

SHAC Housing Association

EQUALITY SCHEME

October 2004

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Company Ref: IP187
DSD Ref: R.25
Charity Ref: XN 45527

FOREWORD

Section 75 of the Northern Ireland Act 1998 requires public authorities, in carrying out their functions, powers and duties, to promote equality of opportunity and good relations among a range of groups. Public Authorities, as defined by the legislation, are required to send an Equality Scheme to the Equality Commission, showing how they intend to carry out their new duties.

As Chairperson and Chief Executive of SHAC Housing Association we are pleased on behalf of our Association Members, Board and staff to support this Equality Scheme which arises out of the implementation of Section 75 of the Northern Ireland Act 1998.

Commitments made in the Equality Scheme refer to how the Association carries out all its functions, powers and duties relating to Northern Ireland. The Association is committed to ensuring that all necessary resources (in terms of people, time and money) are made available to support the effective promotion of equality of opportunity and good relations in all its policies and practices. This also includes making sure there are effective internal arrangements in place to ensure that the duties are effectively complied with and for monitoring and reviewing progress.

The Association will actively seek to develop a programme of communication and training with the aim of ensuring all staff are made aware and understand the new equality obligations. The purpose of this Equality Scheme is to set out how the Association will fulfil the new statutory duties.

Mark McLean
Chairperson

Ray Cashell
Chief Executive

11 April 2005

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1.0 INTRODUCTION

- 1.1 Section 75 of the Northern Ireland Act 1998 ('the Act') requires SHAC Housing Association in carrying out all its functions, powers and duties 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;
 - between men and women generally;
 - between persons with a disability and persons without; and
 - between persons with dependants and persons without.
- 1.2 Also, without prejudice to its obligation above, the Association will, in carrying out its functions, power and duties relating to Northern Ireland have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
- 1.3 Schedule 9 of the Act requires the Association to set out in an Equality Scheme how SHAC Housing Association proposes to fulfil the duties imposed by Section 75. This scheme has been developed to satisfy that statutory requirement.

2.0 DUTIES AND RESPONSIBILITIES

SHAC Housing Association was established on 25 May 1977.

- 2.1 The Association is registered as an Industrial & Provident Society and is recognised as a Charity. Its main role is to provide housing and related support services to people in housing need within a framework set by the Department for Social Development.

The Association focuses on provision of temporary housing with ancillary services, mainly in shared housing, but also provides some permanent, self-contained or unfurnished accommodation.

- 2.2 The Association membership comprises the Shareholding members, who may be individuals or organisations. Governance of the Association is by a Board of Governors elected by the members or co-opted by the Board members within the terms of the Company Rules. Election to the Board of Governors is for a

period of 3 years The Association membership reflects a range of interests, including the interests of users of the service.

The current Board membership as detailed in Appendix 1.

2.3 The functions of the Association for purposes of the Act include its powers and duties. In this Scheme the following are to be regarded as the functions:

- a) to carry on for the benefit of the community, the business of providing housing and any associated amenities for persons in necessitous circumstances upon terms appropriate to their means;
- b) to provide for aged persons in need thereof housing and any associated amenities specially designed or adapted to meet the disabilities and requirements of such persons.

The Association shall have the power to do all things necessary or expedient for the fulfilment of its objects.

2.4 Being subject to regulation and guidance by the Department for Social Development, the Association's general functions may be restricted by Departmental Regulation and the Association may be required by the department to adopt functions policies and practices defined by their regulation.

Chief Executive

2.5 The Chief Executive is responsible to the Chairperson and the Board of Governors for the management of the Association as a corporate body.

Senior Management Team

2.6 The Association's Senior Management Team includes the Chief Executive, Directors and others as detailed in Appendix 1.

3.0 ARRANGEMENTS FOR ASSESSING COMPLIANCE WITH SECTION 75 DUTIES

Organisational Arrangements

3.1 The Association is committed to the fulfilment of its Section 75 obligations in all parts of its work. Statutory Responsibility for the effective implementation of the Scheme lies with the Chairperson of the Association and the Chief Executive.

3.2 The Chief Executive will be accountable to the Association Board of Governors for the development, maintenance and review of the Scheme in accordance with the legislation, including any good practice or guidance that may be issued by the Equality Commission.

- 3.3 Responsibility for driving forward implementation of the Equality Scheme and the point of contact within the Association will be,
- | | |
|---------|--|
| Title | The Equality Officer ¹ |
| Address | 29 Bedford Street, Belfast BT2 7EJ |
| Tel No | 028 9024 6811 |
| Fax No | 028 9033 3724 |
| E Mail | equality@shac.org.uk |

This person will report regularly to the Association's Senior Management Team (SMT) and respond to any queries for all those affected by the statutory duties.

- 3.4 Objectives and targets relating to the statutory duties will be integrated into the Association's strategic and operational plans. Staff who are directly engaged in this work will include implementation of the statutory duties in their personal performance plans, which are subject to appraisal in the annual performance review. In addition, a commitment to the statutory duties will be included in all job descriptions. Progress on meeting the range of objectives will be monitored and reported upon to the Association's SMT on a quarterly basis.

Progress Reporting

- 3.5 The Association will conduct an Annual Review of Progress in relation to the implementation of the Equality Scheme, in complying with the statutory duties. The Association will forward a report of this review to the Equality Commission by 31 July each year. This report, which will follow any guidance on annual reporting issued by the Equality Commission, will also be included in the Association's annual report.
- 3.6 Moreover, the Association will liaise closely with the Equality Commission to build a close working relationship so that progress on the implementation of the Scheme is maintained.

Consultation

- 3.7 The Association acknowledges the emphasis on consultation in the development and implementation of the Scheme, and is committed to full and meaningful consultation on its Equality Scheme, equality impact assessments and monitoring arrangements. Details of this commitment are set out in the following section.

¹ As this is a small organisation, this role would be allocated to a senior manager rather than being a separate full time post.

Complaints

- 3.8 When a complaint is made on the grounds that the Association has failed to comply with the Scheme, the point of contact will be

Title	The Equality Officer
Address	29 Bedford Street, Belfast BT2 7EJ
Tel No	028 9024 6811
Fax No	028 9033 3724
E Mail	equality@shac.org.uk

- 3.9 This Officer, or his/her nominee will carry out an internal investigation of the complaint and respond to the complainant within one month.

During this process, the complainant will be kept fully informed of the procedures for dealing with the complaint under Schedule 9 of the Northern Ireland Act. The Association will also undertake to provide assistance to any complainant who requires information in a format that ensures equality of opportunity.

- 3.10 In any subsequent investigation by the Equality Commission, the Association will co-operate fully, providing access to any relevant documentation that the Equality Commission may require. Similarly, the Association 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.

Review of the Scheme

- 3.11 The Association will conduct a thorough review of the Scheme within five years of its submission to the Equality Commission. This review will evaluate the effectiveness of the Association in meeting its Section 75 obligations. In undertaking this review the Association will follow any guidance issued by the Equality Commission. A report of this review will be made public and sent to the Equality Commission.

4.0 CONSULTATION

The Association has consulted through its own processes and also participated in joint consultations together with other Housing Associations as appropriate to the circumstances in respect of any of the sections below. In particular the Association has participated in NIFHA co-ordinated consultations.

- 4.1 The Association recognises the importance of consultation in all aspects of the implementation of its statutory equality duties. It affirms that all consultation was carried out in accordance with the Equality Commission's Guiding Principles as detailed in its 'Guide to Statutory Duties' (Blue Section 2c). In particular, it endeavoured to conduct all consultations in a timely, open and inclusive way in accordance with the Equality Commission's Guiding Principles.

- 4.2 The Association has consulted as widely as possible to ensure that any organisation or group which has a legitimate, particular interest in its work and/or the likely impact of its policies on the promotion of equality of opportunity and good relations has been included in the process of engagement.

Those Consulted

- 4.3 A list of those consulted, and to be consulted in the future, on matters relevant to the Association's equality duties, including screening and equality impact assessments and the Scheme itself, is detailed in Appendix 2.

The list is not exhaustive and may be amended and reviewed throughout the lifetime of the equality scheme to promote inclusive consultation.

The Association welcomes enquiries from any organisation wishing to be added to the list of consultees, and should contact the Equality Officer in the Association to have their interest noted.

- 4.4 The Association will include the Equality Commission, the Community Relations Council, voluntary groups, community groups and Trade Union groups in all consultations whether or not they have a direct economic or social interest in the work of the Association. Organisations representing the various categories included in Section 75 will be included in any consultation carried out.

Timescale for Consultation

- 4.5 In order to facilitate meaningful consultation, the Association will ensure that consultation with groups and individuals begin as early as possible.

- 4.6 The Association is conscious that some groups will need sufficient time to consult among themselves in order that their contributions to any consultation may be informed. All consultations aim to allow a period of at least eight weeks except in emergencies. Such situations included:

- policies which have to be implemented urgently to protect health and safety;
- policies which have to be implemented urgently to comply with court judgements.

- 4.7 The Association wish to minimise the number of exceptions to good practice guidelines on the timescale for consultation.

When exceptions do occur, the Association report such instances. Exceptions to the normal eight week consultation period are monitored, kept under review, justified very clearly and reported by the Association in its annual report to the Equality Commission.

Procedures for Ensuring Inclusive Consultation

- 4.8 In consulting on any matter to which this scheme relates, the Association works with representative groups and individuals of the Section 75 categories in order to identify how best to obtain their views. This may involve face-to-face meetings, advisory groups, surveys, consultative panels, Internet discussions and other innovative ways of consulting as there are different means of consultation for different groups and it is important to establish the basis for dialogue and engagement during the life of the scheme.
- 4.9 It is intended that barriers to proper consultation are removed by ensuring that language is as clear as possible. Systems are being established to make presentations on this Scheme, if requested, available in an appropriate format to representatives of people with learning disabilities, minority community language speakers, people with disabilities, young people, and Travellers.
- 4.10 To ensure the highest level of inclusivity in any policy decision-making, information will be made available in consultation with groups affected by Section 75. Systems are in place to ensure that information will be available on request in accessible formats in a timely fashion such as Braille, disc, and audiocassette and in minority languages to meet the needs of those who are not fluent in English.
- 4.11 Extra consideration is given to ensuring that all consultations reflect the needs of young people and those with learning disabilities through the provision of accessible formats in a timely manner. The Association, through NIFHA, liases with representatives of young persons and learning disability organisations in the first place (by correspondence/direct communication) and takes account of good practice elsewhere, in order to reflect the needs of these groups in consultations.
- 4.12 The Association believes it is especially important that sufficient timely and appropriate information is provided to enable all affected groups and individuals to consider the full implications of proposals, and it takes steps to ensure this. This includes quantitative and qualitative data that the Association, through NIFHA, holds or has collated, and other documents such as consultants' reports. This applies to all consultations.

- 4.13 Specific training has been arranged for Association staff undertaking consultation exercises to ensure they have the necessary skills to communicate effectively. Any training delivered is will be developed in consultation with relevant Section 75 groups.
- 4.14 Steps are also been taken to ensure full participation in any consultation meetings that are held. The Association considers the time of day, the suitability of the venue, whether it could be accessed by those with disabilities, how the meeting is run, the use of languages other than English, whether a signer is needed, and childcare arrangements. The Association will recognise and in good faith meet related access costs.
- 4.15 The principles and procedures detailed (Sections 4.5 - 4.14) were also applied in the preparation and consultations for the Equality Scheme itself.

5.0 ASSESSING THE IMPACT OF POLICIES ON THE PROMOTION OF EQUALITY OF OPPORTUNITY

Screening

- 5.1 The Association is committed to carrying out a systematic review of all its existing and new/proposed policies to determine whether there are any equality of opportunity implications.
- 5.2 The definition of a 'policy' under the Equality Commission's Guide to the Statutory Duties has a wide remit and includes policies relating to all functions and activities. The Association will monitor the implementation of a policy that it operates of behalf of another public authority, and will work in partnership with other bodies where such a policy is subject to an equality impact assessment.
- 5.3 The Association will consider the impact of each current and new/proposed policy on equality of opportunity in terms of the nine categories listed at Section 75 of the Act when considering which policies will be subject to equality impact assessment. A systematic review of each policy is required and the Association will take the following steps when screening:
- identify all policies, written and unwritten;
 - internally appraise the significance of equality of opportunity and good relations for each policy, taking account of the screening criteria and prioritisation factors detailed below;
 - produce a list detailing policies to be subject to equality impact assessment, together with a timetable for conducting the assessments. This should take account of the need to join up equality impact assessments of related policies;

- consult with Section 75 groups to seek their views on whether all policies have been identified, whether all equality impacts have been identified, and whether they agree with the list of policies to be subject to equality impact assessment and the proposed timetable;
- consider and take account of feedback from the consultation exercise;
- provide information to consultees on the conclusions reached following the initial consultation on screening, on amendments made to the list of policies, and on the final equality impact assessment timetable, in a screening report.

5.4 For each policy the following criteria will be applied:

- is there any indication or evidence of higher or lower participation or uptake by different groups*?
- is there any indication or evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy?
- have previous consultations with relevant groups, organisations or individuals indicated that particular policies create problems that are specific to them?
- is there an opportunity to better promote equality of opportunity or good relations by altering the policy or working with others in government or in the larger community?

* The main groups within each of the nine categories are identified at Appendix 4.

If the answer to any of these four questions is yes, consideration will be given to whether to subject the policy to the equality impact assessment procedure.

Evidence

- 5.5 The Association will make arrangements to obtain relevant information, whether quantitative or qualitative, so that it can clearly demonstrate why a policy is screened in for impact assessment or screened out as not requiring an equality impact assessment.
- 5.6 Evidence may include information from the Association's own information management systems, including service monitoring and complaints handling systems, or from engagement in research, surveys or consultation exercises. Information may also be sourced from commissioned research or from research produced by other public authorities, representative groups, umbrella groups, and trades unions or universities. Information from consultation exercises on previous equality impact assessments, or those undertaken by other public authorities within the same sector will also be considered. Anecdotal evidence, feedback from service users and affected groups or ongoing experience within the authority will also be considered.

Prioritisation & Timetabling

- 5.7 Having screened existing policies or new policies using the four criteria set out above, a view must then be reached on prioritising policies for equality impact assessment. Priorities may be established based on factors such as:
- Social need;
 - effect on people's daily lives;
 - effect on economic, social and human rights;
 - significance of the policy in terms of expenditure;
 - significance of the policy in terms of strategic importance.
- 5.8 An initial timetable will be developed setting out a programme and timescale for equality impact assessments, see appendix 5.

Screening Report

- 5.9 A detailed report of the screening exercise will be provided to consultees and included in the Annual Report sent to the Equality Commission. The report will include details of: (1) those policies which will be subject to equality impact assessment, (2) those policies proposed by those consulted, as appropriate for impact assessment, but have not been subsequently included – giving a explanation for this course of action, (3) the factors for prioritising assessments, and (4) the timetable for equality impact assessments.
- 5.10 Consultation on screening will allow at least eight weeks, and will comply with the Equality Commission's 'Guiding Principles of Consultation'. Consultations will seek the views of the Equality Commission, representative groups of Section 75 categories, other public authorities, voluntary groups, community groups, Trade Unions and other groups with a legitimate interest in the matter including those directly affected by the policy whether or not they have a direct economic or personal interest (see Appendix 2).

The Conduct of Equality Impact Assessments

- 5.11 All equality impact assessments carried out will be conducted in accordance with all the procedures outlined in Annex 1 of the Equality Commission's 'Guide to the Statutory Duties'.
- 5.12 In common with other aspects of the statutory equality duties, the Association will ensure that any equality impact assessment will be subject to consultation. All consultations will seek the views of the Equality Commission, representative groups of Section 75 categories, other public authorities, voluntary groups, community groups, Trade Unions and other groups with a legitimate interest in the matter whether or not they have a direct economic or personal interest and those directly affected by the policy. (see Appendix 2).

- 5.13 In making any decision on a current or proposed policy, the Association will take into account any relevant equality impact assessment and the outcome of associated consultation.

Monitoring Adverse Impact and Access to Services

- 5.14 A system will be established to monitor the impact of policies and access to services across all functions in order to identify their effects on the relevant groups and ensure equality of opportunity. This system will involve:
- an audit of existing information systems within one year of approval of the scheme, similar to that included in Appendix 4 of the Commission's Practical Guidance on EQIA, to identify the extent of current monitoring and a plan to address any gaps so that impacts can effectively be monitored through equality impact assessments.
 - the collection and collation of existing relevant primary quantitative and qualitative data across all nine equality categories on an ongoing basis;
 - the collection and collation of existing relevant secondary sources of quantitative and qualitative data across all nine equality categories on an ongoing basis;
 - identifying where more detailed data is needed in order to have the necessary information on which to base decisions;
 - undertaking or commissioning new data if necessary.
- 5.15 If over a three 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, the Association will ensure that the policy is revised.
- 5.16 If adverse impact appears significant, this action may be taken without delay.
- 5.17 This system will be reviewed on an annual basis and the results will be published as part of the Association 's annual report to the Equality Commission. In all cases relating to the holding of monitoring information or the collection of data, the Association will act sensitively in accordance with Equality Commission guidance and the wishes of representatives from S75 organisations

Publication of Equality Impact Assessments and Monitoring

- 5.18 The Association will make publicly available the outcome of any equality impact assessment and of any monitoring undertaken to measure the adverse impact of policies. Systems will also be established to make available, on request, impact assessments in accessible formats and a timely fashion (i.e. Braille, disk, audio cassette and minority languages) from the responsible officer – The Equality Officer; 29 Bedford Street, Belfast BT2 7EJ.

- 5.19 Extra consideration will be given to ensure that young people and those with learning disabilities are able to access impact assessments in a timely fashion.
- 5.20 The Association will inform the general public about the availability of this material through public relations such as press releases and media coverage. It will also directly inform bodies listed in Appendix 2 when this material is available and it will place information in publications associated with Section 75 categories.
- 5.21 All published information will comply with guidance outlined by the Equality Commission in its 'Guide to Statutory Duty' (Section 1). The Association will publish information on equality impact assessments that:
- includes the aims of the policy to which the assessment relates;
 - details any consideration given to mitigating adverse impact of the policy on the promotion of equality of opportunity;
 - details any consideration given to the consideration of alternative policies which might better achieve the promotion of equality of opportunity.

6.0 PUBLIC ACCESS TO INFORMATION AND SERVICES

- 6.1 The Association is committed to ensuring that the information it disseminates and the services it provides are made accessible to ensure equality of opportunity. It is aware that some groups will not have the same access to information as others. These include:
- children and young people who may have difficulties in accessing or understanding information;
 - people with sensory and learning disabilities that may have difficulties with information in print;
 - members of minority ethnic groups, whose first language is not English, and who may have difficulties with information provided only in English.
- Consideration will be given on how to provide accessible information in a timely manner to all these groups.
- 6.2 The Association will, within a year of approval of this scheme, review its arrangements for providing information in Braille, large print, audio cassette and minority ethnic language formats. The assessment will take account of:
- the statutory requirements of the Disability Discrimination Act 1995; the likely demand for information of various formats across its main policy areas;
 - the resource implications and recommendations from the Northern Ireland cross-departmental Promoting Social Inclusion (PSI) working groups on minority ethnic people and on access to information.

- 6.3 The review will make recommendations on how public access to information can be better ensured by improving arrangements for providing information in different formats and languages. The Association will ensure that it will publicise the current situation, the findings of its review, and any proposed changes to any aspect of information and services to such groups and individuals.
- 6.4 In disseminating information through the media, the Association 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.
- 6.5 The Association will ensure that no section of the community is deterred from visiting Association offices, for whatever reason. Association offices will maintain a welcoming and harmonious environment. The Association will adhere to relevant provisions of the Disability Discrimination Act 1995.

7.0 TRAINING AND COMMUNICATION

- 7.1 The Association will ensure that an effective communication and training programme will be developed for all staff. A series of targets for the implementation of the commitment to training and communication will be outlined in Equality Scheme Action Plan section of this document (Appendix 5).
- 7.2 In order to share resources and expertise, the Association will work closely with other bodies and agencies in the development and delivery of training.

Training

- 7.3 The Association will draw up a detailed training plan for all its staff over the 5 year period to which this Scheme refers which will aim to achieve the following objectives:
- to raise awareness of current anti-discrimination legislation, including the provisions of Section 75 and Section 76 of the Northern Ireland Act 1998. This will include an explanation of the duties and their implications for all employees;
 - to provide those employees involved in screening of policies with the necessary skills and knowledge to do this work effectively;
 - to provide those employees involved in the equality impact assessment of policies with the necessary skills and knowledge to do this work effectively;
 - to provide those employees who deal with complaints in relation to the implementation of the Association 's Scheme, with the necessary skills and knowledge to investigate and monitor complaints effectively;

- to provide those employees involved in consultation processes with the necessary skills and knowledge to do this work effectively;
 - to provide those employees involved in the implementation and monitoring of the effective implementation of the Association 's Equality Scheme to do this work effectively; and
 - to 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.
- 7.4 A report indicating the extent to which training objectives have been met will be reported on as part of the Annual Review of the implementation of the statutory duties, which will be sent to the Equality Commission.
- 7.5 All staff in the Association will receive training within one year of the approval of the Scheme (including those being inducted). Thereafter focused training will be provided for all specialist staff within the Association , and specific training will also be provided for those engaged in consultation.
- 7.6 All training will be developed in Association with the appropriate Section 75 groups.
- 7.7 The Chief Executive wishes to positively communicate the commitment of the Association to the statutory duties (both internally and externally). The *Association* will:
- develop a summary of the Scheme and present it to all staff;
 - provide copies of the full Scheme for all staff;
 - ensure that the Association 's commitment to the statutory duties are made clear in Association publications (such as the Annual Report); and
 - will ensure that any queries or questions of clarification from staff are addressed effectively.

8.0 IMPLEMENTING THE SCHEME

Publication of the Scheme

- 8.1 Following submission to the Equality Commission, this scheme will be available in print form and alternative formats free on request from the Association.
- 8.2 The following arrangements will be made for the publication of the Scheme and to ensure equality of access:
- the Scheme will be available on request in formats such as Braille, disc, and audiocassette and in minority languages to meet the needs of those not fluent in English;

- systems will be in place to ensure that requests for the Scheme in alternative accessible formats will be dealt within a timely manner;
- specific consideration will also be given to how best to communicate the Scheme to young people and those with learning disabilities;
- the Association will develop plain summaries of the Scheme;
- a press release and a prominent advertisement in the press will be placed by the Association, in conjunction with NIFHA whenever the Scheme is approved by the Equality Commission;
- a copy of the Scheme will also be posted on the Association website;
- copies of the approved Scheme will also be sent to key stakeholders.

Timetable for Implementing the Scheme

8.3 Appendix 5 outlines an action plan for implementing the Scheme including date milestones and performance indicators for each task.

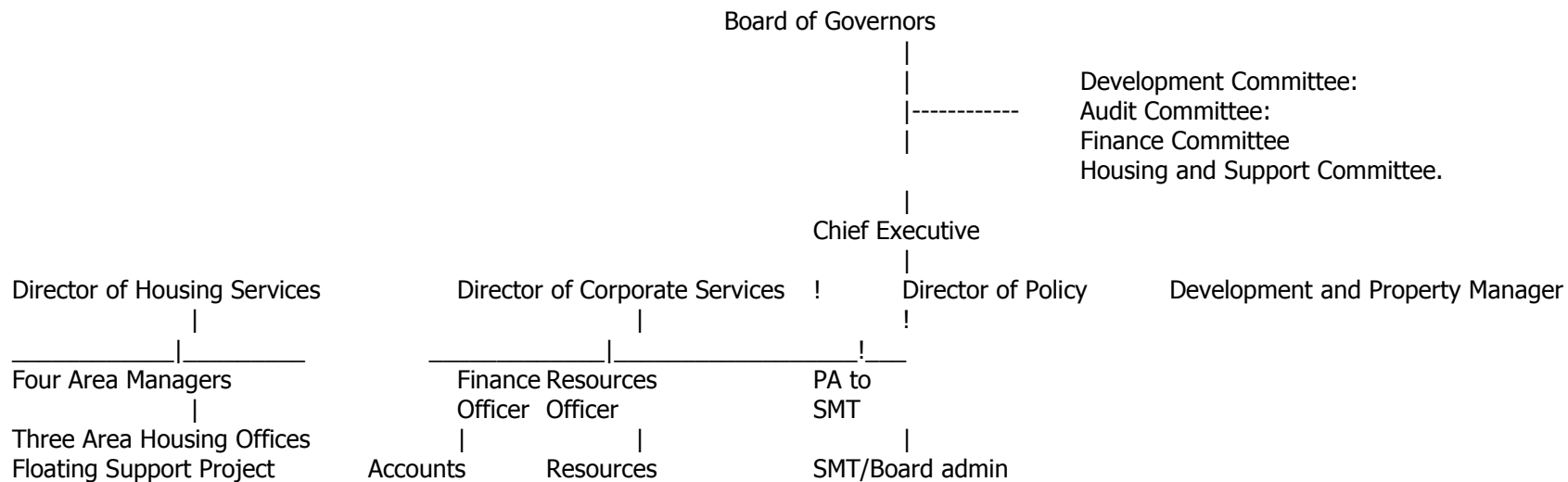
APPENDIX 1: ORGANISATIONAL CHART

The Board of Governors of the Association, at time of scheme submission (October 2004), is:

Chairperson: Mark McLean
 Deputy Chairperson: Ciarán Hanna
 Secretary: Damien Kavanagh
 Treasurer: Hugh Cox
 Other members: Carol Kinkead; Brian Hannon; Donna Bates; Emma Garland; Andrew Watt; Janine Fullerton; Niall Pickering.

The senior Management Team consists of the Chief Executive; Ray Cashell; Director of Housing Services; Jan O'Neill; Director of Policy; Myles McIlwee; Development and Property Manager; Frankie Ormonde. The post of Director of Corporate Services is vacant.

Organisational Chart: As applicable October 2004.



**APPENDIX 2A: LIST OF INDIVIDUALS AND ORGANISATIONS
CONSULTED DIRECTLY IN PREPARATION OF THIS SCHEME AND FOR
FUTURE CONSULTATION**

Association Members
Association Staff
Association Tenants
Association Joint Management Partners

**APPENDIX 2B: LIST OF INDIVIDUALS AND ORGANISATIONS
CONSULTED IN A JOINT EXERCISE WITH NIFHA IN PREPARATION OF
THIS SCHEME AND FOR FUTURE CONSULTATION**

Age Concern Northern Ireland
Alliance Party for Northern Ireland
Altnagelvin Area Hospitals HSST
Amalgamated Engineering & Electrical Union
Amalgamated Transport & General Workers Union
Antrim Borough Council
Armagh & Dungannon HSST
Armagh District Council
Association of Chief Officers (AVOVO)
Association of Independent Advice Centres
Bahai Council for Northern Ireland
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Baptist Union of Ireland
Barnardos
Belfast City Council
Belfast City Hospital HSST
Belfast Hebrew Congregation
Belfast Islamic Centre
Belfast Trade Unions Council
Belfast Travellers Education & Development Group
Blind Centre for NI
Brainwaves Northern Ireland
British Deaf Association (NI)
Carafriend
Carers Northern Ireland
Carrickfergus Borough Council
Castlereagh Borough Council
Causeway HSST
Central Services Agency
Chartered Institute of Housing
Child Poverty Action Group (NI)
Children's Law Centre
Chinese Welfare Association
Coalition on Sexual Orientation (CoSO)
Coleraine Borough Council
Committee on the Administration of Justice (CAJ)
Community Development & Health Network (NI)
Community Relations Council (CRC)

Community Relations/Training Learning Consortium
Cookstown District Council
Council for the Homeless (NI)
Craigavon & Banbridge Community HSST
Craigavon Area Hospital Group HSST
Craigavon Borough Council
Democratic Unionist Party
Department for Social Development
Derry City Council
Derry Well Woman
Disability Action, Belfast
Disability Action, Derry
Down District Council
Down Lisburn HSST
Down's Syndrome Association
Dungannon District Council
East Belfast Community Development Agency
Eastern Health & Social Services Board
Employers' Forum on Disability
Equality Commission for NI
Equality Forum NI
Falls Community Council
Family Planning Association (NI)
Fermanagh District Council
Fermanagh Women's Network
First Key
Foyle Friend
Foyle HSST
Free Presbyterian Church of Ulster
Gay & Lesbian Youth Northern Ireland
General Consumer Council
Gingerbread Northern Ireland
Green Park Healthcare HSST
Help the Aged Northern Ireland
Homefirst Community HSST
Housing Rights Service
Indian Community Centre
Irish Council of Churches
Larne Borough Council
Lesbian Line
Limavady District Council
Lisburn Borough Council
Magherafelt District Council
Magherafelt Women's Group
Mater Infirmorum Hospital Trust
MENCAP
Methodist Church in Ireland

Moyle District Council
Multi-Cultural Resource Centre
Newry & Mourne District Council
Newry & Mourne HSST
Newtownabbey Borough Council
Newtownards Borough Council
NIGRA (Northern Ireland Gay Rights Association)
NIPSA
NITAP
North & West Belfast HSST
North Down Borough Council
North West Community Network
North West Forum of People with Disabilities
Northern Health & Social Services Board
Northern Ireland African Cultural Centre
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health
Northern Ireland Association of Citizens Advice Bureaux
Northern Ireland Committee, Irish Congress of Trade Unions (NIC-ICTU)
Northern Ireland Council for Ethnic Minorities (NICEM)
Northern Ireland Council for Voluntary Action (NICVA)
Northern Ireland Filipino Association
Northern Ireland Housing Council
Northern Ireland Human Rights Commission (NIHRC)
Northern Ireland Mixed Marriage Association
Northern Ireland Office
Northern Ireland Statistics & Research Agency (NISRA)
Northern Ireland Women's Aid Federation
Northern Ireland Women's European Platform (NIWEP)
Northern Ireland Youth Forum
NUS USI
Office of the First Minister & Deputy First Minister
Omagh District Council
Omagh Women's Area Network
Parents & Professionals & Autism
PHAB Northern Ireland
POBAL
PRAXIS
Press for Change
Probation Board for Northern Ireland
Progressive Unionist Party
Queer Space
Royal Group of Hospitals & Dental Hospital HSST
Royal Institute for Deaf People (NI)
Royal National Institute for the Blind (NI)
Rural Community Network
Sense NI

Sikh Cultural Centre
Simon Community
Sinn Fein
Social Democratic & Labour Party
South & East Belfast HSST
Southern Health & Social Services Trust
Sperrin Lakeland Health & Social Care Trust
Staff Commission for Education & Library Boards
Strabane District Council
The Cedar Foundation
The Guide Dogs for the Blind Association
The Local Government Staff Commission for Northern Ireland (LGSC)
The Rainbow Project
The Women's Centre
Traveller Movement Northern Ireland
UCATT
Ulster Community & Hospitals HSST
Ulster Democratic Party
Ulster Scots Heritage Council
Ulster Unionist Party
UNISON
United Hospitals Group HSST
United Kingdom Unionist Party
West Belfast Economic Forum
Western Health & Social Services Board
Women's Forum Northern Ireland
Women's Information Group
Women's Resource & Development Agency (WRDA)
Women's Support Network
Workers Party
Youth Action
Youth Council for NI

Appendix 3: Comments Received from Consultation with the Organisations

Organisation	Summary of comments received	Association's response
Coalition on Sexual Orientation	<ol style="list-style-type: none"> 1. CoSO recommends that all Associations try to ensure that any material they produce is gender neutral e.g. partner instead of spouse 2. Scheme should define precise resources being made available in this context. 3. The first annual reviews should be comprehensive. 4. CoSO welcomes open, inclusive and constructive dialogue, however we may on occasion require more that two months for consultations 5. CoSO welcomes decision to defer screening until after the scheme has been approved as this gives time for greater consideration. 6. CoSO looks forward to being involved in consultation on screening processes and EQIAs. 7. Screening of policies should cover informal or unwritten policies as well as the formal policies. 8. CoSO considers it essential that Associations develop a sensitive system of voluntary and confidential indications of sexual orientation in close consultation with LGBT groups. 9. The necessary funds must be 	<p>Principle accepted.</p> <p>The Association cannot define this precisely at this stage but will ensure resources are made available to meet its commitments.</p> <p>The Association intends the reviews to be as comprehensive as possible.</p> <p>The Association has committed to a minimum of 8 weeks consultation (4.3 refers), but will consider requests for increased time.</p> <p>The Association has committed to screening after scheme approval.</p> <p>The Housing Association movement will continue to consult with CoSO.</p> <p>The Association is committed to a systematic review of all polices (5.1 refers).</p> <p>NIFHA is working with CoSO on behalf of Associations to address this issue. (See point 3)</p> <p>As 2 above; and this will be included in impact monitoring.</p>

	<p>made available to undertake research into the impact of Association policies on the LGBT community.</p> <p>10.</p> <p>11. Draft schemes are sparse on the mechanics of impact assessment.</p> <p>12. CoSO is disappointed at the lack of detail on 'mitigation and alternatives' in draft schemes in relation to the way in which Associations propose to deal with these issues. CoSO believes that all s75 categories are given equal weight when mitigation and alternatives are being considered.</p> <p>13. CoSO feels strongly that there may be instances where it would be preferable if meetings for consultation on EQIAs or the publication of results of EQIAs were publicised only in the LGBT press. This would help LGBT people feel that they can safely attend meetings without fear of 'outing'.</p> <p>14. CoSO objects strongly to the indication in some schemes that a charge may be made for documentation, which the authority is obliged to provide as part of the consultation process.</p> <p>15. Training should be provided for all staff around LGBT issues.</p> <p>16. CoSO approves of providing information online and would</p>	<p>Section 5 of the scheme outlines the process for EQIA in accordance with EC's model</p> <p>The Association does not wish to pre-empt the outcome of impact assessment.</p> <p>The Association appreciates the concerns raised by CoSO and recognises the need for a safe environment. Intention is full accessibility to all sections of the community and categories of person defined in the legislation, and this intent will inform the composition of the media used. Where relevant we will consult with groups individually.</p> <p>This comment is not relevant to the Association, as we have not suggested charging for documentation.</p> <p>Equality and diversity awareness training is planned and will include this.</p> <p>Noted. This will be considered in our communication strategy.</p>
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	<p>encourage the links to the CoSO and website and those of other LGBT organisations.</p> <p>17. The timetable for implementing the statutory duty should include a one-year review of screening/scoping decisions.</p>	<p>A detailed report of the screening exercise will be issued and included in the Annual Report sent to the Equality Commission. (5.4 refers)</p>
<p>Disability Action</p>	<ol style="list-style-type: none"> 1. Include name of Chairperson in revised scheme. 2. Requires information on Board of Management (BOM) to enable informed comment. 3. Has should have textphone to enable deaf people to have same access as hearing people. 4. Progress should be reported to BOM on quarterly basis. 5. Should offer scheme in range of formats, including large print. 6. Complaints procedure should outline how it will support the individual to bring their complaint e.g. interpreter support, specialist transport costs, advocacy services. 7. It is unacceptable that there is a five-year period to assess the effectiveness of the Association in meeting its section 75 duties. The Statutory Duty guidelines state that equality scheme measures are implemented in a 'timely fashion' 8. The Association should purchase the Bobby standard 	<p>Name and signature are on the final document.</p> <p>Details of BOM included. (Appendix 1)</p> <p>We are assessing the best media for text based contact.</p> <p>Quarterly reporting to BOM is now standard business process.</p> <p>Statement of available formats included as part of Foreword. Section 8 reflects commitment. (See Point 1 below)</p> <p>This will be incorporated in more detailed published procedures.</p> <p>Commitment to assess the effectiveness of the Association in meeting s75 duties within five years is in accordance with the statement in the Equality Commission's model scheme. The scheme will also be monitored and reviewed throughout this period.</p> <p>As 3 above, we are reviewing best methods.</p>

	<p>programme to ensure that their website is fully accessible to people with disabilities.</p> <p>9. Exceptions to the normal eight week consultation period with appropriate and careful planning reduced periods should be unusual.</p> <p>10. Disability Action requests that large print be included in the list of accessible formats available.</p> <p>11. The use of simple language and availability of accessible formats should have commenced with this Equality Scheme.</p> <p>12. It is Disability Action's view that each public authority will be responsible for complying with Equality Scheme duties for any policy formulated, adopted or imposed on the authority. Such policies once accepted and put into practice become its policy.</p> <p>13. Please amend persons with a disability to read persons with a physical, sensory, mental or learning disability (Appendix 4).</p> <p>14. Any consultant commissioned for research should be fully conversant with specific equality issues pertinent to the target groups.</p> <p>15. Disability Action would query the decision to review the arrangements for providing a range of accessible formats. The Equality Commission guide states that a public authority should a commitment to the allocation of necessary resources in terms of money,</p>	<p>The Association will aim to keep reduced consultation periods to a minimum. In some cases we may increase the consultation period as with the draft schemes.</p> <p>Agreed.</p> <p>Large print version was produced. Arranges for others were in place but no requests were received. Simple language summaries were used for tenant consultation.</p> <p>The Association takes the view responsibility for imposed policies remains with the body that formulated the policy, however we are committed to highlighting inequalities caused by such policies.</p> <p>Done</p> <p>Noted.</p> <p>As stated in the scheme, the intention of the review is to make recommendations on how public access to information can be better ensured by improving arrangements for providing information in different formats, adopting new methods as they become available.</p>
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	<p>time and people.</p> <p>16. Disability Action would recommend the use of specialist press of the 9 affected groups.</p> <p>17. Regarding training and communication Disability Action requires specific actions, targets and a timeframe to enable informed comment to be made.</p> <p>18. Disability Action is concerned that access to copies was provided rather than giving a copy to all staff.</p> <p>19. Disability Action requests the Association to include large print in the range of accessible formats.</p> <p>20. Disability Action recognised the time and effort that has gone into producing this document for consultation and thanks the Association for the opportunity to respond.</p>	<p>Intention is full accessibility to all parts of the community in Northern Ireland, and this intent will inform the composition of the media used.</p> <p>See Appendix 5 Details of Association's implementation plan, including timeframe are outlined in this section.</p> <p>Agreed – Scheme amended.</p> <p>Agreed.</p> <p>No comment needed</p>
Housing Rights Service	<p>1. Briefly, reviewed schemes on disk at time of issue. Unable to make a written response as due to other consultation priorities during the Associations' public consultation period.</p>	<p>Interest Noted.</p>
Irish Congress of Trades Unions	<p>1. Daunted at receiving 37 Equality Schemes all at one go and even though it is possible to submit a general response, all 37 Schemes need to be read in order to collate that general response. Appreciate that NIFHA has allowed 11 weeks instead of the usual 8 for consultation but, it may be rather difficult to respond in a meaningful manner. Will try to make a response.</p>	<p>Interest Noted.</p>

<p>N I Mixed Marriage Assoc</p>	<p>1. Associations should bear in mind needs of mixed couples and their families who make up around 1 in 10 marriages and may need a safe space. This is an availability issue as public housing is estimated to be only 5% mixed.</p>	<p>Housing Associations do not define housing need, however we would be eager to play an integral role in any work to address this issue. This is a business plan priority..</p>
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<p>West Belfast Economic Forum (WBEF)</p>	<ol style="list-style-type: none"> 1. The Forum acknowledges the many positive features within the Scheme and the Association's commitment to equality. 2. All Equality Schemes should have a strong focus on affirmative action. 3. The Associations should extend the principles of the equality duty to private, voluntary and community sector partners contracted to supply goods or services. 4. The duty of ensuring linguistic equality must be included. 5. The central tenet of the Scheme must be to actively promote equality of opportunity. 6. The Scheme should specify the precise resources being allocated to the process. 7. The timeframes for implementation should be clear and workable. 8. The Scheme should be written in clear and accessible language. 9. Necessary resources should be made available for relevant training and awareness-raising. 	<p>No comment needed</p> <p>The Association is committed to fulfilling its s75 obligations and will work within the law and with the Equality Commission (EC) to achieve this aim.</p> <p>NIFHA is currently exploring ways of addressing this issue.</p> <p>We note that Ethnic minority languages directive and will respond as appropriate. Also, refer to Foreword, 4.4, 6.0 and 8.1 re: commitment to ensuring access and reviewing process within year.</p> <p>Association believes the body of the scheme reflects our commitment to do so.</p> <p>As per Association</p> <p>The Association has outlined its timetable for implementation in Appendix 5</p> <p>The Association has aimed for clarity and used the model Scheme issued by the EC. Plain language summaries are being produced.</p> <p>Being done. Also refer to section 7 and Appendix 5.</p> <p>Targets, with timeframes are recorded in Appendix 5 and</p>
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	<p>10. Objectives and targets relating to the equality duty must be included in annual business plans.</p> <p>11. The Equality Scheme needs to state that employees should disclose membership of oath bound organisations.</p> <p>12. Consultation must be done in such a way that there are no barriers for those who are affected by the policies of the Association.</p> <p>13. Screening must apply to all policies.</p> <p>14. Impact assessments must be undertaken in a clear and transparent fashion and perceived conflicting legal obligations must not be used to 'screen out' policies.</p> <p>15. A formal review must include consultees.</p>	<p>are being included in business plan.</p> <p>The Association recognises the concerns raised. We will address this issue within the law and while respecting the individual right to privacy.</p> <p>Methodology for consultation is outlined in scheme.</p> <p>5.1 refers to Association commitment to full screening. 5.5 refers.</p> <p>This commitment is made in scheme.</p>
<p>Association tenants</p>	<p>1. Tenants support the principle of promoting good relations and opportunities for integrated living but would want this strategy to be promoted in a way that does not place tenants at risk from unwelcome attention from those opposed to this.</p> <p>2. Tenants would like to see the Association address limitations to disabled access for visitors in existing buildings addressed as well as access for disabled</p>	<p>The Association is aware of this risk and of its obligation to protect tenants from harassment. The strategy will have this as a priority.</p> <p>This will be subject of a survey but has major resource implications. Options will be subject to tenant consultation and professional advice.</p>

	tenants. 3. Tenants would welcome systems for structured consultation.	This would be the Association's preference and will be prioritised.
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APPENDIX 4

MAIN GROUPS RELEVANT TO THE SECTION 75 CATEGORIES FOR NORTHERN IRELAND PURPOSES

Category	Main Groups
Religious belief	Protestants; Catholics; people of non-Christian faiths; people of no religious belief
Political opinion	Unionists generally; Nationalist generally; members/supporters of any political party
Racial group	White people; Chinese; Travellers; Indians; Pakistanis; Black people
Men and women generally	Men (including boys); women (including girls), Trans-gendered people, Transsexual people
Marital status	Married people; unmarried people; divorced or separated people; widowed people
Age	Children under 16; people of working age (16/65); people over 65
Persons with a disability	Persons with a physical, sensory, mental or learning disability as defined in sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995
Persons with dependants	Persons with personal responsibility for the care of a child; persons with personal responsibility for the care of a person with an incapacitating disability; persons with personal responsibility for the care of a dependant elderly person
Sexual orientation	Heterosexual people; homosexual people; bisexual people

APPENDIX 5 – ACTION PLAN FOR IMPLEMENTING EQUALITY SCHEME

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Organisational Arrangements	<ul style="list-style-type: none"> Integration of equality objectives into departmental business plans Integration of equality objectives into personal performance plans 	<ul style="list-style-type: none"> SMT agrees equality objectives Equality objectives included in business plans for 2005-2006 Equality objectives reviewed annually in consultation with SMT and included in business plans in years 2006-2007 and beyond SMT agrees draft guidance for staff Objectives included in performance management systems 	<ul style="list-style-type: none"> annually January 2005 annually ongoing annually 	Head of Corporate Services and SMT
Progress Reporting	<ul style="list-style-type: none"> Regular reports to the Board of Management Annual reports to Equality Commission Review of Scheme 	<ul style="list-style-type: none"> Minuted reports at least quarterly Report sent after approval by Board of Management Report incorporated in Associations' Annual Report Review conducted, published and sent to Commission 	<ul style="list-style-type: none"> ongoing annually annually annually 	Chief Executive and Board of Management

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Consultation	<ul style="list-style-type: none"> • Overview of Consultation • Consultation on Equality Impact Assessments 	<ul style="list-style-type: none"> • Meeting takes place to consider joint approaches to consultation with other Registered Housing Associations Bodies • Consultation takes place for Screening of policies in line with the 2 stage approach (see p.12) • Report of consultation on screening exercise to be included as part of annual report to Equality Commission • Consultation takes place on each Equality Impact Assessment 	<ul style="list-style-type: none"> • 06/04 • 09/04 • 05/05 • 08/05 • ongoing 	Equality Officer
Training	<ul style="list-style-type: none"> • Training programme • Top Level briefing on Equality Scheme • Awareness training • Specialised/focused training 	<ul style="list-style-type: none"> • Training programme agreed by and SMT • Briefing on Equality Scheme for Association members, Board of Management and Senior Managers takes place • All staff trained by end 2005 • All new staff to receive equality awareness training within 1 year of joining. • Specialised/focused training (see Section 8 of Scheme for types of training) for key staff (minimum of 1 in year 1) 	<ul style="list-style-type: none"> • Ongoing • 04/04 • 05/04 • 06/04 • 11/04 • 12/05 • ongoing • ongoing 	Head of Corporate Services and SMT

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Equality Impact Assessments (EQIAs)	• Screening	<ul style="list-style-type: none"> • Finalise screening format and procedures, and pilot with sample of policies • Screen all policies • Prioritise policies for EQIA • Consult with relevant interest groups on outcome of screening exercise (including proposed priorities for EQIA) 	<ul style="list-style-type: none"> • 01/05 • 01/05 • 01/05 • 04/05 	Head of Corporate Services
	• Plan for EQIAs	<ul style="list-style-type: none"> • Develop plan for carrying out EQIAs, taking account of consultation responses • Agree plan for EQIAs with SMT • Agree plan with Registered Housing Associations 	<ul style="list-style-type: none"> • 09/05 • 09/05 • 09/05 	Head of Corporate Services and SMT and Registered Housing Associations
	• Carrying out EQIAs	<ul style="list-style-type: none"> • Begin EQIAs • Review Plan for EQIAs • Carry out EQIAs in accordance with for EQIAs 	<ul style="list-style-type: none"> • 10/05 • annually • ongoing 	

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Communication	<ul style="list-style-type: none"> Publication of Equality Scheme Dissemination to key stakeholders 	<ul style="list-style-type: none"> Scheme to be published after approval from the Equality Commission Summary of Scheme to be developed and made available Scheme to be made available in accessible formats on request Scheme to be published on website Copy of Scheme to be made available to all staff Copy of Scheme mailed to all those consulted on the Scheme, and to others on request Press Release to the media informing them of the publication of the Equality Scheme 	<ul style="list-style-type: none"> 10/04 11/04 ongoing 11/04 11/04 11/04 11/04 	<p>Head of Corporate Services</p> <p>Head of Corporate Services NIFHA NIFHA</p>
Access	<ul style="list-style-type: none"> Review of Access to Information and Services 	<ul style="list-style-type: none"> To conduct a review within one year of the implementation of the scheme covering all aspects of access to information and services, and produce report making recommendations To consult on review with key stakeholders Produce action plan for acting on review recommendations Implementation of action plan begins Carry out action plan to meet performance indicator targets 	<ul style="list-style-type: none"> 11/05 02/06 05/06 06/06 ongoing ongoing 	Head of Corporate Services
Complaints	<ul style="list-style-type: none"> Complaints procedure 	<ul style="list-style-type: none"> To respond to any complaints of non-compliance within one month of complaint being made To report on complaints made on an annual basis to the Equality Commission as part of annual report 	<ul style="list-style-type: none"> ongoing annually 	Corporate Services

