

CHIEF ELECTORAL OFFICER FOR NI



REVISED EQUALITY SCHEME

Draft for Consultation

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.

Electoral Office for NI
St Anne's House
15 Church Street
Belfast
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Approved by the Equality Commission for Northern Ireland on [insert date].

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.

In our equality scheme we set out how the office of the Chief Electoral Officer 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 advise our consultees on the Section 75 statutory duties and our commitments in our equality scheme.

I, the Chief Electoral Officer, through my office which is the staff of the Electoral Office for NI, am 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.

I 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.

I 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.

A handwritten signature in cursive script, appearing to read 'Graham Shields', written in black ink.

GRAHAM SHIELDS
Chief Electoral Officer

Contents

	Page
Foreword	1
Chapter 1	Introduction 6
	Section 75 of the Northern Ireland Act 1998 6
	How we propose to fulfil the Section 75 duties in relation to the relevant functions of the CEO and Electoral Office for NI 6
	Who we are and what we do 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
	Our arrangements for assessing the likely impact adopted or proposed to be adopted on the promotion of equality of opportunity of policies 16
	Screening 17
	Equality impact assessment 19
	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 20
	What we publish 20
	How we publish the information 21
	Where we publish the information 21

	Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity	22
	Our arrangements for publishing the results of our monitoring	23
Chapter 5	Staff training	24
	Commitment to staff training	24
	Training objectives	24
	Awareness raising and training arrangements	25
	Monitoring and evaluation	26
Chapter 6	Our arrangements for ensuring and assessing public access to information and services we provide	27
	Access to information	27
	Access to services	28
	Assessing public access to information and services	28
Chapter 7	Timetable for measures we propose in this equality scheme	29
Chapter 8	Our complaints procedure	30
Chapter 9	Publication of our equality scheme	32
Chapter 10	Review of our equality scheme	33
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

Chapter 1 Introduction

Section 75 of the Northern Ireland Act 1998

1.1 Section 75 of the Northern Ireland Act 1998 (the Act) requires the Chief Electoral Officer, through the Electoral Office for NI (EONI), 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 public authority¹. 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 the Chief Electoral Officer

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

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

1.3 We are committed to the discharge of our Section 75 obligations in all parts of our organisation and we will commit the necessary available resources in terms of people, time and money to ensure that the Section 75 statutory duties are complied with and that our equality scheme can be implemented effectively.

Who we are and what we do

The Chief Electoral Officer for Northern Ireland is required to carry out the functions conferred on him by or under the 1962 Act and is responsible for:

- the administration and implementation of the provisions of the Electoral Law Acts (Northern Ireland) 1962 to 1971 and the Electoral Law (Northern Ireland) Order 1972;
- the conduct of all elections to the Parliament of the United Kingdom, the European Assembly, the Northern Ireland Assembly and to Northern Ireland District Councils;
- the conduct of all United Kingdom and Northern Ireland referendums;
- the preparation of polling station schemes, the procurement and the maintenance of election equipment and generally all administrative matters preliminary to or consequent on an election;
- the preparation and publication of the register of electors for Northern Ireland; and
- as soon as possible after the publication of the register of electors in any year making a report to the Secretary of State for Northern Ireland of his proceedings under the 1962 Act, as amended, which will be laid before the Parliament of the United Kingdom.

EONI is the office which supports the Chief Electoral Officer in carrying out his statutory responsibilities. EONI is an organisation which consists of a Headquarters based in Belfast and seven Area Electoral Office locations across Northern Ireland.

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

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

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

Responsibilities and reporting

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

2.3 Responsibility for the effective implementation of our equality scheme lies with the Assistant Chief Electoral Officer (ACEO) who is accountable to the Chief Electoral Officer 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.

EONI has an HR & Equality Officer to support the implementation of the administrative arrangements and who will act as the main point of contact in respect of the Equality Scheme.

EONI's Senior Management Team meet as a monthly Management Board which is responsible for ensuring that Section 75 obligations are taken into account in reviewing, developing and implementing EONI's functions.

EONI has also established an Equality Team which includes the ACEO and is chaired by the HR & Equality Officer. The Team will meet regularly in relation to our fulfilment of Section 75 obligations and the ACEO will report regularly to the Management Board on the progress.

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

Lisa Cherry
HR & Equality Officer
Electoral Office for NI
St Anne's House
15 Church Street
Belfast
BT1 1ER

Tel: 0800 4320 712 (freephone) or 02890446671

Fax: 02890235612

Email: lisa.cherry@eoni.org.uk

Textphone: 0800 3284 502

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

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 The Chief Electoral Officer 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 (organisational) annual report.

2.8 The latest Section 75 annual progress report is available on our website www.eoni.org.uk or by contacting the HR & Equality Officer as detailed in Section 2.4 above.

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

Action Plan/action measures

2.10 EONI 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 make up our action plan are relevant to our functions. They have been developed and prioritised on the basis of an audit of inequalities. The audit of inequalities gathered and analysed information across the Section 75 categories to identify the inequalities that exist for our service users and those affected by our policies.

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

2.13 The action plan has been developed for a period of three 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 formally monitor our progress on the delivery of our action measures annually and update the action plan as necessary throughout the year to ensure that it remains effective and relevant to our functions and work.

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

2.17 Once finalised, our action plan will be available from www.eoni.org.uk or by contacting the HR & Equality Officer directly using the details provided at 2.4 above.

If you require it in an alternative format please contact us on the details provided in Section 2.4 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 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 this revised Equality Scheme being consulted upon to ensure they are aware of the consultation process. Thereafter, to ensure the most effective use of our and our consultees' resources, we may take a targeted approach to consultation, for example, to those consultees that may have a particular interest in the matter/policy being consulted upon and to whom the matter/policy may be of particular relevance. This may include regional or local consultations, sectoral consultation etc.

3.2.2 Consultation with all stakeholders will begin as early as possible. We will engage with affected individuals and representative groups to identify how best 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 any particular Section 75 category eg people with disabilities, young people and minority ethnic communities. We will take account of existing and developing good practice in relation to the range of communication channels available and the needs of different groups to ensure equality of opportunity.

All relevant information will be made available to consultees (in alternative formats on request) in a timely manner. We will ensure that all consultees have equal time to respond.

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

3.2.5 To ensure effective consultation with consultees on Section 75 matters, we will develop awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by undertaking to circulate the final approved Scheme to all consultees and holding focus groups where necessary.

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

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.

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.

3.3 A list of our consultees is included in this equality scheme at Appendix 3. It can also be obtained from our website at www.eoni.org.uk or by contacting the HR & Equality Officer directly using the details provided at 2.4 on page 9.

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

We welcome enquiries from any person/s or organisations wishing to be added to the list of consultees. Please contact Lisa Cherry, HR & Equality Officer (contact details shown on page 9) to provide your contact information and have your areas of interest noted or have your name/details removed or amended. Please also inform us at this stage if you would like information sent to you in a particular format or language.

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

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

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

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

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

4.3 EONI 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 screening questions, 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 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 office of the Chief Electoral Officer.

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 office of the Chief Electoral Officer.

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 the office of the Chief Electoral Officer.

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 www.eoni.org.uk or by contacting the HR & Equality Officer directly using the details provided at 2.4 on page 9.

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.

Equality impact assessment

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

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

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

Our arrangements for publishing the results of the assessments of the likely impact of policies we have adopted or propose to adopt on the promotion of equality of opportunity

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

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

What we publish

4.20 Screening reports

All policies screened will be placed on our website www.eoni.org.uk with a link to the completed screening template(s) which will detail:

- Name of Policy
- A statement of the aim(s) of the policy
- 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

The links to the completed screening template(s) on our website may be replaced by a list of all policies screened annually detailing the above information.

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/ completed templates, the results of equality impact assessments) are available on our website www.eoni.org.uk or by contacting the HR & Equality Officer directly using the details provided at 2.4 on page 9.

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

4.28 We monitor any relevant 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 equality categories on an ongoing basis
- The collection, collation and analysis of existing relevant secondary sources of quantitative and qualitative data across equality categories on an ongoing basis
- An audit of existing information systems where appropriate, 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 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 where appropriate eg every three years EONI completes an Article 55 review of the composition of the workforce and our employment practices

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 EONI's annual progress report is available on our website www.eoni.org.uk or by contacting the HR & Equality Officer directly using the details provided at 2.4 on page 9.

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 Electoral Officer wishes to positively communicate the commitment of the Electoral Office for NI 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 The office of the Chief Electoral Officer operates a performance management system which incorporates a personal development plan for each member of staff which will aim to achieve the following objectives:

- 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 office of Chief Electoral Officer'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 are aware of and understand our equality obligations.

- We will develop a summary of this equality scheme and make it available to all staff.
- We will provide access to copies of the full equality scheme for all staff; ensure that any queries or questions of clarification from staff are addressed effectively.
- Staff in EONI will receive a briefing on this equality scheme within six months after approval of this scheme through the Management Board and AEO/Team briefing process.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within EONI 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, EONI 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 EONI's training programmes have acquired the necessary skills and knowledge to achieve objectives of the learning.
- 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.
- Training evaluation forms are completed by staff attending courses, and the results are revised and reported accordingly.
- Line Managers are responsible, as part of EONI's performance management framework, to review training and development needs for staff, to update performance development plans on training requirements, the progress against meeting the requirement and to comment on the skills gained through the training which have been put into practice.

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

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

6.1 EONI is committed to ensuring that the information we disseminate and the services we provide are fully accessible to all parts of the community in Northern Ireland. We keep our arrangements under review to ensure that this remains the case.

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

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

Access to information

6.3 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.
- EONI liaises with representatives of young people and disability and minority ethnic organisations and takes account of existing and developing good practice.
- We will respond to requests for information in alternative formats in a timely manner, usually within 20 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 EONI is committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories. EONI also adheres to the relevant provisions of current anti-discrimination legislation.

6.6 EONI's website includes Browse Aloud to provide access for those with visual impairments or reading difficulties.

Assessing public access to information and services

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

6.9 The Management Board meet on a monthly basis and consider statistics in relation accessibility of EONI services in relation to our website, visits to area offices, helpline, ID cards and customer comments and complaints.

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 it 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 The Chief Electoral Officer for NI is responsive to the views of members of the public and will endeavour to resolve all complaints made.

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

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

8.3 A person wishing to make a complaint that the office of the Chief Electoral Officer has failed to comply with its approved equality scheme should contact:

Complaints Co-ordinator
PA to the Chief Electoral Officer
Electoral Office for Northern Ireland
3rd Floor, St Anne's House
15 Church Street
Belfast BT1 1ER
Tel: 0800 4320 712
Email: info@eoni.org.uk

8.4 We will in the first instance acknowledge receipt of each complaint within 3 working days.

8.5 The Assistant Chief Electoral Officer will carry out an internal investigation of the complaint and will respond substantively to the complainant within one month of the date of receiving the letter of complaint. Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the complainant may be extended to two months. In those circumstances, the complainant will be advised of the extended period within one month of making the complaint.

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

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

Similarly, the Chief Electoral Officer 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 The Chief Electoral Officer 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 Our equality scheme is available free of charge in electronic, print form and alternative formats from Lisa Cherry, HR & Equality Officer (contact details shown on page 9).

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

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

- We will make every effort to communicate widely the existence and content of our equality scheme. This may include press releases, prominent advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will advise our consultees of the link to our approved equality scheme. We will respond to requests for the equality scheme in alternative formats in a timely manner, usually with 20 working days.
- Our equality scheme is available on request in alternative formats such as Braille, large print, audio formats and in minority languages to meet the needs of those not fluent in English.
- A summary of the scheme will be prepared and circulated to Section 75 groups representing children and young people, people with disabilities and minority ethnic communities.

9.4 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme, visit our website at www.eoni.org.uk or contact Lisa Cherry, HR & Equality Officer (contact details shown on page 9)

Chapter 10 Review of our equality scheme

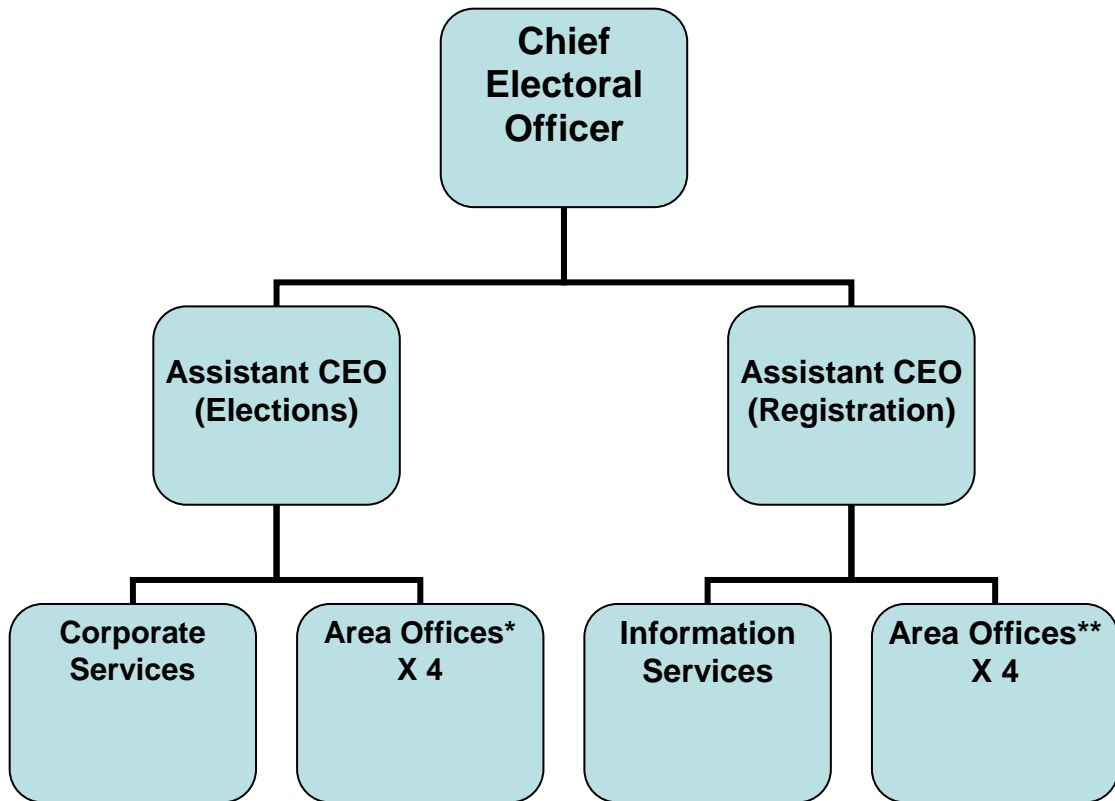
(Schedule 9 8. (3))

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

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

10.2 In undertaking this review we will follow any guidance issued by the Equality Commission. A report of this review will be published on EONI's website and sent to the Equality Commission.

Appendix 1 Organisational chart - Electoral Office for Northern Ireland



* Belfast, Ballymena, Londonderry and Newtownabbey Area Offices

** Omagh, Newtownards and Banbridge A/B Area Offices

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

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

Category	Example groups
Religious belief	Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths. For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment & Treatment (NI) Order</i> ² . 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> ”.
Political opinion ³	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.

² 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.*”

³ *ibid*

Appendix 3 List of consultees

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

POLITICAL OPINION

Alliance Party of Northern Ireland
British National Party
Community Partnership NI
Conservative & Unionist Party
Democratic Unionist Party
eirígí
Fianna Fáil – The Republican Party
Give our Children a Future Party
Green Party
Independent Republican Party
Irish Republican Socialist Party
Labour Party of NI
People Before Profit Alliance
Procapitalism
Progressive Unionist Party of Northern Ireland
SDLP (Social Democratic & Labour Party)
Sinn Féin
Socialist Party NI
The Workers Party
Traditional Unionist Voice (TUV)
UK Independence Party (UKIP)
Ulster Unionist Party
Ulster Unionist Coalition

RELIGIOUS BELIEF

Belfast Islamic Centre
Belfast Jewish Community
Bishop of Down and Connor
Church of Ireland House
Methodist Church
Presbyterian Church

RACE

An Munia Tober
NI Council for Ethnic Minorities
Chinese Welfare Association
Indian Community Centre

MARITAL STATUS

Gingerbread NI
Relate NI

DISABILITY

MENCAP
Disability Action
RNIB NI
Action on Hearing Loss
NI Association for Mental Health
Employers for Disability NI

GENDER

NI Womens Aid Federation
Womens Forum NI
NI Women's European Platform
Training for Women Network
Womens Support Network

DEPENDANTS

Youth Council for NI
Carers NI
NI Anti-Poverty Network

SEXUAL ORIENTATION

Belfast Butterfly Club
Coalition on Sexual Orientation
NI Gay Rights Association
Rainbow Project

AGE

Action for Children NI
Age NI
Office of the Commissioner
for Children & Young People
Children law Centre

STATUTORY/VOLUNTARY AGENCIES

Northern Ireland Office

Electoral Commission

Office of First Minister and Deputy First Minister
Department of Agriculture and Rural Development
Department of Culture, Arts and Leisure
Department of Education
Department of Employment & Learning
Department of Enterprise, Trade and Investment
Department of the Environment
Department of Finance and Personnel
Department of Health, Social Services and Public Safety
Department of Justice
Department for Regional Development
Department for Social Development

Council for Catholic Maintained Schools

NI Human Rights Commission

Equality Commission

Northern Ireland Public Service Alliance

UK Border Agency

Business in the Community

NIACRO

NI Council for Voluntary Action

COUNCILS

Antrim Borough Council
Ards Borough Council
Armagh City & District Council
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Belfast City Council
Carrickfergus Borough Council
Castlereagh Borough Council
Coleraine Borough Council
Cookstown Borough Council
Craigavon BC
Derry City Council;
Down District Council
Dungannon & South Tyrone Borough Council
Fermanagh District Council
Larne Borough Council
Limavady Borough Council
Lisburn City Council
Magherafelt District Council
Moyle District Council
Newry & Mourne District Council
Newtownabbey Borough Council
North Down Borough Council
Omagh District Council
Strabane District Borough

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

Measure	Lead responsibility	Timetable
Section 75 Annual Progress Report	HR & Equality Officer/ Senior Management Team	31 August (annually)
Revised Equality Scheme and Action Plan	HR & Equality Officer/CEO	6/1/12 – 31/3/2012
Submitted to Equality Commission	HR & Equality Officer	1 May 2012
Consultation list reviewed and updated	HR & Equality Officer	January(annually)
Screening timetable And Reports	HR & Equality Officer/ Policy Holder	If Policy is new or needs to be amended, screening will take place, and outcome will be published on EONI's website.
EQIA timetable and Monitoring	HR & Equality Officer / Policy Holder	In accordance with ECNI's guidance and Annual Progress Report by 31 August.
Training	HR & Equality Officer	Identified through EONI's Performance Management framework.
Assessing access to information and services	Information Officer	Monthly at Management Board meetings.
Communication of equality scheme	HR & Equality Officer	Mailings to consultees on 20/12/2011 and EONI website.
Review of equality scheme	HR & Equality Officer / SMT	Within 5 years

Appendix 5 Glossary of terms

Action plan

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

Action measures and outcomes

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

Adverse impact

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

Audit of inequalities

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

Consultation

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

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

Monitoring

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

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

Policy

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

Positive action

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

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

Qualitative data

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

Quantitative data

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

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.

Appendix 6 Action plan/action measures

	Action Point	Intended Outcome	Performance Indicator	Timescale
1.	Schools Initiative - registration visits to FE Colleges and post-primary schools with at least 10 pupils of registration age who are not registered.	Visits to at least 85% of further education colleges and at least 95% of post primary schools.	Increase in attainer registration levels.	Year 1 but target set annually on Business Plan.
2.	Building on current outreach registration initiatives: (a) Circulate flyer/information booklet to increase awareness and provide information - target blue badge holders, councils, health centres and benefits office (pilot) to include poster and forms. (b) Registration Form and information leaflet to be incorporated with payslips in Western Health Trust as a pilot exercise (c) Mobile Phone Cards/iTune vouchers (d) Target new housing developments	Target customers to increase register for example, people with disabilities, recent immigrants eg nurses, and young people.	Improve registration outreach strategy to involve further Section 75 groups. Evaluation of Health Trust Pilot.	Year 1 but this action point will be a long term strategy and will be monitored by the Management Board on a monthly basis.
3.	Commence a review of the office estate in accordance with Business Plan.	All offices to be DDA compliant.	Assessment of accessibility and locations.	To commence in Year 1.
4.	Build on customer focus groups – increase level of engagement with S75 groups .	Focus groups to have a more inclusive strategy.	Review of findings.	Year 1 and part of on-going CSE.
5.	Election Review – to consider hearing loops at polling stations, count centres/review of premises, voter information in alternative languages and to review absent vote procedures for elderly whose signatures can vary considerably eg consider targeting a specified age range to offer a postal or proxy vote and/or carers.	Improved accessibility.	Resources and Material provided.	Year 1 – part of formal Election Review project.

6.	Information Services - booklet on the Electoral Office for Northern Ireland to be Crystal Marked. Signage to be improved in HQ.	Improved clarity.	Approval.	Year 1
7.	Analyse and monitor all Section 75 data across all groups to identify potential inequalities.	Comprehensive information in relation workforce, applicants and appointees.	Improved monitoring process.	Year 1 but will be monitored and reported annually on an on-going basis for trends.
8.	Review recruitment and testing process in relation to the election staff, particularly Polling staff.	Improved representation of gender and religious balance for election staff.	Analysis of data and pool of applicants at next election.	Progress will be measured over the 3 year Scheme period.
9.	Recruitment Campaigns - Encourage interest from all Section 75 groups.	Increase applications from people with disabilities and ethnics minorities.	Adverts to contain welcoming statement.	Year 1 but ongoing as it is likely to be a long-term process.
10.	Review current processes to ensure accessibility of financial information and procedures, and to ensure EONI continue to engage with a diverse range of contract providers.	Promote equality in relation to contract for service providers and accessibility of information.	Review of findings.	It is anticipated that procedures will be reviewed by Year 2.