



Co/ownership



Equality Scheme

Accepted by ECNI on 13th September 2022



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Foreword

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

In our equality scheme we set out how Northern Ireland Co-Ownership Housing Association proposes to fulfil the Section 75 statutory duties.

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

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

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

We, David Little and Mark Graham of Northern Ireland Co-Ownership Housing Association, are fully committed to effectively fulfilling our Section 75 statutory duties across all our functions (including service provision, employment and procurement) through the effective implementation of our equality scheme.

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

On behalf of Co-Ownership 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.

¹ See section 1.1 of our Equality Scheme.

Signed by

Joh K

David Little Chairman

Mark Graham Chief Executive

Date: 31st August 2022

Chapter 1: Introduction – Section 75 of the Northern Ireland Act 1998

1.1. Section 75 of the Northern Ireland Act 1998 (the Act) requires Northern Ireland Co-Ownership Housing Association 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 dependents and person 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 food relations between persons of different religious beliefs, political opinion or racial group.

"Functions" include the "powers and duties" of a public authority². 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 Northern Ireland Co-Ownership Housing Association

- 1.2. Schedule 9.4 (1) of the act requires Northern Ireland Co-Ownership Housing Association as a designated public authority 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 arrangement for fulfilling Section 75 statutory duties and our plan for implementation.
- 1.3. Northern Ireland Co-Ownership Housing Association is committed to the discharge of our Section 75 obligations in all parts of our organisation and we will commit the necessary available resources in terms of people, time and money to ensure that the Section 75 duties are complied with and that our equality scheme can be implemented effectively.

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

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. Some also provide care and /or support services so they work with the relevant public authorities for the health sector too. As a result of this situation, 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 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 have therefore been mindful of the need to focus on measures where they have greatest ability to effect change. Where appropriate, potential inequalities identified that are outside the remit of the housing associations will be referred to the relevant public body.

The Northern Ireland Co-Ownership Housing Association was established in 1978.

The Northern Ireland Co-Ownership Housing Association is registered as a housing association under the Housing (Northern Ireland) Order 1981 and also as an industrial and provident society under the Industrial and Provident Societies Acts (Northern Ireland) 1969 and 1976. The Association is regulated and partly funded by the Department for Communities. Its principal objects are to promote and sustain the concept of affordable social housing through equity sharing and to assist in the rebuilding and revitalising of neighbourhoods and sustainable communities in Northern Ireland. It achieves these through a range of Co-Ownership products.

Its main role is to provide opportunities through equity sharing to those outside the margins of conventional home ownership, showing how affordable housing solutions fit within regeneration and wealth creation strategies for local people.

In 2017, Co-Ownership was accepted by the Charity Commission of Northern Ireland as a registered charity under the classifications of; the advancement of citizenship or community development and; the relief of those in need by reason of youth, age, ill health, disability, financial hardship or other disadvantage.

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 compliances with the Section 75 statutory duties are outlined in other relevant parts of this equality scheme (please see Chapter 4 for detailed arrangements).

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 **Mark Graham, Chief Executive**. The Chief Executive is accountable to the Board of Co-Ownership for the development, implementation, maintenance and review of the equality scheme in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998, including any good practice or guidance that has been or may be issued by the Equality Commission.
- 2.4. If you have any questions or comments regarding our equality scheme, please contact in the first instance **Mark Graham** at the address given below and we will respond to you as soon as possible:

Chief Executive Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD

Tel: 028 90 327276

Text phone: 18001 0800 333644

Fax: 028 90 330720

Email: equality@co-ownership.org or mgraham@co-ownership.org

2.5. Objectives and targets relating to the statutory duties will be integrated into our strategic and operational business plans³.

³ See Appendix 4 'Timetable for measures proposed' and section 2.11 of this Equality Scheme.

- 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 performance plans are subject to appraisal in the annual performance review.
- 2.7. Quarterly progress reports are submitted to the Co-Ownership Board for review. Co-Ownership prepares an annual report on the progress we have made on implementing the arrangements set out in this equality scheme to discharge our Section 75 statutory duties (Section 75 Annual Progress Report).

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

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

2.8. The latest Section 75 Annual progress Report is available on our website https://www.co-ownership.org/about/who-we-are/reports/ or by contacting:

Chief Executive Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD

Tel: 028 90 327276

Text phone: 18001 0800 333644

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- 2.9. Co-Ownership liaise closely with the Equality Commission to ensure that progress on the implementation of our equality scheme is maintained.
- 2.10. An internal equality working group exists within Co-Ownership; this team is responsible for driving forward the equality agenda. This group comprises individuals from across various disciplines across the organisation ensuring a range of experience is taken into account.

Action plan/action measures

2.11. Co-Ownership is committed to developing an action plan to promote equality of opportunity and good relations. This action plan which is referred to in Appendix 6 of this equality scheme offers overview of our actions related to Section 75.

- 2.12. The action measures that will make up our action plan will be relevant to our functions. They will be developed and prioritised on the basis of an audit of inequalities. The audit of inequalities as a working document will gather and analyse information across the Section 75 categories⁴ to identify the inequalities that exist for our service users and those affected by our policies⁵.
- 2.13. Action measures will be specific, measurable, linked to achievable outcomes, realistic and time bound. Action measures will include performance indicators and timescales for their achievement.
- 2.14. We will develop any action plans for a period of between one and five years in order to align them with our corporate and business planning cycles. Implementation of the action measures will be incorporated into our business planning process.
- 2.15. We will seek input from our stakeholders and consult on our action plan before we send it to the Equality Commission and thereafter when reviewing the plan as per 2.16 below.
- 2.16. 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. Co-Ownership 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.
- 2.18. Once finalised, our action plan will be available by contacting:

Chief Executive Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD

Tel: 028 90 327276

Text phone: 18001 0800 333644

Fax: 028 90 330720

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.

Email: equality@co-ownership.org or mgraham@co-ownership.org

https://www.co-ownership.org/about/who-we-are/reports/

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 (if applicable) 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 <u>Appendix 3</u>), 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.

- 3.2.2 Consultation with all stakeholders will begin as early as possible. We will engage with affected individuals and representative groups to identify how best consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these. Methods of consultation could include:
 - Face-to-face meetings
 - Focus groups
 - Written documents with the opportunity to comment in writing
 - Questionnaires
 - Information/notification by email with an opportunity to opt in/opt out of the consultation
 - Internet discussions or

• Telephone consultations.

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

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

Information will be made available, on request, in alternative formats⁶, in a timely manner, usually within 10 working days. We will ensure that such consultees have equal time to respond.

- 3.2.4 Specific training is provided to those facilitating consultations to ensure that they have the necessary skills to communicate effectively with consultees.
- 3.2.5 To ensure effective consultation with 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 staff
 - Meetings with stakeholder groups
 - Public consultation exercise
 - Availability of information on website
- 3.2.6 The consultation period lasts 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.

⁶ See <u>Chapter 6</u> 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.

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

- 3.2.7 If a consultation exercise is to take place over a period when consultees are less able to respond, for example, over the summer or 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. We will try to ensure where possible that consultations will not take place over holiday periods.
- 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).
- 3.2.12 A list of our consultees is included in this equality scheme at **Appendix 3**. It is also available by contacting:

Chief Executive Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD

Tel: 028 90 327276

Text phone: 18001 0800 333644

Fax: 028 90 330720

Email: equality@co-ownership.org or mgraham@co-ownership.org

3.3 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 **Mark Graham** 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, e.g., '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. Co-Ownership uses the tools of screening and equality impact assessment to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will also follow Equality Commission guidance:
 - The guidance on screening, including the screening template, as detailed in the Commission's guidance 'Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)' and
 - On undertaking an equality impact assessment as detailed in the Commission's guidance 'Practical guidance on equality impact assessment (February 2005)'.

Screening

- 4.4. The purpose of screening is to identify those policies that are likely to have an impact on equality of opportunity and/or good relations.
- 4.5. Screening is completed at the earliest opportunity in the policy development/review process. Policies which we propose to adopt will be subject to screening prior to implementation. For more detailed strategies or policies that are to be put in place through a series of stages, we will screen at various stages during implementation.
- 4.6. The lead role in the screening of a policy is taken by the policy decision maker who has the authority to make changes to that policy. However, screening will also involve other relevant team members, for example, subject matter experts,

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 groups? (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 adapted
 - 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.

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 public authority must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories.

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 Co-Ownership.

- 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 Co-Ownership.
- 4.12. If our screening concludes that the likely impact of a policy is 'none', in respect of all of the equality of opportunity and/or good relations categories, we may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, we will give details of the reasons for the decision taken. This screening decision will be 'signed off' by the appropriate policy lead within Co-Ownership.
- 4.13. As soon as possible following the completion of the screening process, the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on our website

https://www.co-ownership.org/about/who-we-are/reports/

and on request to:

Chief Executive Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD

Tel: 028 90 327276

Text phone: 18001 0800 333644

Fax: 028 90 330720

Email: equality@co-ownership.org or mgraham@co-ownership.org

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

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

Equality impact assessment

- 4.16. An equality impact assessment (EQIA) is a thorough and systematic analysis of a policy, whether that policy is formal or informal, and irrespective of the scope of that policy. The primary function of an EQIA is to determine the extent of any impact of a policy upon the Section 75 categories and to determine if the impact is an adverse one. It is also an opportunity to demonstrate the likely positive outcomes of a policy and to seek ways to more effectively promote equality of opportunity and good relations.
- 4.17. Once a policy is screened and screening has identified that an equality impact assessment is necessary, we will carry out the EQIA in accordance with Equality Commission guidance. The equality impact assessment will be carried out as part of the policy development process, before the policy is implemented.
- 4.18. Any equality impact assessment will be subject to consultation at the appropriate stage(s). (For details see above **Chapter 3** "Our Arrangements for Consulting").

Our arrangements for publishing the results of the assessments of the likely impact of policies we have adopted or propose to adopt on the promotion of equality of opportunity (Schedule 9.4 (2) (d); Schedule 9.9 (1))

4.19. We 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 Co-Ownership 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

https://www.co-ownership.org/about/who-we-are/reports/

and on request to:

Chief Executive Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD **Tel:** 028 90 327276

Text phone: 18001 0800 333644

Fax: 028 90 330720

Email: equality@co-ownership.orq or mgraham@co-ownership.orq

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 sent directly to all consultees on a quarterly basis.

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

Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity (Schedule 9.4 (2) (c))

- 4.27. Monitoring can assist us to deliver better public services and continuous improvements. Monitoring Section 75 information involves the processing of sensitive personal data (data relating to the racial or ethnic origin of individuals, sexual orientation, political opinion, religious belief, etc.). In order to carry out monitoring in a confidential and effective manner, the Co-Ownership 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 cross all nine equality categories on an ongoing basis.
 - The collection, collation and analysis of existing relevant secondary sources of quantitative and qualitative data cross 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 also reviewed an annual basis for example, Section 75 tri-annual review and annual monitoring return to the Equality Commission.

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

Chapter 5: Staff training – (Schedule 9.4 (2) (e))

Commitment to staff training

- 5.1 We recognise that awareness raising and training play a crucial role in the effective implementation of our Section 75 duties.
- 5.2 Our **Chief Executive, Mark Graham** wishes to positively communicate the commitment of the Co-Ownership 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 Co-Ownership will draw up a detailed training plan for its staff which will aim to achieve the following objectives:
 - to raise awareness of the provisions of Section 75 of the Northern Ireland Act 1998, our equality scheme commitments and the particular issues likely to affect people across the range of Section 75 categories, to ensure that our staff fully understand their role in implementing the scheme
 - to provide those staff involved in the assessment of policies (screening and EQIA) with the necessary skills and knowledge to do this work effectively
 - to provide those staff who deal with complaints in relation to compliance with our equality scheme with the necessary skills and knowledge to investigate and monitor complaints effectively
 - to provide those staff involved in consultation processes with the necessary skills and knowledge to do this work effectively
 - to provide those staff involved in the implementation and monitoring of the
 effective implementation of the Co-Ownership equality scheme with the
 necessary skills and knowledge to do this work effectively.

Awareness raising and training arrangements

- 5.4 The following arrangements are in place to ensure all our staff and board members are aware of and understand our equality obligations.
 - We will develop a summary of this equality scheme and make it available to all staff.
 - We will provide access to copies of the full equality scheme for all staff; ensure that any queries or questions of clarification from staff are addressed effectively.

- Staff in the Co-Ownership will receive a briefing on this equality scheme within 6 months after approval of the scheme.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within Co-Ownership 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).
- Policy and decision makers will receive general training on each of the nine categories.
- 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.
- 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, the Co-Ownership will, where possible, work closely with other bodies and agencies in the development and delivery of training.

Monitoring and evaluation

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

Chapter 6: Our arrangements for ensuring and assessing public access to information and services we provide – (Schedule 9.4 (2) (f))

- 6.1 Co-Ownership is committed to ensuring that the information we disseminate and the services we provide are fully accessible to all parts of the community in Northern Ireland. We keep our arrangements under review to ensure that this remains the case.
- 6.2 We are aware that some groups will not have the same access to information as others.

In particular:

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

Access to information

6.3 The Co-Ownership website was developed to meet the level AA standards of the Web Accessibility Initiative (WAI) Guidelines and for ease of use by all website visitors.

We use clear and simple language.

We have provided a keyword Search facility to help users search for information. This feature is in the toolbar at the top of each page.

The site is speech enabled using ReachDeck. Users simply click on the 'Speaker' phone icon at the right-hand side of each page.

ReachDeck is a digital inclusion toolbar from Texthelp. It supports users to access and understand our content, helping them interact with our website independently and with ease. It offers a host of reading and translation support such as:

- 1. Text-to-speech: click on or select any text to hear it read aloud.
- 2. Translation: instantly translates web pages into 100+ languages and reads the translations in 40 of the most spoken languages.
- 3. Text magnification: enlarges text and reads it out loud.
- 4. MP3 generation: converts selected text into an MP3 audio file.

5. Screen mask: blocks distractions on screen with a tinted mask web page simplifier: removes clutter from the screen, displaying only the main text settings: customise options to suit individual needs or preference.

ReachDeck empowers every one of our website visitors to interact with our online content in the way that suits them best. It particularly benefits people who have hidden disabilities, such as dyslexia; and individuals with literacy challenges, visual impairments, and non-native speakers.

If a customer requires information in any other format not available within the ReachDeck tool we ask they either telephone us on 028 9032 7276 (Textphone users put 18001 in front) or email **hello@co-ownership.org** and we will cater to their individual needs.

We also have support for anyone who requires help with their online application. Customers can contact us by telephone on 028 9032 7276 (Textphone users put 18001 in front) or email hello@co-ownership.org to request assistance.

- 6.4 In disseminating information through the media we will seek to advertise in the press where appropriate.
- 6.5 Please see 6.3 that details arrangements in place for ensuring public access to information.

Access to services

- 6.6 Co-Ownership is committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories. Co-Ownership also adheres to the relevant provisions of current anti-discrimination legislation.
- 6.7 We also ensure public access to our services through evening visits to leaseholders, evening events at the office and throughout areas in Northern Ireland, concierge at front door, lowered reception desks as well as disabled car parking.

Assessing public access to information and services

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

6.9 We monitor our website statistics on a monthly basis looking at user patterns and especially the information accessed. We particularly monitor the information that is downloaded from our website including the translated documents.

We ask all our applicants to state in their application their communication needs and will monitor this information on an annual basis.

Chapter 7: Time table for measure we propose in this equality scheme – (Schedule 9.4 (3) (b))

- 7.1 **Appendix 4** outlines our timetable for all measures proposed within this equality scheme. The measures outlined in this timetable will be incorporated into our business planning processes.
- 7.2 This timetable is different from and in addition to our commitment to developing 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 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 Co-Ownership is responsive to the views of members of the public. We will endeavour to resolve all complaints made to us.
- 8.2 Schedule 9 paragraph 10 of the Act refers to complaints. A person can make a complaint to a public authority if the complainant believes he or she may have been directly affected by an alleged failure of the authority to comply with its approved equality scheme.
 - If the complaint has not been resolved within a reasonable timescale, the complaint can be brought to the Equality Commission.
- 8.3 A person wishing to make a complaint that Co-Ownership has failed to comply with its approved equality scheme should contact:

Chief Executive Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD

Tel: 028 90 327276

Text phone: 18001 0800 333644

Fax: 028 90 330720

Email: equality@co-ownership.org or mgraham@co-ownership.org

- 8.4 We will in the first instance acknowledge receipt of each complaint within 3 working days.
- 8.5 Co-Ownership will carry out an internal investigation of the complaint and will respond substantively to the complainant within one (1) month 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 to two (2) months. In those circumstances, the complainant will be advised of the extended period within one month of making the complaint.
- 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, the Co-Ownership will co-operate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

Similarly, the Co-Ownership 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 Co-Ownership 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 The Co-Ownership equality scheme is available free of charge in print form and alternative formats from:

Head of Marketing & Communications Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD

Tel: 028 90 327276

Text phone: 18001 0800 333644

Fax: 028 90 330720

Email: equality@co-ownership.org

9.2 Our equality scheme is also available on our website at:

https://www.co-ownership.org/about/who-we-are/reports/

- 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, advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
 - We will respond to requests for the equality scheme in alternative formats in a timely manner, usually within 10 working days.
 - Our equality scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats (CD, mp3, DAISY) and in minority languages to meet the needs of those not fluent in English.
- 9.4 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme or contact:

Head of Marketing & Communications Co-Ownership Moneda House, 25-27 Wellington Place Belfast BT1 6GD

Tel: 028 90 327276

Text phone: 18001 0800 333644

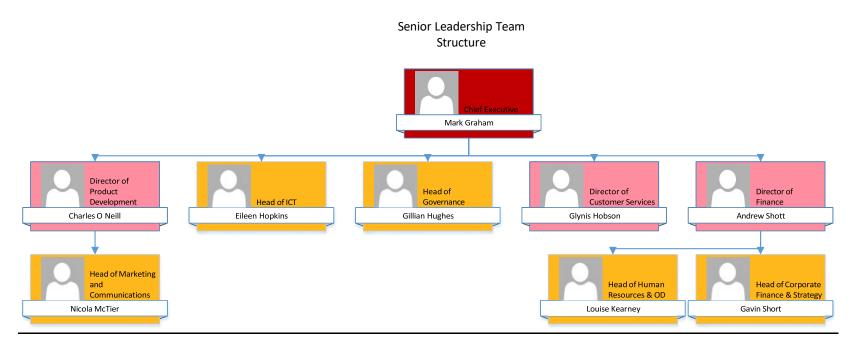
Fax: 028 90 330720

Email: equality@co-ownership.org

Chapter 10: Publication of our equality scheme – (Schedule 9.4 (3) (c))

- 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: Organisational chart



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

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

Category	Example Groups
Religious belief	Buddhist, Catholic, Hindu, Jewish, Muslims, people of no religious belief, Protestants, Sikh, other faiths.
	For the purposes of Section 75, the term "religious belief" is the same definition as that used in the Fair Employment & Treatment (NI) Order ¹⁰ . Therefore, "religious belief" also includes any perceived religious belief (or perceived lack of belief) and, in employment situations only, it also covers any "similar philosophical belief".
Political opinion ¹¹	Nationalist generally, Unionists generally, members/supporters of other political parties.
Racial group	Black people, Chinese, Indians, Pakistanis, people of mixed ethnic backgrounds, Polish, Roma, Travellers, White people.
Men and women generally	Men (including boys), Trans-gendered people, Trans-sexual 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 dependents	Persons with personal responsibility for the care of a child, for the care of a person with a disability, or the care of a dependent 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))

Please note, this list is indicative and not exhaustive. It will be reviewed on an annual basis to ensure it remains relevant.

Action Mental Health
Advice NI
Age NI
Age Sector Platform
Alliance Party for Northern Ireland
An Munia Tober
Antrim & Newtownabbey Borough Council
Ards & North Down Borough Council
Armagh City, Banbridge & Craigavon Borough Council
Aware NI
Bahai Community of Northern Ireland
Barnardos Northern Ireland
Belfast City Council
Belfast Health & Social Care Trust
Belfast Jewish Community & Hebrew Congregation
Belfast Islamic Centre
Brainwaves Northern Ireland
British Deaf Association Northern Ireland
Business Services Organisation
Cara Friend Belfast
Carers NI
Causeway, Coast & Glens Borough Council
Chartered Institute of Housing Northern Ireland
Children's Law Centre
Chinese Welfare Association
CO3
Community Development & Health Network
Community Relations Council
Compass Advocacy Network
Consumer Council NI
Democratic Unionist Party
Department for Communities
Depaul
Derry City & Strabane District Council
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Derry Well Women
Disability Action Belfast
Disability Action Derry
Downs Syndrome Association NI
East Belfast Community Development Agency
Employers for Disability NI
Equality Coalition
Equality Commission for Northern Ireland
Falls Community Council
Family Planning Association NI
Fermanagh & Omagh District Council
Guide Dogs Northern Ireland
Homeless Connect
Housing Rights
Indian Community Centre
Inspire Wellbeing
Irish Council of Churches
Lesbian Line Belfast
Lisburn & Castlereagh Borough Council
Local Government Staff Commission
Methodist Church in Ireland
Mencap Northern Ireland
Mid & East Antrim Borough Council
Mid Ulster District Council
Mind Yourself
Multi-Cultural Resource Centre
Newry, Mourne and Down District Council
NIACRO
NI Gay Rights Association
NILGA
NIPSA
North West Community Network
North West Forum of People with Disabilities
Northern Health and Social Care Trust
Northern Ireland Congress of Trade Unions
Northern Ireland Co-Ownership Housing Association Staff
Northern Ireland Co-Ownership Housing Association Board
Northern Ireland Council for Racial Equality
Northern Ireland Council for Voluntary Action
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Northern Ireland Health and Social Care Board Northern Ireland Housing Council Northern Ireland Housing Executive Northern Ireland Human Rights Commission 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 The Executive Office of NI Assembly (OFMDFM) Omagh Women's Area Network POBAL Polish Education and Cultural Association PRAXIS Press for Change Probation Board of NI Progressive Unionist Party Rainbow Project Royal National Institute for the Blind (NI) Royal National Institute for Deaf People (RNID) NI Rural Community Network Salvation Army Sense NI Simon Community
Northern Ireland Housing Executive Northern Ireland Human Rights Commission 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 The Executive Office of NI Assembly (OFMDFM) Omagh Women's Area Network POBAL Polish Education and Cultural Association PRAXIS Press for Change Probation Board of NI Progressive Unionist Party Rainbow Project Royal National Institute for the Blind (NI) Royal National Institute for Deaf People (RNID) NI Rural Community Network Salvation Army Sense NI Simon Community
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Progressive Unionist Party Rainbow Project Royal National Institute for the Blind (NI) Royal National Institute for Deaf People (RNID) NI Rural Community Network Salvation Army Sense NI Simon Community
Rainbow Project Royal National Institute for the Blind (NI) Royal National Institute for Deaf People (RNID) NI Rural Community Network Salvation Army Sense NI Simon Community
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Sinn Fein
Social and Democratic and Labour Party
South Eastern Health & Social Care Trust
Southern Health and Social Care Trust
Supporting Communities NI
The Cedar Foundation
The Consumer Council
Threshold
Ulster Scots Community Network
Ulster Unionist Party
UNITE The Union
Western Health and Social Care Trust
Women's Regional Consortium
Women's Resource Centre and Development Agency (WRDA)

Women's Support Network
Workers Party
Youth Action
VOYPIC

Additionally we will consult with:

Stakeholders	
Leaseholders	
Staff	

Appendix 4: Timetable for measure proposed – (Schedule 9.4 (3) (b))

Measure	Lead Responsibility	Timetable
Section 75 Annual Progress Report [2.7]	Head of HR & OD	31st August (annually)

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.

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 (i.e., service users, staff and 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.

Equality impact assessment

The mechanism underpinning Section 75, where existing and proposed policies are assessed in order to determine whether they have an adverse impact on equality of opportunity for the relevant 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 Equality 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".

Inequality

Where something an organisation does has a differential or unfair impact on anyone in any of the groups listed in Section 75 definition below.

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.

Monitoring

Monitoring consists of continuously scrutinising and evaluating a policy to assess its impact on the Section 75 categories. Monitoring must be sensitive to the issues associated with human rights and privacy. Public authorities should seek advice from consultees and Section 75 representative groups when setting up monitoring systems. Monitoring consists of the collection of relevant information and evaluation of policies. It is not solely about the collection of data; it can also take the form of regular meetings and reporting of research undertaken. Monitoring is not an end in itself but provides the data for the next cycle of policy screening.

Northern Ireland Act

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

Policy

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

Screening

The procedure for identifying which policies will be subject to 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.

Section 75

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

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

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

Appendix 6: Our arrangements for assessing our compliance with the Section 75 duties – (Schedule 9.4 (2) (a))

Section	Details	Responsibility	Timescale	Status
Our arrangements for	2.5 Objectives and targets relating to the	Senior	Annually for	Ongoing
assessing our compliance	statutory duties will be integrated into our	LeadershipTeam	PDR's and	
with the section 75 duties	strategic and operational business plans.	HR	Business Plans	
			and every 3	
			years for	
			Corporate Plans.	
			New Corporate	
			Plan was	
			developed with	
			focus on Co-	
			Ownership being	
			a diverse and	
			skilled	
			workforce. As	
			part of the	
			People Pan	
			(assigned to	
			HR), includes	
			development of	
			a leadership	
			programme to reflect the	
			changes to our	
			values and	

			behaviours and to embed a culture of respect for all.	
Our arrangements for assessing our compliance with the section 75 duties	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 performance plans are subject to appraisal in the annual performance review.	Senior Leadership Team and HR	Reviewed as part of Job Evaluation and implemented into all new Job Descriptions in April 2018. All new JD's include a general section on meeting our Equality duties.	Ongoing
Our arrangements for assessing our compliance with the section 75 duties	2.7 Quarterly progress reports are submitted to the Co-Ownership Board for review.	Incorporated as part of the HR Update	Quarterly	Ongoing
Our arrangements for assessing our compliance with the section 75 duties	2.11 Co-Ownership is committed to developing an action plan to promote equality of opportunity and good relations.	Senior Leadership Team	Annually	Ongoing
Our arrangements for assessing our compliance with the section 75 duties	2.7 Produce Annual Progress report to the Equality Commission.	HR will produce the report with input from key	Annually	Ongoing

		department representatives.		
Our arrangements for assessing, monitoring and publishing the impact of policies	4.13 A summary of policies screened, including screening outcomes will regularly be publicised by the association and made available on our website as soon as possible after completion.	Marketing and Communications Department	With a review of our Equality Scheme we will develop a specific section on our website to promote and highlight the work of the Association in relation to our S75 duties.	Ongoing

Our arrangements for	4.20 These are published quarterly.	Creator/author	Ongoing	Ongoing
assessing, monitoring and	Screening reports detail:	of the policy and	Crigority	Crigoring
publishing the impact of	All policies screened by Co-Ownership	the Marketing		
	, ,	_		
policies	over the three month period	and		
	A statement of the aim(s) of the	Communications		
	policy/policies to which the assessment	Department		
	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.			
	1			
	- 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			

Our arrangements for assessing, monitoring and publishing the impact of policies	4.20 and 4.22 The results of our assessments (screening reports and completed templates, the results of equality impact assessments) are available on our website.	Creator/author of the policy and the Marketing and Communications Department	EQIA (if applicable) is published once the impact assessment has been completed.	Ongoing
Our arrangements to Staff Training	 5.3 Co-Ownership will draw up a detailed training plan for its staff which will aim to achieve the following objectives: to raise awareness of the provisions of Section 75 of the Northern Ireland Act 1998, our equality scheme commitments and the particular issues likely to affect people across the range of Section 75 categories, to ensure that our staff fully understand their role in implementing the scheme to provide those staff involved in the assessment of policies (screening and EQIA) with the necessary skills and knowledge to do this work effectively to provide those staff who deal with complaints in relation to compliance with our equality scheme with the necessary skills and knowledge to investigate and monitor complaints effectively to provide those staff involved in 	HR and Senior Leadership Team	Completed annually as part of the L & D Plan. Equality and S75 objectives are included as part of the Corporate Induction for all staff. In the next year we would like to add awareness training on the new Equality Scheme and DAP, our plan relating to improving diversity and awareness around issues	Ongoing

	consultation processes with the necessary skills and knowledge to do this work effectively • to provide those staff involved in the implementation and monitoring of the effective implementation of the Co-Ownership equality scheme with the necessary skills and knowledge to do this work effectively		faced by those in accessing services. Training to be developed for Board on S75 duties and S49 duties.	
Awareness raising and training arrangements	5.4 We will develop a summary of this equality scheme and make it available to all staff.	Senior Leadership Team	When Equality Scheme is reviewed.	To complete after 2022 review.
Awareness raising and training arrangements	5.4 Staff in Co-Ownership will receive a briefing on this equality scheme within 6 months after approval of the scheme	Senior Leadership Team	Incorporated into updates from HR.	To complete after 2022 review.
Awareness raising and training arrangements	5.4 The Section 75 statutory duties form part of induction training for new staff.	HR	When any new agency or Co- Ownership staff starts work.	Complete
Awareness raising and training arrangements	5.4 Focused training is provided for key staff within Co-Ownership 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,	Senior Leadership Team & HR	Identified through staff PDR and incorporated into the annual L & D Plan. Focus on staff who are	Ongoing

	conducting equality impact assessments, consultation, monitoring and evaluation).		part of our research team, line managers and customer service staff.	
Awareness raising and training arrangements	5.4 Where appropriate, training will be provided to ensure staff are aware of the issues experienced by the range of Section 75 groups.	Senior Leadership Team & HR	Identified through staff PDR and incorporated into the annual L & D Plan	To be completed in current year.
Awareness raising and training arrangements	5.4 When appropriate and on an ongoing basis, arrangements will be made to ensure staff are kept up to date with Section 75 developments.	Senior Leadership Team & HR	As part of Corporate Briefings.	Ongoing
Monitoring and evaluation	5.6 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.	HR and Line Managers	Through evaluation forms collected via our ESS system. Reviewed quarterly to identify trends.	Ongoing
Monitoring and evaluation	5.6 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.	HR	Annually	Ongoing
Monitoring and evaluation	5.6 We also monitor the number of staff trained, the equality profile of staff trained as well as job roles of staff trained.	HR	Annually	Ongoing

Our arrangements for ensuring and assessing public access to information and services we provide	6.8 We monitor annually across all our functions, in relation to access to information and services, to ensure equality of opportunity and good relations are promoted.	Marketing and Communications Department, Product Development and Customer Services Departments	Annually	Ongoing
Our arrangements for ensuring and assessing public access to information and services we provide	6.9 We monitor our website statistics on a monthly basis looking at user patterns and especially the information accessed. We particularly monitor the information that is downloaded from our website (including previously the translated documents).	Marketing and Communications Department and Customer Services	Monthly	Ongoing
Our arrangements for ensuring and assessing public access to information and services we provide	6.9 We ask all our applicants to state in their application their communication needs and will monitor this information on an annual basis.	Customer Services Department	When applicant applies and during subsequent customer contact.	Ongoing
Publication of our equality scheme	9.3 We will make every effort to communicate widely the existence and content of our equality scheme.	Marketing and Communications Department and Senior Leadership Team		Ongoing
Publication of our equality scheme	9.3 We will respond to requests for the equality scheme in alternative formats in a timely manner, usually within 10 working days.	Senior Leadership Team supported by the Marketing and	As requested	Ongoing

Publication of our equality	0.2 Our equality scheme is available on	Communications Department Marketing and	As requested	Ongoing
Publication of our equality scheme	9.3 .Our equality scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats (CD, mp3, DAISY) and in minority languages to meet the needs of those not fluent in English.	Marketing and Communications Department and Customer Services Department	As requested	Ongoing
Publication of our equality scheme	9.4 List of our stakeholders and consultees available on website.	Marketing and Communications Department		Will be updated as part of Equality Scheme review.
Review of our equality scheme	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.	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.	To be completed in 2022.	To be completed.

Other	Screening of Policies throughout the	All policy	Periodically
	year.	authors	throughout
		Senior	the life of
		Leadership	the Equality
		Team	Scheme.