



Building better lives together

Equality scheme for Triangle Housing Association Ltd

2023-2028

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

***This document is available in a range of formats on request. Please
contact us with your requirements (see page 9 for contact details).***

60 Eastermeade
Gardens, Ballymoney,
Co Antrim BT53 6BD

Foreword

Section 75 of the Northern Ireland Act 1998 (the Act) requires public authorities, in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations across a range of categories outlined in the Act¹.

In our equality scheme we set out how Triangle Housing Association Ltd proposes to fulfil Section 75 statutory duties.

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

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

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

We, N Dunlop, Chair and C Alexander, CEO of Triangle Housing Association Ltd, are fully committed to effectively fulfilling our Section 75 statutory duties across all our functions (including service provision, employment and procurement) through the effective implementation of our equality scheme.

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

¹ See section 1.1 of our Equality Scheme.

failure, on our part, to comply with our equality scheme, can make complaints.

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

Signed by: W. H. D. P. Chairperson

Chris Charles Chief Executive

Date: 26th September 2023

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Chapter 1 Introduction

Section 75 of the Northern Ireland Act 1998

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

Section 75 (1)

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

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

Section 75 (2)

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

“Functions” include the “powers and duties” of a housing association². This includes our employment and procurement functions. Please see below under “Who we are and what we do” for a detailed explanation of our functions.

How we propose to fulfil the Section 75 duties in relation to the relevant functions of Triangle Housing Association Ltd

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

1.3 Triangle Housing Association Ltd is committed to the discharge of its Section 75 obligations in all parts of our organisation and we will commit

² Section 98 (1) of the Northern Ireland Act 1998.

the necessary available resources in terms of people, time and money to ensure that the Section 75 statutory duties are complied with and that our equality scheme can be implemented effectively.

Who we are and what we do

About housing associations

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

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

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

In undertaking their Audits of Inequalities and establishing their Action Plans housing associations were therefore mindful of the need to focus on measures where they have greatest ability to effect change. Where appropriate, potential inequalities identified are outside the remit of the housing associations they will be referred to the relevant public body.

Triangle Housing Association Ltd

Triangle Housing Association Ltd is a registered Housing Association with the Department for Communities. It is a not-for-profit organisation and is registered, as a Charity with the Charities Commission Northern Ireland. It operates solely in Northern Ireland. Its mission is to “enhance lives by providing homes, supporting individuals and families, sustaining communities, and promoting equality”. Services are delivered in line with the association’s values of Purpose; Togetherness; Respect; Empowerment and Accountability. The corporate strategy 2023-2026 outlines the key objectives and core outcomes for the association and is available at www.trianglehousing.org.uk

The association prepares an annual operational plan linked to the corporate strategy. These corporate objectives have detailed measurable core outcomes, priorities and key performance indicators set out in the annual plans and are available on www.trianglehousing.org.uk

Current Activities of Triangle include:

Property Development: Managing a capital budget for property development and refurbishment.

Housing Management: Managing and maintaining a range of supported housing and general family accommodation sometimes in partnership with other specialist agencies.

Floating Support and Outreach Services: Assisting people with complex needs to secure and maintain their tenancies, access benefits and other services in the private and public sector.

Supported Living / Residential and Community Services: Providing individualised housing and care support to people with a learning disability and / or complex needs in dispersed properties. Also home based community support promoting integration into communities.

Progression to Employment Services/Supported Employment Services: Providing support for individuals including those with a range of disabilities to enter or re-enter work activities; supporting individuals to develop required job-related skills; and the provision of ongoing support as required.

Social Enterprise: Enabling adults with learning disabilities to participate in an enterprise – focused programme that will result in active progression towards their engagement in an employment environment.

The association currently employs more than 400 staff ,has a turnover of over £21million and has assets of over £141million. It manages just over

1400 units/bed spaces of accommodation including general family housing and accommodation for people with special needs in partnership with several charitable and statutory partners. Triangle aims to start building 150 new homes per annum. Triangle annually provides housing care and support directly to 160 adults with a learning disability along with 37 frail elderly persons; provides housing floating support services to 800-900 adults in emergency housing need and provides employment support to the economically inactive including those with disabilities. As a condition of receiving public grants and being a registered housing association Triangle is bound by public procurement rules.

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

2.1 Some of our arrangements for assessing our compliance with the Section 75 statutory duties are outlined in other relevant parts of this equality scheme, for example, monitoring arrangements, assessment of impact of policies arrangements, consultation, publication and complaints.

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

Responsibilities and reporting

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

2.3 Responsibility for the effective implementation of our equality scheme lies with the Board of Management. The Board delegate this responsibility to Chief Executive and the Executive Team. The Director of Organisational Development and Communications is the Equality Monitoring Officer and is accountable for the development, implementation, maintenance and review of the equality scheme in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998, including any good practice or guidance that has been or may be issued by the Equality Commission.

2.4 If you have any questions or comments regarding our equality scheme, please contact Sonya Rooke in the first instance at the address given below and we will respond to you as soon as possible:

Sonya Rooke
Triangle Housing Association Ltd,
60 Eastermeade Gardens,
Ballymoney,
Co Antrim
Tel: 02827661731
Mob: 07702518161
E Mail: sonya.rooke@trianglehousing.org.uk

2.5 Objectives and targets relating to the statutory duties are integrated into our strategic and operational business plans. Progress against these

objectives are reported internally quarterly in the Organisational Development and Communications Performance Report to the Executive Team; Organisational Development and Communications Committee and the Board³.

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

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

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

2.8 The latest Section 75 annual progress report is available on our website www.trianglehousing.org.uk

or by contacting:

Sonya Rooke
Triangle Housing Association Ltd,
60 Eastermeade Gardens,
Ballymoney,
Co Antrim
Tel: 02827661731
Mob: 07702518161
E Mail: sonya.rooke@trianglehousing.org.uk

2.9 Triangle Housing Association Ltd liaises closely with the Equality Commission to ensure that progress on the implementation of our equality scheme is maintained.

³ See Appendix 4 'Timetable for measures proposed' and section 2.11 of this equality scheme.

2.10 Triangle has a range of tenant and service user stakeholder groups and staff forums to drive forward equality issues.

Action plan/action measures

2.11 Triangle Housing Association Ltd has developed an action plan to promote equality of opportunity and good relations. This action plan is set out in Appendix 6 to this equality scheme.

2.12 The action measures that make up our action plan are relevant to our functions. They were developed and prioritised on the basis of an audit of inequalities and an equity; diversity and interdependence initiative undertaken by the association previously. The audit of inequalities gathered and analysed information across the Section 75 categories⁴ to identify potential inequalities that exist for our service users and those affected by our policies⁵.

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

2.14 We have developed an action plan for three years to cover the period of our current corporate strategy (2023-2026) in order to align it with our corporate and business planning cycles. Implementation of the action measures is also incorporated into our annual business plans.

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

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

2.17 Triangle Housing Association Ltd will inform the Commission of any changes or amendments to our action plan and will also include this information in our Section 75 annual progress report to the Commission. Our Section 75 annual progress report will incorporate information on progress we have made in implementing our action plans/action measures.

⁴ See section 1.1 of this equality scheme for a list of these categories.

⁵ See section 4.1 of this equality scheme for a definition of policies.

2.18 Once finalised, our action plan will be available on our website
www.trianglehousing.org.uk

or by contacting:

Sonya Rooke
Triangle Housing Association Ltd,
60 Eastermeade Gardens,
Ballymoney,
Co Antrim
Tel: 02827661731
Mob: 07702518161
E Mail: sonya.rooke@trianglehousing.org.uk

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

Chapter 3 Our arrangements for consulting

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

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

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

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

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

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

As the representative body for housing associations, the Northern Ireland Federation of Housing Associations (NIFHA) has assisted its members in the implementation of Section 75 of the Northern Ireland Act 1998 by co-ordinating a joint approach to the Statutory Equality duties to produce our Equality Scheme in 2012 -2017. NIFHA itself is not a designated body, but as part of its support for members took on this co-ordination role, in particular in relation to public consultation. The aim in managing the process in this way was to minimise the impact on consultee and/or

stakeholder organisations. However, throughout each formal consultation exercise the relevant documents were and are available, in a range of formats including hard copies, directly from Triangle Housing Association Ltd.

3.2.2 Consultation with all stakeholders was undertaken as part of the development of the original Equality Scheme for the Association for the period 2012-2017. We will continue to engage with affected individuals and representative groups when required, to identify how best to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these. Methods of consultation include:

- Face-to-face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email with an opportunity to opt in/opt out of the consultation
- Internet discussions or
- Telephone consultations
- Tenant and Service user conferences

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

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

A range of easy read documents/leaflets/reports are produced generally and for equality consultations for adults with learning disabilities.

Feedback cards using the traffic light system and smiley or sad symbols are used at tenant and service user consultations/events. Advocates are sometimes used in securing feedback from adults with learning

disabilities and specific training and support is also given in order that the views of adults with learning disabilities are captured.

Information will be made available, on request, in alternative formats⁶, in a timely manner, usually within a week. We will ensure that such consultees have equal time to respond.

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

3.2.5 To ensure effective consultation with consultees⁷ on Section 75 matters, we will develop a programme of awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by undertaking the following:

- Meetings with tenants and service users-Tenant Advisory Panel (TAP);
- Tenant Advisory Group (TAG) for adults with a learning disability
- Annual Tenant and Service User conference
- Providing easy read versions of the Equality Scheme
- Meetings with staff/staff conference
- Meetings with stakeholder groups
- Public consultation exercises
- Providing information on Triangle's website

3.2.6 The consultation periods will last for a minimum of twelve weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view. However, in exceptional circumstances when this timescale is not feasible (for example implementing EU Directives or UK wide legislation, meeting Health and Safety requirements, addressing urgent public health matters or complying with Court judgements), we may shorten timescales to eight weeks or less before the policy is implemented. We may continue consultation thereafter and will review the policy as part of our monitoring commitments⁸.

Where, under these exceptional circumstances, we must implement a policy immediately, as it is beyond our authority's control, we may

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

⁷ Please see Appendix 3 for a list of our consultees.

⁸ Please see below at 4.27 to 4.31 for details on monitoring.

consult after implementation of the policy, in order to ensure that any impacts of the policy are considered.

3.2.7 If a consultation exercise is to take place over a period when consultees are less able to respond, for example, over the summer or Christmas break, or if the policy under consideration is particularly complex, we will give consideration to the feasibility of allowing a longer period for the consultation.

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

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

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

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

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

or by contacting:

Sonya Rooke
Triangle Housing Association Ltd,

60 Eastermeade Gardens,
Ballymoney,
Co Antrim
Tel: 02827661731
Mob: 07702518161
E Mail: sonya.rooke@trianglehousing.org.uk

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

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

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

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

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

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

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

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

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

Screening

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

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

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

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

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

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

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

1. the policy has been 'screened in' for equality impact assessment

2. the policy has been 'screened out' with mitigation⁹ or an alternative policy proposed to be adopted
3. the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

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

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

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

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

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

4.13 As soon as possible following the completion of the screening process, the screening template, signed off and approved by the senior manager responsible for the policy will be filed and recorded as a change under our ISO 9001 quality management system. Screening documents will be available on request and on our website.

⁹ Mitigation – Where an assessment (screening in this case) reveals that a particular policy has an adverse impact on equality of opportunity and / or good relations, a housing association must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories.

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

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

Equality impact assessment

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

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

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

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

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

What we publish

4.20 Screening reports

These are published quarterly. Screening reports detail:

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

4.21 Screening templates

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

4.22 Equality impact assessments

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

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

How we publish the information

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

Where we publish the information

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

www.trianglehousing.org.uk

and by contacting:

Sonya Rooke
Triangle Housing Association Ltd,
60 Eastermeade Gardens,
Ballymoney,
Co Antrim
Tel: 02827661731
Mob: 07702518161
E Mail: sonya.rooke@trianglehousing.org.uk

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

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

Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity (Schedule 9 4. (2) (c))

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

manner, the Triangle Housing Association Ltd follows guidance from the Office of the Information Commissioner and the Equality Commission.

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

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

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

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

4.31 We review our EQIA monitoring information on an annual basis. Other monitoring information is reviewed from the annual staff survey; the annual tenant and service user surveys. Triangle also undertakes a diversity audit within the association.

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

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

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

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

Chapter 5 Staff training

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

Commitment to staff training

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

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

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

Training objectives

5.3 Triangle Housing Association Ltd has drawn up a detailed training plan for its staff and board members which aims to achieve the following objectives:

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

Awareness raising and training arrangements

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

- We will develop a summary of this equality scheme and make it available to all staff.
- We will provide access to copies of the full equality scheme for all staff; ensure that any queries or questions of clarification from staff are addressed effectively.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within Triangle who are directly engaged in taking forward the implementation of our equality scheme commitments (for example those involved in research and data collection, policy development, service design, conducting equality impact assessments, consultation, monitoring and evaluation). The Equality Commission Training Calendar will be circulated to relevant staff annually for sourcing of update training
- Where appropriate, training will be provided to ensure staff are aware of the issues experienced by the range of Section 75 groups.
- When appropriate and on an ongoing basis, arrangements will be made to ensure staff are kept up to date with Section 75 developments.
- A learning and development strategy has been developed and an annual learning and development plan and calendar are provided outlining all the learning and development including the equality related training.
- Additional awareness raising and presentations have been and will continue to be given at staff and tenant and service user conferences.

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

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

Monitoring and evaluation

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

- We evaluate the extent to which all participants in this training programme have acquired the necessary skills and knowledge to achieve each of the above objectives.
- The extent to which training objectives have been met will be reported on as part of the Section 75 annual progress report, which will be sent to the Equality Commission.
- Monitoring of each training programme is carried out at the end of the session. Also monitoring and review of the increase in skills or knowledge are included in each staff members personal development plan within the performance review system.
- Numbers of staff/board members trained are monitored quarterly and reported to the Organisational Development and Communications Committee and the Board of Management within the quarterly Learning and Development report.

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

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

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

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

In particular:

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

Access to information

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

Alternative formats may include Easy Read, audio formats (CD, mp3 or DAISY), large print or minority languages to meet the needs of those for whom English is not their first language.

Triangle Housing Association Ltd liaises with representatives of young people and disability and minority ethnic organisations and takes account of existing and developing good practice.

We will respond to requests for information in alternative formats in a timely manner, usually within a week.

Most key publications are produced in easy read versions for people with learning disabilities.

The association is investigating further ways of people with disabilities accessing information.

6.4 In disseminating information through the media we will seek to advertise in the press where appropriate.

6.5 All key information is provided on our website
www.trianglehousing.org.uk

Access to services

6.6 Triangle Housing Association Ltd is committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories.

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

6.7 Most of our services are accessed through statutory agency referrals or lists. Where application is possible information regarding access can be found on our website.

Assessing public access to information and services

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

6.9 The Corporate Services team will monitor access to information and services. Also, the quarterly directorate reports contain information on public accessing our services.

Chapter 7 Timetable for measures we propose in this equality scheme

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

7.1 Appendix 4 outlines our timetable for all measures proposed within this equality scheme. The measures outlined in this timetable are incorporated into our business planning processes.

7.2 This timetable is different from and in addition to our commitment to developing action plans/action measures to specifically address inequalities and further promote equality of opportunity and good relations. We have included in our equality scheme a commitment to develop and implement/deliver an action plan. Accordingly, this commitment is listed in the timetable of measures at Appendix 4. For information on these action measures please see above at 2.11 – 2.18.

Chapter 8 Our complaints procedure

(Schedule 9 10.)

8.1 Triangle Housing Association Ltd is responsive to the views of members of the public. We will endeavour to resolve all complaints made to us. Triangle's complaint procedure is contained within its ISO 9001 quality management system under C6-1. It is a three-stage procedure and an information leaflet is available on request.

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

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

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

Sonya Rooke
Triangle Housing Association Ltd,
60 Eastermeade Gardens,
Ballymoney,
Co Antrim
Tel: 02827661731
Mob: 07702518161
E Mail: sonya.rooke@trianglehousing.org.uk

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

8.5 Triangle will carry out an internal investigation of the complaint and will respond substantively to the complainant within 10 working days of the date of receiving the letter of complaint. Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the complainant may be extended. In those circumstances, the complainant will be advised of the extended period within 10 working days of making the complaint. If it cannot be resolved it will be dealt with at stage 2 by the CEO who will acknowledge this within a further 2 working days. The CEO will attempt to deal with it within 10

working days. If it cannot be resolved at this stage complainants have the option of referring the issue to the Ombudsman.

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

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

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

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

Chapter 9 Publication of our equality scheme

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

9.1 Triangle Housing Association Ltd's equality scheme is available free of charge in print form and alternative formats from:

Sonya Rooke
Triangle Housing Association Ltd,
60 Eastermeade Gardens,
Ballymoney,
Co Antrim
Tel: 02827661731
Mob: 07702518161
E Mail: sonya.rooke@trianglehousing.org.uk

9.2 Our equality scheme is also available on our website at:
www.trianglehousing.org.uk

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

- We will make every effort to communicate widely the existence and content of our equality scheme. This may include press releases, prominent advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a link to our approved equality scheme to our consultees on our consultation lists. Other consultees without e-mail will be notified by letter that the scheme is available on request. We will respond to requests for the equality scheme in alternative formats in a timely manner, usually within a week.
- Our equality scheme is available on request in alternative formats such as Easy Read, large print, audio formats (CD, mp3, DAISY) and in minority languages to meet the needs of those not fluent in English.
- Tenants and service user representative groups with learning disabilities will be consulted within Triangle. Easy read versions will be available to all adults with learning disabilities.

9.4 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme, visit our website at www.trianglehousing.org.uk

Sonya Rooke
Triangle Housing Association Ltd,
60 Eastermeade Gardens,
Ballymoney,
Co Antrim
Tel: 02827661731
Mob: 07702518161
E Mail: sonya.rooke@trianglehousing.org.uk

Chapter 10 Review of our equality scheme

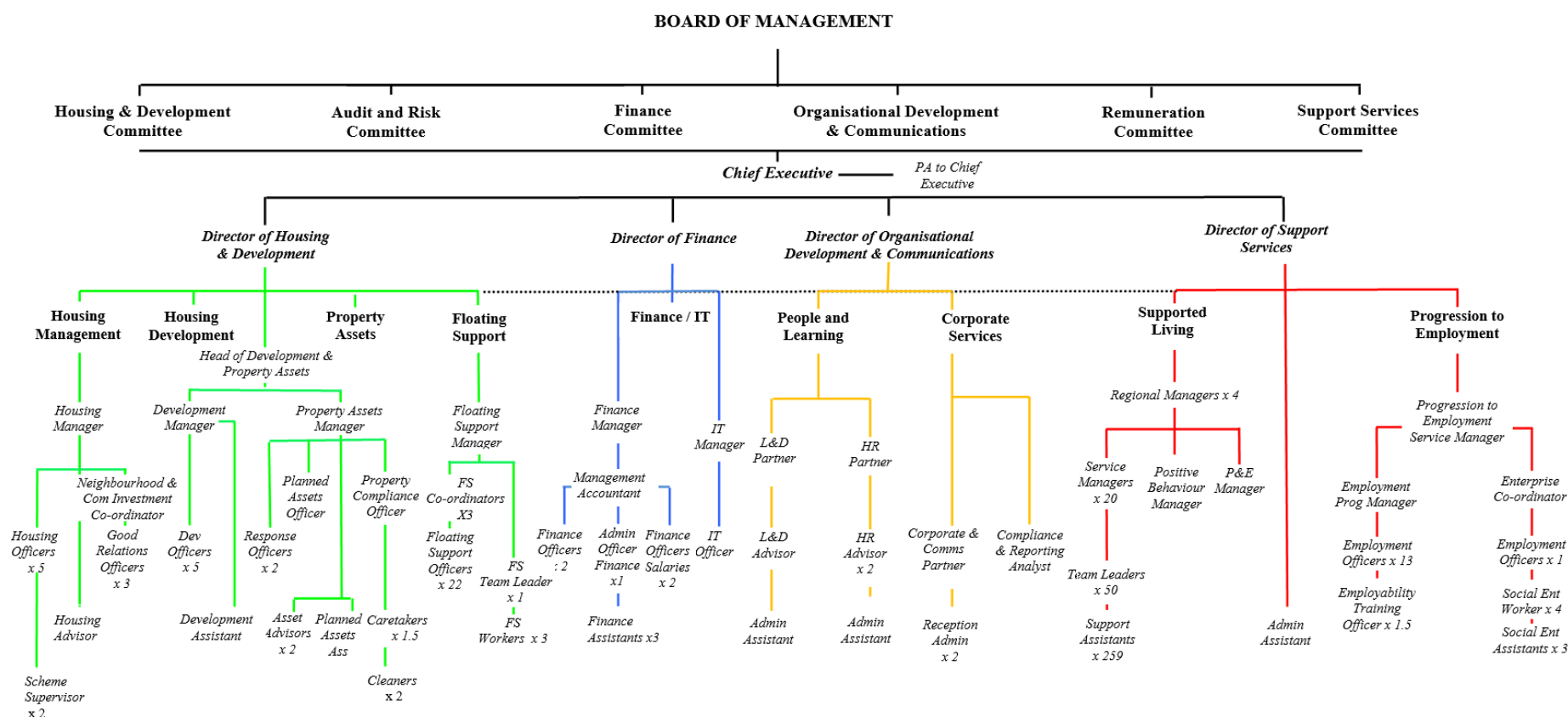
(Schedule 9 8. (3))

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

The review will evaluate the effectiveness of our scheme in relation to the implementation of the Section 75 statutory duties relevant to our functions in Northern Ireland.

10.2 In undertaking this review we will follow any guidance issued by the Equality Commission. A report of this review will be made public on our website and sent to the Equality Commission.

Appendix 1: Triangle Housing Association Ltd – Organisation Chart



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

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

Category	Example groups
Religious belief	<p>Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths.</p> <p>For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment & Treatment (NI) Order</i>¹⁰. Therefore, “religious belief” also includes any <i>perceived</i> religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “<i>similar philosophical belief</i>”.</p>
Political opinion ¹¹	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people.
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls).
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientation	Bisexual people; heterosexual people; gay or lesbian people.

¹⁰ See Section 98 of the Northern Ireland Act 1998, which states: “*In this Act... “political opinion” and “religious belief” shall be construed in accordance with Article 2(3) and (4) of the Fair Employment & Treatment (NI) Order 1998.*”

¹¹ *ibid*

Appendix 3: List of Consultees

(Schedule 9 4. (2) (a))

Access Employment Ltd (AEL)
Age Concern Northern Ireland
Age Sector Platform
Alliance Party for Northern Ireland
Amalgamated Engineering & Electrical Union
Amalgamated Transport & General Workers Union
An Munia Tober
Antrim and Newtownabbey Borough Council
Ards and North Down Borough Council
Armagh City, Banbridge and Craigavon Borough Council
Association of Independent Advice Centres
Autism Initiatives
Bahai Council for Northern Ireland
Barnardos
Belfast City Council
Belfast Health & Social Services Trust
Belfast Hebrew Congregation
Belfast Islamic Centre
Belfast Trade Unions Council
Brainwaves Northern Ireland
British Deaf Association (NI)
Carafriend
Carers Northern Ireland
Causeway Coast and Glens Borough Council
Causeway Womens Aid
Central Services Agency
Chartered Institute of Housing
Child Poverty Action Group (NI)
Children's Law Centre
Chinese Welfare Association
Citizens Advice Regional Office (Belfast)
CO3 Chief Officers Third Sector
Coalition on Sexual Orientation (CoSO)
Committee on the Administration of Justice (CAJ)
Community Development & Health Network (NI)
Community Relations Council (CRC)
Compass People (CAN)
Council for the Homeless (NI)
Craigavon Borough Council

Democratic Unionist Party
Department for Communities
Derry City and Strabane District Council
Derry Well Woman
Disability Action, Belfast
Disability Action, Derry
Down's Syndrome Association
DRP Mainstay
East Belfast Community Development Agency
Eastern Health & Social Services Board
Equality Commission for NI
Equality Forum NI
Falls Community Council
Family Planning Association (NI)
Fermanagh and Omagh District Council - Enniskillen Office
Gay & Lesbian Youth Northern Ireland
General Consumer Council
Gingerbread Northern Ireland
Help the Aged Northern Ireland
Housing Rights Service
Indian Community Centre
Irish Council of Churches
Lesbian Line
Lisburn and Castlereagh City Council
Magherafelt Women's Group
MENCAP
Methodist Church in Ireland
Mid and East Antrim Borough Council
Mid Ulster District Council - Dungannon
Mind Yourself
Multi-Cultural Resource Centre
Newry, Mourne and Down District Council
NIGRA (Northern Ireland Gay Rights Association)
NIPSA
North West Community Network
North West Forum of People with Disabilities
Northern Health & Social Care Trust
Northern Health & Social Services Board
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health (Not sure it exists now)
Northern Ireland Committee for Refugees & Asylum Seekers (NICRAS)
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 Housing Council
Northern Ireland Housing Executive
Northern Ireland Human Rights Commission (NIHRC)
Northern Ireland Mixed Marriage Association
Northern Ireland Office
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 Women's Area Network
Parents & Professionals & Autism
POBAL
Polish Welfare Association
Positive Futures
PRAXIS
Press for Change
Probation Board for Northern Ireland
Progressive Unionist Party
Prospects
Royal Institute for Deaf People (NI)
Royal National Institute for the Blind (NI)
Rural Community Network
SEEDS
Sense NI
Simon Community
Sinn Fein
Social Democratic & Labour Party
Southern Health & Social Care Trust
Southern Health & Social Services Board
Staff Commission for Education & Library Boards
Stepping Stones
Supporting Communities NI
The Appleby Trust
The Cedar Foundation
The Guide Dogs for the Blind Association
The Rainbow Project
The Women's Centre
Traveller Movement Northern Ireland
Triangle staff; tenants & service users

UCATT
Ulster Democratic Party
Ulster Scots Heritage Council
USEL
Ulster Unionist Party
Western Health & Social Care Trust
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 4 Timetable for measures proposed

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

Measure	Lead responsibility	Timetable
Section 75 Annual Progress Report [2.7] (To include associated action plans)	Director of Organisational Development and Communications	31 August (annually)
Action plan review	Director of Organisational Development and Communications	April (annually)
Consultation on action plan amendments if required [2.15]	Executive Team	April to July (annually)
Finalised action plan published [2.18]	Director of Organisational Development and Communications	September (annually)
Arrangements for monitoring progress in place [2.16]	Director of Organisational Development and Communications	Quarterly ODC Committee
Consultation list reviewed and updated [3.4]	Corporate Communications Partner	September (annually)
Screening timetable [4.4]	Director of Organisational Development and Communications	In month of new policy or when policy reviewed
Screening Reports [4.15]	Compliance and Reporting Analyst	Quarterly within the quarter of new policy creation or when policy reviewed
EQIA timetable [4.16]	Director of Organisational Development and Communications	As required

Measure	Lead responsibility	Timetable
Monitoring Review of monitoring information [4.31]	HR Partner	Quarter 1 (annually)
Publication of monitoring information [4.33;4.34]	HR Partner	Quarter 1 (annually)
	Corporate Communications Partner	August (annually)
Annual Training Plan Developed	Learning & Development Partner	Quarter 4 (annually)
Development of summary scheme [5.4]	Director of Organisational Development and Communications	As required
Development of overall training programme [5.5]	Learning & Development Partner	Quarter 4 (annually)
Evaluation of training [5.6]	Learning & Development Partner	Quarterly
Assessing access to information and services [6.9]	Corporate Communications Partner	As part of CSE Assessment (annually)
Communication of equality scheme [9.3]	Director of Organisational Development and Communications	Ongoing via website and email
Review of equality scheme [10.1]	Board	Quarter 1 (2028)

Appendix 5 Glossary of terms

Action plan

A plan which sets out actions a public authority will take to implement its Section 75 statutory duties. It is a mechanism for the realisation of measures to achieve equality outcomes for the Section 75 equality and good relations categories.

Action measures and outcomes

Specific measures to promote equality and good relations for the relevant Section 75 and good relations categories, linked to achievable outcomes, which should be realistic and timely.

Adverse impact

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

Affirmative action

In general terms, affirmative action can be defined as being anything consistent with the legislation which is necessary to bring about positive change. It is a phrase used in the Fair Employment and Treatment Order (NI) 1998 to describe lawful action that is aimed at promoting equality of opportunity and fair participation in employment between members of the Protestant and Roman Catholic communities in Northern Ireland.

Article 55 Review

Under the Fair Employment and Treatment (NI) Order 1998, all registered employers must conduct periodic reviews of the composition of their workforces and of their employment practices for the purposes of determining whether members of the Protestant and Roman Catholic communities are enjoying, and are likely to continue to enjoy, fair participation in employment in each employer's concern.

These reviews, which are commonly known as Article 55 Reviews, must be conducted at least once every three years.

Audit of inequalities

An audit of inequalities is a systematic review and analysis of inequalities which exist for service users and those affected by a public authority's policies. An audit can be used by a public authority to inform its work in relation to the Section 75 equality and good relations duties. It can also enable public authorities to assess progress on the implementation of the Section 75 statutory duties, as it provides baseline information on existing inequalities relevant to a public authority's functions.

Consultation

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

Desk audit

An audit of a draft equality scheme to ensure that the scheme conforms with the requirements on form and content as detailed in the Commission's Guidelines (the Guide).

Differential impact

Differential impact occurs where a Section 75 group has been affected differently by a policy. This effect could either be positive, neutral or negative. A public authority must make a judgement as to whether a policy has a differential impact and then it must determine whether the impact is adverse, based on a systematic appraisal of the accumulated information.

Discrimination

The anti-discrimination laws prohibit the following forms of discrimination:

- Direct discrimination
- Indirect Discrimination
- Disability Discrimination
- Victimisation
- Harassment

Brief descriptions of these above terms follow:

Direct discrimination

This generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances, on one or more of the statutory non-discrimination grounds. A decision or action that is directly discriminatory will normally be unlawful unless: (a) in an age discrimination case, the decision can be objectively justified, or (b) in any other case, the public authority can rely on a statutory exception that permits it – such as a *genuine occupational requirement exception*; or, a *positive action exception* which permits an employer to use “welcoming statements” or to take other lawful positive action to encourage participation by under-represented or otherwise disadvantaged groups.

Indirect discrimination

The definition of this term varies across some of the anti-discrimination laws, but indirect discrimination generally occurs where a public authority applies to all persons a particular provision, criterion or practice, but which is one that has the effect of placing people who share a particular equality characteristic (e.g. the same sex, or religious belief, or race) at a particular disadvantage compared to other people. A provision, criterion or practice that is indirectly discriminatory will normally be unlawful unless (a) it can be objectively justified, or (b) the public authority can rely on a statutory exception that permits it.

Disability discrimination

In addition to direct discrimination and victimisation and harassment, discrimination against disabled people may also occur in two other ways: namely, (a) *disability-related discrimination*, and (b) *failure to comply with a duty to make reasonable adjustments*.

- (a) *Disability-related discrimination* generally occurs where a public authority, without lawful justification, and for a reason which relates to a disabled person’s disability, treats that person less favourably than it treats (or, would treat) other people to whom that reason does not (or, would not) apply.
- (b) *Failure to comply with a duty to make reasonable adjustments*: One of the most notable features of the disability discrimination legislation is that in prescribed circumstances it imposes a duty on employers, service providers and public authorities to take such steps as are reasonable to remove or reduce particular disadvantages experienced by disabled people in those circumstances.

Victimisation

This form of discrimination generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances, because the person has previously exercised his/her rights under the anti-discrimination laws, or has assisted another person to do so. Victimisation cannot be justified and is always unlawful.

Harassment

Harassment generally occurs where a person is subjected to unwanted conduct that is related to a non-discrimination ground with the purpose, or which has the effect, of violating their dignity or of creating for them an intimidating, hostile, degrading, humiliating or offensive environment. Harassment cannot be justified and is always unlawful.

Economic appraisal

An economic appraisal is a systematic process for examining alternative uses of resources, focusing on assessment of needs, objectives, options, costs benefits, risks, funding and affordability and other factors relevant to decisions.

Equality impact assessment (EQIA)

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

Equality of opportunity

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

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

Equality scheme

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

Good relations

Although not defined in the legislation, the Commission has agreed the following working definition of good relations: 'the growth of relations and structures for Northern Ireland that acknowledge the religious, political and racial context of this society, and that seek to promote respect, equity and trust, and embrace diversity in all its forms'.

Mainstreaming equality

The integration of equal opportunities principles, strategies and practices into the every day work of public authorities from the outset. In other words, mainstreaming is the process of ensuring that equality considerations are built into the policy development process from the beginning, rather than being bolted on at the end. Mainstreaming can help improve methods of working by increasing a public authority's accountability, responsiveness to need and relations with the public. It can bring added value at many levels.

Mitigation of adverse impact

Where an equality impact assessment reveals that a particular policy has an adverse impact on equality of opportunity, a public authority must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories; this is known as mitigating adverse impact.

Monitoring

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

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

Northern Ireland Act

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

Northern Ireland Human Rights Commission

A statutory body established under Section 68 of the Northern Ireland Act 1998, which works to ensure that the human rights of everyone in Northern Ireland are fully protected in law, policy and practice.

Northern Ireland Statistics & Research Agency (NISRA)

The Northern Ireland Statistics and Research Agency (NISRA) is an Executive Agency within the Department of Finance and Personnel (DFP).

They provide statistical and research information regarding Northern Ireland issues and provide registration services to the public in the most effective and efficient way.

OFMdfM

The Office of the First Minister and Deputy First Minister is responsible for providing advice, guidance, challenge and support to other NI Civil Service Departments on Section 75 issues.

PAFT

The Policy Appraisal and Fair Treatment (PAFT) Guidelines constituted the first non-statutory attempt at mainstreaming equality in Northern Ireland in January 1994. The aim of the PAFT Guidelines was to ensure that issues of equality and equity informed policy making and activity in all spheres and at all levels of government. PAFT has now been superseded by Section 75 of the Northern Ireland Act 1998.

Policy

The formal and informal decisions a public authority makes in relation to carrying out its duties. Defined in the New Oxford English Dictionary as 'a course or principle of action adopted or proposed by a government party, business or individual'. In the context of Section 75, the term **policies** covers all the ways in which a public authority carries out or proposes to carry out its functions relating to Northern Ireland. Policies include unwritten as well as written policies.

Positive action

This phrase is not defined in any statute, but the Equality Commission understands it to mean any lawful action that a public authority might take for the purpose of promoting equality of opportunity for all persons in relation to employment or in accessing goods, facilities or services (such as health services, housing, education, justice, policing). It may involve adopting new policies, practices, or procedures; or changing or abandoning old ones. *Positive action* is not the same as *positive discrimination*.

Positive discrimination differs from positive action in that *positive action* involves the taking of lawful actions whereas *positive discrimination* involves the taking of unlawful actions. Consequently, *positive action* is by definition lawful whereas *positive discrimination* is unlawful.

Qualitative data

Qualitative data refers to the experiences of individuals from their perspective, most often with less emphasis on numbers or statistical analysis. Consultations are more likely to yield qualitative than quantitative data.

Quantitative data

Quantitative data refers to numbers, typically derived from either a population in general or samples of that population. This information is often analysed by either using descriptive statistics, which consider general profiles, distributions and trends in the data, or inferential statistics, which are used to determine 'significance' either in relationships or differences in the data.

SACHR

The Standing Advisory Commission on Human Rights (SACHR) has now been replaced by the Northern Ireland Human Rights Commission. SACHR, as part of its review of mechanisms in place to promote employment equality and reduce the unemployment differential, recommended that the PAFT Guidelines should be made a statutory requirement.

Screening

The procedure for identifying which policies will be subject to equality impact assessment, and how these equality impact assessments will be prioritised. The purpose of screening is to identify the policies which are likely to have a minor/major impact on equality of opportunity so that greatest resources can be devoted to improving these policies.

Screening requires a systematic review of existing and proposed policies.

Schedule 9

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

Section 75

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

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

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

Section 75 investigation

An investigation carried out by the Equality Commission, under Schedule 9 of the NI Act 1998, arising from the failure of a public authority to comply with the commitments set out in its approved equality scheme.

There are two types of Commission investigation, these are as follows:

1. An investigation of a complaint by an individual who claims to have been directly affected by the failure of a public authority to comply with its approved equality scheme;
2. An investigation initiated by the Commission, where it believes that a public authority may have failed to comply with its approved equality scheme.

Appendix 6 Equality Action Plan

The Equality Action Plan focuses on the functions of Triangle Housing Association Ltd¹².

No.	Action	Timescale	Responsible Person or Dept.	Outcome / Measure	Inequalities
1	Ensure everyone has access to a secure and sustainable home that is appropriate to meet their needs	Annually	Director of Housing	<p>Design new homes to meet Lifetime Homes Standard</p> <p>10% of new homes to meet wheelchair standard</p> <p>Provide an efficient and accessible property adaptations service</p> <p>Ensure properties are Disability Discrimination Act compliant</p> <p>Deliver quality supported housing schemes which meet the needs of those with disabilities and complex needs</p> <p>Improve the energy performance and thermal comfort of homes</p>	<p>Disability</p> <p>Disability</p> <p>Disability</p> <p>Disability</p> <p>Disability</p> <p>Age</p>

¹² As defined in the Housing Association Rules

No.	Action	Timescale	Responsible Person or Dept.	Outcome / Measure	Inequalities
				<p>Increase the supply of 1bed homes</p> <p>Promote financial inclusion measures</p> <p>Provide appropriate housing for over 55 year olds</p> <p>Provide floating support services to assist people to find homes and maintain their tenancy</p> <p>Develop shared, housing for all, schemes which promote community safety, cohesion and relations</p>	<p>Age, Dependents</p> <p>Age, Dependents, Gender</p> <p>Age</p> <p>All</p> <p>All</p>
2	Review workforce composition and take positive action if necessary	Annually	HR Partner	Workforce composition reviewed as part of the Annual Monitoring report	All
3	Continued roll out of Mandatory Equality & Diversity and Safeguarding training modules.	<p>Ongoing</p> <p>Ongoing</p>	<p>All Managers</p> <p>All Managers</p>	<p>Increase awareness and compliance with policies.</p> <p>Mandatory training matrices have been completed for all employees including modules on equality, diversity and safeguarding. The</p>	<p></p> <p>All</p>

No.	Action	Timescale	Responsible Person or Dept.	Outcome / Measure	Inequalities
		Annually	L&D Partner	LMS records training undertaken and 'flags' when refresher training is due. Managers will ensure their teams have completed their training. Review induction and training materials to ensure current content.	
4	Further embed equality and cultural diversity throughout the organisation	Ongoing	L&D Partner HR Partner CS Partner	Equality and diversity is embedded through: <ul style="list-style-type: none"> • L&D evaluation • Exit Surveys • Compliments & Complaints • Employee survey 	All
5	Develop wellbeing support to broaden diversity and create a culture which understands and accepts differences.	Ongoing	ODC and Support Services Directorates	Develop wellbeing approaches for: LGBTQIA+ / Mental Health / Disability / Racial difference / Prayer facilities	All
		Ongoing	L&D Partner	To increase knowledge and understanding through learning opportunities	
		Ongoing	HR Partner	Develop Mental Health First Aid group in organisation	
6	Encourage participation in working Groups, internal and external	Ongoing	All	Develop a schedule for a range of areas to celebrate to demonstrate	All

No.	Action	Timescale	Responsible Person or Dept.	Outcome / Measure	Inequalities
	events			how we embrace diversity.	
7	Monitor, Evaluate and Review	August Annually	HR Partner	Annual Progress Report submitted and reviewed by Equality Commission.	
		April Annually	HR Partner	Monitoring Return submitted.	
		Annually	Executive Team	Reviewing equality action plan and updating as necessary	
		Annually	Executive Team	Reviewing Disability action plan and updating as necessary	
		Annually	Executive Team	Reviewing Good Relations plan and updating as necessary	