

Equality scheme for Belfast Harbour Commissioners

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

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

Belfast Harbour Commissioners Harbour Office Corporation Square Belfast BT1 3AL
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Approved by the Equality Commission for Northern Ireland on 27 February
2013

Foreword

We are pleased to present the new Equality Scheme for Belfast Harbour Commissioners (BHC). The Equality Scheme sets out how BHC propose to fulfil the Section 75 statutory duties.

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

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

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

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

The Chairman and Chief Executive of Belfast Harbour Commissioners, are fully committed to effectively fulfilling our Section 75 statutory duties across all our functions (including service provision, employment and procurement) through the effective implementation of our equality scheme.

We realise the important role that the community and voluntary sector and the general public have to play to ensure the Section 75 statutory duties are effectively implemented. Our equality scheme demonstrates how determined we are to ensure there are opportunities, for people affected by our work, to positively influence how we carry out our functions in line with our Section 75

¹ See section 1.1 of our Equality Scheme.

statutory duties. It also offers the means whereby persons directly affected by what they consider to be a failure, on our part, to comply with our equality scheme, can make complaints.

On behalf of Belfast Harbour Commissioners and our staff we are pleased to support and endorse this equality scheme which has been drawn up in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998 and Equality Commission guidelines.



Dr. Leonard O'Hagan C.B.E.
Chairman
Belfast Harbour
Commissioners



Mr. Roy Adair
Chief Executive
Belfast Harbour
Commissioners

30 October 2012

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Chapter 1 Introduction

Section 75 of the Northern Ireland Act 1998

1.1 Section 75 of the Northern Ireland Act 1998 (the Act) requires Belfast Harbour Commissioners 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 authority². This includes our employment and procurement functions. Please see below under “Who we are and what we do” for a detailed explanation of our functions.

How we propose to fulfil the Section 75 duties in relation to the relevant functions of Belfast Harbour Commissioners.

1.2 Schedule 9 4. (1) of the Act requires Belfast Harbour Commissioners 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.

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

1.3 Belfast Harbour Commissioners are committed to the discharge of our Section 75 obligations in all parts of our organisation and we will commit the necessary 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

Belfast Harbour is a Trust Port; as such its operational remit is governed by Statute and operates on a commercial basis. BHC's purpose outlined in its corporate plan 2011-2013 www.belfast-harbour.co.uk is to support and develop the regional economy by the operation of the Port, growth of Port capacity and development of the Harbour Estate.

Our Vision is to be a world class Port offering leading- edge marine and estate facilities, thereby enabling the economic development of Northern Ireland.

We recognise that the values held by the organisation guide the decision making process at all levels. The values stated below, therefore, are employed to validate behaviours and decisions throughout the business.

- Safety - provide a safe environment for everyone using Belfast Harbour;
- Environmental Sustainability - seek to reduce the impact we have on our natural environment;
- Service to Society - make a difference to our local and regional communities;
- Integrity - mean what we say and say what we mean;
- Respect/Equality - treat everyone as a valued customer;
- Teamwork - co-operate to achieve the best outcomes;
- People - develop the business environment to make Belfast Harbour a rewarding place to work.

Our functions are as follows:

- Commercial
 - Business Development
 - Port Engineering
 - Warehousing & Port Land

- Property
 - Estate Tenants
 - Titanic Quarter
 - Urban Regeneration
- Marketing
- Operations
 - Harbour Master's Dept
 - Harbour Police
 - Support Services
 - Environmental Health & Safety
- Human Resources
- Finance
 - Financial Management
 - Corporate Services

Procurement

BHC has undertaken an EQIA of its procurement policy and carries out its procurement activities in accordance with the good practice in procurement recommended by the Equality Commission and the CPD.

Staff

At 1 April 2012 BHC employed a total of 121. BHC is committed to discharging its equality obligations across all aspects of its employment functions.

An organisational chart is included in Appendix one.

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, monitoring arrangements (Chapter 4 page 18), assessment of impact of policies arrangements (Chapter 4, page 21), consultation (Chapter 3, page13), publication (Chapter 9, page 32), complaints (Chapter 8, page 31)etc.

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 Primary Responsibility for the effective implementation of our equality scheme lies at Board level with the Chief Executive. The Chief Executive is accountable to the Board for the development, implementation, maintenance and review of the equality scheme in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998, including any good practice or guidance that has been or may be issued by the Equality Commission.

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

Address: Harbour Office, Corporation Square, Belfast, BT1 3AL

Email address: equalityofficer@belfast-harbour.co.uk

Telephone Number: 02890 554422

Textphone Number: 02890 322013

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

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 BHC 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 (read our Annual Equality Progress Reports).

BHC's 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 see link below or by contacting us.

<https://www.belfast-harbour.co.uk/equality>

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: equalityofficer@belfast-harbour.co.uk

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

2.10 Due to the nature of BHC's business model there are limitations in terms of how the organisation can enhance the promotion of equality and good relations. However, notwithstanding the nature of the functions undertaken by BHC, equality and good relations obligations are mainstreamed across the organisation through the implementation of the corporate

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

values and objectives. Through the development and implementation of the Corporate Social Responsibility Strategy BHC has taken a proactive and innovative approach to promoting equality and good relations in their internal and external functions. BHC has integrated the promotion of Statutory Duties into their arrangements for Governance and the Commissioners have a strategic role in monitoring the performance of the organisation in this regard.

All Directors and senior managers have been trained in Section 75 and are responsible for ensuring that the Section 75 statutory duties are taken fully into account in developing, reviewing and implementing policy decisions across their business remit.

Day-to-day responsibility for overseeing the Equality Agenda and monitoring compliance across BHC lies with the Human Resources Section which reports directly to the Chief Executive. The Human Resources Manager is a member of the Senior Management Team and forms part of the weekly senior management team agenda.

Action plan/action measures

2.11 BHC 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.

2.12 The action measures that will make up our action plan are relevant to our functions. They have been developed and prioritised on the basis of the audit of inequalities. The audit of inequalities collates and analyses information across the Section 75 categories⁴ to identify the inequalities that exist for our service users and those affected by our policies⁵.

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

⁴ See section 1.1 of this equality scheme for a list of these categories.

⁵ See section 4.1 of this equality scheme for a definition of policies.

2.14 We will develop any action plans for a period of between one and five years in order to align them with our corporate and business planning cycles. Implementation of the action measures will be incorporated into our business planning process.

2.15 We will seek input from our stakeholders and consult on our action plan before we send it to the Equality Commission and thereafter when reviewing the plan as per 2.16 below.

2.16 We will monitor our progress on the delivery of our action measures annually and update the action plan as necessary to ensure that it remains effective and relevant to our functions and work.

2.17 BHC 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.

2.18 Once finalised, our action plan will be available:

On the BHC website, <https://www.belfast-harbour.co.uk/equality> or by contacting us:

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: equalityofficer@belfast-harbour.co.uk

We will also bring it to the attention of all our consultees.

Our progress on our Audit of Inequalities Action Plan targets will be reported in our Section 75 Annual Progress Report to the Equality Commission.

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. We will also consult on our Audit of Inequalities and its accompanying Action Plan.

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 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.

BHC will monitor its approach to consultation, to ensure that it is open and encourages participation; and that it continues to reach out to representative groups and to those individuals directly affected by the matter / policy.

Initially consultees (see Appendix 3), will as a matter of course be notified (by email or post) of the matter/policy being consulted upon to ensure they are aware of up and coming consultations.

However, we realise that many of our consultees may / may not wish to be contacted about all of BHC's up-coming consultation exercises. Thereafter, to ensure the most effective use of our and our consultees' resources, we will take a targeted approach to consultation for those consultees that may have a particular

interest in the matter/policy being consulted upon and to whom the matter/policy is of particular relevance. This may include for example regional or local consultations, sectoral or thematic consultation etc.

3.2.2 Consultation with all stakeholders will begin as early as possible. We will engage with affected individuals and representative groups to identify how best to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these. Methods of consultation could include:

- Face-to-face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email with an opportunity to opt in/opt out of the consultation
- Internet discussions or
- Telephone consultations.

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

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

BHC is committed to achieving effective communication with its customers and with the public. We will ensure that we provide a wide range of accessible communication channels to suit the needs of our customers, and we will also take action to promote the availability of our accessible services too. Where it is requested we will make our information services accessible through a range of different formats where it is required, and will

seek feedback from our customers and as appropriate, review and enhance our service provision. Particular care will be taken to ensure that we take account of the specific communication needs of people with disabilities, older people and children and young people.

BHC has developed a user friendly website for children- webstersays.com –which promotes the activities of the Harbour in schools across Northern Ireland.

Information will be made available, in a timely fashion, (normally within 28 days) and in accessible formats in consultation with the affected groups.

3.2.4 Training will be given to staff engaged in consultation exercises to ensure they have the necessary skills to communicate effectively with those being consulted.

3.2.5 To ensure effective consultation with consultees⁶ on Section 75 matters, we will develop a programme of awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by undertaking the following:

- Meeting on a face to face or telephone basis with consultees
- Attending events organised by consultees to respond on section 75 matters
- Facilitating any requests received for meetings

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 commitments⁷.

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

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

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

3.2.7 If a consultation exercise is to take place over a period when consultees are less able to respond, for example, over the summer or Christmas break, or if the policy under consideration is particularly complex, we will give consideration to the feasibility of allowing a longer period for the consultation.

3.2.8 We are conscious of the fact that affected individuals and representative groups may have different needs. We will take appropriate measures to ensure full participation in any meetings that are held. We will consider for example the time of day, the appropriateness of the venue, in particular whether it can be accessed by those with disabilities, how the meeting is to be conducted, the use of appropriate language, whether a signer and/or interpreter is necessary, and whether the provision of childcare and support for other carers is required.

3.2.9 We make all relevant information available to consultees in appropriate formats to ensure meaningful consultation. This includes detailed information on the policy proposal being consulted upon and any relevant quantitative and qualitative data.

3.2.10 In making any decision with respect to a policy adopted or proposed to be adopted, we take into account any assessment and consultation carried out in relation to the policy.

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

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

<https://www.belfast-harbour.co.uk/equality>

or by contacting

Patricia Toolan

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: equalityofficer@belfast-harbour.co.uk

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 Patricia Toolan, equalityofficer@belfast-harbour.co.uk, to provide your contact details and have your areas of interest noted or have your name/details removed or amended. Please also inform us at this stage if you would like information sent to you in a particular format or language.

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

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

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

4.1 In the context of Section 75, 'policy' is very broadly defined and it covers all the ways in which we carry out or propose to carry out our functions in relation to Northern Ireland. In respect of this equality scheme, the term policy is used for any (proposed/amended/existing) strategy, policy initiative or practice and/or decision, whether written or unwritten and irrespective of the label given to it, 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 BHC uses the tools of **screening** and **equality impact assessment** to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will also follow Equality Commission guidance:

- the guidance on screening, including the screening template, as detailed in the Commission's guidance '*Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)*' and
- on undertaking an equality impact assessment as detailed in the Commission's guidance '*Practical guidance on equality impact assessment (February 2005)*'.

Screening

4.4 The purpose of screening is to identify those policies that are likely to have an impact on equality of opportunity and/or good relations.

4.5 Screening is completed at the earliest opportunity in the policy development/review process. Policies which we propose to adopt will be subject to screening prior to implementation. For more detailed strategies or policies that are to be put in place through a series of stages, we will screen at various stages during implementation.

4.6 The lead role in the screening of a policy is taken by the policy decision maker who has the authority to make changes to that policy. However, screening will also involve other relevant team members, for example, equality specialists, those who implement the policy and staff members from other relevant work areas. Where possible we will include key stakeholders in the screening process.

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

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

4.8 In order to answer the screening questions, we gather all relevant information and data, both qualitative and quantitative. In taking this evidence into account we consider the different needs,

experiences and priorities for each of the Section 75 equality categories. Any screening decision will be informed by this evidence.

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

1. the policy has been 'screened in' for equality impact assessment
2. the policy has been 'screened out' with mitigation⁸ 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 BHC.

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 subject the policy to an equality impact assessment. This screening decision will be 'signed off' by the appropriate policy lead within BHC.

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

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

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 BHC.

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 request by contacting:

Patricia Toolan

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: equalityofficer@belfast-harbour.co.uk

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

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

Equality impact assessment

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

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

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

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

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

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

What we publish

4.20 These are published quarterly on the BHC website. Our screening reports will include:

- Details of policies screened by BHC over the three month period
- A short statement about the aim(s) of each of the specific policy / policies which have been screened
- Details of the consideration given to measures which might mitigate any adverse impact
- Details of the consideration given to alternative policies which might better achieve the promotion of equality of opportunity;
- Details about each screening assessment made, i.e:
 - whether the policy has been 'screened in' for equality impact assessment
 - whether the policy has been 'screened out' with mitigation or an alternative policy proposed to be adopted
 - whether the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

- Where applicable, a timetable for conducting equality impact assessments
- A weblink to each of the completed screening form(s).

4.21 Screening templates

For details on the availability of our screening templates please refer to 4.13.

4.22 Equality impact assessments

EQIA reports are published once the impact assessment has been completed. These reports include:

- A statement of the aim of the policy assessed
- Information and data collected
- Details of the assessment of impact(s)
- Consideration given to measures which might mitigate any adverse impact
- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity
- Consultation responses
- The decision taken
- Future monitoring plans.

How we publish the information

4.23 All information we publish is accessible and can be made available in alternative formats on request. Please see 6.3 below.

Where we publish the information

4.24 The results of our assessments (screening reports and completed templates, the results of equality impact assessments) are available on our website

<https://www.belfast-harbour.co.uk/equality>

or by contacting:

Patricia Toolan
Telephone Number: 02890 554422
Textphone Number: 02890 322013
Email address: equalityofficer@belfast-harbour.co.uk

4.25 In addition to the above, our screening reports (which set out details about the policies we have screened over a 3 month period) are sent out by email link to our consultees on a quarterly basis. Hard copies of our screening reports can also be made available, on request.

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

Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity
(Schedule 9 4. (2) (c))

4.27 Monitoring can assist us to deliver better public services and continuous improvements. Monitoring Section 75 information involves the processing of sensitive personal data (data relating to the racial or ethnic origin of individuals, sexual orientation, political opinion, religious belief, etc). In order to carry out monitoring in a confidential and effective manner, the BHC follows guidance from the Office of the Information Commissioner and the Equality Commission.

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

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

- The collection, collation and analysis of existing relevant quantitative and qualitative data across all nine equality categories on an ongoing basis

- An audit of existing information systems within one year of approval of this equality scheme, to identify the extent of current monitoring and take action to address any gaps in order to have the necessary information on which to base decisions
- Undertaking or commissioning new data if necessary.

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

4.31 We review our EQIA monitoring information on an annual basis.

- Human Resources staff and where necessary external specialist assistance is used to provide guidance to business areas on the completion of equality impact assessments and arrangements to undertake appropriate equality monitoring;
- Our Section 75 Annual Progress Report to the Equality Commission includes an update on the equality monitoring actions we have undertaken and the outcomes from this action;
- Section 75 complaints are regularly monitored to ensure satisfaction with services is maintained and that any issues raised by stakeholders are addressed promptly and satisfactorily.

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 Our consultees will be advised by email when our Annual Progress report is published. Hard copies can be made available on request.

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

Chapter 5 Staff training

(Schedule 9 4.(2) (e))

Commitment to staff training

5.1 We recognise that awareness raising and training play a crucial role in the effective implementation of our Section 75 duties.

5.2 Our Chief Executive wishes to positively communicate the commitment of the BHC 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 BHC will draw up a detailed training plan for its staff which will aim to achieve the following objectives:

- to raise awareness of the provisions of Section 75 of the Northern Ireland Act 1998, our equality scheme commitments and the particular issues likely to affect people across the range of Section 75 categories, to ensure that our staff fully understand their role in implementing the scheme
- to provide those staff involved in the assessment of policies (screening and EQIA) with the necessary skills and knowledge to do this work effectively
- to provide those staff who deal with complaints in relation to compliance with our equality scheme with the necessary skills and knowledge to investigate and monitor complaints effectively
- to provide those staff involved in consultation processes with the necessary skills and knowledge to do this work effectively
- to provide those staff involved in the implementation and monitoring of the effective implementation of the BHC equality scheme with the necessary skills and knowledge to do this work effectively.

Awareness raising and training arrangements

5.4 The following arrangements are in place to ensure all our staff and the Commissioners 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 BHC will receive a briefing on this equality scheme within three months after the approval of the Scheme.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within the BHC 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.
- Management has received training on Diversity Awareness.
- The frontline employees and BHC Police have received training on Disability Equality. The training on Disability Equality has also been provided for contractors used by BHC. The further roll out of this training is also planned.
- Dignity at work and Diversity Awareness training have been provided for the BHC Police.
- All managers in BHC have been briefed on the New Guidance in relation to Section 75 of the Northern Ireland Act and information is to be provided for the Commissioners at appropriate intervals.
- Management has been briefed on the new arrangements in relation to screening.

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

Monitoring and evaluation

5.6 Our training programme is subject to the following monitoring and evaluation arrangements:

- We evaluate the extent to which all participants in this training programme have acquired the necessary skills and knowledge to achieve each of the above objectives.
- The extent to which training objectives have been met will be reported on as part of the Section 75 annual progress report, which will be sent to the Equality Commission.

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

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

6.1 BHC 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.

The BHC 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.

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

Access to services

6.5 BHC are committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories. BHC's purpose is to operate and maintain the Port, develop Port capacity and the Harbour Estate, so supporting the development of the regional economy.

BHC also adheres to the relevant provisions of current anti-discrimination legislation.

Assessing public access to information and services

6.6 BHC monitors annually across all its functions, in relation to access to information and services, to ensure equality of opportunity and good relations are promoted.

6.7 BHC monitors progress on a number of key areas including any Section 75 complaints and issues raised in relation to access to BHC information and services.

6.8 Accessibility of our information and services is also reviewed periodically through feedback and monitoring arrangements.

Chapter 7 Timetable for measures we propose in this equality scheme

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

- 7.1 Appendix 4 outlines our timetable for all measures proposed within this equality scheme. The measures outlined in this timetable will be incorporated into our business planning processes.
- 7.2 This timetable is different from and in addition to our commitment to developing action plans/action measures to specifically address inequalities and further promote equality of opportunity and good relations. We have included in our equality scheme a commitment to develop an action plan. Accordingly, this commitment is listed in the timetable of measures at Appendix 4. For information on these action measures please see above at 2.11 – 2.18.

Chapter 8 Our complaints procedure

(Schedule 9 10.)

8.1 BHC are responsive to the views of members of the public. We will endeavour to resolve all complaints made to us.

8.2 Schedule 9 paragraph 10 of the Act refers to complaints. A person can make a complaint to a 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 BHC has failed to comply with its approved equality scheme should contact:

Patricia Toolan

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: equalityofficer@belfast-harbour.co.uk

8.4 A complaint perceived to be of a minor nature will be dealt with and a response given within five working days. A complaint perceived to be of a more serious nature will be acknowledged within five working days and if the investigation is likely to be protracted an intended response date will be given. This will not normally be more than two months

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

Similarly, the BHC 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 BHC 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 BHC equality scheme is available free of charge in print form and alternative formats from:

Patricia Toolan

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: equalityofficer@belfast-harbour.co.uk

9.2 Our equality scheme is also available on our website at:
<https://www.belfast-harbour.co.uk/equality>

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 communicate widely about the publication and content of our equality scheme. This may include press releases, advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a weblink to all Section 75 consultees on our consultation list letting them know about the publication of our approved Equality Scheme, and how to access it on the BHC website. Other consultees who prefer written communication or do not have an e-mail address will be notified by letter that our Equality Scheme is available on request.
- Our equality scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats (CD, mp3, DAISY) and in minority languages to meet the needs of those not fluent in English.
- A summary of our Equality Scheme will be prepared and circulated for distribution to organisations representing the groups under Section 75.

9.4 For a list of our consultees please see Appendix 3 of the equality scheme, visit our website at <https://www.belfast-harbour.co.uk/equality> or contact:

Patricia Toolan

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: equalityofficer@belfast-harbour.co.uk

Chapter 10 Review of our equality scheme

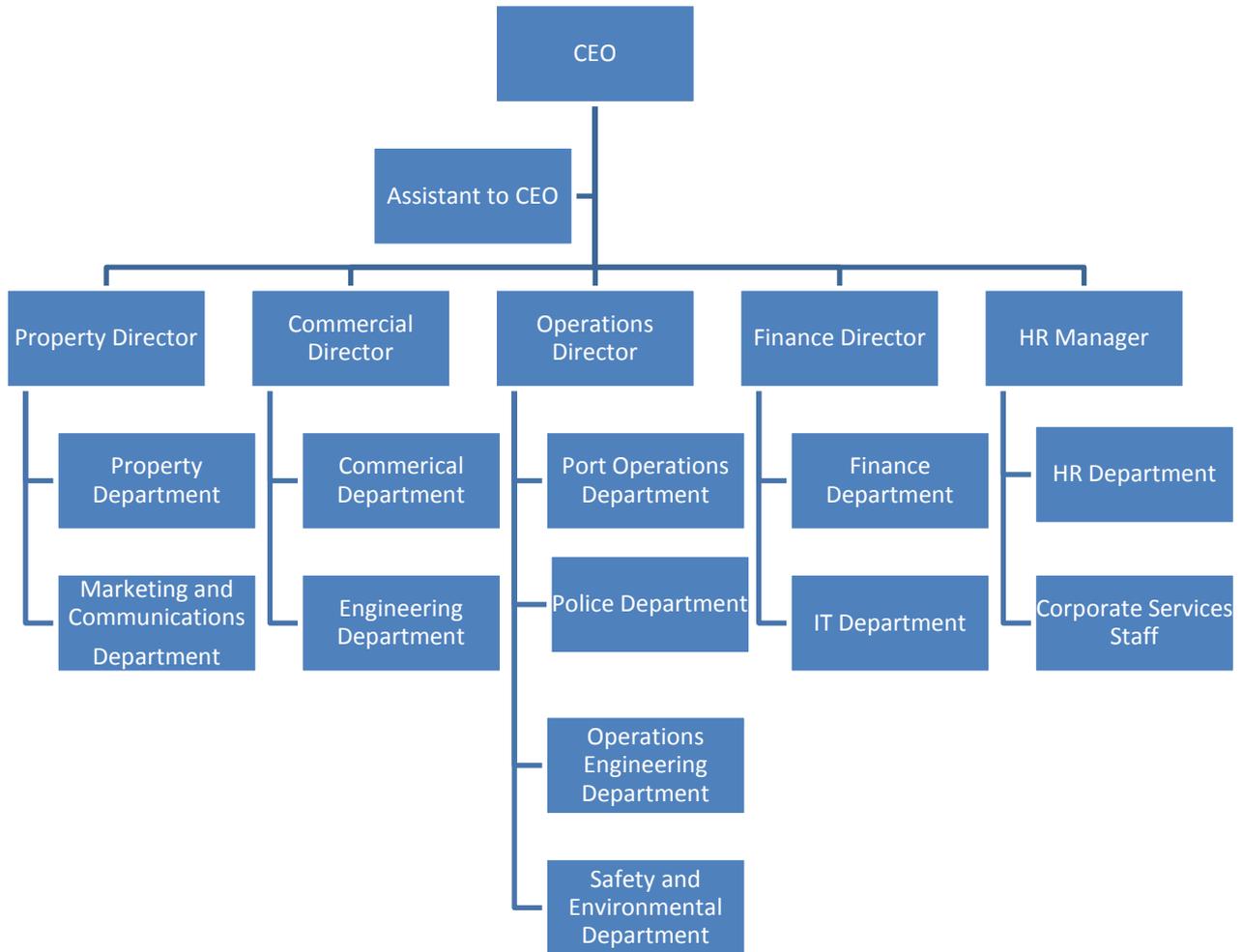
(Schedule 9 8. (3))

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 made public on the BHC website, with consultees notified by email and a report sent to the Equality Commission.

Appendix 1 Organisational chart



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

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

Category	Example groups
Religious belief	<p>Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths.</p> <p>For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment & Treatment (NI) Order</i>⁹. Therefore, “religious belief” also includes any <i>perceived</i> religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “<i>similar philosophical belief</i>”.</p>
Political opinion ¹⁰	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.

⁹ 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.*”

¹⁰ *ibid*

Sexual
orientation

Bisexual people; heterosexual people; gay or lesbian people.

Appendix 3 List of consultees

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

D.O.E. Planning Service
Belfast Trust
Belfast city council
Housing Executive
DRD
OFMDFM
Belfast Education and Library Board
CCMS
Department of Finance and Personnel
Port Welfare Committee
Mission to Seafarers
Unite the Union
NIPSA
UCATT
GMB
Londonderry Port
Warrenpoint Port
Green Party
Sinn Fein
DUP
PUP
Alliance
SDLP
UUP
The Workers Party
Aware Defeat Depression
British Deaf Association
Employers Forum on Disability
RNIB
Down's Syndrome Association
Chinese Welfare Association
NICEM
Indian Community Centre

Belfast Travellers Education and Development Group/An Munia Tober
Polish Association
Belfast Metropolitan College
Methodist Church
Church of Ireland Board for Social Responsibility
Presbyterian Church
Catholic Church
Belfast Islamic Centre
Belfast Hebrew Congregation
Baha'i Faith Baptist Union of Ireland
Women's Aid NI
Training for Women's Network
Queerspace
Carafriend
The Rainbow Project
Carers National Association NI
Age Concern NI
Community Relations Council NI
Disability Action
Equality Commission NI
MENCAP
NIACRO
NSPCC
Irish Traveller Movement
Youth Council for NI
MS Society
Northern Ireland Commissioner for Children and Young People
Northern Ireland Association for Mental Health
Advice NI

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

Measure	Lead responsibility	Timetable
Reflect the actions targets and PI's in the Corporate Plan and Business Plans (2.5)	Human Resources Manager /Chief Executive and Management Team	Annually September each year
Section 75 Annual Progress Report (2.7)	Human Resources Manager/Chief Executive	31 August annually
Update to the Commissioners	Human Resources Manager/Chief Executive	Normally - February and June annually
<p>Action plan</p> <p>Consultation on draft action plan [2.15]</p> <p>Arrangements for monitoring progress in place [2.16]</p> <p>Finalised action plan published [2.18]</p>	<p>Human Resources Manager</p> <p>Human Resources Manager</p> <p>Human Resources Manager and Chief Executive</p>	<p>June – September 2012</p> <p>December 2013</p> <p>December 2012 - dependent on date of approval by Equality Commission</p>
Consultation list reviewed and updated [3.4]	Human Resources Officer	June Annually
Awareness raising of New Equality Scheme	Human Resources Manager	Within three months of the publication of the scheme

Measure	Lead responsibility	Timetable
Screening timetable [4.15] Quarterly publication of screening reports	Human Resources Manager	To commence by March 2013
Monitoring Review of monitoring information [4.31]	Human Resources Manager	December 2013
Training Development of summary scheme [5.4] Development of overall training programme [5.5] Focussed training [5.3 and 5.4] Update training [5.4] Evaluation of training [5.6]	Human Resources Manager Human Resources Manager and the Management Team Human Resources Manager Human Resources Manager Human Resources Manager	Within three months of approval of the scheme Annually Ongoing Ongoing Ongoing
Assessing access to information and services [6.8]	Communications and Marketing Manager	Annually
Communication of Equality Scheme [9.3] Notification of consultees [9.3]	Human Resources Manager Human Resources Manager	Ongoing Within three months of approval of the scheme
Review of Equality Scheme [10.1]	Human Resources Manager	Within 5 years – approximately December 2017

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.

Affirmative action

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

Article 55 Review

Under the Fair Employment and Treatment (NI) Order 1998, all registered employers must conduct periodic reviews of the composition of their workforces and of their employment practices for the purposes of determining whether members of the

Protestant and Roman Catholic communities are enjoying, and are likely to continue to enjoy, fair participation in employment in each employer's concern. These reviews, which are commonly known as Article 55 Reviews, must be conducted at least once every three years.

Audit of inequalities

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

Consultation

In the context of Section 75, consultation is the process of asking those affected by a policy (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.

Council of Europe

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

Desk audit

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

Differential impact

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

Discrimination

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

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

Brief descriptions of these above terms follow:

Direct discrimination

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

Indirect discrimination

The definition of this term varies across some of the anti-discrimination laws, but indirect discrimination generally occurs where a public authority applies to all persons a particular provision, criterion or practice, but which is one that has the effect

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

Disability discrimination

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

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

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

Victimisation

This form of discrimination generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances,

because the person has previously exercised his/her rights under the anti-discrimination laws, or has assisted another person to do so. Victimisation cannot be justified and is always unlawful.

Harassment

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

Economic appraisal

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

Equality impact assessment

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

Equality of opportunity

The prevention, elimination or regulation of discrimination between people on grounds of characteristics including sex, marital status, age, disability, religious belief, political opinion, dependants, race and sexual orientation. The promotion of equality of opportunity entails more than the elimination of discrimination. It requires proactive measures to be taken to secure equality of opportunity between the categories identified under Section 75.

Equality scheme

A document which outlines a public authority's arrangements for complying with its Section 75 obligations. An equality scheme must include an outline of the public authority's arrangements for

carrying out consultations, screening, equality impact assessments, monitoring, training and arrangements for ensuring access to information and services.

Good relations

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

Mainstreaming equality

The integration of equal opportunities principles, strategies and practices into the 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.

Mitigation of adverse impact

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

Monitoring

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

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

Northern Ireland Act

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

Northern Ireland Statistics & Research Agency (NISRA)

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

OFMDFM

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

PAFT

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

Policy

The formal and informal decisions a public authority makes in relation to carrying out its duties. Defined in the New Oxford English Dictionary as 'a course or principle of action adopted or

proposed by a government party, business or individual'. In the context of Section 75, the term **policies** 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.

SACHR

The Standing Advisory Commission on Human Rights (SACHR) has now been replaced by the Northern Ireland Human Rights Commission. SACHR, as part of its review of mechanisms in place

to promote employment equality and reduce the unemployment differential, recommended that the PAFT Guidelines should be made a statutory requirement.

Screening

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

Schedule 9

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

Section 75

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

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

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

Section 75 investigation

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

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

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

Appendix 6 Action Plan / Action Measures

BELFAST HARBOUR COMMISSIONERS AUDIT OF INEQUALITIES AND ACTION PLAN - 2012-2013

KEY FUNCTIONS: OPERATIONS- Harbour Masters Department, Harbour Police, Support Services, and Environmental, Health and Safety

Equality Category	Issues Identified and Source	Actions and Targets
1.0: Religion	In the Belfast Harbour Corporate Plan 2011-2013, it is stated that the purpose of Belfast Harbour BHC's purpose is to operate and maintain the Port, develop Port capacity and the Harbour Estate, so supporting the development of the regional economy. Therefore the activities of the Harbour have implications not just for the resident population of Belfast but also for the wider Northern Ireland population.	See Corporate Social Responsibility, Communications and Marketing

Equality Category	Issues Identified and Source	Actions and Targets
<p>1.0: Religion (continued)</p>	<p>Through the Belfast Harbour corporate citizenship role the Harbour has taken a number of positive steps to reach out and engage with the local community and has given a commitment in the corporate plan to continue with these activities. Objectives have been set in the Belfast Harbour Policing Plan 2010-2012 to expand liaison with schools. Through the corporate social responsibility strategy the Harbour Police and the Harbour Masters Department have been involved in working with schools on a cross community basis locally and across Northern Ireland.</p> <p>Research undertaken by the Equality Commission and by the Education and Training Inspectorate has identified higher levels of under-achievement among boys and in particular among Protestant working class boys. (Source Inequalities Audit Staff Commission for Education and Library Boards)</p>	<p>None</p>

Equality Category	Issues Identified and Source	Actions and Targets
2.0: Political Opinion	As above	None
3.0: Race	<p>The NI Census 2001 demonstrates that in accordance with the statistics across NI the population from long standing ethnic minority communities is just over 1%. The Chinese and Indian communities are the two main communities. Clarification on these statistics will be provided when the new census is published. The situation with migrant workers is different and there has been a notable decline over the last few years (2009 Labour Force Survey).</p> <p>The police have produced information targeted specifically at ethnic minority communities and participate in multi – cultural events in the city.</p> <p>Since 2009 all the Belfast Harbour Police have undertaken Race awareness training as part of their Diversity Awareness Training. Through Consultation with the police the need was identified for support in communicating with people from ethnic minority communities that do not have English as a first language.</p>	<p>3.1 Action To review communications with a view to translating documentation and introducing signage.</p> <p>3.1 Target To invite representatives from the ethnic minority community to meet with the Belfast Harbour Police.</p> <p>3.2 Action To review the information available in other languages and the support available to the Harbour Police in communicating with minority ethnic communities that cannot communicate in English.</p> <p>3.2 Target To undertake a review of the support that needs to be provided to the BHC police to communicate with people from ethnic minority communities and actions taken.</p> <p style="text-align: right;">December 2013.</p>

Equality Category	Issues Identified and Source	Actions and Targets
4.0: Disability	<p>Through consultation with the Harbour Police it was established that support was required in raising awareness on working with members of the public with mental health issues.</p> <p>During 2009-2010 the Harbour Police and front line staff received Disability Equality Training.</p>	<p>4.1 Action To undertake an audit of all the training to date to determine the future targeted development needs.(cross reference to Human Resources actions)</p> <p>4.1 Target Audit undertaken and targeted action plan agreed June 2013</p> <p>(cross reference to HR targets)</p>
5.0: Dependents	None	
6.0: Sexual Orientation	<p>In the 2009 EQIA's on HR policies the need was identified to monitor the workforce and to provide training.</p> <p>Diversity and Dignity at work training has been provided to the Harbour Police.</p>	<p>6.1 Action To evaluate the effectiveness of the Dignity at work training.</p> <p>6.1 Target To identify any further targeted actions required to better promote Equality of Opportunity for people of different sexual orientation June 2013</p>
7.0: Age	Initiatives have been implemented by the Harbour Police in the Policing Plan 2010-2012 to work more closely with	To keep under review

Equality Category	Issues Identified and Source	Actions and Targets
	<p>the Belfast Metropolitan College the PSNI and other stakeholders to build relations with young people.</p> <p>Operations staff and the Harbour Police have worked with schools from across Northern Ireland, local youth organisations and over 50's groups through hosting events and supporting young entrepreneurs. (Annual Progress Review 2010-2011)</p>	
8.0: Gender	<p>Statistically females are under-represented in the operational departments within the workforce.</p>	<p>8.1 Action. Review additional actions that will promote Belfast Harbour as an Equal Opportunities Employer that welcomes applications from women.</p> <p>8.1 Target. Identify potential actions to put a plan in place</p> <p style="text-align: right;">June 2013</p>
9.0: Marital Status	<p>The marital status of the workforce will be reviewed as part of the newly implemented monitoring of the workforce.</p> <p>No issues were identified in terms of the consultations undertaken on the</p>	<p>No further action is required at this time.</p>

Equality Category	EQIA's of the HR polices 2009. Issues Identified and Source	Actions and Targets
10.0: All Categories	<p>The Health and Safety and Environmental Policy reviewed 2010</p> <p>A new Policing Plan and Code of Ethics will be developed in 2012</p>	<p>10.1 Action To determine the new policies to be screened in the action plan in the revised Equality Scheme.</p> <p>10.1 Target. Policies identified for screening in the final action plan</p> <p style="text-align: right;">December 2012</p> <p>10.2. Action Review the Dignity at Work Policy.</p> <p>10.2 Target Policy reviewed</p> <p style="text-align: right;">June 2013.</p> <p>(cross-reference to HR)</p>

KEY FUNCTIONS: FINANCE: Financial Management, Corporate Services, Governance

Equality Category	Issues Identified and Source	Actions and Targets
<p>1.0: Gender, Ethnic Minority Communities and Young People</p>	<p>An EQIA on the procurement policy was undertaken in 2004 and mitigating actions were recommended in relation to women, and ethnic minority communities.</p> <p>Awareness raising briefing has since been provided on the Equality Commission Guidance on Procurement and Section 75.</p> <p>A review has been undertaken of the Procurement policy which will require screening.</p>	<p>1.1 Action To determine the policies to be screened the action plan and the timeframes.</p> <p>1.1 Target To have trained all managers in the new screening template and to have an agreed timetable for screening in place upon approval of the Scheme by the Equality Commission.</p>
<p>2.0: Gender, Disability, Ethnic Minority Communities</p>	<p>In the DRD Inequalities audit 2011 a commitment is given to encourage more women, people with disabilities and people from ethnic minority communities to apply for public appointments.</p> <p>BHC do not have any role in terms of appointing Commissioners however where possible it will support DRD in promoting the role of Commissioner to those Section 75 groups that are currently under-represented</p>	<p>2.1 Action To explore how BHC might support the work of DRD in encouraging under-represented groups to take up public appointments.</p> <p>2.1 Target Identify potential opportunities.</p>

KEY FUNCTION: Human Resources

Equality Category	Issues Identified and Source	Actions and Targets
<p>1.0: Religion</p>	<p>Belfast Harbour monitors the religious composition of the workforce and uses this information to compile the Annual Monitoring Return and Article 55 Review, and in compiling the five year review to the Equality Commission.</p> <p>The figures in the most recent Article 55 Review demonstrate that there has been a increase in the percentages of people from the Roman Catholic community applying for and securing jobs with the BHC.</p> <p>In the Article 55 Review there is evidence of the workforce becoming more reflective of the comparators in terms of travel to work areas and the economically active population.</p> <p>(NISRA Census 2001)</p>	<p>1.1 Action To review on an ongoing basis the applicant flows in terms of the two main communities for each recruitment exercise.</p> <p>1.1.Target To ensure that there is evidence of fair participation in relation to the applicant flows for all posts advertised and in particular for the posts advertised through the recruitment agencies.</p> <p>Taking appropriate action as necessary.</p> <p style="text-align: right;">Timeframe May each year</p>

Equality Category	Issues Identified and Source	Actions and Targets
<p>1.0: Religion</p>	<p>Since 2007 the organisation has become much more proactive in promoting BHC as an Equal Opportunities employer and in raising its profile within the local community. An extensive ongoing programme of equality training is also being implemented as part of the mitigating actions identified through the EQIA's of the Human Resources policies.</p> <p>Representation of the two main communities applying for and securing positions with BHC is becoming more reflective of the economically active persons data.</p> <p>Source Census 2001</p> <p>Through the consultation responses to the EQIA on Equal Opportunities and Recruitment and Selection Policies a number of issues were identified in relation to the need for awareness raising and training on different minority ethnic faiths.</p>	<p>1.2 Action To undertake an audit of all Equality Training</p> <p>1.2 Target To have a targeted Equality Training Plan</p> <p style="text-align: right;">June 2013.</p>

Equality Category	Issues Identified and Source	Actions and Targets
2.0: Political Opinion	A Good Relations Policy has been developed by BHC. However it is acknowledged that it will need to be reviewed in accordance with the agreed future strategy on Cohesion, Sharing and Integration.	<p>2.1 Action To review the Good Relations policy in accordance with the launch of the revised CSI document.</p> <p>2.1 Target To develop a coherent approach to promoting Good Relations.</p> <p style="text-align: right;">December 2013 (subject to CSI being launched)</p>

Equality Category	Issues Identified and Source	Actions and Targets
3.0: Race	<p>In an EQIA of the BHC HR policies undertaken in 2009 it was agreed that targeted training be undertaken on Race as part of the Dignity at Work training for employees and that targeted promotional activities be implemented by BHC with youth, ethnic minority communities and with the two main communities.</p> <p>Monitoring arrangements have been put in place to monitor the racial background of the workforce and applicants.</p>	<p>3.1 Action To undertake targeted training with representatives from the ethnic communities.</p> <p>(cross-reference to Belfast Harbour Police).</p> <p>3.1 Target One targeted outreach activity implemented per year</p> <p>(cross-reference to Belfast Harbour Police).</p>
4.0: Disability	<p>As a result of conducting the EQIA's on the HR policies in 2009 monitoring of the workforce has been implemented in relation to a wide range of the Section 75 groups including disability and training provided to the BHC police and to front line employees on Disability Equality. Disability Equality Training was also made available to contractors.</p>	<p>4.1 Action To review the Disability Action Plan and produce a new Plan</p> <p>4.1 Target New Disability Action Plan and targets</p> <p style="text-align: right;">January 2013</p>

Equality Category	Issues Identified and Source	Actions and Targets
<p>4.0: Disability</p>	<p>The Disability Action Plan 2007-2012 is due for review in 2011-2012 and the revised plan and targets will be consulted on as part of the Inequalities Audit, Equality Scheme action plan and targets.</p>	<p>4.2 Action To review the information generated through more comprehensive monitoring of the workforce and to identify the steps that need to be taken to support the ongoing employment of people with disabilities.</p> <p>4.2 Target Implementation of reasonable adjustments as required supporting the employment of people with disabilities.</p> <p>4.3 Action To review the Disability Action Plan and produce a new Plan.</p> <p>4.3 Target As 4.1 above</p>

Equality Category	Issue Identified and Source	Actions and Targets
4.0 Disability		<p>4.4 Action To undertake an audit of all the training to date to determine the future targeted development needs.</p> <p>4.4 Target Audit undertaken and actions agreed</p> <p style="text-align: right;">June 2012 (Cross- reference Belfast Harbour Police)</p>
5.0: Dependents	<p>The EQIA report 2009 on the HR policies did not identify any adverse differential impacts in terms of people with dependants.</p> <p>It is generally recognised however that caring responsibilities fall to women and in the Article 55 Review covering the period 2007- 2010 the representation of women has risen from 19 to 29 at a time when the workforce contracted.</p> <p>BHC has implemented a range of flexible working practices to support women with caring responsibilities.</p> <p>The monitoring data on caring responsibilities and dependents is captured and updated annually.</p>	<p>5.1 Action Review flexible working requests and monitoring data on an annual basis</p> <p>5.1 Target Review and update monitoring data</p> <p style="text-align: right;">June 2013 and annually thereafter</p>

Equality Category	Issue Identified and Source	Actions and Targets
<p>6.0: Sexual Orientation</p>	<p>In the 2009 EQIA's on HR policies the need was identified to monitor the workforce and to provide training.</p> <p>Diversity and Dignity at work training has been provided to the Harbour Police.</p>	<p>6.1 Action To review the monitoring information and to keep HR policies and practices under review to assess if further action is required.</p> <p>6.1 Target Review of policy and practices if and when the Sexual Orientation Strategy for Northern Ireland is published.</p> <p>6.2 Action To undertake an audit of all Equality Training (see 1.1 above)</p> <p>6.2 Target To have a targeted Equality Training Plan (see 1.1 above)</p>
<p>7.0: Age</p>	<p>In the HR EQIA's undertaken in 2009 no differentials were identified in relation to the application of the policies in terms of the age of applicants or the workforce composition.</p> <p>The HR policies in terms of retirement age and recruitment have been reviewed in terms of the changes to the legislation.</p>	

Equality Category	Issues Identified and Source	Actions and Targets
<p>8.0: Gender</p>	<p>In the Population Estimates (NISRA 2009) 47.75% of the population of Belfast are male and 52.25% are female. The representation of males and females in the BHC workforce are male 77% and female 23% (Source: Article 55 Review 2007-2010)</p> <p>In the BHC Article 55 Review it was noted that while the overall representation of women in the workforce is low there has been a marked increase over the last number of years and women are now starting to apply for positions which would have historically been regarded as predominantly male roles. (cross- reference Operations)</p>	<p>8.1 Action To continue to promote BHC as an equal opportunities employer.</p> <p>8.1 Target To monitor fair participation in the work force in terms of gender on an annual basis and to evaluate the impact of the HR policies and procedures annually.</p> <p style="text-align: right;">May Annually</p>
<p>9.0: Marital Status</p>	<p>The marital status of the workforce will be reviewed as part of the newly implemented monitoring of the workforce.</p> <p>No issues were identified in terms of the consultations undertaken on the EQIA's of the HR polices 2009.</p>	<p>9.1 Action To review the composition of the workforce in light of the updated monitoring of the workforce.</p> <p>9.1 Target Review completed</p> <p style="text-align: right;">June 2013.</p>

Equality Category	Issues Identified and Source	Actions and Targets
<p>10.0: All Categories</p>	<p>To implement the recommendations and mitigating actions arising from the EQIA of the recruitment policies</p>	<p>10.1 Action Refresher training for potential recruitment panel members from a legislative perspective.</p> <p>10.1 Target Training implemented October 2013</p> <p>10.2. Action Review the Dignity at Work Policy.</p> <p>10.2 Target Policy reviewed June 2013 (Cross-reference to Operations).</p>

KEY FUNCTION: Corporate Social Responsibility, Communications and Marketing

Equality Category	Issues Identified and Source	Actions and Targets
<p>1.0 Religion</p>	<p>Through the implementation of the Marketing Strategy BHC supports a wide range of cross-community projects in Belfast.</p> <p>Some examples of the cross-community initiatives Belfast Harbour supported include: the “Aim High” initiative to be delivered where ten Students from Catholic and Protestant areas in North Belfast are given bursaries to allow them to pursue their acting, dancing and performing ambitions. In a separate Lyric Theatre Summer Scheme, students were given workshops by leading artists/performers in the field of dance and drama.</p>	<p>1.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable.</p> <p>1.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme.</p>

Equality Category	Issues Identified and Source	Actions and Targets
<p>1.0 Religion</p>	<p>Harbour Support provided bursaries for participants from disadvantaged areas to take part in the Lyric Theatre's summer programme. The scheme runs 5 weeks and involves Catholic and Protestant school children aged 7-10, 11-13 and 14-17 from across Belfast.</p> <p>Webster's WaterWorks – Webster the Port's Mascot for the Environment participated with the Ulster Orchestra in a water themed musical concert staged in the Ulster Hall. Aimed at primary school children, musicians with the orchestra held workshops with pupils to make instruments to use at the concert.</p> <p>Webster's Green Teacher of the Year 2010 – The second year of the project witnessed a total of 73 schools and 583 individual from across Northern Ireland entries.</p>	

Equality Category	Issues Identified and Source	Actions and Targets
<p>Religion continued</p>	<p>BHC's annual contribution to the Sailortown's Community & Religious Festival - outreach programme</p> <p>Through the Corporate Social Responsibility Strategy and Sponsorship Strategy BHC makes annual grants directly available to a number of projects that are cross-community and aimed at promoting diversity in terms of religion, race and age. The funding allocations are monitored on an annual basis.</p>	

Equality Category	Issues Identified and Source	Actions and Targets
<p>2.0 Political Opinion</p>	<p>No issues identified</p>	<p>2.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable. (as 1.1 above)</p> <p>2.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme. (as 1.1 above)</p>

Equality Category	Issues Identified and Source	Actions and Targets
<p>3.0 Race</p>	<p>Through the Corporate Marketing Strategy and the Strategy on Corporate Social Responsibility events are supported such as the Mela Festival in Belfast.</p> <p>The policy on the usage of the building was screened in 2007 and the usage of the building is monitored on an annual basis.</p> <p>(Source List of events 2009-2011).</p> <p>The BHC has hosted events to promote awareness in relation to Hate Crime Attacks.</p> <p>No complaints have been recorded relating to the application of the policy on usage of the building and the policy was screened in 2007.</p> <p>Bursaries were provided to Children from Ethnic Minority Communities through the Lyric Theatre Outreach Programme supported by BHC. Source CSR Sponsorship programmes 2010 and 2011.</p>	<p>3.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable. (as 1.1 above)</p> <p>3.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme. (as 1.1 above)</p>

Equality Category	Issues identified and Source	Actions and Targets
4.0 Disability	Through the records maintained in relation to the sponsorship programme and the policy on the usage of the Building it is evident that the activities supported are targeted at people with disabilities. A number of the events for young people are directed specifically at children with special needs and the building has been used by groups representing people with disabilities including the visually impaired Source List of events 2009-2011; Source CSR Sponsorship programmes 2010 and 2011	<p>4.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable. (as 1.1 above)</p> <p>4.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme. (as 1.1 above)</p>
5.0 Dependents	No Issues Identified	<p>5.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable. (as 1.1 above)</p> <p>5.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme. (as 1.1 above)</p>

Equality Category	Issues identified and Source	Actions and Targets
6.0 Sexual Orientation	No Issues Identified	<p>6.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable. (as 1.1 above)</p> <p>6.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme. (as 1.1 above)</p>
7.0 Age	The records on the activities supported through the sponsorship programme and on the usage of the building demonstrate that there is clear evidence of supporting events and providing access to the building for young people and for older people.	<p>7.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable. (as 1.1 above)</p> <p>7.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme. (as 1.1 above)</p>

Equality Category	Issues identified and Source	Actions and Targets
8.0 Gender	No data is captured on the gender of the recipients of the activities supported through the sponsorship programme. The records on usage of the building demonstrate that it has been made available to groups representing women.	<p>8.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable. (as 1.1 above)</p> <p>8.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme. (as 1.1 above)</p>
9.0 Martial Status	No issues identified	<p>9.1 Action To include screening the Corporate Communications and CSR strategy in the screening timetable. (as 1.1 above)</p> <p>9.1 Target To screen the Corporate Communication and CSR Strategy following the approval of the Scheme. (as 1.1 above)</p>