

TRIANGLE HOUSING ASSOCIATION LIMITED

EQUALITY SCHEME

DRAWN UP IN ACCORDANCE WITH SECTION 75 OF THE
NORTHERN IRELAND ACT 1998

This Scheme is also available on request electronically; large print; Braille; audiocassette and in minority languages to meet the needs of those not fluent in English;

FOREWARD

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 Triangle Housing Association we are pleased on behalf of our 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 Triangle Housing Association carries out all its functions, powers and duties relating to Northern Ireland. The Housing 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.

Triangle Housing 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 as they relate to our functions affecting Northern Ireland.

Chairperson

Chief Executive

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1.0 INTRODUCTION

- 1.1. Section 75 of the Northern Ireland Act 1998 ('the Act') requires Triangle 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 person with a disability and persons without; and
 - between persons with dependants and persons without
- 1.2. Also, without prejudice to its obligation above, Triangle Housing 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 Triangle Housing Association to set out in an Equality Scheme how the 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 OF A HOUSING ASSOCIATION

2.1. Triangle Housing Association was established in November 1977. The Association is registered with the Department for Social Development. It is a Limited company under the Industrial and Provident Societies Act and has charitable status with the Inland Revenue. Triangle's mission is to "Deliver quality housing and appropriate support to people in need, promoting equality and opportunity for all". Its corporate objectives are:

- To ensure the Associations core values, equality and opportunity are evident throughout all its activities;
- To ensure effective, efficient and accountable governance of the Association;
- To respond to identified housing need with innovative and high quality accommodation;
- To ensure quality and economic estate and housing management services are provided to all tenants and partner agencies;
- To ensure innovative and individualised housing, personal care, employment and community support services are provided to tenants and service users;
- To ensure the Association is resourced with skilled staff to meet all of its objectives;
- To ensure efficient financial, technical and administrative performance to meet the needs and demands of a growing organisation;
- To ensure effective internal and external communication.

2.2. Its main role is to provide social housing and any related activities to promote the social inclusion of its tenants

2.3. There are 54 shareholding members of Triangle Housing Association who elect the Board at the Annual General Meeting. The Board consists of the Chairperson and 11 other members who serve on the board for a period of three years. The Board Members reflect a range of interests across the housing and social care network and the interests of the users of the services provided by the organisation. The current Board is:

O Boyle Chairperson, K Mackenzie Vice-Chair/Treasurer, B Christie, B Conway, L Dougherty, S Dwyer, J Jackson, M Lynas, M McCaughan, J McCollam, M Nesbitt, A Watson.

2.4. The functions of the Housing Association for purposes of the Act include its powers and duties. In this Scheme the following are to be regarded as the functions under the legislative remit of the Housing Order 2003 and the Housing Support Bill 2003 (Supporting People):

- Housing Development
- Housing Management
- Maintenance of Housing Assets

Housing Plus Activities including:

- Supported Housing
- Personal Care Support
- Registered Care Home
- Floating Support Service and Rent Guarantee Scheme
- Supported Employment Services
- Volunteer Support and Tenant Participation Services

Chief Executive

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

Senior Management Team

- 2.6. The Housing Association's Senior Management Team includes the following officers:

Director of Housing:

Responsible for Housing Development, Housing Management, Maintenance of Housing Assets and Floating Support Service and Rent Guarantee Scheme

Director of Finance:

Responsible for Finance, Administration and Human Resources Administration

Director of Support Services:

Responsible for Supported Housing, Registered Care Home, Supported Employment Services and Volunteer Support and Tenant Participation Services

3.0 ARRANGEMENTS FOR ASSESSING COMPLIANCE WITH SECTION 75 DUTIES

Organisational Arrangements

- 3.1. Triangle Housing 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 Chair of Triangle Housing Association and the Chief Executive.
- 3.2. The Chief Executive will be accountable to the board of the Housing Association 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 housing association will be:

Alan Crilly
Director of Finance
60 Eastermeade Gardens
Ballymoney BT56 6BD

Telephone Number: 028 2766 6880
Fax Number: 028 2766 2294
E Mail: alan.crilly@trianglehousing.org.uk

or other relevant member of the Senior Management Team.

- 3.4. He will report regularly to the Housing Association's Senior Management Team and respond to any queries for all those affected by the statutory duties.
- 3.5. Objectives and targets relating to the statutory duties will be integrated into the housing 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 Housing Association's senior management team on a quarterly basis.

Progress Reporting

- 3.6. Triangle Housing Association will conduct an Annual Review of progress in relation to the implementation of the Equality Scheme, in

complying with the statutory duties. Triangle Housing 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 Triangle Housing Association's annual report.

- 3.7. Moreover, Triangle Housing 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

- 3.8. Triangle Housing 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.

Complaints

- 3.9. When a complaint is made on the grounds that Triangle Housing Association has failed to comply with the Scheme, the point of contact will be:

Edna Dunbar
Chief Executive
60 Eastermeade Gardens
Ballymoney BT56 6BD

Telephone Number: 028 2766 6880

Fax Number: 028 2766 2294

Email: info@trianglehousing.org.uk

- 3.10. This Officer 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. Triangle Housing Association will also undertake to provide assistance to any complainant who requires information in a format that ensures equality of opportunity.
- 3.11. In any subsequent investigation by the Equality Commission Triangle Housing Association will co-operate fully, providing access to any relevant documentation that the Equality Commission may require. Similarly, Triangle Housing Association will co-operate fully with any investigation by the Equality Commission under sub-para 11 (1) (b) of Schedule 9 to the Northern Ireland Act 1998.

Review of the Scheme

- 3.12. Triangle Housing 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 organisation in meeting its Section 75 obligations. In undertaking this review Triangle Housing 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

- 4.1. Triangle Housing Association recognises the importance of consultation in all aspects of the implementation of its statutory equality duties. It affirms that all consultation will be carried out in accordance with the Equality Commission's Guiding Principles as detailed in its 'Guide to Statutory Duties. In particular, it will endeavour to conduct all consultations in a timely, open and inclusive way in accordance with the Equality Commission's Guiding Principles.
- 4.2. Triangle Housing Association will consult 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 will be included in the process of engagement.

Those being consulted

- 4.3. A list of those being consulted on matters relevant to the housing 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. Triangle Housing Association welcomes enquiries from any organisation wishing to be added to the list of consultees, and should contact Mr. Alan Crilly in Triangle Housing Association to have their interest noted.
- 4.4. Triangle Housing Association will include the Equality Commission, the Community Relations Council, other relevant public bodies and 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 Triangle Housing Association. Organisations representing the various categories included in Section 75 will also be included in any consultation carried out.

Timescale for Consultation

- 4.5. In order to facilitate meaningful consultation, Triangle Housing Association will ensure that consultation with groups and individuals will begin as early as possible.
- 4.6. Triangle Housing 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 will aim to allow a period of at least eight weeks except in emergencies. Such situations will include:

- 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 Triangle Housing Association wishes to minimise the number of exceptions to good practice guidelines on the timescale for consultation. When exceptions do occur, Triangle Housing Association will report such instances. Exceptions to the normal eight-week consultation period will be monitored, kept under review, justified very clearly and reported by the housing 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, Triangle Housing Association will work 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 will be different means of consultation for different groups and it will be 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 will be removed by ensuring that language is as clear as possible. Systems will be 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 will be in place to ensure that information will be available on request in accessible formats in a timely fashion such as Braille, electronically, and audiocassette and in minority languages to meet the needs of those who are not fluent in English.
- 4.11. Extra consideration will be 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. Triangle Housing Association will liaise with representatives of young persons and learning disability organisations in the first place (by correspondence/direct communication) and take account of good practice elsewhere, in order to reflect the needs of these groups in consultations.
- 4.12. Triangle Housing Association believes it 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 will take steps to ensure this. This will include quantitative and qualitative data that Triangle Housing Association holds or has collated and other documents such as consultants reports. This will apply to all consultations.

- 4.13. Specific training will be arranged for Triangle Housing Association's staff undertaking consultation exercises to ensure they have the necessary skills to communicate effectively. Any training delivered will be developed in consultation with relevant Section 75 groups.
- 4.14. Steps will also be taken to ensure full participation in any consultation meetings that are held. Triangle Housing Association will consider the time of day, the suitability of the venue, whether it can be accessed by those with disabilities, how the meeting is to be run, the use of languages other than English, whether a signer is needed, and childcare arrangements.

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

Screening

- 5.1. Triangle Housing 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. Triangle Housing Association will monitor the implementation of a policy that it operates on 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. Triangle Housing 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 Triangle Housing Association will take the following steps when screening:
 - identify all relevant policies, written and unwritten (see Appendix 4);
 - 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 draft 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 5.

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 Triangle Housing 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 organisation'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 6.

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 and Monitoring Adverse Impact

- 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, Triangle Housing 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 relevant 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, Triangle Housing 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, Triangle Housing Association will ensure that the policy is revised.
- 5.16 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, Triangle Housing 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

- 5.17 Triangle Housing 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, electronically, audio cassette and minority languages) from the responsible officer – Alan Crilly, Director of Finance, 60 Eastermeade Gardens, Ballymoney BT53 6BD.
- 5.18 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.
- 5.19 Triangle Housing 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.

5.20 All published information will comply with guidance outlined by the Equality Commission in its 'Guide to Statutory Duty' (Section 1). Triangle Housing 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 grounds 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. Triangle Housing 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. Triangle Housing 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 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. Triangle Housing 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, Triangle Housing 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. Triangle Housing Association intends that all of its services are fully accessible to all parts of the community in Northern Ireland.

- 6.5. Triangle Housing Association will ensure that no section of the community is deterred from visiting the housing association's offices, for whatever reason. Triangle Housing Association's offices will maintain a welcoming and harmonious environment. Triangle Housing Association will adhere to relevant provisions of the Disability Discrimination Act 1995.

7.0 TRAINING AND COMMUNICATION

- 7.1 Triangle Housing 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 6).
- 7.2 In order to share resources and expertise, Triangle Housing Association will work closely with other bodies and agencies in the development and delivery of training.

Training

- 7.3 Triangle Housing 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 Triangle Housing 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 Triangle Housing 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 Triangle Housing Association will receive training within two years of the approval of the scheme (including those being inducted). Thereafter focused training will be provided for all specialist staff with the housing 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 Board and the Chief Executive wish to positively communicate the commitment of Triangle Housing Association to the statutory duties (both internally and externally). Triangle Housing Association will:
- Develop a summary of the scheme and make it available to all staff;
 - Provide access to copies of the full Scheme for all staff;
 - Ensure that Triangle Housing Association's commitment to the statutory duties are made clear in Triangle Housing Association's publications (such as the Annual Report);
 - Will ensure that any queries or questions of clarification from staff are addressed effectively.

8.0 IMPLEMENTING THE SCHEME

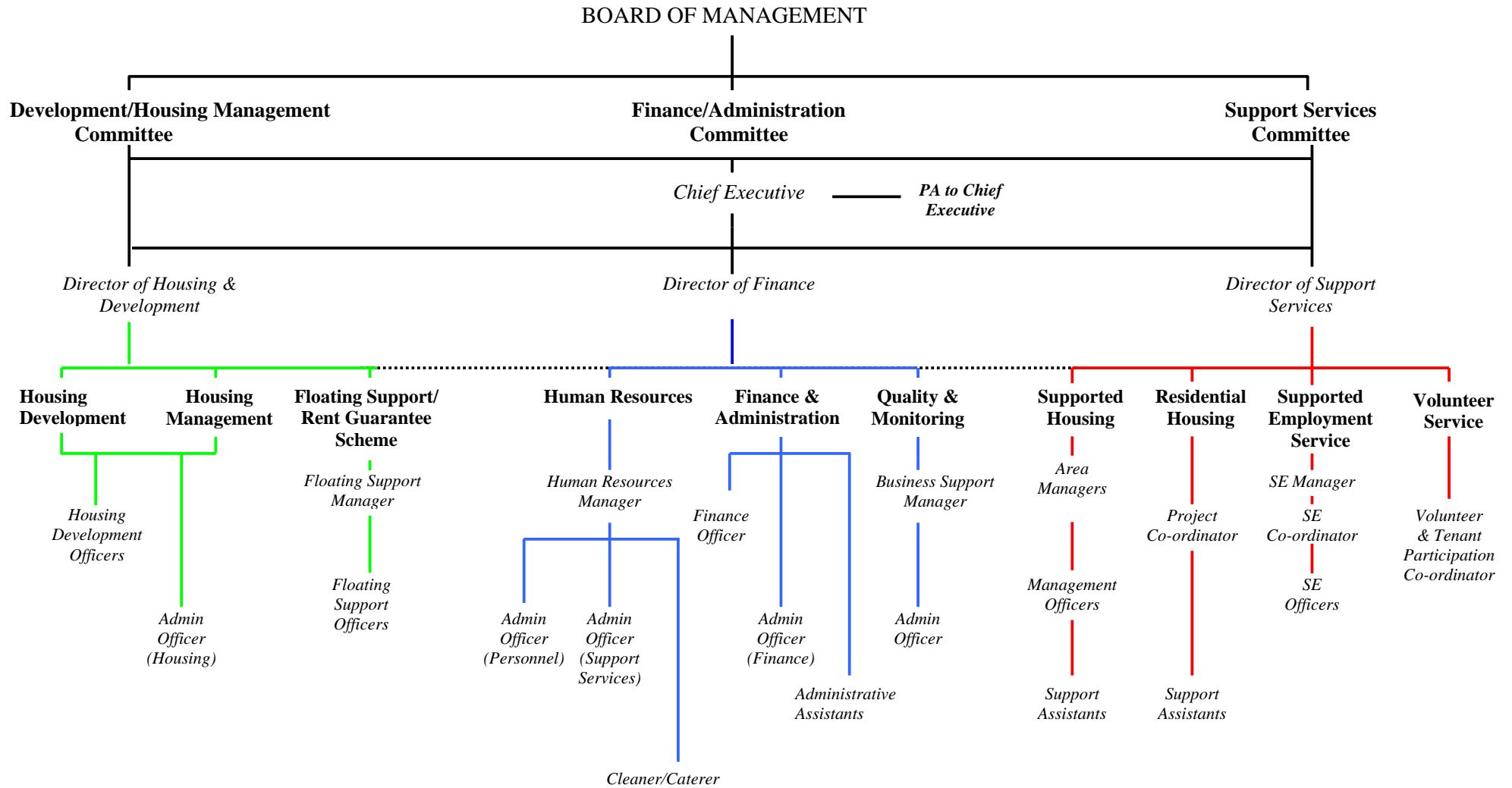
Publication of the Scheme

- 8.1. Following submission to the Equality Commission, this scheme will be available in print form and alternative formats free on request from Triangle Housing 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, electronically 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 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;
 - Triangle Housing Association will develop a plain English summary of the Scheme;
 - A press release and a prominent advertisement in the press will be placed by Triangle Housing Association whenever, the Scheme is approved by the Equality Commission;
 - A copy of the Scheme will also be posted on Triangle Housing Association's website;
 - Copies of the approved Scheme will also be sent to key stakeholders.

Timetable for Implementing the Scheme

- 8.3. Appendix 6 outlines an action plan for implementing the Scheme including date milestones and performance indicators for each task.

APPENDIX 1: TRIANGLE HOUSING ASSOCIATION LTD – INTERNAL MANAGEMENT STRUCTURE



Responsible for Housing Development, Policy and New Initiatives for Supported Housing.
 Responsible for Housing Management of Special and General Needs Housing.
 Responsible for the co-ordination of JMA partnership arrangements.

Responsible for financial & administrative management and co-ordination of Human Resources Training & Development programme.

Approximate Number of Employees 180.

Responsible for management of Support Services, Supported Housing, Supported Employment and Volunteer/Tenant Community Service.

APPENDIX 2: LIST OF ORGANISATIONS CONSULTED

Shareholders and Board Members – consultation and awareness raised at various board meetings

Staff – awareness raising presentation for all staff undertaken

Tenants – representative special needs tenant workshops held

Service Users – letters sent outlining the scheme

Named carers and families – where possible letters sent outlining the scheme

Multi agency professionals/inter agency professionals and partner agencies – where possible letters sent outlining the scheme

Employers related to Supported Employment Service – letters sent outlining the scheme

Volunteers – letters sent outlining the scheme

Suppliers, contractors and consultants – where possible letters sent outlining the scheme

Agency partners and private landlords – letters sent outlining the scheme

Purchasing authorities and funders – letters sent outlining the scheme

Umbrella groups for the nine Section 75 categories – letters sent outlining the scheme

Relevant statutory and voluntary bodies – letters sent outlining the scheme

Northern Ireland Federation of Housing Associations consultee list – Public consultations attended in Belfast and Derry and various workshops attended

Trade unions – where possible letters sent outlining the scheme

Political parties – where possible letters sent outlining the scheme

Advocacy, residents and tenants groups – where possible letters sent outlining the scheme

District Councils – where possible letters sent outlining the scheme

Churches/faith groups – where possible letters sent outlining the scheme

APPENDIX 3: COMMENTS RECEIVED FROM CONSULTATION WITH THE ORGANISATIONS RESPONSE

Organisation	Summary of Comments received	Our Response
Coalition on Sexual Orientation	<ul style="list-style-type: none"> ▪ CoSO recommends that all associations try to ensure that any material they produce is gender neutral e.g. partner instead of spouse ▪ Scheme should define precise resources being made available in this context. ▪ The first annual reviews should be comprehensive. ▪ CoSO welcomes open, inclusive and constructive dialogue, however we may on occasion require more that two months for consultations ▪ CoSO welcomes decision to defer screening until after the scheme has been approved as this gives time for greater consideration. ▪ CoSO looks forward to being involved in consultation on screening processes and EQIAs. ▪ Screening of policies should cover informal or unwritten policies as well as the formal policies. ▪ CoSO considers it essential that associations develop a sensitive system of voluntary and confidential indications of 	<p>The association will review the material it produces having regard to all section 75 groups.</p> <p>The association will make resources available throughout each department in keeping with the size of the association.</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, but will consider requests for increased time.</p> <p>The association has committed to screening after scheme approval.</p> <p>The association movement has and will continue to consult with CoSO.</p> <p>The association is committed to a systematic review of all polices (appendix 4 refers).</p> <p>NIFHA is working with CoSO on behalf of</p>

	<p>sexual orientation in close consultation with LGBT groups.</p> <ul style="list-style-type: none"> ▪ The necessary funds must be made available to undertake research into the impact of association policies on the LGBT community. ▪ Draft schemes are sparse on the mechanics of impact assessment. ▪ 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. ▪ 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’. ▪ 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. ▪ Training should be provided for all staff around LGBT issues. 	<p>associations to address this issue.</p> <p>The association will undertake any research into the impact of it’s policies as it deems necessary on all s75 groups.</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 parts of the community in Northern Ireland, and this intent will inform the composition of the media used.</p> <p>This comment is not relevant to the association, as we have not suggested charging for documentation.</p> <p>Equality awareness training is planned within the association around issues for all s75 groups.</p>
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	<ul style="list-style-type: none"> ▪ CoSO approves of providing information online and would encourage the links to the CoSO and website and those of other LGBT organisations. ▪ The timetable for implementing the statutory duty should include a one-year review of screening/scoping decisions. 	<p>The association plans to make information available online.</p> <p>A detailed report of the screening exercise will be issued and included in the Annual Report sent to the Equality Commission. (5.9 refers)</p>
Disability Action	<ul style="list-style-type: none"> ▪ Include name of Chairperson in revised scheme. ▪ Requires information on Board of Management (BOM) to enable informed comment. ▪ HAs should have textphone to enable deaf people to have same access as hearing people. ▪ Progress should be reported to BOM on quarterly basis. ▪ Should offer scheme in range of formats, including large print. ▪ Complaints procedure should outline how it will support the individual to bring their complaint e.g. interpreter support, specialist transport costs, advocacy services. ▪ It is unacceptable that there is a five-year period to assess the effectiveness of the Association in meeting its section 75 	<p>Name and signature on scheme.</p> <p>Details of BOM included in scheme. (2.3 refers)</p> <p>The association will try to ensure all s75 groups have same access. The association considers email to be a reasonable alternative in this case.</p> <p>Quarterly reporting to BOM is now standard business process.</p> <p>Statement of available formats included on cover of scheme. Section 8 reflects commitment.</p> <p>Support will be made available within reason subject to available resources.</p> <p>Commitment to assess the effectiveness of the Association in meeting s75 duties</p>

	<p>duties. The Statutory Duty guidelines state that equality scheme measures are implemented in a 'timely fashion'</p> <ul style="list-style-type: none"> ▪ The Association should purchase the Bobby standard programme to ensure that their website is fully accessible to people with disabilities. ▪ Exceptions to the normal eight week consultation period with appropriate and careful planning reduced periods should be unusual. ▪ Disability Action requests that large print be included in the list of accessible formats available. ▪ The use of simple language and availability of accessible formats should have commenced with this Equality Scheme. ▪ 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. ▪ Please amend persons with a disability to read persons with a physical, sensory, mental or learning disability (Appendix 4). 	<p>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>The association will try to ensure it's website is accessible to all s75 groups.</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>Large print format is available on request.</p> <p>Accessible formats have been available with this equality scheme.</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>Appendix 5 amended as suggested.</p>
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	<ul style="list-style-type: none"> ▪ Any consultant commissioned for research should be fully conversant with specific equality issues pertinent to the target groups. ▪ 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 have a commitment to the allocation of necessary resources in terms of money, time and people. ▪ Disability Action would recommend the use of specialist press of the 9 affected groups. ▪ Regarding training and communication Disability Action requires specific actions, targets and a timeframe to enable informed comment to be made. ▪ Disability Action is concerned that access to copies was provided rather than giving a copy to all staff. 	<p>Any consultants commissioned will be fully conversant with specific equality issues pertinent to the target groups.</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.</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 6 Details of association's implementation plan, including timeframe are outlined in this section.</p> <p>This commitment is in line with the Model Scheme issued by the Equality Commission. All staff have or will attend awareness raising presentation at team meetings and summary scheme.</p>
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	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ No comment needed
Housing Rights Service	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ None received
Irish Congress of Trades Unions	<ul style="list-style-type: none"> ▪ 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. 	None received
N I Mixed Marriage Assoc	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ Housing associations do not define housing need, however we would be eager to play an integral role in any work to address this issue.
West Belfast Economic Forum (WBEF)	<ul style="list-style-type: none"> • The Forum acknowledges the many positive features within the Scheme and the association's commitment to equality. • All Equality Schemes should have a strong focus on affirmative action. 	<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>

	<ul style="list-style-type: none"> • The associations should extend the principles of the equality duty to private, voluntary and community sector partners contracted to supply goods or services. • The duty of ensuring linguistic equality must be included. • The central tenet of the Scheme must be to actively promote equality of opportunity. • The Scheme should specify the precise resources being allocated to the process. • The timeframes for implementation should be clear and workable. • The Scheme should be written in clear and accessible language. • Necessary resources should be made available for relevant training and awareness-raising. • Objectives and targets relating to the equality duty must be included in annual business plans. 	<p>NIFHA is currently exploring ways of addressing this issue.</p> <p>The association has a commitment to ensuring access and reviewing process within year. 8.2 refers</p> <p>Association believes the body of the scheme reflects our commitment to do so.</p> <p>The association will make resources available throughout each department in keeping with the size of the association.</p> <p>The association has outlined its timetable for implementation in Appendix 6</p> <p>The associaton has aimed for clarity and used the model Scheme issued by the EC.</p> <p>The association will make resources available throughout each department in keeping with the size of the association.</p> <p>Targets, with timeframes are recorded in Appendix 6 and have been included in business plan.</p>
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	<ul style="list-style-type: none"> • The Equality Scheme needs to state that employees should disclose membership of oath bound organisations. • Consultation must be done in such a way that there are no barriers for those who are affected by the policies of the association. • Screening must apply to all policies. • Impact assessments must be undertaken in a clear and transparent fashion and perceived conflicting legal obligations must not be used to ‘screen out’ policies. ▪ A formal review must include consultees. 	<p>The association recognises the concerns raised. The association will address any issues that arise around this, within the law and while respecting the individual right to privacy.</p> <p>Methodology for consultation is outlined in section 4 of the scheme.</p> <p>5.1 refers to association commitment to full screening.</p> <p>Perceived conflicting legal obligations will not be used to ‘screen out’ policies. 5.1 refers.</p> <ul style="list-style-type: none"> ▪ This commitment is made in scheme.
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APPENDIX 4: LIST OF TRIANGLE HOUSING ASSOCIATION'S POLICIES

BOARD MEMBERS POLICIES
Code of Governance
Declaration of Interest
Duties of Staff to the Board and its Committees
Essential Functions of the Board
Responsibilities of the Company Secretary
Shareholding Membership Policy
Terms of Reference of Finance Committee
Terms of Reference of Development Committee
Terms of Reference Support Services Committee
Urgent Business between Meetings Policy
Quality Improvement Policy

HUMAN RESOURCE POLICIES
Absence from Work
Adoption Leave
Additional Employment
Annual Leave and Public/Bank Holidays Entitlement
Appraisal Policy
Bereavement Leave
Code of Conduct Policy
Confidentiality
Communication and Information
Complaints
Definitions of Unauthorised Absence from Work
Disciplinary Policy
Equal Opportunities
Eye Testing
Grievance Policy
Harassment Policy

Health and Safety -

- Accident/Incident
- Administration of Medicines
- Confidential Counselling Service
- Motability

Issue of Terms and Conditions of Employment

Induction

Maternity Leave

Payroll

Parental Leave

Paternity Leave

Public Duties Leave

Pensions Policy

Recruitment, Selection and Induction

Representative Advertising

Retirement

Risk Assessment

Salary Grades and Conditions of Service

Sickness Leave

Special Leave (Paid and Unpaid)

Staff Training and Development

Staff Meals Policy

Time off for Dependents

Transport Scheme

Travel Expenses and Use of Private Vehicles

Unauthorised Absence from Work

Use of Lifts

Violence at Work

Whistleblowing Policy

GENERAL POLICIES

Flexi Policy
Gifts, Donations and Hospitality
Identification Cards
Information Communication and Technology
Lone Working
References
Smoking
Substance Abuse
Termination of Employment
Trade Union Membership
Training and Development
Use of Telephones

SUPPORT SERVICES POLICIES

Access to Information Policy
Access of Inspectors / Auditors Policy
Accident / Incident Policy
Administration of Medications Policy
Administration of Holiday Medication Policy
Admissions Policy
Assessment of Needs Policy
Alcohol and Illegal Addictive Substances Policy
Booking of Annual Leave Policy
Control of Substances Hazardous to Health Policy
Controlled Medication Policy
Emergency Out of Hours Contact Policy
Finance Policy (Project)
Immunisation (Influenza) Policy
Laundry Policy
Motability Policy

Operational Policy
Protection of Vulnerable Adults Policy
Referrals Policy
Risk Assessment (Tenants and Service Users) Policy
Staff Meals Policy
Use of Stair Lift Policy
Tenants Personal Belongings Policy
Tenant and Service User Participation Policy
Tenants Holiday Policy
Tenants /Service Users Finance Policy
Transport Policy
What to do in the Event of a Death Policy
Voting Policy

FINANCE AND ADMINISTRATION POLICIES

Mail
Suppliers / Procurement
Fraud
Finance Policies
Administration Policies

HOUSING DEVELOPMENT POLICIES AND PROCEDURES

Development Policy Overview and Statement
Risk Assessment
Consultation
Design Options
Responsibility for development Work
Panel of Consultants
Commissioning Consultants
Select Lists of Contractors
Tendering Process

Appointment of Contractors
Pre contract Meeting and On Site Supervision
Determining a Contract
Practical Completion
Post Contract Defects
Post Implementation Review
Nature and levels of Delegated Authority
Design Guide and Scheme Specific Design Briefs.

HOUSING MANAGEMENT POLICIES AND PROCEDURES

Selection and Allocation Policy and Procedures
Tenants Handbook plus Easy to Read Version
Tenancy Agreements
Right to Repair Procedure
Tenant Compensation for Improvements
Disabled Adaptations
Rent Arrears Prevention and Recovery Procedures
Neighbour Disputes Procedure
Access to Information

HOUSING MAINTENANCE POLICIES AND PROCEDURES

Maintenance Policy incorporating:

- response times (routine maintenance)
- planned maintenance
- service agreements
- finance for maintenance work
- home loss and redecoration payments
- compensation
- information to tenants / licencees

Approved Contractor List
Ordering Work
On Site Control

Costs and Payments
Quotes and Tenders
Appointment of Contractors
Determining a Contract
Specifications
Equal Opportunities
Bribery and Corruption
Confidentiality

**APPENDIX 5: 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 6– 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 	<ul style="list-style-type: none"> SMT agrees equality objectives Equality objectives included in business plans for 2004-2005 Equality objectives reviewed annually in consultation with SMT and included in business plans in years 2005-2006 	<ul style="list-style-type: none"> annually annually annually 	Board of Management, Chief Executive & Senior Management Team
	<ul style="list-style-type: none"> Integration of equality objectives into personal performance plans 	<ul style="list-style-type: none"> SMT agrees draft guidance for staff Objectives included in personal performance plans 	<ul style="list-style-type: none"> ongoing annually 	
Progress Reporting	<ul style="list-style-type: none"> Regular reports to Board of Management 	<ul style="list-style-type: none"> Minuted reports at least quarterly 	<ul style="list-style-type: none"> ongoing 	Board of Management, Chief Executive & Senior Management Team
	<ul style="list-style-type: none"> Annual reports to Equality Commission 	<ul style="list-style-type: none"> Report sent after approval by Board of Management Report incorporated in Association's Annual Report 	<ul style="list-style-type: none"> annually annually 	
	<ul style="list-style-type: none"> Review of Scheme 	<ul style="list-style-type: none"> Review conducted, published and sent to Commission 	<ul style="list-style-type: none"> annually 	

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 • Consultation on draft Equality Scheme (see section 4) • Consultation takes place for Screening of policies • 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 • 07/04- 08/04 • 11/04-01/05 • ongoing • ongoing 	Board of Management, Chief Executive & Senior Management Team
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 Board of Management and SMT • Briefing on Equality Scheme for Association members Board of Management and Senior Managers takes place • All staff trained by Dec 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 	<ul style="list-style-type: none"> • 10/04 • 04/04 • 05/04 • 06/04 • 12/05 • ongoing • ongoing 	Board of Management, Chief Executive & Senior Management Team

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Equality Impact Assessments (EQIAs)	<ul style="list-style-type: none"> • Screening 	<ul style="list-style-type: none"> • Finalise screening instrument 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 	Board of Management, Chief Executive & Senior Management Team
	<ul style="list-style-type: none"> • 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 Board of Management 	<ul style="list-style-type: none"> • 09/05 • 09/05 • 09/05 	Board of Management, Chief Executive & Senior Management Team
	<ul style="list-style-type: none"> • 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 	and Registered Housing Associations

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 • 12/04 • 11/04 • 11/04 • 11/04 	Board of Management, Chief Executive & Senior Management Team and NIFHA
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 	Board of Management, Chief Executive & Senior Management Team
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 	Chief Executive