

Northern Ireland Fishery Harbour Authority

EQUALITY SCHEME 5 YEAR REVIEW

This report covers a review of the operation of an Equality Scheme for the period

2018-2023

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EQUALITY COMMISSION FOR NORTHERN IRELAND

Public Authority Five Year Review Report

Name of public authority (Enter details below)

Northern Ireland Fishery Harbour Authority (NIFHA)

Equality Officer name and contact details (Enter details below)

Name: Rosemary Scott

Administration Officer

N I Fishery Harbour Authority

St Patrick's Avenue

Downpatrick BT30 6DW

Tel: 028 4461 3844

Email: equality@nifha.co.uk

Executive Summary

Main conclusions in terms of:

a) To what extent has your public authority's approved scheme provided a workable basis for mainstreaming the need to promote equality of opportunity and good relations into policy making over the past five years?

The Northern Ireland Fishery Harbour Authority (NIFHA) is an executive non-departmental public body (NDPB) sponsored by the Department of Agriculture, Environment and Rural Affairs (DAERA).

It has a statutory responsibility for improving, managing and maintaining the three fishery harbours and harbour estates of Ardglass, Kilkeel, and Portavogie and for operating the facilities provided at these harbours.

The Authority was formed in 1973 under the Northern Ireland Fishery Harbour Authority Order (Northern Ireland) 1973 and the Harbours Act (NI) 1970.

NIFHA's vision is:

"Delivering safe, sustainable harbours, supporting healthy seas and thriving seafood and coastal communities."

NIFHA's mission is:

"to fulfil its statutory duties by safely, efficiently and sustainably providing a range of facilities and services which meet the needs of its customers and stakeholders."

The primary functions of the NIFHA are:

- To improve, manage and maintain the three fishery harbours and harbour estates of Ardglass, Kilkeel and Portavogie.
- to operate such facilities as may be provided at the harbours.
- to dredge and maintain the harbour berths, channels and entrances.
- to lease, dispose of or develop land vested in the Authority; and
- To construct, alter or extend any tidal work (subject to regulatory consent).

The Northern Ireland Fishery Harbour Authority (NIFHA) is primarily responsible for ensuring all onshore and marine activities within port limits are carried out safely and efficiently and harbour facilities are maintained and improved in an effective manner.

The last five years have presented challenges for NIFHA due to the impact of the pandemic on the Fishery Industry. However, during the lockdown all three ports remained open for business.

Notwithstanding the challenges NIFHA has faced over the last five years it now looks forward with optimism. In April 2021 the investment recommendations of the Fisheries and Seafood Development Programme (FSDP) were published. The recommendations in the Programme, closely align to the vision of NIFHA and include future proofing all three harbours and developing Kilkeel Harbour as a fisheries and marine hub for the Irish sea.

Mainstreaming the promotion of equality of opportunity and good relations in policy making in NIFHA, must be placed within the context of the nature of the business. A key feature of the business of NIFHA is to meet high standards of environmental protection and Health and Safety compliance. The core business of the organisation and decision -making powers relate to the effective and efficient management and development of the three Harbours. NIFHA is a small organisation with 21 staff (4 work part time) based in each of the three Harbours and Head Office in Downpatrick. There are limitations, therefore to the areas of the business where there is opportunity to mainstream equality and good relations in the decision making of NIFHA and these are in: Human Resources policy and practice; Corporate Responsibility; the physical environment of the harbours; the potential to promote equality and good relations for the wider community through partnerships with other organisations.

The commitments made in the Equality Scheme have provided a solid basis for mainstreaming equality considerations into policy review and delivery where applicable. The scheme has enabled the organisation to recognise what is proportionate and achievable in terms of the promotion of Equality and Good Relations, given its remit and scale.

Progress on meeting the commitments made in the Equality Scheme has been monitored over the last five years and reported on in accordance with the commitments in the Equality Scheme Action plan.

The following statement on Section 75 is included in the Draft Corporate Plan 2024-2028:

"NIFHA is committed to the effective implementation of Section 75 and to delivering the necessary resources in terms of people, time, and money to make sure the Equality Scheme is implemented effectively and on time".

Equality has been mainstreamed in the revised draft strategic plan 2024-2028. The future strategic plan will form the framework for implementing Section 75. Reference is also made to the promotion of equality and good relations in the values statements and strategic objectives.

Values on People

"We value our people and equality matters. We will deliver a culture of continuous improvement through teamwork and by collaborating, supporting, learning and innovating"

Strategic Outcome 4

"An inspiring, agile and innovative organisation that supports its staff and contributes to the sustainability of its coastal communities whilst enhancing equality and building capacity"

Since the period of the last five-year review, the organisation has continued to work proactively in engaging with stakeholders and exploring new options for partnership working; HR policies and procedures have been adopted in relation to Dignity at Work, Health and Well-Being and Hybrid Working and systems and processes have been adopted to implement good governance.

One of the main themes to emerge from the last Audit of inequalities and picked up in the Action Plan was the opportunity to achieve more impact in terms of promotion of Equality and Good Relations through partnership working. During the last five years a proactive approach has been taken to engaging with local communities, schools, and the Harbour User groups. Partnership working has also been enhanced through working with the local support groups, providing assistance to migrant workers, and through engaging with the local council on community initiatives. However, some activities had to be suspended during the last five years due to the restrictions imposed by the pandemic.

Changes implemented in relation to the workforce have included the implementation of HR policies and procedures to promote equality and fairness. Policies have been implemented to address the health and well-being of the workforce and to ensure the new requirements in terms of hybrid working are facilitated.

The Equality Scheme and timetable has facilitated the delivery and evaluation of timely, targeted training for all staff and Board members. A targeted programme of training has ensured that Board members and

staff have an awareness of their statutory duties and of good practice. There is evaluation of training and implementation of initiatives to reinforce roles and responsibilities, the values of the organisation and associated behaviors expected of employees.

The internal cultural change and increase in stakeholder engagement over the last five years has been driven by the Chief Executive and the Board members, their corporate vision, and values and commitment to social responsibility. The Equality Scheme has provided a useful framework for mainstreaming equality and good relations into those areas of policy and activity within the remit of NIFHA where an impact can be made.

b) What key lessons have been learnt over the past five years in terms of effectively implementing the approved equality scheme?

Through the commitment of the Board and senior management to the implementation of the Equality Scheme there has been further support for taking an integrated approach to mainstreaming equality and good relations into the aspects of the business where a positive impact can be made. Anecdotal feedback from the training sessions with Board members and staff indicates a sound acknowledgment of how they contribute to the commitments in the Equality Scheme through their respective roles.

Through empowering and engaging staff in the implementation of practical projects there is evidence in the annual progress reports to the Equality Commission of enhanced action to promote equality and good relations in the local communities. There is evidence that Section 75 has now become more meaningful and real for employees.

Mainstreaming the promotion of equality of opportunity and good relations in policy making in NIFHA must however be placed in context. This is a small organisation with 21 staff that operates in a highly regulated environment serving an industry where there are major challenges. The lessons learnt during this period are that although faced with a challenging environment, through the leadership in NIFHA the commitments in the Equality Scheme have been implemented.

Notwithstanding the challenges during the review period, the organisation has continued to ensure the Equality Scheme has been an integral part of the cultural change. Policies on Health and Well-Being at work, Dignity at Work, Menopause and on Hybrid Working have been implemented to reflect good practice in HR policies and procedures and the needs of a modern workforce.

Changing the workforce composition in an organisation of this scale; in a sector where pay rates are not competitive with the market, is problematic. Small changes in leavers and new starts can skew the actual representation of the two communities in the workforce.

Reporting on the Article 55 monitoring continues to be made to the Senior Management and Board and going forward there will be continued analysis on the impact of the affirmative action measures.

Progressive and proactive approaches to partnership working have continued with young people, women, both sections of the community and migrant workers to ensure the Fishing sector is a welcoming environment to work in. The audit of inequalities has demonstrated there is an ongoing need to continue to work in partnership with others to support greater diversity in a sector where the overall level of employment is in decline.

Through the review it has been established that more proactive screening and monitoring of the impacts of polices would provide further reassurance that the polices in NIFHA are having the desired impact on equality and good relations.

The current review has however been useful in focusing attention on what is realistic and proportionate for NIFHA going forward and on where the focus should be to better promote equality and good relations.

c) What more needs to be done to achieve outcomes for individuals from the nine equality categories?

As stated in the earlier section of the report; the regulatory environment NIFHA operates in; the demands of key stakeholders, and its scale, place limitations on the outcomes it can achieve for the individuals from the nine equality categories.

Notwithstanding the challenges facing the organisation, the Board and senior management remain committed to adopting a best-practice approach to equality and to integrating it into their governance arrangements. This will continue to be a feature of how NIFHA implements the equality duties going forward.

In terms of the workforce composition, the Article 55 reviews have demonstrated that the trend in the religious composition of the workforce reflects the changing representation of two main communities in the 2021 census. Moreover, the composition of the workforce in the harbours is reflective of the trends in the council areas in the 2021 census.

Good progress has been achieved in the representation of women in the workforce from 33% to 39%. It is worthy of note, this is a positive change in an organisation based in a traditionally male dominated industry with lower numbers of applicants available with specialist skills. The organisation will continue to engage in affirmative action measures to promote NIFHA as an organisation that welcomes applicants from underrepresented section 75 groups.

Monitoring of HR polices will remain to ensure we continue to raise interest from potential female employees going forward.

The investment in the Health and Well-Being of the workforce will continue as well as monitoring of the impact on those with a disability and older workers.

Through the changes made on community engagement there has been considerable progress in the level of community outreach and engagement. Positive anecdotal feedback has been received from groups representing young people and ethnic minority communities on the outreach work.

Positive initiatives are reported in the Annual Progress Report to the Equality Commission on support for migrant workers through collaboration with the Fisherman's Mission. There are plans to continue to support this initiative and to review the impacts in terms of migrant workers.

While NIFHA has been very successful in recruiting and appointing women in this industry, the audit of inequalities identified there is a recognition in Northern Ireland and in other jurisdictions that more needs to be done to encourage participation and support for females that wish to take up a career in the fishing industry. This will become an area to be explored further for some of the partnership initiatives with others in the future.

Generally going forward greater focus needs to be given to capturing data on the outcomes for targeted Section 75 groups through the outreach measures. It is however noted that it can be problematic measuring actual impact of outreach community work on specific 75 groups.

1. A general introductory statement specifying the purpose of the scheme and the public authority's commitment to the statutory duties.

The NIFHA equality scheme has been used to ensure the organisation has where appropriate fulfilled its duties in terms of Section 75(1) and (2) i.e. the duties to have:

- due regard to the need to promote equality of opportunity and
- regard to the desirability of good relations

Leadership commitment to the promotion of Equality and Good Relations has been championed by the Chief Executive and the Board members, who have taken a keen interest in the activities the organisation has engaged in regarding Section 75. The Equality Scheme has provided a solid framework structuring Section 75 activities at Board and operational level.

The Corporate Plan values and objectives contain a commitment to corporate responsibility and Section 75 and this commitment is cascaded throughout the organisation in the operational plan.

A summary of the annual review is produced and circulated to the Board members for consideration. The senior management and the Board review the actions agreed and progress in implementing actions.

NIFHA has made significant progress over the past five years in terms of community outreach. There has been increased interaction with young people, through the school's programme. Beach cleans have involved children, community groups, and people from the areas local to the harbours. Community festivals are facilitated and supported. Through their partnerships with stakeholders, support has been enhanced for migrant workers, local community organisations and partners involved in promoting good relations in the areas where the harbours are located.

1a) To what extent were senior management involved in ensuring scheme compliance over the 5-year period and what further steps could be undertaken to ensure effective internal arrangements?

The senior management and Board have supported the adoption of proactive HR policies and practices and the outreach work NIFHA has engaged in, the CEO also gave his direct support by attending the schools and assisting with their visits to the harbours. During the period of the review, equality has been mainstreamed into the strategic planning and reporting processes for the new corporate plan.

Under the organisation's governance arrangements senior level accountability for equality and good relations has been allocated to the Chief Executive who is accountable for the delivery of all processes and procedures including section 75.

Management ensure that all staff are aware of their responsibilities in relation to equality and good relations by ensuring they attend induction training and ongoing refresher training in this regard.

Having taken cognizance of the findings in the review, good practice recommendations and the comments of the senior management it is proposed that going forward further consideration is given to the following:

- Adopting a clear process for tracking new and revised polices and that screening of relevant policies is reported on;
- Ensuring that the "due regard" duty is fully incorporated into the screening methodology;
- Ensuring there is a clear understanding that the Section 75 duties are regarded as continuous, and that screening should be revisited if new evidence or information requires it.
- Continued work on effective monitoring systems to provide accurate and useful information on the impact of policies.

1b) Outline annual direct expenditure of resources to ensure that the statutory duties were complied with, in terms of staff and money over the past 5 years, and comment on the extent that all necessary resources were allocated.

NIFHA has resourced the implementation of Section 75 over the last five years by dedicating a proportion of the Chief Executive's time and an Administration Officer's role to Equality and Good Relations. The Chief Executive provides the strategic overview on Equality and Diversity and advises the Board and Management on policy and practice in this regard. The Chief Executive is supported by the Administration Officer who collates and reports on all the Section 75 data and engages in outreach activities.

A strategic decision was taken by NIFHA not to employ a full-time equality officer due to the scale of the organisation and limited resources to fund a post of this nature. The internal resource is supported through using an external advisory resource as and when required.

Due to the mainstreaming of Equality and Diversity within the organisation it is the responsibility of each manager. The Chief Executive and

Administration Officer provide an advisory and support role to the managers who are responsible for the day-to-day implementation of the Equality Scheme.

During the review period NIFHA committed £9,600 in direct costs which include external consultancy fees and internal staff costs.

It excludes the direct spend on community outreach activities and programmes and does not include 15% staff time and 20% of the Environmental Officer's commitment to schools and beach cleans.

2. An outline of how the public authority intends to assess its compliance with the Section 75 duties and for consulting on matters to which a duty under that section is likely to be relevant.

Through the process of change that has taken place in the organisation a cultural shift has taken place. The staff have been empowered through changed management practices and policies to become more engaged in the delivery of an enhanced range of activities. NIFHA has become a more outwardly focused organisation that engages proactively with a wide range of stakeholders across the nine Section 75 groups.

Religion

The Article 55 Reviews over the last five years demonstrate the workforce is now more reflective of the community background for Northern Ireland as reported in the 2021 NISRA census. In the census for 2021 there was a decrease in the percentage of people identifying from the Protestant community. Census statistics 2021 indicate (44%) stated they were Protestant (46%) Catholic, other Christian Religions (1%) and (9%) none. In the NIFHA Article 55 Review 2020-22 (52%) of the workforce are Protestant (43%) Catholic. Meanwhile, in the Harbours the workforce is reflective of the council areas.

Affirmative action measures have been implemented and ongoing monitoring and reporting on the workforce composition. In the Article 55 Reviews it is noted that the applicants tend to be reflective of the local council areas where the offices are located. Monitoring will be continued to ensure there is fair participation in recruitment and selection.

Section 75 training delivered in 2021 for the Harbours and Head Office staff demonstrated an interest in and understanding of the requirement to promote equality of opportunity, good relations at work and in dealings with external stakeholders.

In the audit of inequalities reference is made to the Good Relations Indicators Report (2020) and to the fact that 85% of those surveyed stated their neighborhood was a place they could be open about cultural identity, while fewer said this about their workforce. Continued evaluation of Section 75 training and awareness sessions, and assessment of promotion of good relations in the workplace will be implemented in the future.

Through events sponsored by NIFHA, schools from both the main communities and young people from areas of social deprivation are invited to participate in educational activities. There has been a marked increase year on year (excluding during the pandemic) in the cross-community activities with schools and community organisations. It is noted in the audit of inequalities, reporting to date (included in the Annual Review Report) is mainly on activities supported, as opposed to outcomes achieved, this is something to be addressed in the future.

Political Opinion

As above

Race

In the audit of inequalities reference is made to the statistics in the DAERA audit of Inequalities (2021-2025) on the significant number of migrant workers in the fishing industry living in rural areas in Northern Ireland.

In the NIFHA Annual Progress Review Reports to the Equality Commission reference has been made to the support and assistance provided to the migrant workers in the Harbours, through co-operation with the Fisherman's Mission and supporting staff in volunteer activities. Enhanced welfare facilities have also been provided at Ardglass Harbour.

It is proposed in the audit of inequalities, that the staff activities in promoting equality for migrant workers continues to be supported by NIFHA and information is collected on the impact of the initiatives in promoting equality and opportunity, and good relations.

Section 75 training delivered in 2021 for the HQ staff and Harbours demonstrated an interest in and understanding of the requirement to promote equality of opportunity, good relations at work and in dealings with external stakeholders.

Disability

Actions in the Annual Review Reports to the Equality Commission over the last five years reflect the actions that have been taken by the organisation to promote equality of opportunity for people with disabilities such as: upgrades to Head Office building and Harbours to improve accessibility for staff and members of the public.

Training has also been provided to raise awareness of the needs of people with disabilities and on mental health issues specifically. Employees are now better equipped to assist stakeholders and members of the public with disabilities.

Management of Occupational Health and Well-Being training has been provided to two employees enabling them to better understand issues in relation to employee mental health for the workforce and customers.

Through consultation with employees, it was established that supporting the mental health of staff is important. Investment has been made by the organisation in training and external support for mental health. The organisation has also signed up to The Mental Health Charter and provides access to an Employment Assistance Programme 24/7.

Section 75 training delivered in 2021 for the Head Office and Harbour staff demonstrated an interest in and understanding of the requirement to promote equality of opportunity, good relations at work and in dealings with external stakeholders.

In the audit of inequalities consideration has been given to the Equality Commission guidance on good practice in the development and monitoring of the implementation of Disability Action Plans and to the need to more focused outcome reporting.

Age

The enhanced community outreach measures include increased interaction with young people through the School's Programme "Happy Harbours" and beach clean-ups. The actions taken by NIFHA in relation to young people are in accordance with the recommendation of providing opportunities for educational activities with young people in the "Children and Young People's Strategy".

Reasonable adjustments due to age-related illnesses have been put in place for some employees due to the nature of the work being carried out at the harbours.

Community initiatives include participation from older people in the area.

Gender

Over the period of the review a range of HR polices have been implemented to support women in the workforce and to attract more women to consider careers with NIFHA. The overall representation of women in the workforce has increased during the period of the review from 33% to 39%. It is also worth noting this increase was in posts traditionally held by males.

A review of salaries and gender pay audit has been completed.

In the DAERA audit of inequalities 2021-25 there is a recognition that

more could be done to encourage female participation in the workforce and the industry where they are underrepresented. In Scotland Fisheries Management Strategy 2020-23 it is stated the role of women in the industry is significant but often unappreciated. The case is made for the fishing industry to create better conditions for women working in or considering working in the sector. Through information provided during NIFHA's school's programme, participants are encouraged to consider a career at the harbours or in fishing-related industries.

Sexual Orientation

In completing the review, the findings of the ECNI on Promoting Positive Attitudes to LGBTQ+ People in Northern Ireland and Stonewall research (2018) was considered.

In the NIFHA Annual Progress Review Report (2021) reference is made to the Dignity at Work training undertaken for Board members and staff.

Positive impacts and outcomes have been achieved during the period of the review for young people, for women, for people from ethnic minority communities and for people with disabilities. Going forward enhanced feedback from our workforce will be gathered on the actual impacts for these Section 75 groups.

2b) Outline the number of equality scheme related consultation exercises undertaken by your authority over the past five years. Set out the number and percentage related to screening exercises and to EQIAs and indicate the extent that your scheme helped you to engage with external stakeholders.

Measures to consult with stakeholders have included: a stakeholder advisory forum; the Harbour Users Meetings; consultations with groups representing migrant workers; use of social media and customer satisfaction survey.

No Equality Scheme related consultation exercises have been undertaken over the period in relation to screening or EQIA. It is proposed going forward to consider how NIFHA could integrate consultation on Section 75 into the consultation exercises they currently engage in.

2c) Indicate if your list of consultees was amended during the 5-year period and what further steps could be taken to develop your level of engagement and consultation?

Equality Consultation List

NIFHA has reviewed the list of consultees annually over the last five years and has removed those consultees who have indicated they do not wish

to remain on the list. New consultees have been added that are reflective of the business NIFHA is engaged in and key stakeholders.

The experiences of equality consultation demonstrate that both the organisation and consultees would benefit in considering how to integrate equality into internal and external communication and outreach activities rather than conduct stand-alone exercises.

Through the community outreach activities, NIFHA has established strong links with individuals and organisations represented in the following Section 75 Groups: young people, women, cross-community groups; groups representing non-nationals.

2d) To what extent did your authority consult directly with directly affected individuals as well as with representative groups, particularly in relation to young people and those with learning disabilities, and was this sufficient?

During COVID all outreach programmes were paused and due to reduced resources, NIFHA focused on sustaining day-to-day activities.

In seeking the views of young people, NIFHA has engaged with a range of groups representing young people. Moreover, through their Facebook page, the updated website and extensive volunteering activities, engagement with young people has been increased.

Consultation with people with learning disabilities is continuous due to employee needs and also through people on work experience.

3. The authority's arrangements for assessing and consulting *on* the impact of policies adopted or proposed to be adopted on the promotion of equality of opportunity.

There were no policies screened during the review period. However, training has now taken place on screening and a schedule of policies to be screened has been drawn up

Table 2: Policies Screened over the last five years

Year	2012/13	2013/14	2014/15	2016/17
Total No. of policies				
Screening Decision Out				
Screening Decision In	0 (0%)	0 (0%)	0 (0%)	0 (0%)

3b) To what extent did your authority's consideration of the screening criteria not identify equal opportunity implications on any of s75 categories, but for which consultees then highlighted problems?

N/A

3c) Outline over the past five years how many EQIAs your authority commenced as a result of i) initial screening and ii) as a result of screening new/revised policies subsequently and discuss the extent that your authority has become more effective at identifying equality of opportunity dimensions in its policies.

N/A

3d) Outline over the past five-year period the percentage of your authority's initial EQIA timetable that reached i) stage 6 of the EQIA process i.e. decision making, and ii) stage 7 of the EQIA process i.e. annual monitoring & publication of results and indicate the extent that your authority has become more effective at progressing EQIAs.

N/A

- 4. The authority's arrangements for monitoring any adverse impact of policies adopted by the authority on the promotion of equality of opportunity.
- 4a) To what extent were sufficient arrangements put in place to collect data relating to the nine equality categories to monitor the impact of policies and what could your authority do in future to develop monitoring arrangements?

Monitoring of the workforce is implemented in terms of gender, religion, disability, marital status, age and race.

Information in relation to the section 75 groups that are supported through the community engagement activities is reviewed.

- 5. The authority's arrangements for publishing the results of equality impact assessments and of monitoring any adverse impact of policies adopted by the authority on the promotion of equality of opportunity.
- 5a) Indicate the number of reports published outlining the results of EQIAs and monitoring over the past five years, and outline what your authority could do in future in relation to improving the publication of EQIA results and monitoring.

N/A

- 6. A commitment that in making any decision with respect to a policy adopted or proposed to be adopted by it that the public authority shall take into account any equality impact assessment and consultation carried out in relation to the policy.
- 6a) In terms of the number of EQIAs that reached stage 6 i.e. decision making, to what extent were mitigation measures and alternative policies adopted?

N/A

6b) To what extent did consideration of EQIAs and consultations contribute to a change in policy, as opposed to policy decisions which would probably have been made in any event by your authority?

N/A

- 7. The authority's arrangements for training staff on issues relevant to the duties.
- 7a) To what extent were sufficient arrangements put in place to develop and deliver a training programme in accordance with scheme commitments?

NIFHA has implemented a practical and proportionate training plan over the last five years. The training plan was informed by an evaluation of Section 75 training that was undertaken as one of the actions in the action plan developed arising from the initial Equality Scheme.

The training provided has included:

- Refresher training on Section 75 and Dignity at Work for all employees
- Equality and Disability Awareness Training for new starts
- Disability Equality Training for frontline staff in the Harbours
- Briefing for the Board members on Section 75
- Management of Occupational Health and Well-Being to IOSH standard
- Mental Health Awareness for Line Managers
- Supervising First Aid for Mental Health
- Personal Resilience
- Screening training
- Recruiting Fairly
- Retirement planning
- Gender Equality
- Promoting Equality for Employees with Mental ill Health
- Promoting Health & Wellbeing in the Workplace

Section 75 training delivered in 2021 for the Head Office and Harbour employees demonstrated an interest in and understanding of the requirement to promote equality of opportunity, good relations at work and in dealings with external stakeholders.

7b) Have all staff received awareness training and what could your authority do in future to deliver an effective training programme?

All staff have received awareness training, ensuring that the activities and achievements in relation to Section 75 are communicated to all employees and Board Members.

- 8. The authority's arrangements for ensuring and assessing public access to information and to services provided by the authority.
- 8a) To what extent were sufficient arrangements put in place to ensure and assess public access to information and to services provided by the authority?

NIFHA has become a much more open, accessible and responsive organisation as evidenced in the values in the corporate plan.

Customer Focus

"We will deliver an excellent customer service through listening, engaging and being a doing organisation".

NIFHA is guided in any consultation undertaken in relation to Section 75 by the Equality Commission guidance on good practice on consultation.

Alternative Formats

NIFHA has included a statement in all Section 75 documents indicating the documents can be produced in alternative formats on request. However, to date no such requests have been received.

NIFHA Website

The NIFHA website has been redesigned to enhance the content and accessibility.

- 9. The authority's timetable for measures proposed in the scheme.
- 9a) Outline the extent to which measures set out in the original timetable have been implemented. Any detailed information should be included as an appendix to the report.

NIFHA's commitment to providing an Annual Report to the Equality Commission, continuing training and communication on the Equality Scheme commitments have all been met.

9b) If your authority was to be reconstituted in the next five years what would be the main scheme actions/equality considerations that an incoming authority should address? Any detailed information should be included as an appendix to the report.

Not applicable.

10.Details of how the scheme will be published.

10a) Were scheme commitments in this section delivered and what evidence supports this view?

Commitments on how the scheme would be published were met.

A summary of the scheme in an easy read format was produced.

Notification of the draft and final version of the scheme were issued to all consultees on the consultation list and targeted consultation was undertaken.

The scheme was made available to consultees on the website.

The Equality Scheme is available to the public on the NIFHA website and will continue to be placed on the site.

- 11. The authority's arrangements for dealing with complaints arising from a failure to comply with the scheme.
- 11a) Outline the number and nature of complaints received by your authority, and what your authority could do in future to develop its complaints handling process and learn from complaints.

The NIFHA scheme sets out the procedure for investigating any complaints regarding Section 75 duties. No complaints were lodged under the NIFHA Equality Scheme during the five-year period.

- 12.A commitment to conducting a review of the scheme within five years of its submission to the Equality Commission and to forwarding a report of this review to the Equality Commission.
- 12a) What has been your authority's experience of conducting this review? To what extent has the Commission's guidance been useful in undertaking the review?

The review has helped us to take stock of achievements to date, to benchmark our activities and to reflect on where the organisation can improve upon section 75 activities going forward.