

woven

Equality Scheme

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



Woven Housing Association Ltd.

Laganwood House
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Approved by the Equality Commission for Northern Ireland

Contents

Foreword and Appendices 3 and 4 form part of this Equality Scheme.

Foreword	4
Chapter 1 Introduction	5
▪ Section 75 of the Northern Ireland Act 1998	5
▪ How we propose to fulfil the Section 75 duties in relation to the relevant functions of Woven Housing Association Ltd.	5
▪ Who we are and what we do	6
▪ About RSHPs in Northern Ireland	6
▪ About Woven Housing Association Ltd.	7
Chapter 2 Our arrangements for assessing our compliance with the Section 75 Duties	8
▪ Responsibilities and reporting	8
▪ Action plan/action measures	10
Chapter 3 Our arrangements for consulting	12
Chapter 4 Our arrangements for assessing, monitoring and publishing the impact of policies	16
▪ Arrangements for assessing the likely impact adopted or proposed to be adopted on the promotion of equality of opportunity of policies	16
▪ Screening	16
▪ Equality impact assessment	18
▪ 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	19
▪ What we publish	19
▪ How we publish the information	20
▪ Where we publish the information	20
▪ Arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity	21
▪ Arrangements for publishing the results of monitoring	22
Chapter 5 Staff training	23
▪ Commitment to staff training	23
▪ Training objectives	23
▪ Awareness raising and training arrangements	23
▪ Monitoring and evaluation	24

Chapter 6	Our arrangements for ensuring and assessing public access to information and services we provide	25
	▪ Access to information	25
	▪ Access to services	26
	▪ Assessing public access to information and services	26
Chapter 7	Timetable for measures we propose in this equality scheme	27
Chapter 8	Our complaints procedure	28
Chapter 9	Publication of our equality scheme	29
Chapter 10	Review of our equality scheme	30
Appendix 1	Organisational chart	
Appendix 2	Example groups relevant to the Section 75 categories for Northern Ireland purposes	
Appendix 3	List of consultees	
Appendix 4	Timetable for measures proposed	
Appendix 5	Glossary of terms	
Appendix 6	Action plan/action measures	

Foreword

Section 75 of the NI 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 Woven Housing Association Ltd. - hereafter Woven - 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 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 employees on the Section 75 statutory duties and our commitments in our equality scheme.

We, the Chair and Chief Executive of Woven, 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 Woven and our staff we are pleased to support and endorse our equality scheme which has undergone a 5-year review in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998 and Equality Commission guidelines.



Neil McIvor | Chair
August 2025



Alan McKeown | Chief Executive

¹ See section 1.1 of our Equality Scheme.

Chapter 1 Introduction

Section 75 of the Northern Ireland Act 1998

1.1 Section 75 of the Northern Ireland Act 1998 (the Act) requires Woven to comply with two statutory duties:

Section 75 (1)

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

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

Section 75 (2)

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

“Functions” include the “powers and duties” of a Registered Social Housing Provider (RSHP)². 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 Woven

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

1.3 Woven is committed to the discharge of its 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 statutory 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 Registered Social Housing Providers in Northern Ireland

A Registered Social Housing Provider (RSHP) in Northern Ireland is an organisation that is officially recognised and regulated by the Department for Communities to provide social rented housing. These providers are typically Registered Housing Associations (RHAs), which are:

- Non-profit organisations or companies
- Registered under Article 4(1)(c) of the Housing (Northern Ireland) Order 1992
- Subject to regulation to ensure they meet standards in governance, financial management, and tenant services.

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.

Since April 2004 RSHPs 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 RSHPs were designated as public authorities for the purposes of Section 75 of the Northern Ireland Act 1998.

As mentioned above RSHPs 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, RSHPs 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 providers must operate the policy of another body and have little or no scope to change that policy. For example, RHSPs are the main delivery vehicle for the Social Housing Development Programme but need is determined by the NIHE and the DfC develops the programme which is then managed by the Housing Executive. So, whilst RSHPs 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 establishing their action plans RSHPs 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 RSHPs will be referred to the relevant public body.

Woven (previously Habinteg) is a RSHP established in 1976 subject to the provisions of the housing Orders (NI) 1976, 1992 and 2003 and the Industrial and Provident Societies Act (NI) 1969 and 1976.

Woven plans, develops and manages housing schemes in both urban and rural areas throughout the region and works with a number of partner organisations in providing supported housing projects. The Association has over 2500 units of housing at more than 100 locations across Northern Ireland and 18 partnership projects.

About Woven Housing Association Ltd.

Woven's Vision: **Homes, Lives and Communities; Woven as one**, encapsulates the Association's central aim of providing not only housing which combines a range of dwelling types - family houses, apartments and bungalows - in order to appropriately meet the needs of the widest range of users, including older persons and persons with a disability but homes that will enhance and enrich the lives of our residents and in doing so continue to create sustainable communities.

Quality, sustainable developments include large and medium sized suburban housing developments, inner city apartments, individual rural cottages and specialised housing schemes. Partnership projects include sensitively designed housing with care schemes, temporary accommodation for people who are homeless, and housing initiatives for people with additional support needs.

Work is overseen by a voluntary Board and executed by nearly 105 full time members of staff, the majority of whom work in head office in Laganwood House, Belfast. This office houses staff in a number of functional areas including Finance, I.T., Development, Homes & Communities, Asset Management, Human Resources, Procurement and Executive Support. There is also a North West regional office which houses Homes & Communities, Asset Management, Executive Support, Development and Administrative staff. A number of residential and non-residential staff are also based at larger housing schemes across the Province.

Woven is a member of the Northern Ireland Federation of Housing Associations (NIFHA). We also have a Residents Forum, which comprises of elected resident representatives.

Woven are long standing holders of the Customer Service Excellence Standard (CSE) and Investors in People (IIP) Status having retained CSE since its Charter Mark days in 2000 and the IIP status since 1997.

The Board of Woven reflects a range of interests representing the needs of service users. Membership comprises the Chairperson, Vice chairperson, Treasurer, Honorary Secretary and up to six other members. The Board meets bi-monthly including holding an Annual General Meeting when new members may seek election and when a third of existing members who wish to continue to serve as members are obliged to seek re-election.

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

- ❑ **Homes & Communities** – provision, allocation and management of rented Woven properties
- ❑ **Asset Management** – planned, cyclical and response maintenance of rented Woven properties, communal buildings and communal areas
- ❑ **Development** – the procurement of land and buildings
- ❑ **Human Resources** – recruitment and employment
- ❑ **Contracting** – procurement of goods and services
- ❑ **Finance** – borrowing and investing money
- ❑ **Procurement** - acquiring goods, services, and works—ranging from construction and maintenance to IT systems and consultancy—needed to deliver housing services.
- ❑ **Sales** – sale/disposal of land or dwellings

The Chief Executive is responsible to the Chairperson and the Board of Woven for the management of Woven which is a Registered Social Housing Provider (RSHP), an Industrial and Provident Society and has charitable status.

Please note: Woven's **Organisational Chart at Appendix 1** outlines the various roles within the organisation.

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

2.1 Some of our arrangements for assessing our compliance with the Section 75 statutory duties are outlined in other relevant parts of this equality scheme [please see **Chapters 3- Consulting, Chapter 4-Our arrangements for assessing, monitoring and publishing the impact of policies, Chapter 5-Staff Training** and **Chapter 8-our Complaints Procedure**].

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

Responsibilities and reporting

2.2 Woven is committed to the fulfilment of its Section 75 obligations in all parts of its work.

2.3 Responsibility for the effective implementation of our equality scheme lies with the Chief Executive. The Corporate Assurance Manager is accountable to Woven in the capacity of Equality Manager 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 our Corporate Assurance Manager at the address given below and we will respond to you as soon as possible:

Corporate Assurance Manager

Address Woven Housing Association Ltd
Laganwood House
44 Newforge Lane
Belfast
BT9 5NW
Tel No 028 90427211/028 71360015
E mail equality@woven.org.uk

2.5 Objectives and targets relating to the statutory duties are integrated into Woven's strategic and operational plans.

2.6 In addition, a commitment to the statutory duties is included in all job descriptions and performance plans to reflect employees' duties to implement and regard Section 75 statutory duties outlined in the equality scheme.

2.7 Woven conducts an Annual Review of Progress in relation to the implementation of the Equality Scheme, in complying with the statutory duties. Woven forwards a report of this review to the Equality Commission by 31 August each year. This report follows 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 Annual Report.

2.8 The latest Section 75 annual progress report is available on our website <https://www.woven.org.uk/housing/equality-matters/annual-reports-ecni>

Or by contacting:

Corporate Assurance Manager
Address, Telephone and Email at 2.4

2.9 Woven will liaise closely with the Equality Commission to ensure that progress on the implementation of our equality scheme is maintained.

2.10 Woven is committed to 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 will be refined and further developed as required 5 yearly or as and when best practice and/or legislation necessitate this.

Action plan/action measures

2.11 The action measures, which have been reviewed as part of our 5-year review, make up our action plan and are relevant to our functions. They have been reviewed and prioritised on the basis of the previous audit of inequalities. The audit of inequalities gathered and analysed information across the Section 75 categories³ to identify the inequalities that exist for our service users and those affected by our policies⁴. The audit of inequalities is a 'living' document that will be amended as continued evidence is gathered on newly identified inequalities.

2.12 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.

2.13 We will also review our action plan between one and five years and ensure it remains aligned with our corporate and business planning cycles. Implementation of the action measures will be incorporated into our business planning process.

2.14 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.

2.15 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.

2.16 Woven 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.

³ See section 1.1 of this equality scheme for a list of these categories.

⁴ See section 4.1 of this equality scheme for a definition of policies.

2.17 Once finalised, our action plan will be available in this **Equality Scheme** at **Appendix 6** or on request from:

Corporate Assurance Manager

Address, Telephone and Email at 2.4

If you require it in an alternative format, please contact us using the details provided above.

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 existing and developing good practice and the following principles (as contained in the Equality Commission's guidance '*Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)*')

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

Initially all consultees (see Appendix 3), as a matter of course, will be notified through our social media platforms, via text and/or via email where applicable 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.

Throughout each formal consultation exercise the relevant documents will also be available, in a range of formats including hard copies, directly from Woven.

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 to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these. Methods of consultation could include:

- Face-to-face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email and/or text message 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)*.

RSHPs provide services to a wide range of people. Based on Woven's tenant profile, special consideration is given to.

- Single people
- Families
- Older people
- People with disabilities and
- People where English is not their first language.

Information will be made available, on request, in alternative formats in a timely manner, usually within 15 working days. We will ensure that such consultees have equal time to respond.

3.2.4 Specific training will continue to be arranged for Woven staff undertaking consultation exercises to ensure they have the necessary skills to communicate effectively with consultees.

3.2.5 Steps will also continue to be taken to ensure full participation in any consultation meetings that are held. Woven will continue to consider the time of day, the suitability of the venue, whether it can be accessed by those with disabilities, how the meeting is to be run, the use of languages other than

English, whether a signer is needed, childcare arrangements and will recognise and in good faith meet access related costs.

3.2.6 The consultation periods will last for a minimum of twelve weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view. However, in exceptional circumstances when this timescale is not feasible (for example implementing EU Directives or UK wide legislation, meeting Health and Safety requirements, addressing urgent public health matters or complying with Court judgements), we may shorten timescales to eight weeks or less before the policy is implemented. We may continue consultation thereafter and will review the policy as part of our monitoring commitments⁵.

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.

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.

⁵ See Chapter 6 of our equality scheme for further information on alternative formats we provide

⁶ Please see Appendix 3 for a list of all our consultees

⁷ Please see below at 4.27 to 4.31 for details on monitoring.

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

3.3 A list of our consultees is included in this equality scheme at Appendix 3. It can also be obtained by contacting

Corporate Assurance Manager

Address, Telephone and Email at 2.4

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

We welcome enquiries from any person/s or organisations wishing to be added to the list of consultees. Please use the contact details above 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.

3.5 In consulting we will take cognisance of ODI guidance on accessible consultation events for people with a disability
<http://www.officefordisability.gov.uk/iod/channels/events.php>
and the Department for Business, Enterprise and Regulatory Reform Code of Conduct on Consultation (2008) Code of Practice on consultations

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 Woven 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, equality specialists, those who implement the policy and staff members from other relevant work areas. Where possible we will include key stakeholders in the screening process.

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

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

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

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

1. the policy has been ‘screened in’ for equality impact assessment
2. the policy has been ‘screened out’ with mitigation⁶ or an alternative policy proposed to be adopted
3. the policy has been ‘screened out’ without mitigation or an alternative policy proposed to be adopted.

4.10 If our screening concludes that the likely impact of a policy is ‘minor’ in respect of one, or more, of the equality of opportunity and/or good relations categories, we may on occasion decide to proceed with an equality impact assessment, depending on the policy. If an EQIA is not to be conducted, we

⁸ Mitigation – Where an assessment (screening in this case) reveals that a particular policy has an adverse impact on equality of opportunity and / or good relations, a housing association/RSHP must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories.

will nonetheless consider measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations.

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

This screening decision will be 'signed off' by the appropriate policy lead within Woven.

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 Woven.

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 Woven.

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 <http://www.woven.org.uk/equality-matters/policy-screening>. This will also be available from:

Corporate Assurance Manager

Address, Telephone and Email at 2.4

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

4.15 Details of strategies/policies/procedures screened will be published on our website quarterly.

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 on our website.

What we publish

4.20 Screening reports

These will be made available on request. Screening reports will detail:

- All policies screened by Woven over a 3-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) will be made available quarterly on our website <http://www.woven.org.uk/equality-matters/policy-screening> and by contacting the Corporate Assurance Manager.

Corporate Assurance Manager

Address, Telephone and Email at 2.4

4.25 In addition to the above, a summary of screening reports (electronic link or hard copy on request if more suitable for recipients) which include all policies screened over a 3-month period can be made available 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, Woven follows guidance from the Office of the Information Commissioner and the Equality Commission.

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

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

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

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

4.31 We review our EQIA monitoring information on an annual basis. Other monitoring information is reviewed monthly, quarterly, and annually. Other monitoring information is reviewed. This includes.

- **Staff Information:** Gathered on the commencement of employment.
- **Board Information:** Gathered annually and when a new member is recruited.
- **Tenant Information:** Gathered from the tenant at Tenancy Sign up for 7 out of 9 main category groups identified under Section 75.

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 In addition to the above, monitoring information can be made available for consultees to receive if they so choose.

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 wishes to positively communicate the commitment of the Woven 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 Woven 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 Woven 's 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 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 and Board Members in Woven will receive a briefing on this equality scheme as soon as possible 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 Woven 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).
- 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.
- Woven will continue to liaise with the Equality Commission NI and other relevant agencies, where necessary including participating in all relevant equality training events which arise as a result of the Section 75 duty.

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, Woven 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 monitor and evaluate the number of our staff that are trained and the equality profile of the staff trained, as well as the job roles of the staff involved in equality training.

Chapter 6 Our arrangements for ensuring and assessing public access to information and services we provide (Schedule 9 4. (2) (f))

6.1 Woven 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.

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.

Consideration will be given on how to provide accessible information in a timely manner to all these groups

Access to information

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

Alternative formats may include Easy Read, Braille, large print and the Reachdeck toolbar on the website (for translation, audio, magnification, MP3 generation, screen mask, screen simplification and picture dictionary)

Woven will liaise with representatives of young people and disability and minority ethnic organisations where appropriate and take account of existing and developing good practice.

We will continue to respond to requests for information in alternative formats in a timely manner, usually within 15 working days of receiving a request. Where the exact request cannot be met, we will ensure a reasonable alternative is provided.

Woven will also continue to review its arrangements for providing information in Braille, large print, audio and minority ethnic language formats.

6.4 In disseminating information through the media, Woven in collaboration with NIFHA, will seek to advertise in the press. This arrangement will be kept under review, in terms of promoting wide access throughout the implementation of statutory equality duties. Woven intends that all of its services are fully accessible to all parts of the community in Northern Ireland.

6.5 Woven will ensure that no section of the community is deterred from visiting Woven offices, for whatever reason. Woven offices will maintain a welcoming and harmonious environment. Woven will adhere to relevant provisions of the Disability Discrimination Act 1995.

Access to services

6.6 Woven is committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories. The Association also adheres to the relevant provisions of current anti-discrimination legislation.

6.7 Woven will continue to update its website with information on accessing its services and continue to include ReachDeck for translation, audio, magnification, MP3 generation, screen mask, screen simplification and picture dictionary.

Assessing public access to information and services

6.8 We continue to monitor on an ongoing basis 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 will continue to use a variety of customer surveys at various times to determine customers' experiences when using our services, 4-week survey, repair satisfaction surveys, 12-month and post-handover satisfaction surveys.

We routinely review our approach to surveys and collating customer satisfaction feedback, to ensure that every customer has the same opportunity to engage at a level that is appropriate to them.

Chapter 7 Timetable for measures we propose in this equality scheme

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

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

7.2 This timetable is different from and in addition to our commitment to developing an action plan to specifically address inequalities and further promote equality of opportunity and good relations. We have included in our equality scheme a commitment to further develop our 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 – 2.17.

Chapter 8 Our complaints procedure (Schedule 9 10.)

8.1 Woven are 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 RSHP if the complainant believes they may have been directly affected by an alleged failure of the authority to comply with its approved equality scheme.

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

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

Corporate Assurance Manager
Address, Telephone and Email at 2.4

8.4 We will in the first instance acknowledge receipt of each complaint within 5 working days.

8.5 The Association will carry out an internal investigation of the complaint and will respond to the complainant within 15 working days of the date of receiving notification of the complaint. Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the complainant may be extended up to two months.

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, Woven will co-operate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

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

8.8 Woven 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 Woven's equality scheme is available free of charge in print form and alternative formats by contacting:

Corporate Assurance Manager
Address, Telephone and Email at 2.4

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

<https://www.woven.org.uk/housing/equality-matters/annual-reports-ecni>

9.3 The following arrangements are in place for the publication of the Scheme and to ensure equality of access:

- We will make every effort to communicate widely the existence and content of our Equality Scheme. This may include advertisement in the press, the internet and direct mail shots to groups representing the various Section 75 categories.
- We will email a link of our approved Equality Scheme to our consultees on our consultation lists. Other consultees without email will be notified in writing that the scheme is available on request.
- The Scheme will be made available on request in a range of formats and accessible via the website in in minority languages to meet the needs of those not fluent in English.
- Systems will be in place to ensure that requests for the Scheme in accessible formats will be dealt with in a timely manner, usually within 15 working days
- A copy of the approved Scheme will also be posted on Woven's website.

9.4 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme, or visit our website or contact

Corporate Assurance Manager
Address, Telephone and Email at 2.4

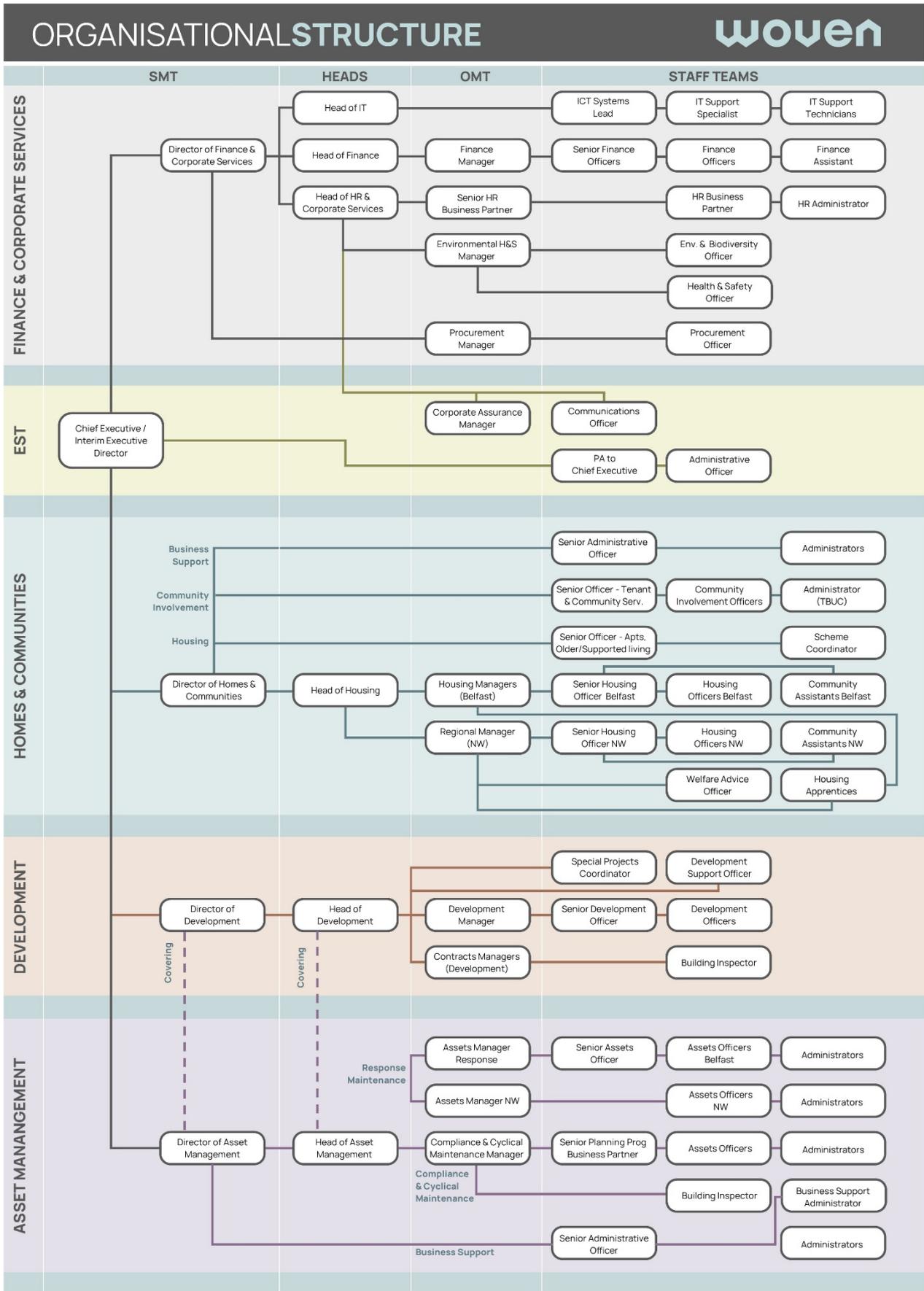
Chapter 10 Review of our equality scheme (Schedule 9 8. (3))

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

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

10.2 In undertaking this review we will follow any guidance issued by the Equality Commission. The review will be made public on our website and our social media forms. Following this review any guidance issued by the Equality Commission will be presented to the Woven 's Board and the Equality Commission for ratification.

Appendix 1



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

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

Category	Example groups
Religious belief	<p>Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths.</p> <p>For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment & Treatment (NI) Order</i>⁷. Therefore, “religious belief” also includes any <i>perceived</i> religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “<i>similar philosophical belief</i>”.</p>
Political opinion ⁸	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people.
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls).
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientation	Bisexual people; heterosexual people; gay or lesbian people.

⁷ 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.*”

⁸ *ibid*

Appendix 3 List of consultees (Schedule 9 4. (2) (a))**NB** The Consultee list will be reviewed on an annual basis and is not an exhaustive list.**EQUALITY CONSULTATION LIST****Regulatory & Oversight Bodies**

Department for Communities (DfC) – Housing Regulation Branch	Causeway Exchange, 1-7 Bedford Street, Belfast BT2 7EG Tel: 028 9051 5169 Email: hagovernance@communities-ni.gov.uk
Northern Ireland Housing Executive (NIHE)	2 Adelaide Street, Belfast BT2 8PB Tel: 03448 920 900
Northern Ireland Federation of Housing Associations (NIFHA)	6c Citylink Business Park, Belfast BT12 4HB Tel: 028 9023 0446 Email: info@nifha.org

Housing Associations

Radius Housing	38-52 Lisburn Road, Belfast BT9 6AA Tel: 0330 123 0888 Email: info@radiushousing.org
Choice Housing	Leslie Morrell House, 37-41 May Street, Belfast BT1 4DN Tel: 0300 111 2211 Email: info@choice-housing.org
Clanmil Housing	Northern Whig House, 3 Waring Street, Belfast BT1 2DX Tel: 028 9087 6000 Email: info@clanmil.org.uk
Co-ownership	Murray House Murray Street Belfast BT1 6DN Tel: 028 90327276 Email: hello@co-ownership.org
Craigowen Housing Association	First Floor 1 Strand Studios 150 Holywood Road Belfast BT4 1NY Tel: 028 90657040 Email: office@craigowenha.org.uk

Covenanter Housing Association	City East Business Centre, 68-72 Newtownards Road, Belfast, BT4 1GW Tel: 028 90941672 Email: CoventResAssnLtd@outlook.com
Apex Housing	10 Butcher Street, Derry~Londonderry BT48 6HL Tel: 028 7130 4800 Email: info@apex.org.uk
Alpha Housing	Ravenhill Reach, 61 Ravenhill Road, Belfast BT6 8DQ Tel: 028 9078 7750 Email: info@alphahousingni.org
Ark Housing Association	Unit 1 Hawthorn Office Park 43 Stockmans Way Belfast BT9 7ET Tel: 028 90752310 Email: info@arkhousing.co.uk
Arbour Housing Association	18-22 Carleton Street Portadown County Armagh BT62 3EN Tel: 028 38339795 Email: info@arbourhousing.org
Abbey Field and Wesley Housing Association	2 Wesley Court Carrickfergus Co. Antrim BT38 8HS Tel: 028 93363558 Email: info@abbeyfieldandwesley.org.uk
Grove Housing Association	171 York Road Belfast BT15 3HB Tel: 028 90773330 Email: infor@groveha.org.uk
NB Housing	Gatelodge 8 Flax Street Belfast BT14 7EQ Tel: 028 90592110 Email: info@nb-housing.org
Newington Housing Association	300 Limestone Road, Belfast BT15 3AR Tel: 028 90744055 Email: admin@newingtonha.co.uk
Rural Housing Association	Tollgate House 2 Killyclogher Road Omagh County Tyrone BT79 0AX Tel: 028 82246118 Email: info@ruralhousing.co.uk

St. Matthew's Housing Association	58 Harper Street Belfast BT5 4EN Tel: 028 90451070 Email: office@smha.co.uk
Triangle Housing	60 Eastermeade Gardens, Ballymoney BT53 6BD Tel: 028 2766 6880 Email: info@trianglehousing.org.uk
Woodvale and Shankill Community Housing	91 - 95 Woodvale Road Belfast BT13 3BP Tel: 028 90741618 Email: info@wscha.org

Advocacy & Voluntary Sector Consultees

Housing Rights	Middleton Building, 10-12 High Street, Belfast BT1 2BA Tel: 028 9024 5640 Email: info@housingrights.org.uk
Shelter NI	4th Floor, Ascot House, Shaftesbury Square, Belfast BT2 7DB Tel: 028 9024 7752 Email: info@shelterni.org
Simon Community NI	25-27 Franklin Street, Belfast BT2 7DJ Tel: 028 9023 2882 Email: info@simoncommunity.org
Council for the Homeless NI	22-24 Donegall Street, Belfast BT1 2GP Tel: 028 9023 9444 Email: info@chni.org.uk
Participation and the Practice of Rights (PPR)	6A Upper Charles Street, Belfast BT15 1ES Tel: 028 9031 3315 Email: info@pprproject.org
NICVA	61 Duncairn Gardens, Belfast BT15 2GB Tel: 028 9087 7777 Email: info@nicva.org

Disability Action NI	109-113 Royal Avenue, Belfast BT1 1FF Tel: 028 9029 7880 Email: info@disabilityaction.org
Age NI	3 Lower Crescent, Belfast BT7 1NR Tel: 028 9024 5729 Email: info@ageni.org
RNIB NI	Victoria House, 15-17 Gloucester Street, Belfast BT1 4LS Tel: 028 9032 9373 Email: nireception@rnib.org.uk
Women's Aid Federation NI	129 University Street, Belfast BT7 1HP Tel: 028 9024 9041 Email: info@womensaidni.org
NICRAS	143A University Street, Belfast BT7 1HP Tel: 028 9031 9639 Email: info@nicras.org.uk
Equality Commission for NI	Equality House, 7-9 Shaftesbury Square, Belfast BT2 7DP Tel: 028 90 500 600 Email: information@equalityni.org

Appendix 4 Timetable for measures proposed (Schedule 9 4.(3) (b))

Measure (example)	Lead responsibility (example)	Timetable (example)
Submit Section 75 Annual Progress Report	Corporate Assurance Manager [Equality Manager] / Chief Executive	31 August (annually)
Consultation on draft scheme action plan	Corporate Assurance Manager [Equality Manager]	(in line with consultation timeframe outlined in equality scheme)
Finalised scheme and action plan published	Corporate Assurance Manager [Equality Manager] / Chief Executive	Five-year review or earlier where necessary
Arrangements for monitoring progress in place	Corporate Assurance Manager [Equality Manager]	Annually
Consultation list reviewed and updated	Corporate Assurance Manager [Equality Manager]	September (annually)
Screening timetable	Senior Leadership Team & Corporate Assurance Manager [Equality Manager]	Annually
Screening Reports	Senior Leadership Team & Corporate Assurance Manager [Equality Manager]	Quarterly
EQIA timetable	Corporate Assurance Manager [Equality Manager]	As required following screening
Monitoring and Review of monitoring information	Head of HR and Corporate Services Director/Head of Homes and Communities	Staff Information: Gathered on the commencement of employment. Board Information: Gathered annually and when a new member is recruited. Tenant Information: Gathered from the tenant at Tenancy Sign up for 7 out of 9 main category groups identified under Section 75.
Review of EQIA monitoring information	Corporate Assurance Manager [Equality Manager]	Annually
Publication of monitoring information [4.33;4.34]	Head of HR and Corporate Services	Annually

Training	Corporate Assurance Manager [Equality Manager]	As part of induction for every new staff member and annual training on specific Section 75 groups
Development of overall training programme [5.5]	Director of Finance & Corporate Services	(annually)
Focussed training [5.4]	“	(annually)
Update training [5.4]	“	(annually)
Evaluation of training [5.6]	Head of HR and Corporate Services	[annually]
Communication of equality scheme [9.3]	Corporate Assurance Manager [Equality Manager] & Chief Executive	As part of induction for every new staff member and annual training on specific Section 75 groups. Updates on Staff Intranet as necessary
Notification of consultees [9.3]	Corporate Assurance Manager [Equality Manager]	Updated on scheme and Website when necessary
Review of equality scheme [10.1]	Corporate Assurance Manager [Equality Manager]	Every five years (September)
Any other measures proposed in equality scheme	Corporate Assurance Manager [Equality Manager]	September [annually]

Appendix 5 Glossary of terms [As per Equality Commission's Section 75 Guide]

Action plan

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

Action measures and outcomes

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

Adverse impact

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

Affirmative action

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

Article 55 Review

Under the Fair Employment and Treatment (NI) Order 1998, all registered employers must conduct periodic reviews of the composition of their workforces and of their employment practices for the purposes of determining whether members of the Protestant and Roman Catholic communities are enjoying, and are likely to continue to enjoy, fair participation in employment in each employer's concern. These reviews, which are commonly known as Article 55 Reviews, must be conducted at least once every three years.

Audit of inequalities

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

Consultation

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

Council of Europe

The Council of Europe, based in Strasbourg, covers virtually the entire European continent, with its 47 member countries. Founded on 5 May 1949 by 10 countries, the Council of Europe seeks to develop throughout Europe common and democratic principles based on the European Convention on Human Rights and other reference texts on the protection of individuals.

Desk audit

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

Differential impact

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

Discrimination

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

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

Brief descriptions of these above terms follow:

Direct discrimination

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

statements” or to take other lawful positive action to encourage participation by under-represented or otherwise disadvantaged groups.

Indirect discrimination

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

Disability discrimination

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

(a) *Disability-related discrimination* generally occurs where a public authority, without lawful justification, and for a reason which relates to a disabled person’s disability, treats that person less favourably than it treats (or would treat) other people to whom that reason does not (or would not) apply.

(b) *Failure to comply with a duty to make reasonable adjustments*: One of the most notable features of the disability discrimination legislation is that in prescribed circumstances it imposes a duty on employers, service providers and public authorities to take such steps as are reasonable to remove or reduce particular disadvantages experienced by disabled people in those circumstances.

Victimisation

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

Harassment

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

Economic appraisal

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

Equality impact assessment

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

Equality of opportunity

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

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

Equality scheme

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

Good relations

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

Mainstreaming equality

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

Mitigation of adverse impact

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

Monitoring

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

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

Northern Ireland Act

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

Northern Ireland Human Rights Commission

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

Northern Ireland Statistics & Research Agency (NISRA)

The Northern Ireland Statistics and Research Agency (NISRA) is an Executive Agency within the Department of Finance and Personnel (DFP). They provide statistical and research information regarding Northern Ireland issues and provide registration services to the public in the most effective and efficient way.

OFMdFM

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

PAFT

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

Policy

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

functions relating to Northern Ireland. Policies include unwritten as well as written policies.

Positive action

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

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

Qualitative data

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

Quantitative data

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

SACHR

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

Screening

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

Schedule 9

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

Section 75

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

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

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

Section 75 investigation

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

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

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

Appendix 6 Action plan/action measures

Action	Target Group(s)	Expected outcome(s)	Timescale & Lead	Status
Conduct equality screening and Equality Impact Assessments (EQIAs) on all new policies and major decisions as required	All Section 75 categories	Policies better reflect needs of diverse groups and to ensure compliance with equality legislation	Ongoing <i>CAM / Policy Leads (author)</i>	In Progress
Monitor and report on complaints by Section 75 category	All Section 75 groups	Identify disparities and improve policy response	Annually <i>CAM</i>	Ongoing
Continue with Good Relations initiatives in mixed housing areas (e.g. shared housing programmes, cultural awareness events)	Religious belief, racial group, political opinion	Stronger community relations and safer neighbourhoods	Annually <i>H&C</i>	Ongoing
Continue to involve tenants in shaping services through inclusive tenant forums	All groups, incl. older people, disabled tenants, young people, minority ethnic groups	Services reflect diverse needs and preferences	Quarterly <i>H&C</i>	Active
Continue to employ accessibility software for online services	Racial groups, people with limited English proficiency and disabled people	Enhanced access to services and support	Ongoing <i>EST</i>	Ongoing
Maintain a commitment to deliver wheelchair accessible housing	People with disabilities	Enhanced access to services and support	Ongoing <i>H&C, Dev & Assets.</i>	Ongoing
Implementing recommendations from EDIF to raise awareness of staff and improve inclusive services	All staff	Staff are aware of and meet Section 75 duties	Quarterly <i>EDIF</i>	Ongoing
Deliver equality and diversity training for all staff, with additional training for senior managers	All staff	Staff are aware of and meet Section 75 duties	Annually <i>HR</i>	Planned 2025/2026

continued

Action	Target Group(s)	Expected outcome(s)	Timescale & Lead	Status
Review recruitment practices to ensure inclusive and barrier-free processes	Minority ethnic groups, disabled people	Increased representation in workforce	By Q2 2026 <i>HR</i>	Under review
Publish annual progress report on Equality Scheme and Action Plan	All stakeholders	Transparent tracking of outcomes	Annually <i>CAM</i>	Report due Q3 each year
Improve access to translated materials and interpretation services	Racial groups, people with limited English proficiency and disabled people	Enhanced access to services and support	Ongoing <i>EST</i>	Ongoing
Update Disability Action Plan to align with Equality Scheme	Disabled people	Improved support and accessibility in housing	By Q1 2026 <i>CAM</i>	Under review

Key

CAM: Corporate Assurance Manager
 EST: Executive Support Team
 H&C: Homes & Communities Team
 HR: Human Resources Team
 Dev: Development Team
 Assets: Assets Team
 EDIF: Equality Diversity & Inclusion Forum

Monitoring and Review

- The Action Plan will be monitored quarterly by the Equality, Diversity & Inclusion Forum.
- Progress will be published in the Annual Equality Progress Report to the Equality Commission NI.
- The Action Plan will be reviewed and updated annually or in response to significant legislative or organisational change.

Links with Other Strategies - this Action Plan aligns with and supports our:

- Corporate Strategy
- Disability Action Plan
- Good Relations Strategy
- Safeguarding policies
- Tenant & Community Engagement Strategy

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