

EQUALITY COMMISSION FOR NORTHERN IRELAND

Public Authority 2012 – 2013 Annual Progress Report on:

- **Section 75 of the NI Act 1998 and**
- **Section 49A of the Disability Discrimination Order (DDO) 2006**

This report template includes a number of self assessment questions regarding implementation of the **Section 75 statutory duties** from *1 April 2012 to 31 March 2013 (Part A)*.

This template also includes a number of questions regarding implementation of **Section 49A of the DDO** from the *1 April 2012 to 31 March 2013 (Part B)*.

Please enter information at the relevant part of each section and ensure that it is **submitted** electronically (by completing this template) and in hardcopy, with a signed cover letter from the Chief Executive or, in his / her absence, the Deputy Chief Executive to the Commission **by 31 August 2013**.

In completing this template it is essential to focus on the application of Section 75 and Section 49. This involves progressing the commitments in your equality scheme or disability action plan which should lead to outcomes and impacts in terms of measurable improvement for individuals from the equality categories. Such outcomes and impacts may include changes in public policy, in service provision and/or in any of the areas within your functional remit.

Name of public authority (Enter details below)

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Part A: Section 75 Annual Progress Report 2012 - 2013

Executive Summary

- What were the key policy / service developments made by the authority during this reporting period to better promote equality of opportunity and good relations and what outcomes were achieved?

For the period 1 April 2012 – 31 March 2013 Connswater Homes continues to promote equality of opportunity and good relations through all its policies and direct service provision to customers.

The Association's Director of Corporate Assurance continues with her responsibility for Section 75 as well as promotion of the Association and its work.

The Association's Annual Report was published in line with RNIB Clear Print guidelines for the 7th year in succession. Tenants are also kept informed of policy changes and revisions via the tenants newsletter which was published 3 times in the past year and also via the Association's website.

Tenants and customers are made aware that all documents can be made available in alternative formats, if required, and the Association has a contract with a translation service (Language Line) who provide translation and interpretation if required.

The Association submitted a new equality scheme to the ECNI on 1st August 2012, this scheme was approved by the Equality Commission on 28 November 2012.

Joint working continued throughout the year with NIFHA who provided a variety of open courses and workshops for members, a number of which were aimed at helping us meet our equality obligations. A key area concentrated on this year was function-specific policy screening workshops during February/March 2013.

- What are the main initiatives planned in the coming year to ensure the authority improves outcomes in terms of equality of opportunity and good relations for individuals from the nine categories covered by Section 75?

The following provided information on the main initiatives planned in the coming year to ensure the Association improves outcomes in terms of equality of opportunity and good relations for individuals from the nine categories covered by Section 75.

In the coming year the Association will continue to:

- Meet the equality objectives as set out in our Strategic Plan 2012 – 15 and Business Plan 2012 – 15.
- Ensure that the actions detailed in the Action Plan of the Equality Scheme are delivered.
- Continue to provide updates on equality work to stakeholders and communicate progress to staff, Board members and tenants.
- Continue to provide training on equality as necessary.
- Monitor progress with the Disability Action Plan.
- Investigate opportunities to maintain the profile and importance of equality issues and the need for diversity in the Association's work and activities.

New / Revised Equality Schemes

- Please indicate whether this reporting period applies to a new or revised scheme and (if appropriate) when the scheme was approved?

This reporting period falls between the equality scheme published in 2005 and approved on 14 September 2005 and the equality scheme published in 2012 and approved on 28 November 2012. As this covers only 4 months in the reporting period of the current equality scheme it will be the next reporting period (2013-14) before a full business year can be reported on for the equality scheme published on 28 November 2012.

Section 1: Strategic Implementation of the Section 75 Duties

- Please outline evidence of progress made in developing and meeting *equality and good relations objectives*, performance indicators and targets in corporate and annual operating plans during 2012-13.

This report has been approved by the Chief Executive and will be ratified by the Board of Management at its meeting on 25 September 2013.

There were no EQIA's carried out in the reporting period.

Connswater Homes has equality fixed firmly within its corporate plan and is pleased that the equality scheme submitted for approval was approved on 28 November 2012 and is now working to ensure that all objectives will be met, in conjunction with the housing association sector.

Connswater Homes' Director of Corporate Assurance is a member of the NIHFA Equality Co-ordination Task Group and works with this group as required on equality issues – the main focus of the work in the past reporting period was to ensure that the housing association working together met the deadlines set by the ECNI in relation to the submission of new schemes for approval.

Section 2: Examples of Section 75 Outcomes / Impacts

Given the renewed focus of Section 75 aiming to achieve more tangible impacts and outcomes and addressing key inequalities; please report in this section how the authority's work has impacted on individuals across the Section 75 categories. Consider narrative in the following structure:

The Association's Strategic Plan 2012 – 15 was implemented during the reporting period. The Association's commitment to equality continues to be central to the provision of direct services to customers and in the development and formulation of policy and service delivery.

The submission and approval of a new equality scheme ensures that the Association continues its commitment to Section 75.

Equality & diversity training is undertaken by all new staff and in this reporting period all staff were provided with refresher equality training by The Rainbow Project.

A tenant satisfaction survey was undertaken during the reporting period and 96% of Connswater's tenants felt that they were treated fairly across all nine of the equality categories.

- Please give examples of changes to policies or practices using **screening or EQIA**, which have resulted in **outcomes or impacts for individuals**. If the change was a result of an EQIA please indicate this and also reference the title of the relevant EQIA.

None

- Please give examples of **outcomes or impacts on individuals** as a result of any **action measures** undertaken as part of your Section 75 action plan:

None

- Please give examples of **outcomes or impacts on individuals** as a result of any **other Section 75 processes** e.g. consultation or monitoring:

None

Section 3: Screening

- Please provide an update of new / proposed / revised *policies screened* during the year.

For those authorities that have started issuing of screening reports in year; this section may be completed in part by appending, to this annual report, a copy of all screening reports issued within the reporting period.

Screening reports are at Appendix A for the following policies:

- Governance Policy
- Health & Safety Policy
- Anti-Bribery & Corruption Policy
- Vehicle Use Policy

Section 4: Equality Impact Assessment (EQIA)

Please provide an update of policies subject to EQIA during 2012-13, stage 7 EQIA monitoring activities and an indicative EQIA timetable for 2013-14.

- EQIA Timetable: April 2012 - March 2013

Title of Policy EQIA	EQIA Stage at end March 2013 (Steps 1-6)	Outline adjustments to policy intended to benefit individuals and the relevant Section 75 categories due to be affected.
N/A		

Where the EQIA timetable for 2012-13 (as detailed in the previous annual S75 progress report to the Commission) has not been met, please provide details of the factors responsible for delay and details of the timetable for re-scheduling the EQIA/s in question.

N/A

- Ongoing EQIA Monitoring Activities: April 2012- March 2013

Title of EQIA subject to Stage 7 monitoring	Indicate if differential impacts previously identified have reduced or increased	Indicate if adverse impacts previously identified have reduced or increased

Please outline any proposals, arising from the authority's monitoring for adverse impacts, for revision of the policy to achieve better outcomes the relevant equality groups:

N/A

2013-14 EQIA Timetable

Title of EQIAs due to be commenced during April 2013 – March 2014	Revised or New policy?	Please indicate expected timescale of Decision Making stage i.e. Stage 6
None to date		

Section 5: Training

- Please outline training provision during the year associated with the Section 75 Duties / Equality Scheme requirements including types of training provision and conclusions from any training evaluations.

Connswater Homes' Director of Corporate Assurance during the past year attended training sessions/workshops facilitated by NIFHA on the following: Section 75 Overview, January 2013 – seminar facilitated by John Kremer Function-specific policy screening workshops, March 2013 – facilitated by John Kremer & NIFHA

Connswater Homes has introduced an e-learning platform for all employees and have developed a equality & diversity module specific to the needs of Northern Ireland and Section 75 requirements. All new staff are required to complete during their induction period and longer serving staff on a refresher basis.

All staff at Connswater Homes benefitted from Equality & Diversity training delivered by The Rainbow Project in December 2012.

The Director of Corporate Assurance continues to update staff on equality issues and provides in-house training as required.

Section 6: Communication

- Please outline how the authority communicated progress on delivery of the Section 75 Duties during the year and evidence of the impact / success of such activities.

The Association produces its documents and correspondence adhering to the RNIB Clear Print Guidelines and ensures all tenants and customers know that information can be made available in a range and variety of formats and languages on request.

The Association has a text number for tenants and customers with a hearing impairment so that they can communicate with us in this format if they prefer.

The Annual Report contains an update on progress in relation to the equality duties and how our tenants feel they are treated in line with the nine categories. The tenants newsletter and the Association's website give

details of how to obtain information in other formats. The Association's newsletter gives updates on performance throughout the year and shows how the Association is carrying out its business.

Section 7: Data Collection & Analysis

- Please outline any systems that were established during the year to supplement available statistical and qualitative research or any research undertaken / commissioned to obtain information on the needs and experiences of individuals from the nine categories covered by Section 75, including the needs and experiences of people with multiple identities.

During the reporting period all tenants who availed of the Association's repairs service received a satisfaction survey to complete.

A tenant satisfaction survey was carried out across the Association's stock during the reporting period.

- Please outline any use of the Commission's Section 75 Monitoring Guide.

None

Section 8: Information Provision, Access to Information and Services

- Please provide details of any initiatives / steps taken during the year, including take up, to improve access to services; including provision of information in accessible formats.

The Association continues to use Language Line to provide information in other formats as required.

The Association's office provides:

- At least one access point to the building is level access
- The reception desk has a lowered section
- Interview room situation on the ground floor
- Wheelchair accessible lift to all floors of the building
- Disabled toilets on the ground floor
- Disabled parking

- Induction loop system

The Association holds contact details for Action on Hearing Loss NI to provide signing services and the office benefits from a loop system installed to cater for those with impaired hearing.

The Association has an employee who is a fluent speaker of another language and has provided interpretation services to both tenants and staff when required.

Section 9: Complaints

- Please identify the number of Section 75 related complaints:
 - received and resolved by the authority (including how this was achieved);
 - which were not resolved to the satisfaction of the complainant;
 - which were referred to the Equality Commission.

During 2012 – 13 the Association received twelve (12) formal complaints, none of which were related to Section 75. All complaints received by the Association are dealt with through the Association's complaints policy and procedure.

To date the Association has not received any complaints in connection with Section 75. Any complaint that is received would be dealt with in accordance with the Association's complaints policy and procedure to ensure consistency of approach.

Section 10: Consultation and Engagement

- Please provide details of the measures taken to enhance the level of engagement with *individuals* and representative groups during the year.
- Please outline any use of the Commission's guidance on consulting with and involving children and young people.

Connswater Homes continues to try and generate enough interest to establish a tenants forum or for tenant participation in other areas. Unfortunately in this reporting period the Association has had a nil response to all endeavours.

Therefore, the Director of Corporate Assurance continues to keep contact with community groups and forums working in areas that the Association

has properties and she attends these community meetings to aid involvement and participation as much as possible.

The Association is however still committed to progressing tenant participation in the Association.

The Association continues to use its website to provide news updates for tenants, advertise any job opportunities and host documents and information relating to all aspects of the Association's business areas.

The Association works jointly with NIFHA on formal consultation and this work has proved invaluable in terms of consistency and making consultation meaningful for not only this Association, but the housing association sector. The work conducted by NIFHA on behalf of housing associations is attached as Appendix B to this report.

Section 11: The Good Relations Duty

- Please provide details of additional steps taken to implement or progress the good relations duty during the year. Please indicate any findings or expected outcomes from this work.

The Association continues to actively promote its commitment to all aspects of Section 75 and the equality agenda in Northern Ireland.

Partnership working with other housing associations has ensured economies of scale have been achieved in relation to maintenance and repair work of which the Association was part of a Measured Term Contract during the reporting period. This mode of delivering response, planned & cyclical maintenance delivers consistency of approach, good customer service and measurable performance outcomes. A procurement exercise began during the reporting period to procure a new Measured Term Contract for the next business year as part of the Abacus Procurement Group.

- Please outline any use of the Commission's Good Relations Guide.

N/A

Section 12: Additional Comments

- Please provide any additional information/comments.

Part B: 'Disability Duties'
Annual Report 1 April 2012 / 31 March 2013

1. How many action measures for this reporting period have been

4

Fully
Achieved?

Partially
Achieved?

1

Not
Achieved?

2. Please outline the following detail on **all actions that have been fully achieved** in the reporting period.

2 (a) Please highlight what **public life measures** have been achieved to encourage disabled people to participate in public life at National, Regional and Local levels:

Level	Public Life Action Measures	Outputs ¹	Outcomes / Impact ²
National ³			
Regional ⁴			
Local ⁵			

¹ **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

² **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

³ **National** : Situations where people can influence policy at a high impact level e.g. Public Appointments

⁴ **Regional**: Situations where people can influence policy decision making at a middle impact level

⁵ **Local** : Situations where people can influence policy decision making at lower impact level e.g. one off consultations, local fora.

2(b) What **training action measures** were achieved in this reporting period?

	Training Action Measures	Outputs	Outcome / Impact
1	Equality & Diversity Training	15 full time staff trained	Improved knowledge & awareness to be able to provide better customer service
2	Customer Service Training	15 staff trained – 3 new staff & 12 refresher training	Improved customer service skills in staff and positive feedback from customers

2(c) What Positive attitudes **action measures** in the area of **Communications** were achieved in this reporting period?

	Communications Action Measures	Outputs	Outcome / Impact
1	Reports & items on Disability Awareness & equality issues in the Association's newsletters and website	Ongoing communication and information to customers and stakeholders with regard to the Association's business areas	Promotion of the Association's commitment to ensure equality of opportunity and service to all

2 (d) What action measures were achieved to ‘**encourage others**’ to promote the two duties:

	Encourage others Action Measures	Outputs	Outcome / Impact
1			
2			
3			
4			

2 (e) Please outline **any additional action measures** that were fully achieved other than those listed in the tables above:

	Action Measures fully implemented (other than Training and specific public life measures)	Outputs	Outcomes / Impact
1	Adaptations made for tenants with disabilities	19 tenants had physical adaptations made to their homes	Ease of use or access to facilities within tenants home to make living conditions more accessible and enjoyable

3. Please outline what action measures have been partly achieved as follows:

	Action Measures partly achieved	Milestones ⁶ / Outputs	Outcomes/Impacts	Reasons not fully achieved
1				
2				
3				
4				

4. Please outline what action measures have not been achieved and the reasons why?

	Action Measures not met	Reasons
1	Establishing a tenants forum	No interest or take up from tenants
2		

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⁶ **Milestones** – Please outline what part progress has been made towards the particular measures; even if full output or outcomes/ impact have not been achieved.

5. What **monitoring tools** have been put in place to evaluate the degree to which actions have been effective / develop new opportunities for action?

(a) Qualitative

All tenants who have adaptation work carried out on their homes are surveyed and their comments recorded on the quality of the workmanship, the speed of the process and their satisfaction with the outcome and the positive impact that the adaptation has made to their lives and to them being able to remain in their home and enjoy living there.

(b) Quantitative

Number of adaptations carried out to tenants homes to improve facilities and to give them better access to be able to remain in their homes and to enjoy living there. Cost of adaptations at present is covered in grant funding paid by DSD.

6. As a result of monitoring progress against actions has your organisation either:

- made any **revisions** to your plan during the reporting period or
- taken any **additional steps** to meet the disability duties which were **not outlined in your original** disability action plan / any other changes?

No

If yes please outline below:

	Revised/Additional Action Measures	Performance Indicator	Timescale
1			
2			
3			
4			
5			

7. Do you intend to make any further **revisions to your plan** in light of your organisation's annual review of the plan? If so, please outline proposed changes?

No

Section 75 Policy Screening Form

Part 1: Policy Scoping

The first stage of the screening process involves scoping the policy or policy area. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

You should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

Information about the policy

Name of the policy or policy area:

Governance Policy

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

Existing	Revised	New
✓		

Brief Description

The Governance policy is the primary document which sets how governance is structured within the Association. The policy is based on guidance laid down in the Department of Social Development (DSD) guidance, following the rules of the Association and using the National Housing Federation's excellence in governance.

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

Operating according to principles that are fair, reasonable and proportionate. To adopt best practice procedures for Connswater Homes in order to ensure the future well-being and good governance of the Association, for the benefits of its customers, officers, staff and all those associated with Connswater Homes and the wider community.

Are there any Section 75 categories which might be expected to benefit from the intended policy?

YES	NO	N/A
	✓	

If YES, explain how.

N/A

Who initiated or wrote the policy?

The details within this policy are based on guidance laid down in the DSD guidance, following the rules of the Association, National Housing Federation excellence in governance guidance (for members).

Who owns and who implements each element of the policy?

Chief Executive

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

YES	NO	N/A
✓		

If YES, are they

Financial: No

Legislative: Yes

Changes in Charitable Status

Other, please specify:

Changes in the DSD Housing Association Guide (Governance)

Main stakeholders affected

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

Staff:

All staff and board members.

Service users:

Tenants and future users

Other public sector organisations:

DSD

Voluntary/community/trade unions:

Partner organisations within the voluntary sector ie NI Federation of Housing Associations (NIFHA), Chartered Institute of Housing (CIH)

Other, please specify:

All stakeholders

Other policies with a bearing on this policy

What are they and who owns them?

The governance policy is the underpinning document for Connswater Homes. This includes the following policies:

- Shareholding & Membership Policy
- Board Recruitment & Succession Policy
- Anti-Bribery & Corruption Policy
- Risk Management Policy

Governance permeates and impacts upon all core functions of Connswater Homes, including all other policies.

Available evidence

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for relevant Section 75 categories.

Section 75 Category	Details of Evidence/Information
ALL	No evidence affecting specific groups has been gathered. This framework applies to all members of staff and stakeholders fairly and consistently irrespective of which equality group they belong to.

Needs, experiences and priorities

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

Section 75 Category	Details of Needs/Experiences/Priorities
ALL	The Governance Policy is the underpinning document which clearly sets out Board governance arrangements for Connswater Homes.

Part 2: Screening Questions

Introduction

1. If the conclusion is **none** in respect of all of the Section 75 categories, then you may decide to screen the policy **out**. If a policy is 'screened out', you should give details of the reasons for the decision taken.
2. If the conclusion is **major** in respect of one or more of the Section 75 categories, then consideration should be given to subjecting the policy to an EQIA.
3. If the conclusion is **minor** in respect of one or more of the Section 75 categories, then consideration should still be given to proceeding with an EQIA, or to measures to mitigate the adverse impact; or an alternative policy.

In favour of a 'major' impact

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and hence it would be appropriate to conduct an EQIA;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns among affected individuals and representative groups, for example in respect of multiple identities;
- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

In favour of 'minor' impact

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

- a) The policy has no relevance to equality of opportunity or good relations.
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the earlier evidence, consider and comment on the likely impact on equality of opportunity / good relations for those affected by this policy, by applying the following screening questions and the impact on the group i.e. minor, major or none.

Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? Minor/Major/None		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
Religious belief		None
Political opinion		None
Racial / ethnic group	Governance Policy can be made available in various languages where English is not the first language.	Minor (positive)
Age		None
Marital status		None
Sexual orientation		None
Men and women generally		None
Disability	Literature will be available in alternative formats on request. Support such as interpreters will be available on request. Adjustments will be made on request eg specific training implemented for individual staff to aid them to comply with mandatory training as and when required.	Minor (positive)
Dependents		None

2 Are there opportunities to better promote equality of opportunity for people within any of the Section 75 categories?		
Section 75 Category	If Yes, provide details	If No, provide reasons
		This governance policy applies to all groups fairly and consistently irrespective of which equality group they do or do not belong to.

3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Minor/Major/None		
Good Relations Category	Details of policy impact	Level of impact Minor/Major/None
Religious belief	N/A	None
Political opinion	N/A	None
Racial group	N/A	None

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If Yes , provide details	If No , provide reasons
	N/A	This policy does not provide opportunities to promote equality amongst particular groups but the Association is committed to the promotion of good relations. There are a number of other policies in place to ensure the promotion of good relations between employees to ensure they are comfortable in all work areas.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

None identified

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

None identified

Part 3: Screening Decision

In light of your answers to the previous questions, do you feel that the policy should:
(please underline one):

- 1. Not be subject to an EQIA (with no mitigating measures required)**
- 2. Not be subject to an EQIA (with mitigating measures /alternative policies)**
- 3. Not be subject to an EQIA at this time**
- 4. Be subject to an EQIA**

If 1. or 2. (i.e. not be subject to an EQIA), please provide details of the reasons why:

This policy is reflective of best practice and follows DSD guidance closely. DSD have confirmed that no equality issues were identified following revision of the Housing Association Guide.

If 2. (i.e. not be subject to an EQIA), in what ways can identified adverse impacts attaching to the policy be mitigated or an alternative policy be introduced?

No mitigation necessary

In light of these revisions, is there a need to re-screen the revised/alternative policy at a future date? YES / NO

If YES, when & why?

If 3. or 4. (i.e. to conduct an EQIA), please provide details of the reasons:

Timetabling and Prioritising EQIA

If 3. or 4., is the policy affected by timetables established by other relevant public authorities? YES / NO

If YES, please provide details:

Please answer the following questions to determine priority for timetabling the EQIA. On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for EQIA.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people’s daily lives	
Relevance to a public authority’s functions	

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for EQIA. This list of priorities will assist you in timetabling the EQIA. Details of your EQIA timetable should be included in the quarterly Section 75 report.

Proposed date for commencing EQIA: _____

Any further comments on the screening process and any subsequent actions?

Part 4: Monitoring

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development. You should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007). The Commission recommends that where the policy has been amended or an alternative policy introduced, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

This policy will be reviewed once every three years unless changes in legislation dictate otherwise.

Part 5: Approval and Authorisation

Screened by:	Position/Job Title	Date
C Waterworth	Director of Corporate Assurance	11/03/13
Approved by:		
J Locke	Chief Executive	11/03/13

Note: A copy of the Screening Template, for each policy screened should be ‘signed off’ and approved by a senior manager responsible for the policy, made easily accessible on your website as soon as possible following completion and made available on request.

Section 75 Policy Screening Form

Part 1: Policy Scoping

The first stage of the screening process involves scoping the policy or policy area. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

You should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

Information about the policy

Name of the policy or policy area:

Health & Safety Policy

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

Existing	Revised	New
	✓	

Brief Description

The Health & Safety Policy is the primary document setting out Connswater Homes statement of intent for H&S, the organisation and the arrangements for H&S within Connswater Homes for staff, customers, tenants and visitors.

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

The primary objective of the policy is to ensure that all those who engage with Connswater Homes whether as an employer or provider of goods, facilities and services, will be afforded all reasonable protection from harm and damage.

Are there any Section 75 categories which might be expected to benefit from the intended policy?

YES	NO	N/A
✓		

If YES, explain how.

All those who engage with Connswater Homes if the policy successfully provides protection from harm.

Who initiated or wrote the policy?

Connswater Homes – corporate assurance

Who owns and who implements each element of the policy?

Connswater Homes – implemented by Connswater Homes employees

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

YES	NO	N/A
✓		

If YES, are they

Financial: No

Legislative: Yes

Primary legislation is the Health, Safety and Work (Northern Ireland) Order 1978. Any changes to legislation or guidance from enforcement agencies such as the Health and Safety Executive for Northern Ireland or the Northern Ireland Fire and Rescue Service are notified in advance. However, to ensure revisions are captured, a system is in place within Connswater Homes to ensure that the Health & Safety policy, and any associated policies, are reviewed every three years, or earlier if legislation dictates.

Other, please specify:

There may be issues in terms of staff familiarisation with the policy, however, line managers/supervisors are responsible for ensuring that staff adhere to policies. Staff are briefed on all health and safety issues & the policy during their induction and e-learning modules are included on health & safety areas within the e-learning platform that all employees must complete.

Main stakeholders affected

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

All staff and board members.

Service users:

Potential stakeholders also include those who may be affected by the activities of the Association eg claims for personal injuries by people living in or visiting some of our housing schemes.

Other public sector organisations:

n/a

Voluntary/community/trade unions:

n/a

Other, please specify:

n/a

Other policies with a bearing on this policy

What are they and who owns them?

Derivative health and safety policies from the Health and Safety at Work 1978 (NI) Order are as follows:

- Management of Health and Safety at Work Regulations 2003
- Control of Substances Hazardous to Health (NI) Regulations 2003
- Manual Handling Operations (NI) 1992
- Fire Safety (NI) Regulations 2010
- Display Screen Assessment (NI) Regulations
- Working at Height (NI) Regulations 2005
- PPE Regulations
- Health and Safety (First Aid) Regulations (NI) 2000
- The Smoking (NI) Order 2006

Available evidence

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for relevant Section 75 categories.

Section 75 Category	Details of Evidence/Information
ALL	Health & Safety Inspection Reports Fire Risk Assessments Issues arising from litigation – Public Liability Claims Accident Reports Risk Assessments

Needs, experiences and priorities

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

Section 75 Category	Details of Needs/Experiences/Priorities
Disability	Where tenants have disabilities the association, working in conjunction with occupational therapists, will make relevant adaptations to individual dwellings bespoke to the tenant.

Part 2: Screening Questions

Introduction

1. If the conclusion is **none** in respect of all of the Section 75 categories, then you may decide to screen the policy **out**. If a policy is 'screened out', you should give details of the reasons for the decision taken.
2. If the conclusion is **major** in respect of one or more of the Section 75 categories, then consideration should be given to subjecting the policy to an EQIA.
3. If the conclusion is **minor** in respect of one or more of the Section 75 categories, then consideration should still be given to proceeding with an EQIA, or to measures to mitigate the adverse impact; or an alternative policy.

In favour of a 'major' impact

- g) The policy is significant in terms of its strategic importance;
- h) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and hence it would be appropriate to conduct an EQIA;
- i) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- j) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns among affected individuals and representative groups, for example in respect of multiple identities;
- k) The policy is likely to be challenged by way of judicial review;
- l) The policy is significant in terms of expenditure.

In favour of 'minor' impact

- e) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- f) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- g) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- h) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

- c) The policy has no relevance to equality of opportunity or good relations.
- d) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the earlier evidence, consider and comment on the likely impact on equality of opportunity / good relations for those affected by this policy, by applying the following screening questions and the impact on the group i.e. minor, major or none.

Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? Minor/Major/None		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
Religious belief		None
Political opinion		None
Racial / ethnic group	Advice on H&S must be provided in a format that is appropriate for those who cannot access written English	Minor (positive)
Age	Staff should be mindful of young employees who may not have the experience to determine the actual risk of activities.	Minor (positive)
Marital status		None
Sexual orientation		None
Men and women generally		None
Disability	Evacuation procedures must accommodate those with problems related to mobility.	Minor (positive)
Dependants		None

2 Are there opportunities to better promote equality of opportunity for people within any of the Section 75 categories?		
Section 75 Category	If Yes, provide details	If No, provide reasons
ALL	Opportunities for the promotion of Health & Safety are provided where possible eg tenant newsletters, health & safety info leaflets, e-learning modules for staff.	

3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Minor/Major/None		
Good Relations Category	Details of policy impact	Level of impact Minor/Major/None
Religious belief	N/A	None
Political opinion	N/A	None
Racial group	N/A	None

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If Yes , provide details	If No , provide reasons
	N/A	The Association is committed to the promotion of good relations. There are a number of policies and procedures in place to ensure the promotion of good relations between employees to ensure they are comfortable in all work areas.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

None identified

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

None identified

Part 3: Screening Decision

In light of your answers to the previous questions, do you feel that the policy should:
(please underline one):

- 1. Not be subject to an EQIA (with no mitigating measures required)**
- 2. Not be subject to an EQIA (with mitigating measures /alternative policies)**
- 3. Not be subject to an EQIA at this time**
- 4. Be subject to an EQIA**

If 1. or 2. (i.e. not be subject to an EQIA), please provide details of the reasons why:

The aim of this policy is to ensure the health & safety of all employees.

If 2. (i.e. not be subject to an EQIA), in what ways can identified adverse impacts attaching to the policy be mitigated or an alternative policy be introduced?

This policy is reflective of best practice and recognises the statutory requirements of both health and safety legislation and also Section 75. The detail within the policy is largely written to ensure legal compliance with the relevant health & safety legislation.

In light of these revisions, is there a need to re-screen the revised/alternative policy at a future date? YES / NO

If YES, when & why?

If 3. or 4. (i.e. to conduct an EQIA), please provide details of the reasons:

Timetabling and Prioritising EQIA

If 3. or 4., is the policy affected by timetables established by other relevant public authorities? YES / NO

If YES, please provide details:

Please answer the following questions to determine priority for timetabling the EQIA. On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for EQIA.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people’s daily lives	
Relevance to a public authority’s functions	

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for EQIA. This list of priorities will assist you in timetabling the EQIA. Details of your EQIA timetable should be included in the quarterly Section 75 report.

Proposed date for commencing EQIA: _____

Any further comments on the screening process and any subsequent actions?

Part 4: Monitoring

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development. You should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007). The Commission recommends that where the policy has been amended or an alternative policy introduced, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

This policy will be reviewed once every three years unless changes in legislation dictate otherwise.

Part 5: Approval and Authorisation

Screened by:	Position/Job Title	Date
C Waterworth	Director of Corporate Assurance	05/03/13
Approved by:		
J Locke	Chief Executive	05/03/13

Note: A copy of the Screening Template, for each policy screened should be ‘signed off’ and approved by a senior manager responsible for the policy, made easily accessible on your website as soon as possible following completion and made available on request.

Section 75 Policy Screening Form

Part 1: Policy Scoping

The first stage of the screening process involves scoping the policy or policy area. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

You should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

Information about the policy

Name of the policy or policy area:

Anti-Bribery & Corruption Policy

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

Existing	Revised	New
✓		

Brief Description

Policy to ensure that all reasonable measures have been put in place under the governance of the Association to ensure compliance with The Bribery Act 2010, which came into effect on 1/7/11.

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

To mitigate and protect the Association which could be vulnerable to acts of bribery due to the high value of building works contracts they let and also for developing associations in the purchasing of land/and or existing buildings, and also to protect against bribery in the allocation of tenancies.

Are there any Section 75 categories which might be expected to benefit from the intended policy?

YES	NO	N/A
	✓	

If YES, explain how.
N/A

Who initiated or wrote the policy?

The details within this policy are in conjunction with The Bribery Act 2010 which came into effect on 1 July 2011.

Who owns and who implements each element of the policy?

Chief Executive

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

YES	NO	N/A
	✓	

If YES, are they

Financial: No

Legislative: No

Other, please specify:

Main stakeholders affected

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

Staff:

All staff and board members.

Service users:

Tenants and future users

Other public sector organisations:

DSD, NIHE

Voluntary/community/trade unions:

Partner organisations within the voluntary sector ie NI Federation of Housing Associations (NIFHA), Chartered Institute of Housing (CIH)

Other, please specify:

Construction companies, professional services eg architects, engineers, surveyors, all other stakeholders

Other policies with a bearing on this policy

What are they and who owns them?

- Governance Policy
- Risk Management Policy
- Fraud Policy

All owned by the Chief Executive

Available evidence

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for relevant Section 75 categories.

Section 75 Category	Details of Evidence/Information
ALL	No evidence affecting specific groups has been gathered. This policy applies to all members of staff and stakeholders fairly and consistently irrespective of which equality group they belong to.

Needs, experiences and priorities

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

Section 75 Category	Details of Needs/Experiences/Priorities
ALL	The Anti-Bribery Policy is directly set in relation to The Bribery Act 2010 which all staff and stakeholders are subject to irrespective of which equality group they belong to.

Part 2: Screening Questions

Introduction

1. If the conclusion is **none** in respect of all of the Section 75 categories, then you may decide to screen the policy **out**. If a policy is 'screened out', you should give details of the reasons for the decision taken.
2. If the conclusion is **major** in respect of one or more of the Section 75 categories, then consideration should be given to subjecting the policy to an EQIA.
3. If the conclusion is **minor** in respect of one or more of the Section 75 categories, then consideration should still be given to proceeding with an EQIA, or to measures to mitigate the adverse impact; or an alternative policy.

In favour of a 'major' impact

- m) The policy is significant in terms of its strategic importance;
- n) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and hence it would be appropriate to conduct an EQIA;
- o) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- p) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns among affected individuals and representative groups, for example in respect of multiple identities;
- q) The policy is likely to be challenged by way of judicial review;
- r) The policy is significant in terms of expenditure.

In favour of 'minor' impact

- i) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- j) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- k) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- l) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

- e) The policy has no relevance to equality of opportunity or good relations.
- f) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the earlier evidence, consider and comment on the likely impact on equality of opportunity / good relations for those affected by this policy, by applying the following screening questions and the impact on the group i.e. minor, major or none.

Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? Minor/Major/None		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
Religious belief		None
Political opinion		None
Racial / ethnic group	Anti-Bribery & Corruption Policy can be made available in various languages where English is not the first language.	Minor (positive)
Age		None
Marital status		None
Sexual orientation		None
Men and women generally		None
Disability		None
Dependants		None

2 Are there opportunities to better promote equality of opportunity for people within any of the Section 75 categories?		
Section 75 Category	If Yes, provide details	If No, provide reasons
		This anti-bribery & corruption policy applies to all groups fairly and consistently irrespective of which equality group they do or do not belong to.

3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Minor/Major/None		
Good Relations Category	Details of policy impact	Level of impact Minor/Major/None
Religious belief	N/A	None
Political opinion	N/A	None
Racial group	N/A	None

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If Yes, provide details	If No, provide reasons
	N/A	This policy does not provide opportunities to promote equality amongst particular groups but the Association is committed to the promotion of good relations. There are a number of other policies in place to ensure the promotion of good relations between employees to ensure they are comfortable in all work areas.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

None identified

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

None identified

Part 3: Screening Decision

In light of your answers to the previous questions, do you feel that the policy should:
(please underline one):

- 1. Not be subject to an EQIA (with no mitigating measures required)**
- 2. Not be subject to an EQIA (with mitigating measures /alternative policies)**
- 3. Not be subject to an EQIA at this time**
- 4. Be subject to an EQIA**

If 1. or 2. (i.e. not be subject to an EQIA), please provide details of the reasons why:

This policy is reflective of best practice in relation to legislation and is directly related to The Bribery Act 2010.

If 2. (i.e. not be subject to an EQIA), in what ways can identified adverse impacts attaching to the policy be mitigated or an alternative policy be introduced?

No mitigation necessary

In light of these revisions, is there a need to re-screen the revised/alternative policy at a future date? YES / NO

If YES, when & why?

If 3. or 4. (i.e. to conduct an EQIA), please provide details of the reasons:

Timetabling and Prioritising EQIA

If 3. or 4., is the policy affected by timetables established by other relevant public authorities? YES / NO

If YES, please provide details:

Please answer the following questions to determine priority for timetabling the EQIA. On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for EQIA.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people’s daily lives	
Relevance to a public authority’s functions	

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for EQIA. This list of priorities will assist you in timetabling the EQIA. Details of your EQIA timetable should be included in the quarterly Section 75 report.

Proposed date for commencing EQIA: _____

Any further comments on the screening process and any subsequent actions?

Part 4: Monitoring

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development. You should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007). The Commission recommends that where the policy has been amended or an alternative policy introduced, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

This policy will be reviewed once every three years unless changes in legislation dictate otherwise.

Part 5: Approval and Authorisation

Screened by:	Position/Job Title	Date
C Waterworth	Director of Corporate Assurance	07/03/13
Approved by:		
J Locke	Chief Executive	07/03/13

Note: A copy of the Screening Template, for each policy screened should be ‘signed off’ and approved by a senior manager responsible for the policy, made easily accessible on your website as soon as possible following completion and made available on request.

Section 75 Policy Screening Form

Part 1: Policy Scoping

The first stage of the screening process involves scoping the policy or policy area. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

You should remember that the Section 75 statutory duties apply to internal policies (relating to people who work for the authority), as well as external policies (relating to those who are, or could be, served by the authority).

Information about the policy

Name of the policy or policy area:

Vehicle Use Policy

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

Existing	Revised	New
		✓

Brief Description

Under Health & Safety legislation Connswater Homes as an employer who provides company pool vehicles is required to ensure that the best possible precautions are taken by the Association to adhere to Health & Safety at work legislation and regulations.

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

Awareness of staff and users of their responsibilities under their employment contracts and to protect the Association’s assets, both human and material and to comply with traffic law and the highway code.

Are there any Section 75 categories which might be expected to benefit from the intended policy?

YES	NO	N/A
	✓	

If YES, explain how.

Who initiated or wrote the policy?

Connswater Homes – corporate assurance

Who owns and who implements each element of the policy?

Connswater Homes – implemented by Connswater Homes employees

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

YES	NO	N/A
✓		

If YES, are they

Financial: No

Legislative: Yes

Primary legislation is the Health, Safety and Work (Northern Ireland) Order 1978. Any changes to legislation or guidance from enforcement agencies such as the Health and Safety Executive for Northern Ireland or the Northern Ireland Fire and Rescue Service are notified in advance. Safety while driving and the correct use of company vehicles is of paramount importance to the Association.

Other, please specify:

n/a

Main stakeholders affected

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

All staff members.

Service users:

None

Other public sector organisations:

n/a

Voluntary/community/trade unions:

n/a

Other, please specify:

n/a

Other policies with a bearing on this policy

What are they and who owns them?

The underpinning document for this Vehicle Use Policy is the Association's Health & Safety policy which is legislatively compliant with the Health & Safety at Work (Northern Ireland) Order 1978.

Available evidence

Evidence to help inform the screening process may take many forms. Public authorities should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for relevant Section 75 categories.

Section 75 Category	Details of Evidence/Information
ALL	Employee driving licence information

Needs, experiences and priorities

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

Section 75 Category	Details of Needs/Experiences/Priorities
Disability	Where a member of staff has a disability that means a reasonable adjustment is required to enable them to use a company vehicle or an alternative form of transport then this will be facilitated by the Association.

Part 2: Screening Questions

Introduction

1. If the conclusion is **none** in respect of all of the Section 75 categories, then you may decide to screen the policy **out**. If a policy is 'screened out', you should give details of the reasons for the decision taken.
2. If the conclusion is **major** in respect of one or more of the Section 75 categories, then consideration should be given to subjecting the policy to an EQIA.
3. If the conclusion is **minor** in respect of one or more of the Section 75 categories, then consideration should still be given to proceeding with an EQIA, or to measures to mitigate the adverse impact; or an alternative policy.

In favour of a 'major' impact

- s) The policy is significant in terms of its strategic importance;
- t) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and hence it would be appropriate to conduct an EQIA;
- u) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- v) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns among affected individuals and representative groups, for example in respect of multiple identities;
- w) The policy is likely to be challenged by way of judicial review;
- x) The policy is significant in terms of expenditure.

In favour of 'minor' impact

- m) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- n) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- o) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- p) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

- g) The policy has no relevance to equality of opportunity or good relations.
- h) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the earlier evidence, consider and comment on the likely impact on equality of opportunity / good relations for those affected by this policy, by applying the following screening questions and the impact on the group i.e. minor, major or none.

Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 grounds? Minor/Major/None		
Section 75 Category	Details of Policy Impact	Level of Impact? Minor/Major/None
Religious belief		None
Political opinion		None
Racial / ethnic group		None
Age		None
Marital status		None
Sexual orientation		None
Men and women generally		None
Disability	Flexible arrangements for staff with a disability who require alternative arrangements.	Minor (positive)
Dependants		None

2 Are there opportunities to better promote equality of opportunity for people within any of the Section 75 categories?		
Section 75 Category	If Yes, provide details	If No, provide reasons
		The Association is committed to the promotion of equality of opportunity. There are a number of policies and procedures in place to ensure the promotion of equality of opportunity in the workplace.

3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? Minor/Major/None		
Good Relations Category	Details of policy impact	Level of impact Minor/Major/None
Religious belief	N/A	None
Political opinion	N/A	None
Racial group	N/A	None

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	If Yes , provide details	If No , provide reasons
	N/A	The Association is committed to the promotion of good relations. There are a number of policies and procedures in place to ensure the promotion of good relations between employees to ensure they are comfortable in all work areas.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

None identified

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

None identified

Part 3: Screening Decision

In light of your answers to the previous questions, do you feel that the policy should:
(please underline one):

- 1. Not be subject to an EQIA (with no mitigating measures required)**
- 2. Not be subject to an EQIA (with mitigating measures /alternative policies)**
- 3. Not be subject to an EQIA at this time**
- 4. Be subject to an EQIA**

If 1. or 2. (i.e. not be subject to an EQIA), please provide details of the reasons why:

The aim of this policy is to ensure the health & safety of all employees while using company provided vehicles.

If 2. (i.e. not be subject to an EQIA), in what ways can identified adverse impacts attaching to the policy be mitigated or an alternative policy be introduced?

This policy is reflective of best practice and recognises the statutory requirements of both health and safety legislation and also Section 75.

In light of these revisions, is there a need to re-screen the revised/alternative policy at a future date? YES / NO

If YES, when & why?

If 3. or 4. (i.e. to conduct an EQIA), please provide details of the reasons:

Timetabling and Prioritising EQIA

If 3. or 4., is the policy affected by timetables established by other relevant public authorities? YES / NO

If YES, please provide details:

Please answer the following questions to determine priority for timetabling the EQIA. On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for EQIA.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people’s daily lives	
Relevance to a public authority’s functions	

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for EQIA. This list of priorities will assist you in timetabling the EQIA. Details of your EQIA timetable should be included in the quarterly Section 75 report.

Proposed date for commencing EQIA: _____

Any further comments on the screening process and any subsequent actions?

Part 4: Monitoring

Effective monitoring will help identify any future adverse impacts arising from the policy which may lead you to conduct an EQIA, as well as help with future planning and policy development. You should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007). The Commission recommends that where the policy has been amended or an alternative policy introduced, then you should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Please detail proposed monitoring arrangements below:

This policy will be reviewed once every three years unless changes in legislation dictate otherwise.

Part 5: Approval and Authorisation

Screened by:	Position/Job Title	Date
C Waterworth	Director of Corporate Assurance	14/02/13
Approved by:		
J Locke	Chief Executive	14/02/13

Note: A copy of the Screening Template, for each policy screened should be ‘signed off’ and approved by a senior manager responsible for the policy, made easily accessible on your website as soon as possible following completion and made available on request.



Housing Associations' Joint Equality Exercise

Annual Progress Report 2012-13

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) is the trade body for 28 registered and five non-registered housing associations in N Ireland. NIFHA itself is *not* a designated body, but we support member associations in their implementation of the Statutory Equality Duties. In doing so we help members maximise their resources, while reducing the impact on consultee and/or stakeholder bodies. In 2012-13 the 26 designated associations¹ again took part in this joint approach.

This project is facilitated by NIFHA's Corporate Services Manager and steered by the Federation's Business Committee; a task group also assisted during 2012-13. However, responsibility for fulfilling the Statutory Duties *remains* with each designated housing association; NIFHA's role is purely supportive. The following sections outline the collective work carried out with or on behalf of members.

General

NIFHA's regular support to member associations during 2012-13 is summarised below:

- Reporting on equality matters and progress of the joint project at three Federation Business Committee and four Resources and Standards Committee meetings
- Co-ordinating meetings and relevant working / task groups
- Producing equality-specific briefings for members as well as issuing prompts for action and providing updates on equality and diversity matters in NIFHA's e-News
- (15 in 2012-13)
- Organising or signposting to training relevant to the associations' equality work
- Centrally collating and distributing statistical information and consultee feedback
- Managing, maintaining and sharing a Joint Consultee List
- Facilitating and managing relevant joint consultation exercises or events
- Capturing and reflecting the views of members when responding to equality-related consultations undertaken by other organisations
- Liaising with the Equality Commission for Northern Ireland (ECNI)
- Representing the housing association movement through participation in the NI Housing Executive's (NIHE) Consultative Forum on Equality
- Acting as a liaison point for organisations representing Section 75 groups
- Acting as a contact point for all designated associations
- Routinely providing information, advice and support to assist designated associations in fulfilling their statutory duties

¹ Craigowen Housing Association gained exemption at initial designation. Following the Commission's request for a new Equality Scheme Covenanter Residential Association Ltd sought and, during 2012-13, was granted exemption.

EQIA Process

The designated housing associations original Equality Impact Assessment (EQIA) programme came to an end in 2011. No additional impact assessments had been identified for joint action in 2012-13.

During this period our members' focus was on development and submission of new equality schemes, although individual associations may have progressed EQIAs specific to their organisation none were undertaken as part of our collaborative work. We considered the process of developing new schemes was in itself likely to generate information that prompted future equality impact assessments.

Training

In 2012-13 NIFHA arranged a variety of open courses and workshops for members; a number of which were aimed at helping them to meet their equality obligations. One practical example from our training programme was:

- Adaptations awareness seminar, June 2012

Sessions specific to the development of new Equality Schemes were:

- Section 75 Overview, January 2013 – seminar facilitated by John Kremer
- Function- specific policy screening workshops, February / March 2013 – facilitated by John Kremer and Lucinda McMurran, NIFHA

The above-mentioned workshops focussed on the following functional areas:

- Housing management
- Housing finance
- Development and maintenance
- Corporate governance

The table shown at Annex A records member participation in the different equality sessions. For each of these events most associations were represented by several staff members. This helped ensure practical screening skills were developed and shared across teams in the main functional areas for housing associations.

To complement our own events, NIFHA continued to sign-post members to relevant training on equality matters during 2012-13. As part of our member support role the Corporate Services Manager may undertake sessions for individual associations which focus on their equality obligations. Presentations and/or training materials which Federation personnel have produced for equality purposes are also freely available for any member association to adapt for use in their own training.

Communications ²

Throughout 2012-13 NIFHA's Corporate Services Manager maintained her role as a liaison between the Equality Commission and housing associations. The Federation was the main link between members and those with an interest in promoting equality of opportunity, e.g. consultee organisations, voluntary groups or statutory bodies.

Moreover, the NIFHA team answered queries, provided general information about associations and co-ordinated any public engagement aspects of the joint project. Where appropriate, NIFHA also used its publications and website (www.nifha.org) to showcase the work members have undertaken to implement equality of opportunity and promote good relations. During 2012-13 we commissioned a new website for NIFHA; accessibility and equality were among the areas prioritised when developing our specification for the site. The new site is due for launch in summer 2013.

Federation staff actively participate in the events of other organisations, using such occasions to promote the positive contribution housing associations make for our community beyond the actual provision of homes, including on equality and diversity matters. The following are examples from 2012-13:

- Corporate Services Manager - participation in NIHE Equality Consultative Forum meetings
- Chief Executive / Housing Policy & Research Manager - regular participation in NIHE Research Committee
- Housing Policy & Research Manager - ongoing participation in Joint Housing Adaptations Group
- Housing Policy & Research Manager - regular contribution to work of Voluntary Sector Housing Policy Forum
- Communications Officer - Assisted with Ark Housing's Annual Neighbourhood Day which has a multi-cultural focus

NIFHA was also a key participant in the 'Digital Age Partnership' which was launched in 2012. This multi-agency project³ is a new four year scheme funded by the Big Lottery to address digital exclusion experienced by older people living in sheltered housing. The two key elements of the project are training in the use of IT for tenants of sheltered accommodation and inter-generational projects between each participating scheme and local schools. The scheme was launched at Newington's Camberwell Court scheme and several other member associations have also availed of the training during the first year of the project.

² Reported NIFHA communications output only relates to the joint aspects of our members' work and is intended to complement each individual association's messages about their respective equality and good relations activities.

³ The five partners are: WEA (lead agency), AVEC solutions, Beth Johnston Foundation – Linking Generations, the National Institute of Adult Continuing Education (NIACE), and NIFHA.

Data Collection & Analysis

During 2012-13 the main information gathering activities co-ordinated or undertaken by NIFHA under the joint exercise were:

- Production of reports from the Federation's NICORE Database
- Use of NIFHA's database to provide equality data for member associations
- Use of NIFHA's database to provide baseline equality data to inform the overall audit of inequalities and resulting action plans.

Information Provision; Access to Information and Services

NIFHA itself is not designated under Section 75 but the Federation has maintained its commitment to producing information and publications in formats that use accessible fonts and type styles. NIFHA also strives to ensure that information provided on www.nifha.org is accessible and takes a positive approach to requests for production of materials in alternative formats.

The Federation routinely provides information and advice for members on translation, interpretation services and producing material in alternative formats. NIFHA automatically shares any information received about suppliers of these services. This information sharing is intended to equip the housing associations to react promptly to any requests where accessibility may be a factor. We also respond to specific queries from individual member associations / sign-post them to service providers. How these services are implemented remains the responsibility of the individual association.

Consultation and Engagement

In 2012-13 NIFHA was responsible for co-ordinating public consultation on the draft versions of our members' new equality schemes. On behalf of our members we inserted public notices of the consultation in the three main local papers. We also produced an issued a disc containing background information on NIFHA's members together with the schemes of the designated associations and an over-arching Audit of Inequalities for the sector. At the launch of the consultation period this disc was issued to the 140 consultee organisations on NIFHA's shared list. Additional discs were sent out on request and each member also received a copy for their records.

In addition, NIFHA facilitated association participation in a face-to-face consultation event run by the Equality Coalition⁴ for all Tranche 6 public authorities. The sector was represented at the event by NIFHA and a number of associations who also relayed the comments they received to NIFHA. We collated these responses, as well as all other feedback submitted to us during the 12 week consultation period, and circulated this information to the designated associations. To aid consistency NIFHA also developed a template document which members could use to record their response and/or intended course of action on the points raised by consultees.

⁴ Participating consultee organisations were: CAJ, Chinese Welfare Association, Disability Action, Mencap, NICEM, Rainbow, Unison

Throughout the reporting period NIFHA also maintained our general consultation and engagement activities as part of our member support work for the associations' Joint Equality Project, such as:

- Conducting routine exercises to ensure that the joint consultee list remained accurate, up-to-date and valid
- Amending the consultee list following individual notification of changes and / or on discovery of invalid details relating to consultee data
- Participating in a range of inter-agency groups which enable engagement with 'equalities' organisations – this is in addition to electronic networking and consultation with relevant groups

Where appropriate, NIFHA also consulted with member associations using their feedback to inform detailed written responses on relevant consultation exercises by other organisations.

Those of particular importance in 2012-13 related to the following consultations⁵:

- DSD - Audit of Inequalities
- NIHE - Audit of Inequalities
- DSD - Draft Bungalow Policy
- DSD - Discretionary Support Policy
- NIHE - Safeguarding Vulnerable Adults Policy and Procedures
- DHSS&PS - Strategic Framework for Public Health
- DSD - Welfare Reform Bill
- HSCT - Transforming your care – vision to action
- NIHE - Housing Selection Scheme
- NI Fire & Rescue Service - Draft People at Risk Strategy
- DHSSPSNI - The Future of Adult Care in Northern Ireland

Good Relations Duty

In 2012-13 NIFHA remained an advocate of mainstream funding and consistent support for a 'Shared Future' housing programme. We undertake this commitment to promoting good relations in our role as an umbrella organisation while our members responsible for implementing it in the community through their housing programmes. Where it is relevant, the individual associations provide details of Shared Future schemes which they developed during 2012-13 in their respective Annual Progress Reports.

NIFHA continued to be involved with various inter-agency groups working to foster good relations. Initiating and sustaining such strategic alliances is integral to our work on behalf of our membership. Such active participation allows us to offer useful assistance and share best practice with associations which can enhance our members' approach to the good relations duty. It also creates opportunities to highlight the many excellent contributions of housing associations in this important area of work.

As the reporting period ended we were in the process of arranging an event with the Minister of State for Northern Ireland which would consider cross-community work and how housing providers can work to address the challenge of fostering good relations.

⁵ All such response documents are available at www.nifha.org

Disability Duties

Responsibility for implementation of the Disability Duties lies with the individual association. Their respective Actions Plans record how they intend to deliver on this requirement.

NIFHA's support in this area is more generic, for example through our communications or involvement in inter-agency activity such as the Joint Housing Adaptations Group mentioned above. The latter has contributed to improved processes for managing adaptations to the homes of individuals with a disability.

Additional Comments

NIFHA and its members welcome the opportunity to actively contribute to mainstreaming equality and good relations.

Lucinda McMurrin

Corporate Services Manager

NIFHA

18 July 2013

Member participation in NIFHA sessions 2012-13

Association Name	S75 Overview	Feb – Policy Screening	Mar – Policy Screening
Abbeyfield (UK) NI			
Alpha	✓	✓	
Apex		✓	
Ark	✓	✓	✓
Clanmil			
Connswater	✓	✓	
Co-Ownership	✓	✓	
Covenanter	<i>Exemption approved 2012 – 13</i>		
Filor	✓	✓	✓
Flax	✓	✓	✓
FOLD			
Gosford			
Grove			
Habinteg	✓	✓	
Harmony			
Hearth			
Helm	✓		✓
Newington	✓	✓	
Oaklee	✓	✓	✓
Open Door	✓		
Rural	✓	✓	✓
SHAC		✓	
South Ulster	✓	✓	✓
St Matthew's		✓	
Triangle	✓		✓
Trinity	✓	✓	✓
Ulidia	✓	✓	
Wesley		✓	