Policies which we propose to adopt will be subject to screening prior to implementation. For more detailed strategies or policies that are to be put in place through a series of stages, we will screen at various stages during implementation.

4.6 The lead role in the screening of a policy is taken by the policy decision maker who has the authority to make changes to that policy. However, screening will also involve other relevant team members, for example, equality specialists, those who implement the policy and staff members from other relevant work areas. Where possible we will include key stakeholders in the screening process.

4.7 The following questions are applied to all our policies as part of the screening process:

- 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)
- Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?
- To what extent is the policy likely to impact on good relations between people of a different religious belief, political opinion or racial group? (minor/major/none)
- Are there opportunities to better promote good relations between people of a different religious belief, political opinion or racial group?

4.8 In order to answer the screening questions, we gather all relevant information and data, both qualitative and quantitative. In taking this evidence into account we consider the different needs, experiences and priorities for each of the Section 75 equality categories. Any screening decision will be informed by this evidence.

4.9 Completion of screening, taking into account our consideration of the answers to all four screening questions set out in 4.7 above, will lead to one of the following three outcomes:

1. the policy has been 'screened in' for equality impact assessment
2. the policy has been 'screened out' with mitigation⁸ or an alternative policy proposed to be adopted
3. the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

4.10 If our screening concludes that the likely impact of a policy is 'minor' in respect of one, or more, of the equality of opportunity and/or good relations categories, we may on occasion decide to proceed with an equality impact assessment, depending on the policy. If an EQIA is not to be conducted we will nonetheless consider measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations.

Where we mitigate we will outline in our screening template the reasons to support this decision together with the proposed changes, amendments or alternative policy.

This screening decision will be 'signed off' by the appropriate policy lead within Radius Housing.

4.11 If our screening concludes that the likely impact of a policy is 'major' in respect of one, or more, of the equality of opportunity and/or good relations categories, we will normally subject the policy to an equality impact assessment. This screening decision will be 'signed off' by the appropriate policy lead within Radius Housing.

4.12 If our screening concludes that the likely impact of a policy is 'none', in respect of all of the equality of opportunity and/or good relations categories, we may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, we will give details of the reasons for the decision taken. This screening decision will be 'signed off' by the appropriate policy lead within Radius Housing.

⁸ Mitigation – Where an assessment (screening in this case) reveals that a particular policy has an adverse impact on equality of opportunity and / or good relations, a RSHP must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories.

4.13 As soon as possible following the completion of the screening process, the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on our website. This will also be available from:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel: 028 90320485
Fax: 028 9033 0402
Typetalk: 18001 028 9032 0485
Email: equality@radiushousing.org
Website: www.radiushousing.org

4.14 If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, we will review the screening decision.

4.15 Our screening reports are published quarterly [see below at 4.20 - 4.22 and 4.23 for details].

Equality impact assessment

4.16 An equality impact assessment (EQIA) is a thorough and systematic analysis of a policy, whether that policy is formal or informal, and irrespective of the scope of that policy. The primary function of an EQIA is to determine the extent of any impact of a policy upon the Section 75 categories and to determine if the impact is an adverse one. It is also an opportunity to demonstrate the likely positive outcomes of a policy and to seek ways to more effectively promote equality of opportunity and good relations.

4.17 Once a policy is screened and screening has identified that an equality impact assessment is necessary, we will carry out the EQIA in accordance with Equality Commission guidance. The equality impact assessment will be carried out as part of the policy development process, before the policy is implemented.

4.18 Any equality impact assessment will be subject to consultation at the appropriate stage(s). (For details see above Chapter 3 “Our Arrangements for Consulting”).

Our arrangements for publishing the results of the assessments of the likely impact of policies we have adopted or propose to adopt on the promotion of equality of opportunity
(Schedule 9 4 (2) (d); Schedule 9 9 (1))

4.19 We will make publicly available the results of our assessments (screening and EQIA) of the likely impact of our policies on the promotion of equality of opportunity and good relations.

What we will publish

4.20 Screening reports

These will be published quarterly. Screening reports detail:

- All policies screened by Radius Housing over the three month period
- A statement of the aim(s) of the policy/policies to which the assessment relates
- Consideration given to measures which might mitigate any adverse impact
- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity;
- Screening decisions, i.e.:
 - whether the policy has been ‘screened in’ for equality impact assessment.
 - whether the policy has been ‘screened out’ with mitigation or an alternative policy proposed to be adopted.
 - whether the policy has been ‘screened out’ without mitigation or an alternative policy proposed to be adopted.
- Where applicable, a timetable for conducting equality impact assessments
- A link to the completed screening template(s) on our website

4.21 Screening templates

For details on the availability of our screening templates please refer to 4.13.

4.22 Equality impact assessments

EQIA reports are published once the impact assessment has been completed. These reports include:

- A statement of the aim of the policy assessed
- Information and data collected
- Details of the assessment of impact(s)
- Consideration given to measures which might mitigate any adverse impact
- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity
- Consultation responses
- The decision taken
- Future monitoring plans.

How we publish the information

4.23 All information we publish is accessible and can be made available in alternative formats on request. Please see 6.3 below.

Where we publish the information

4.24 The results of our assessments (screening reports and completed templates, the results of equality impact assessments) are available on our website

www.radiushousing.org

or by contacting:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel: 0330 123 0888

Fax: 028 90330402
Textphone: 18001 0289032 0485
Email: equality@radiushousing.org
Website: www.radiushousing.org

4.25 In addition to the above, screening reports (electronic link or hard copy on request if more suitable for recipients) which include all policies screened over a 3 month period will also be sent directly to all consultees on a quarterly basis.

4.26 We will inform the general public about the availability of this material through communications such as press releases where appropriate.

Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity

(Schedule 9 4. (2) (c))

4.27 Monitoring can assist us to deliver better public services and continuous improvements. Monitoring Section 75 information involves the processing of sensitive personal data (data relating to the racial or ethnic origin of individuals, sexual orientation, political opinion, religious belief, etc). In order to carry out monitoring in a confidential and effective manner, the Radius Housing follows guidance from the Office of the Information Commissioner and the Equality Commission.

4.28 We monitor any adverse impact on the promotion of equality of opportunity of policies we have adopted. We are also committed to monitoring more broadly to identify opportunities to better promote equality of opportunity and good relations in line with Equality Commission guidance.

4.29 The systems we have established to monitor the impact of policies and identify opportunities to better promote equality of opportunity and good relations are:

- The collection, collation and analysis of existing relevant primary quantitative and qualitative data across all nine equality categories on an ongoing basis

- The collection, collation and analysis of existing relevant secondary sources of quantitative and qualitative data across all nine equality categories on an ongoing basis
- An audit of existing information systems to identify the extent of current monitoring and take action to address any gaps in order to have the necessary information on which to base decisions
- Undertaking or commissioning new data gathering if necessary.

4.30 If over a two year period monitoring and evaluation show that a policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, we will ensure that the policy is revised to achieve better outcomes for relevant equality groups.

4.31 We review our EQIA monitoring information on an annual basis. Other monitoring information including:
Staff Information: is undertaken on commencement of employment
Board Information: will be undertaken annually
Tenant Information: is collected for 7 of the 9 categories from all new tenants

Our arrangements for publishing the results of our monitoring (Schedule 9 4. (2) (d))

4.32 Schedule 9 4. (2) (d) requires us to publish the results of the monitoring of adverse impacts of policies we have adopted. However, we are committed to monitoring more broadly and the results of our policy monitoring are published as follows:

4.33 EQIA monitoring information is published as part of our Section 75 annual progress report [see 2.7]

4.34 We will publish a summary of our monitoring information on our website, and by sending a link to our consultees by email annually.

4.35 All information published is accessible and can be made available in alternative formats on request. Please see below at 6.3 for details.

Chapter 5 Staff training

(Schedule 9 4.(2) (e))

Commitment to staff training

5.1 We recognise that awareness raising and training play a crucial role in the effective implementation of our Section 75 duties.

5.2 Our Chief Executive wishes to positively communicate the commitment of the Radius Housing to the Section 75 statutory duties, both internally and externally.

To this end we have introduced an effective communication and training programme for all staff and will ensure that our commitment to the Section 75 statutory duties is made clear in all relevant publications.

Training objectives

5.3 Radius Housing will draw up a detailed training plan for its staff which will aim to achieve the following objectives:

- to raise awareness of the provisions of Section 75 of the Northern Ireland Act 1998, our equality scheme commitments and the particular issues likely to affect people across the range of Section 75 categories, to ensure that our staff fully understand their role in implementing the scheme
- to provide those staff involved in the assessment of policies (screening and EQIA) with the necessary skills and knowledge to do this work effectively
- to provide those staff who deal with complaints in relation to compliance with our equality scheme with the necessary skills and knowledge to investigate and monitor complaints effectively
- to provide those staff involved in consultation processes with the necessary skills and knowledge to do this work effectively
- to provide those staff involved in the implementation and monitoring of the effective implementation of the Radius Housing equality scheme with the necessary skills and knowledge to do this work effectively.

Awareness raising and training arrangements

5.4 The following arrangements are in place to ensure all our staff and Board members are aware of and understand our equality obligations.

- We will develop a summary of this equality scheme and make it available to all staff.
- We will provide access to copies of the full equality scheme for all staff; ensure that any queries or questions of clarification from staff are addressed effectively.
- Staff in Radius Housing will receive a briefing on this equality scheme within three months after approval of scheme.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within Radius Housing who are directly engaged in taking forward the implementation of our equality scheme commitments (including those involved in research and data collection, policy development, service design, conducting equality impact assessments, screening, consultation, monitoring and evaluation).
- Where appropriate, training will be provided to ensure staff are aware of the issues experienced by the range of Section 75 groups.
- When appropriate and on an ongoing basis, arrangements will be made to ensure staff are kept up to date with Section 75 developments.
- As we are working jointly with other designated RSHPs through NIFHA, Radius will contribute to and participate in all equality training events which arise as a result of the Section 75 duty.

5.5 Training and awareness raising programmes will, where relevant, be developed in association with the appropriate Section 75 groups and our staff.

In order to share resources and expertise, Radius Housing will, where possible, work closely with other bodies and agencies in the development and delivery of training.

Monitoring and evaluation

5.6 Our training programme is subject to the following monitoring and evaluation arrangements:

- We evaluate the extent to which all participants in this training programme have acquired the necessary skills and knowledge to achieve each of the above objectives.
- The extent to which training objectives have been met will be reported on as part of the Section 75 annual progress report, which will be sent to the Equality Commission.
- We will monitor and evaluate the number of staff trained and the equality profile of the staff trained, as well as the job roles of the staff involved in equality training.

Chapter 6 Our arrangements for ensuring and assessing public access to information and services we provide

(Schedule 9 4. (2) (f))

6.1 Radius Housing is committed to ensuring that the information we disseminate and the services we provide are fully accessible to all parts of the community in Northern Ireland. We keep our arrangements under review to ensure that this remains the case.

6.2 We are aware that some groups will not have the same access to information as others.

In particular:

- People with sensory, learning, communication and mobility disabilities may require printed information in other formats.
- Members of ethnic minority groups, whose first language is not English, may have difficulties with information provided only in English.
- Children and young people may not be able to fully access or understand information.

Access to information

6.3 To ensure equality of opportunity in accessing information, we provide information in alternative formats on request, where reasonably practicable. Where the exact request cannot be met we will ensure a reasonable alternative is provided.

Alternative formats include CD / MP3, Braille, pictorial, large print or minority languages to meet the needs of those for whom English is not their first language.

Radius Housing will liaise with representatives of young people and disability and minority ethnic organisations and takes account of existing and developing good practice.

We will respond to requests for information in alternative formats in a timely manner, usually within 20 days of receiving a request. Where

the exact request cannot be met we will ensure a reasonable alternative is provided.

We are currently exploring options for improving how we provide information to children and young people, however at present we work on an *ad hoc* basis with schools in some of the areas in which we provide housing stock.

A Tenancy Agreement is specifically designed for people with learning disabilities providing information about the tenancy with Radius and the commitments and duties of each party therein. We will continue to review how we provide information to people with learning disabilities so that we can improve this aspect of Radius' service.

Access to services

6.4 Radius Housing is committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories.

Radius Housing also adheres to the relevant provisions of current anti-discrimination legislation.

6.5 In disseminating information through the media the Association in collaboration with NIFHA, will seek to advertise in the press. This arrangement will be kept under review, in terms of promoting wide access throughout the implementation of statutory equality duties. The Association intends that all of its services are fully accessible to all parts of the community in Northern Ireland.

Assessing public access to information and services

6.6 We monitor annually across all our functions, in relation to access to information and services, to ensure equality of opportunity and good relations are promoted.

6.7 The Tenant Satisfaction Survey in which we aim to include 10% of all our tenants asks general questions about satisfaction with accessing services through various means, and tests satisfaction with the opportunities for involvement in the work of Radius Housing.

We routinely review our approach to surveys and collating customer satisfaction feedback, to ensure that every customer has the same opportunity to engage at a level that is appropriate for them.

Chapter 7 Timetable for measures we propose in this equality scheme

(Schedule 9 4. (3) (b))

- 7.1 Appendix 4 outlines our timetable for all measures proposed within this equality scheme. The measures outlined in this timetable will be incorporated into our business planning processes.
- 7.2 This timetable is different from and in addition to our commitment to developing an action plan to specifically address inequalities and further promote equality of opportunity and good relations. We have included in our equality scheme a commitment to further develop our action plan. Accordingly, this commitment is listed in the timetable of measures at Appendix 4. For information on these action measures please see above at 2.11 – 2.17.

Chapter 8 Our complaints procedure

(Schedule 9 10.)

8.1 Radius Housing is responsive to the views of members of the public. We will endeavour to resolve all complaints made to us.

8.2 Schedule 9 paragraph 10 of the Act refers to complaints. A person can make a complaint to a RSHP if the complainant believes he or she may have been directly affected by an alleged failure of the authority to comply with its approved equality scheme.

If the complaint has not been resolved within a reasonable timescale, the complaint can be brought to the Equality Commission.

8.3 A person wishing to make a complaint that Radius Housing has failed to comply with its approved equality scheme should contact:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel: 0330 123 08888
Fax: 028 9033 0402
Typetalk: 18001 028 9032 0485
Email: equality@radiushousing.org
Website: www.radiushousing.org

8.4 We will in the first instance acknowledge receipt of each complaint within 2 working days of receipt.

8.5 Radius Housing will carry out an internal investigation of the complaint and will respond substantively to the complainant within 20 working days of the date of receiving the letter of complaint. Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the complainant may be extended. In those circumstances, the complainant will be advised of the extended period within 20 working days of making the complaint, including when the complainant can expect a full response and the reason for the delay

8.6 During this process the complainant will be kept fully informed of the progress of the investigation into the complaint and of any outcomes.

8.7 In any subsequent investigation by the Equality Commission, Radius Housing will co-operate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

Similarly, Radius Housing will co-operate fully with any investigation by the Equality Commission under sub-paragraph 11 (1) (b) of Schedule 9 to the Northern Ireland Act 1998.

8.8 Radius Housing will make all efforts to implement promptly and in full any recommendations arising out of any Commission investigation.

Chapter 9 Publication of our equality scheme

(Schedule 9 4. (3) (c))

9.1 Radius Housing equality scheme is available free of charge in print form and alternative formats from:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel: 0330 123 0888
Fax: 028 9033 0402
Typetalk: 18001 028 9032 0485
Email: equality@radiushousing.org
Website: www.radiushousing.org

9.2 The following arrangements are in place for the publication in a timely manner of our equality scheme to ensure equality of access:

- We will make every effort to communicate widely the existence and content of our equality scheme. This may include advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a link to our approved equality scheme to our consultees on our consultation lists. Other consultees without e-mail will be notified by letter that the scheme is available on request. We will respond to requests for the equality scheme in alternative formats in a timely manner, usually within 15 working days.
- Our equality scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats (CD, MP3) and in minority languages to meet the needs of those not fluent in English.
- We are currently exploring options for improving how we provide information to children and young people. Radius

Housing will liaise with representatives of young people and disability and minority ethnic organisations and takes account of existing and developing good practice.

9.3 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme.

or contact:

Director of Corporate Services
Radius Housing
Radius House
38-52 Lisburn Road
Belfast
BT9 6AA

Tel:	0330 123 0888
Fax:	028 9033 0402
Typetalk:	18001 028 9032 0485
Email:	equality@radiushousing.org
Website:	www.radiushousing.org

Chapter 10 Review of our equality scheme

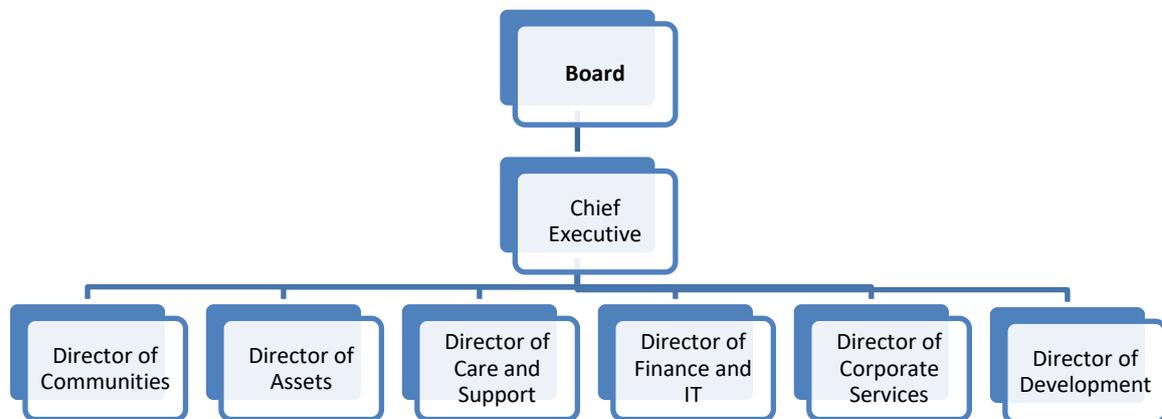
(Schedule 9 8. (3))

10.1 As required by Schedule 9 paragraph 8 (3) of the Northern Ireland Act 1998 we will conduct a thorough review of this equality scheme. This review will take place either within five years of submission of this equality scheme to the Equality Commission or within a shorter timescale to allow alignment with the review of other planning cycles.

The review will evaluate the effectiveness of our scheme in relation to the implementation of the Section 75 statutory duties relevant to our functions in Northern Ireland and will be forwarded to the ECNI for information on completion.

10.2 In undertaking this review we will follow any guidance issued by the Equality Commission. The review will be made public on our website with a link sent to all consultees. Following this review any guidance issued by the Equality Commission will be presented to the Radius Board for enactment.

Appendix 1 Organisational Chart



Appendix 2 Example groups relevant to the Section 75 categories for Northern Ireland purposes

Please note, this list is for illustration purposes only, it is not exhaustive.

Category	Example groups
Religious belief	<p>Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths.</p> <p>For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment & Treatment (NI) Order</i>⁹. Therefore, “religious belief” also includes any <i>perceived</i> religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “<i>similar philosophical belief</i>”.</p>
Political opinion ¹⁰	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people.
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls) and those identifying as other.
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientation	Bisexual people; heterosexual people; gay or lesbian people; queer people and those identifying as other.

⁹ See Section 98 of the Northern Ireland Act 1998, which states: “*In this Act...“political opinion” and “religious belief” shall be construed in accordance with Article 2(3) and (4) of the Fair Employment & Treatment (NI) Order 1998.*”

¹⁰ Ibid

Appendix 3 Consultation List

Equality Consultation List	Email
Antrim and Newtownabbey Borough Council	info@antrimandnewtownabbey.gov.uk
Ards and North Down Borough Council	shirley.poxon@ardsandnorthdown.gov.uk
Armagh City, Banbridge and Craigavon Borough Council	mary.hanna@armaghbanbridgecraigavon.gov.uk
Belfast City Council	generalenquiries@belfastcity.gov.uk
Causeway Coast and Glens Borough Council	Elizabeth.beattie@causewaycoastandglens.gov.uk
Derry City and Strabane District Council - Derry Office	john.kelpie@derrycityandstrabanedistrict.com
Fermanagh and Omagh District Council - Enniskillen Office	pdo@fermanagh.gov.uk
Lisburn and Castlereagh City Council	equality.officer@lisburn.gov.uk
Mid and East Antrim Borough Council	sandra.mcdonald@midandeastantrim.gov.uk
Mid Ulster District Council - Dungannon	philip.moffett@midulstercouncil.org
Newry, Mourne and Down District Council	colin.moffett@nmandd.org
Action for Hearing Loss	information.nireland@hearingloss.org.uk
Age NI	duane.farrell@ageni.org
Age Sector Platform	eamonn.donaghy@agesectorplatform.org
Alliance Party for NI	naomi.long@allianceparty.org
Advice NI	info@adviceni.net
Autism NI	info@autismni.org
Aware NI	patricia@aware-ni.org
Baha'i Council for NI	bcni@bahai.org.uk
Barnardos	lynda.wilson@barnardos.org.uk
Belfast Charitable Society	lucy@cliftonbelfast.org.uk

Belfast Health and Social Care Trust	orla.barron@belfasttrust.hscni.net
Belfast Health and Social Services Board	Equality.Unit@hscni.net
Belfast Hebrew Congregation	belfastjewishcommunity@gmail.com
Belfast Islamic Centre	info@belfastislamiccentre.org.uk
Belfast Trade Unions council	belfasttradescouncil@hotmail.co.uk
Brainwaves NI	info@brainwaves-ni.org
British Deaf Association	busdeve.niscot@bda.org.uk
Bryson Intercultural	info@brysonintercultural.org
Carafriend	admin@cara-friend.org.uk
Carafriend Youth	admin@cara-friend.org.uk
Care Circle?	
Carers NI	info@carersni.org
Central Services Agency	
Chartered Institute of Housing	ni@cih.org
Child Poverty Action Group (NI)	info@cpag.org.uk
Children's Law Centre	info@childrenslawcentre.org
Chinese Welfare Association	reception@cwa-ni.info
Cithrah	cithrah@hotmail.com
Citizens Advice Regional Office (Belfast)	info@citizensadvice.co.uk
CO3 Chief Officers Third Sector	info@co3.bz
Coalition on Sexual Orientation (CoSo)	admin@coso.org.uk
Committee on the Administration of Justice (CAJ)	info@caj.org.uk
Community Development and Health Network (NI)	info@cdhn.org
Community Relations Council (CRC)	info@nicrc.org.uk
CRAIC NI	eileen@craicni.com
De Paul Ireland	<ul style="list-style-type: none"> depaulni@depaulcharity.net
Democratic Unionist Party	info@mydup.com
Department for Communities	equality.unit@communities-ni.gov.uk
Derry Well Woman	info@derrywellwoman.org
Disability Action, Belfast	hq@disabilityaction.org
Disability Action, Derry	derry@disabilityaction.org
Down's Syndrome Association	enquiriesni@downs-syndrome.org.uk

East Belfast Community Development Agency	info@ebcda.org
Eastern Health and Social Services Board	
Education Authority	info@eani.org.uk
Equality Commission for NI	information@equalityni.org
Equality Coalition	equalitycoalition@caj.org.uk
Extern	info@extern.org
Falls Community Council	info@fallscouncil.com
Family Planning Association (NI)	websupport@fpa.org.uk
Gingerbread NI	advice@gingerbreadni.org
Guide Dogs for the Blind Association	guidedogs@guidedogs.org.uk
Housing Rights Service	hrs@housingrights.org.uk
Indian Community Centre	ccnibelfast@gmail.com
Irish Council of Churches	info@churchesinireland.com
Life	info@lifeni.org.uk
MACS	info@macsni.org
MENCAP	helpline.ni@mencap.org.uk
Methodist Church in Ireland	info@irishmethodist.org
Migrant Centre	info@belfastmigrantcentre.org
NIGRA (Northern Ireland Gay Rights Association)	info@nigra.org.uk
NIPSA	info@nipso.org.uk
North West Community Forum	info@nwcfn.org
Northern Health and Social Care Trust	northerntrust.hscni.net.
Northern Health and Social Services Board	Northern.lcg@hscni.net.
NI Anti-Poverty Network	info@communityni.org
NI Association for Mental Health	hello@inspirewellbeing.org
NICRAS (NI Committee for Refugees and Asylum Seekers)	info@nicras.org.uk
NI Committee, Irish Congress of Trade Unions (NIC-ICTU)	info@ictuni.org
NICCY (NI Commissioner for Children and Young People)	info@niccy.org
NICVA (NI Council for Voluntary Action)	shauna.oneill@nicva.org
NI Housing Council	
NI Housing Executive	equality@nihe.gov.uk
NIHRC NI Human Rights Commission	info@nihrc.org
NI Mixed Marriage Association	info@nimma.org.uk
NIO Northern Ireland Office	NIOEnquiries.mailbox@nio.gov.uk
NI Women's Aid Federation	info@womensaidni.org
NI Women's European Platform (NIWEP)	niwep@btconnect.com

NI Youth Forum	info@niyf.org
NUS USI	info@nistudents.org
The Executive Office NI Assembly	Committee.Executive@niassembly.gov.uk
Omagh Women's Area Network	owan@btinternet.com
POBAL	eolas@pobal.org
Polish Education and Cultural Association	info@peca.org.uk
PRAXIS	info@praxiscare.org.uk
Press for Change (UK based LGB and T)	office@pfc.org.uk
Probation Board of NI	admin.alderwood@pbni.gsi.gov.uk
Progressive Unionist Party	press@pupni.com
Royal National Institute for the Blind (NI)	rnibni@rnib.org.uk
Rural Community Network	kate@ruralcommunitynetwork.org
Salvation Army	info@salvationarmy.org.uk
Sense NI	nienquiries@sense.org.uk
Simon Community	CAP@simoncommunity.org
Sinn Fein	admin@sinnfein.ie
Social and Democratic and Labour Party	info@sdlp.ie
Southern Health and Social Care Trust	info@northerntrust.hscni.net.
Southern Health and social Services Board	corporate.hq@southerntrust.hscni.net
Supporting Communities NI	info@supportingcommunities.org
The Cedar Foundation	info@cedar-foundation.org
The Consumer Council	info@consumercouncil.org.uk
The Rainbow Project	info@rainbow-project.org
The Women's Centre	info@fallswomenscentre.org
Threshold	bernie.ross@threshold-services.co.uk
UNITE	executive.council@unitetheunion.org
Ulster Scots Community Network	iainc@ulster-scots.com
Ulster Unionist Party	uup@uup.org
Western Health and Social Care Trust	info.enquiry@westerntrust.hscni.net
Western Health and Social Services Board	Northern.lcg@hscni.net.
Women's Forum NI	patinine@googlemail.com
Women's Information Group	helen@womensinfony.com
Women's Regional Consortium	info@nirwn.org
Women's Resource Centre and	info@wrda.net

Development Agency (WRDA)	
Women's Support Network	info@wsn.org.uk
Workers Party	<ul style="list-style-type: none"> workerspartyenquiries@gmail.com
Youth Action	emma2@youthaction.org
Youth Council for NI	info@ycni.org
Radius Staff	
Radius Area Panels	
VOYPIC	claire.killen@voypic.org

Appendix 4 Timetable for measures (Schedule 9 4(3) (b))

Measure	Lead responsibility	Timetable
Submit Section 75 Annual Progress Report [2.7]	Director of Corporate Services/ Chief Executive	31 August (annually)
Consultation on draft scheme and action plan [Chapter 3]	Corporate Assurance Manager	October –December 2017
Finalised scheme and action plan published [2.17]	Director of Corporate Services/Chief Executive	April 2018
Implement / Deliver Action plan [2.17]	All Senior Executives and Board of Management	See Appendix 6 for 5 year Action Plan starting 2018/19
Arrangements for monitoring progress in place [2.15]	Director of Corporate Services	Annually in September following Progress Report
Review and Publication of monitoring information [4.31]	Director of Corporate Services	Annually in September following Progress Report
Consultation list reviewed and updated [3.3]	Corporate Assurance Manager	September (annually)
Screening timetable [4.4]	Human Resources Managers	Annually
Screening Reports [4.15]	Senior Executives	Quarterly
EQIA timetable [4.16]	Director of Corporate Services	Annually in September following Progress Report
Development of summary document of this equality scheme [5.4]	Director of Corporate Services	Within 6 months of ECNI approval of scheme Annually -

Development of equality training programme [5.5]	Director of Corporate Services/HR Manager	Annually
Evaluation of equality training [5.6]	HR Managers	At induction and every three years
Update of staff training	Managers	Annually as part of training planning
Focus Training for those involved in Equality Programmes	Equality Related Staff	Year 1 and every three years, or sooner if the need is apparent.
Assessing access to information and services [6.9]	Corporate Assurance Manager	Annually
Communication of equality scheme [9.3]	Corporate Assurance Manager	On approval of Scheme
Notification of consultees [9.3]	Corporate Assurance Manager	On approval of Scheme
Review of equality scheme [10.1]	Director of Corporate Services	Within 5 years of submission
Review of Radius Tenant Surveys to include questions to test satisfaction with access to services	Director of Housing /Director of Corporate Services	Annually

5 Glossary of terms

Adverse Impact

Where a Section 75 category has been affected differently by a policy and the effect is less favourable, i.e. adverse. If a policy has an adverse impact on a Section 75 category a public authority must consider whether or not the adverse impact is unlawfully discriminatory. In either case a public authority must take measures to redress the adverse impact, by considering mitigating measures and/or alternative ways of delivering the policy.

Consultation

In the context of Section 75, consultation is the process of asking those affected by a policy (i.e. service users, staff, the general public) for their views on how the policy could be implemented more effectively to ensure equality of opportunity across the 9 groups. Different circumstances will call for different types of consultation. Consultations could, for example, include meetings, focus groups, surveys and questionnaires.

Equality Impact Assessment

The mechanism underpinning Section 75, where existing and proposed policies are assessed in order to determine whether they have an adverse impact on equality of opportunity for the relevant groups. EQIAs require the analysis of both quantitative and qualitative data.

Equality of Opportunity

The prevention, elimination or regulation of discrimination between people on grounds of characteristics including sex, marital status, age, disability, religious belief, political opinion, dependants, race and sexual orientation.

The promotion of equality of opportunity entails more than the elimination of discrimination. It requires proactive measures to be taken to secure equality of opportunity between the categories identified under Section 75.

Equality Scheme

The document which outlines a public authority's arrangements for complying with its Section 75 obligations. An equality scheme must include an outline of the public authority's arrangements for carrying out consultations, screening, equality impact assessments, monitoring, training and arrangements for ensuring access to information and services.

Good Relations

Although not defined in the legislation, the Commission has agreed the following working definition of good relations: 'the growth of relations and

structures for Northern Ireland that acknowledge the religious, political and racial context of this society, and that seek to promote respect, equity and trust, and embrace diversity in all its forms.’ The integration of equal opportunities principles, strategies and practices into the every day work of public authorities from the outset. In other words, mainstreaming is the process of ensuring that equality considerations are built into the policy development process from the beginning, rather than being bolted on at the end. Mainstreaming can help improve methods of working by increasing a public authority’s accountability, responsiveness to need and relations with the public. It can bring added value at many levels.

Mitigation of Adverse Impact

Where an equality impact assessment reveals that a particular policy has an adverse impact on equality of opportunity, a public authority must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant groups; this is known as mitigating adverse impact.

Monitoring

Monitoring consists of continuously scrutinising and evaluating a policy to assess its impact on the Section 75 categories. Monitoring must be sensitive to the issues associated with human rights and privacy. Public authorities should seek advice from consultees and Section 75 representative groups when setting up monitoring systems.

Monitoring consists of the collection of relevant information and evaluation of policies. It is not solely about the collection of data, it can also take the form of regular meetings and reporting of research undertaken. Monitoring is not an end in itself but provides the data for the next cycle of policy screening.

Northern Ireland Act

The Northern Ireland Act, implementing the Good Friday Agreement, received Royal Assent on 19 November 1998. Section 75 of the Act created the statutory equality duties.

Policy

The formal and informal decisions a public authority makes in relation to carrying out its duties - defined in the New Oxford English Dictionary as ‘a course or principle of action adopted or proposed by a government party, business or individual’. In the context of Section 75 the term **policies** covers all the ways in which a public authority carries out or

proposes to carry out its functions relating to Northern Ireland. Policies include unwritten as well as written policies.

Screening

The procedure for identifying which policies will be subject to a full equality impact assessment, and how these impact assessments will be prioritised. The purpose of screening is to identify the policies which are likely to have a significant impact on equality of opportunity so that greatest resources can be devoted to improving these policies. Screening requires a systematic review of existing and proposed policies.

Schedule 9

Schedule 9 of the Northern Ireland Act 1998 sets out detailed provisions for the enforcement of the Section 75 duties, including an outline of what should be included in an equality scheme.

Section 75

Section 75 of the Northern Ireland Act provides that each public authority is required, in carrying out its functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity between:-

- persons of different religious belief, political opinion, racial group, age, marital status and sexual orientation;
- men and women generally;
- persons with a disability and persons without; and
- persons with dependants and persons without.

Without prejudice to these obligations each public authority in carrying out its functions relating to Northern Ireland must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

Appendix 6 Equality Action Plan 2018-2023 Updated Annually

Equality Category: Age			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
Few play spaces for young people / children	<ul style="list-style-type: none"> • Liaise with appropriate local authority to encourage the inclusion of play areas in new developments where no play facilities exist 	Annually	
<p>Electronic forms of communication can cause problems for older people</p> <p>Digital divide as older people may not be able to use / access services which are available electronically for example through internet</p>	<ul style="list-style-type: none"> • Undertake review of preferred methods of communication for tenants • Continue to facilitate training on electronic communications where appropriate – e.g. silver surfers through Digital Inclusion Big Lottery. • Implement Communications Strategy and Digital Inclusion Action Plan • Review digital forms of communication used by association to ensure maximum inclusivity. • Annual visit staff collect email addresses and email addresses will be sought from 	<p>Annually</p> <p>Annually</p> <p>March 2018</p> <p>Annually</p> <p>Annually</p>	

<p>Social isolation of older people Welfare Reform</p>	<p>all tenants surveyed</p> <ul style="list-style-type: none"> • Gather information to inform the development of suitable activities • Liaise with relevant authorities as necessary • Continue to lobby government on the impact of Welfare Reform 	<p>Annually</p> <p>Board Reports and quarterly updates from Communities Directorate.</p>	
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Equality Category: Dependents			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
Welfare Reform – single room rate will have adverse impact on single parents under 35; especially males	<ul style="list-style-type: none"> • Continue to lobby government on the impact of Welfare Reform • Regular communication with tenants on all aspects of the single room rate 	In line with government timeframe for implementation	
Lack of play space for children	<ul style="list-style-type: none"> • Liaise with appropriate local authority to encourage the inclusion of play areas in new developments 	Please refer to section on 'age'	

Equality Category: Disability			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
Lack of suitable (Lifetime homes) accommodation highlighted in ECNI statement of Key Inequalities	<ul style="list-style-type: none"> All new social housing is built to Lifetime Homes standard Undertake stock condition survey Continue work with NIHE in development of comprehensive property database to enable better matching of stock to individual need 	<p>Throughout delivery of new build programme.</p> <p>Qtr.2</p>	All general needs homes are built to Lifetime Homes standard (exceptions are Category 1, supported Schemes and properties without a lift)
Communication which does not meet differing needs of services users	<ul style="list-style-type: none"> Undertake review of forms of communication used by association to ensure maximum inclusivity Implement Communications Strategy and Digital Inclusion Action Plan Gather more comprehensive tenant profile information to improve identification of preferred methods of communication 	March 2018	

Equality Category: Disability			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
Electronic communications / digital divide	<ul style="list-style-type: none"> • Undertake review of digital forms of communication used by association to ensure maximum inclusivity. • Implement Communications Strategy and Digital Inclusion Action Plan • Equality awareness emails to staff • Attendance at key S75 group events • Continually review website to update and ensure accessibility and to enhance inclusivity. • Continue to ensure compliance with legislation and keep abreast of best practice • Engage with representative groups identify / mitigate potential barriers 	<p>Annually</p> <p>March 2018</p> <p>Quarterly</p> <p>Annually</p> <p>Monthly</p> <p>Annually</p> <p>Annually</p>	
Funding for adaptations is only available once	<ul style="list-style-type: none"> • Explore options for alternative funding 	<p>As required</p> <p>As required</p>	

which may cause difficulties if needs change	<ul style="list-style-type: none">• Continue to liaise with relevant authorities as necessary• Gather baseline information to clarify the number of instances where the Association is not in position to assist	As required	
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Equality Category: Gender			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
Activities at (sheltered) schemes can be geared towards one gender only	<ul style="list-style-type: none"> • Gather more comprehensive tenant profile information to improve development of customer services through a programme of satisfaction surveys using Open Housing system • Gather baseline information on uptake of activities, if relevant. • Use tenant feedback to inform the development of activities in sheltered housing schemes • Cross-sectoral sharing of case studies / good practice 	Annually	

Equality Category: Race			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
Communications and accessibility may be difficult for those whose first language is not English or who are unfamiliar with system	<ul style="list-style-type: none"> • Gather more comprehensive tenant profile information to help tailor services to customer needs • Undertake review of preferred methods of communication for tenants • Continue to use translation and interpretation services as appropriate • Liaise with relevant stakeholder bodies to identify best practice • Cross-sectoral sharing of case studies / good practice 	<p>Annually through annual visits</p> <p>Annually</p> <p>As and when requested</p> <p>Annually at Diversity Event</p> <p>NIHE Equality Forum Steering Group (1/4ly)</p>	
Electronic communications / digital divide	<ul style="list-style-type: none"> • Review digital forms of communication used by association to ensure maximum inclusivity through Communications Strategy and Digital Inclusion Action Plan 	Annually	
Lack of adequate housing and accommodation for	<ul style="list-style-type: none"> • Through the Social Housing Development Programme work with NIHE to deliver 	Annually via the SHDP	

Travellers	housing schemes which meet the needs of Travellers		
Literacy of Travellers	<ul style="list-style-type: none"> • Explore alternative options for engaging with Travellers 	Through Annual Diversity Day Event	
People from Black and Minority Ethnic communities are vulnerable to exploitation and discrimination	<ul style="list-style-type: none"> • Develop improved cross-sectoral liaison with representatives of relevant stakeholder groups • Establish liaison with specific stakeholder groups as required 	<p>Through NIHE Equality Forum Steering Group (1/4ly)</p> <p>Through Annual Diversity Day Event</p>	

Equality Category: Religion			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
People of one community taking longer to get housed than another	<ul style="list-style-type: none"> • Where practical take action to minimise potential chill factors – for example develop / implement strategies relating to flags, emblems and/or sectional symbol • Training programmes as appropriate 	Supported through adherence to the Equality Scheme	
Imbalances due to housing schemes being (or perceived as) largely made up of those from a specific religion	<ul style="list-style-type: none"> • Maintain use of Good Neighbour Agreements for all housing stock 	Supported through adherence to the Equality Scheme	
Lack of 'shared neighbourhoods'	<ul style="list-style-type: none"> • Continue development of Shared Future housing schemes as opportunities arise • Develop introduction of shared neighbourhood schemes where suitable 	Annually through the development programme	

Equality Category: Sexual Orientation			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
Attitudes to those of differing sexual orientation	<ul style="list-style-type: none"> • Cross-sectoral sharing of case studies / good practice • Forge better links with LGBT community 	NIHE Equality Forum Steering Group (1/4ly) Through Annual Diversity Day Event	
Access to services	<ul style="list-style-type: none"> • Explore use of Advocacy service where appropriate 	Ad-hoc	

Equality Category: Cross Category			
Potential Inequalities	Proposed Actions	Target date / progress	Outcome
Make up of Housing Association Boards – potentially relates to age, disability, gender religion/political opinion	<ul style="list-style-type: none"> • Make use of NIFHA Board Member Register as appropriate during Board renewal 	During Board recruitment exercises	
Impact of Anti-social behaviour (ASB) policies may be greater for certain groups – e.g. young males	<ul style="list-style-type: none"> • Monitor cases of ASB to identify trends – in particular where they may affect a specific group such as young men or people from a different racial background • Maintain adherence to policy and procedures, with regular review 	<p>Annually within Communities directorate</p> <p>3 year review cycle</p>	
Accessibility of information and services has the potential to vary for different equality categories – whilst this has been subject to EQIA it continues to merit ongoing	<ul style="list-style-type: none"> • Gather more comprehensive tenant profile information to help tailor services to customer needs • Continue to review and monitor association approach to provision of information and services • Use information from previous EQIA and 	<p>Annually through annual visits</p> <p>Annually</p> <p>Ad-hoc</p>	

consideration	subsequent monitoring to inform the introduction of improvements.		
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