



## ***Equality Scheme for Choice Housing Ireland Ltd.***

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

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

**Leslie Morrell House  
37-41 May Street  
Belfast  
BT1 4DN**

Approved by the Equality Commission for Northern Ireland on:

## 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 Act<sup>1</sup>.

In our equality scheme we set out how Choice 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, the Chair and Group Chief Executive of Choice, 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 the Section 75

---

<sup>1</sup> See section 1.1 of our Equality Scheme.

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 Choice, our staff and our Board, 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.

---

*Mrs Hazel Bell*  
**Chair**

---

*Mr Michael McDonnell*  
**Group Chief Executive**

***Date:***

## Contents

*Please note: Foreword and Appendices form part of this equality scheme.*

	Page
Foreword	1
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	
the Association	5
Who we are and what we do	6
Chapter 2      Our arrangements for assessing our compliance	
with the Section 75 Duties	9
Responsibilities and reporting	9
Action plan/action measures	11
Chapter 3      Our arrangements for consulting	13
Chapter 4      Our arrangements for assessing, monitoring and	
publishing the impact of policies	17
Our arrangements for assessing the likely	
impact adopted or proposed to be adopted	
on the promotion of equality of opportunity of	
policies	17
Screening	18
Equality impact assessment	20
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	21
What we publish	21
How we publish the information	22
Where we publish the information	22
Our arrangements for monitoring any	23

	adverse impact of policies we have adopted on equality of opportunity Our arrangements for publishing the results of our monitoring	24
Chapter 5	Staff training	25
	Commitment to staff training	25
	Training objectives	25
	Awareness raising and training arrangements	26
	Monitoring and evaluation	27
Chapter 6	Our arrangements for ensuring and assessing public access to information and services we provide	28
	Access to information	28
	Access to services	29
	Assessing public access to information and services	29
Chapter 7	Timetable for measures we propose in this equality scheme	30
Chapter 8	Our complaints procedure	31
Chapter 9	Publication of our equality scheme	33
Chapter 10	Review of our equality scheme	34
Appendix 1	Organisational chart	35
Appendix 2	Example groups relevant to the Section 75 categories for Northern Ireland purposes	36
Appendix 3	List of consultees	37
Appendix 4	Timetable for measures proposed	41
Appendix 5	Glossary of terms	43
Appendix 6	Action plan/action measures	51

## **Chapter 1      Introduction**

### **Section 75 of the Northern Ireland Act 1998**

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

#### **Section 75 (1)**

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

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

#### **Section 75 (2)**

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

“Functions” include the “powers and duties” of a housing association<sup>2</sup>. 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 Choice**

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

1.3 Choice is committed to the discharge of our Section 75 obligations in all parts of our organisation and we will commit the

---

<sup>2</sup> Section 98 (1) of the Northern Ireland Act 1998.

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

### **Who we are and what we do - *About Housing Associations***

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

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

Housing associations are regulated by the Department for Communities (DfC). They work closely with the DfC and the Northern Ireland Housing Executive (NIHE) to deliver housing and related services. Some also provide care and /or support services so also work with the relevant public authorities for the health sector. 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 housing 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 DfC 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.

While each designated housing association has produced its own Equality Scheme they have also agreed to work collectively on this major undertaking. Their representative body the Northern Ireland Federation of Housing Associations (NIFHA) is at present taking a co-ordinating role as part of this collaborative approach to help maximise resources, promote the sharing of best practice and minimise the administrative burden for stakeholder organisations.

### ***About Choice***

Choice is the largest independent housing association in Northern Ireland. The high quality homes, care and support services we provide help meet the diverse needs of a wide range of customers including; older people, families, mature singles and people with complex needs.

Our focus is on delivering more homes, better services and stronger inclusive communities. We're proud that more than 10,000 customers have made us their 'provider of choice' and we're committed to building more high quality homes for those who are in need of support.

Choice combines the experiences and expertise of four great housing associations that have spent three decades building 10,000 homes and delivering friendly and personal services to customers across Northern Ireland.

Our size, scale and capacity mean that we can do much more than any other housing association. Our core values commit us to shaping new standards of excellence that redefine our sector and provide more great housing and support at a reasonable cost.

### **Our Promise**

Our focus is on delivering more great homes, enhanced services and stronger inclusive communities.

We are a housing association that delivers much more than housing. We are in the business of transforming lives and building communities. It is in our DNA and what motivates us to enhance the range of services available to our customers.



At Choice, we take pride in changing what our customers can expect from a modern housing association. We value our customers as partners in our journey. Personal, friendly and trusted relationships are at the heart of our promise to deliver exceptional services that can anticipate and meet current and future needs.

### **Our Core Values**

Our core values are the building blocks of our culture, providing common language and acceptable standards of behaviour. The values we are adopting for our brand and organisational culture are as follows:

- Trustworthy
- Customer Centred
- Dynamic

Choice is led and controlled by a Board. The Board has ultimate responsibility for directing the activity of the Association, ensuring it is well run and governed, delivering on its social ethos.

Choice currently employs over 300 staff. For the purposes of this equality scheme, Choice performs the following functions:

- Provision of a range of housing, care and support services
- Property Maintenance and Repairs
- Development of new homes
- Recruitment of Board and staff
- Contributes to Building Sustainable Communities

## **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 (refer to Appendix 4).

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

### **Responsibilities and reporting**

2.2 Choice is committed to the fulfilment of our Section 75 obligations in all parts of our work.

2.3 Responsibility for the effective implementation of our equality scheme lies with the Group Chief Executive. The Group Chief Executive is accountable to the Board for ensuring 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 this equality scheme, please contact Organisational Development using the contact details below and we will respond to you as soon as possible:

Governance & Communications

[equality@choice-housing.org](mailto:equality@choice-housing.org)

37-41 May Street

Belfast

BT1 4DN

Tel: 0300 111 2211

Email: [equality@choice-housing.org](mailto:equality@choice-housing.org)

Website: [www.choice-housing.org](http://www.choice-housing.org)

2.5 Objectives and targets relating to the statutory duties will be integrated into our strategic and operational business plans<sup>3</sup>.

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 Choice 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 31 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 annual report.

2.8 The latest Section 75 annual progress report will be made available on our website [www.choice-housing.org](http://www.choice-housing.org) or by contacting:

Governance & Communications  
Leslie Morrell House  
37-41 May Street  
Belfast  
BT1 4DN

Tel: 0300 111 2211  
Email: [enquiries@choice-housing.org](mailto:enquiries@choice-housing.org)  
Website: [www.choice-housing.org](http://www.choice-housing.org)

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

---

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

## **Action plan/action measures**

2.10 Choice has developed an action plan to promote equality of opportunity and good relations. This action plan is set out in Appendix 6 to this equality scheme.

2.11 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 will gather and analyse information across the Section 75 categories<sup>4</sup> to identify the inequalities that exist for our service users and those affected by our policies<sup>5</sup>.

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 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.

2.14 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 2.15 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 Choice 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.

---

<sup>4</sup> See section 1.1 of this equality scheme for a list of these categories.

<sup>5</sup> See section 4.1 of this equality scheme for a definition of policies.

2.17 Once finalised, our action plan will be available on our website [www.choice-housing.org](http://www.choice-housing.org) or by contacting:

Governance & Communications  
Leslie Morrell House  
37-41 May Street  
Belfast  
BT1 4DN

Tel: 0300 111 2211  
Email: [equality@choice-housing.org](mailto:equality@choice-housing.org)  
Website: [www.choice-housing.org](http://www.choice-housing.org)

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

## **Chapter 3      Our arrangements for consulting**

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

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

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

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

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

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

As the representative body for housing associations, the Northern Ireland Federation of Housing Associations (NIFHA) has been assisting its members in the implementation of Section 75 of the Northern Ireland Act 1998 by co-ordinating a joint approach to the

Statutory Equality duties. NIFHA itself is not a designated body, but as part of its support for members has taken on this co-ordination role, in particular in relation to public consultation. Their aim in managing the process in this way is to minimise the impact on consultee and/or stakeholder organisations. However, throughout each formal consultation exercise the relevant documents will also be available, in a range of formats including hard copies, directly from Choice.

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 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 will 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 formats<sup>6</sup>, in a timely manner, usually within 10 working days. We will ensure that such consultees have equal time to respond.

3.2.4 To ensure effective consultation with consultees<sup>7</sup> on Section 75 matters, we will develop a programme of awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by undertaking the following:

- *Meetings with tenants*
- *Meetings with staff*
- *Public consultation exercises*
- *Availability of information on website and Newsletters*

3.2.5 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 commitments<sup>8</sup>.

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.

3.2.6 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.

3.2.7 Choice is conscious of the fact that affected individuals and representative groups may have different needs. We will take

---

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

<sup>7</sup> Please see Appendix 3 for a list of our consultees.

<sup>8</sup> Please see below at 4.27 to 4.31 for details on monitoring.



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.

3.2.8 Choice makes all relevant information available to consultees in appropriate formats (as requested) to ensure meaningful consultation. This includes detailed information on the policy proposal being consulted upon and any relevant quantitative and qualitative data.

3.2.9 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.

3.2.10 Choice provides feedback to consultees in a timely manner. A feedback report is prepared which includes summary information on the document 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 consultees is included in this equality scheme at Appendix 3.

3.4 The 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 Organisational Development 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 Choice 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 will be completed at the earliest opportunity in the policy development/review process. 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 staff members. 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 mitigation<sup>9</sup> or an alternative policy proposed to be adopted
3. the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

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

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

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

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 the organisation.

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

---

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

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

4.13 As soon as possible following the completion of the screening process, a summary of the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on our website [www.choice-housing.org](http://www.choice-housing.org) and on request by contacting:

Governance & Communications  
Leslie Morrell House  
37-41 May Street  
Belfast  
BT1 4DN

Tel: 0300 111 2211  
Email: [equality@choice-housing.org](mailto:equality@choice-housing.org)  
Website: [www.choice-housing.org](http://www.choice-housing.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 will be 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 will 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 will be published quarterly. Screening reports will detail:

- All policies screened by the organisation 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 assessment) will be made available on our website ([www.choice-housing.org](http://www.choice-housing.org)) and by contacting Governance & Communications on 028 9044 1316.

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, Choice follows guidance from the Office of the Information Commissioner and the Equality Commission.

4.28 Choice monitors 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 annually or biannually.

**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 on our website.

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

4.34 Summary monitoring information will be made available on our website.

4.35 All information published is accessible and can be made available in alternative formats on request. Please refer to 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 Group Chief Executive wishes to positively communicate the commitment of Choice to the Section 75 statutory duties, both internally and externally.

To this end we will introduce 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 Choice will draw up a 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 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 staff and board members are aware of, and understand, the organisation's Section 75 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 will receive a briefing on this equality scheme as soon as possible after approval of scheme.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff 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.

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, Choice will, where possible, work closely with other bodies and agencies in the development and delivery of training.

## **Monitoring and evaluation**

5.6 Choice's 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.

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

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

6.1 Choice 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 Choice is aware that some groups will not have the same access to information as others.

In particular:

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

### **Access to information**

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

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

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

We will respond to requests for information in alternative formats in a timely manner, usually 10 working days.

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

## **Access to services**

6.5 Choice is committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories. We also adhere to the relevant provisions of current anti-discrimination legislation.

## **Assessing public access to information and services**

6.6 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.

6.7 Data is gathered through a comprehensive tenant satisfaction survey which includes a section on equality and access to information and services.

## **Chapter 7      Timetable for measures we propose in this equality scheme**

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

- 7.1 Appendix 4 outlines our timetable for all measures proposed within this equality scheme. The measures outlined in this timetable 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 Choice 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 Housing Association 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 request a copy of the organisation's complaints procedure or make a complaint that we have failed to comply with our approved equality scheme should contact:

Customer Services Officer  
Leslie Morrell House  
37-41 May Street  
Belfast  
BT1 4DN

Tel:            0300 111 2211  
Email:        [equality@choice-housing.org](mailto:equality@choice-housing.org)  
Website:     [www.choice-housing.org](http://www.choice-housing.org)

8.4 As set out in the organisation's complaints procedure we will acknowledge complaints on date of receipt.

8.5 Choice will carry out an internal investigation of the complaint and will respond to the complainant within 14 working days. Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the complainant may be extended to one month. In those circumstances, the complainant will be advised of the extended period and when they can expect a response.



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

Similarly, Choice 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 Choice 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 Choice's equality scheme is available free of charge in print form and alternative formats by contacting:

Governance & Communications  
Leslie Morrell House  
37-41 May Street  
Belfast  
BT1 4DN

Tel:            0300 111 2211  
Email:        equality@choice-housing.org  
Website:     www.choice-housing.org

9.2 Our equality scheme will also be made available on our website at [www.choice-housing.org](http://www.choice-housing.org)

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

- We will make every effort to communicate widely the existence and content of our equality scheme. This may include press releases, prominent advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a link to our approved equality scheme to our consultees on our consultation lists. Other consultees without e-mail will be notified by letter that the scheme is available on request. We will respond to requests for the equality scheme in alternative formats in a timely manner, usually 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 Organisational Development.

## **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 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.