

# **TRINITY HOUSING**

## **EQUALITY SCHEME**

DRAWN UP IN ACCORDANCE WITH SECTION 75  
OF THE NORTHERN IRELAND ACT 1998

Date Approved: September 2005

**Trinity Housing**  
**95a Finaghy Road South**  
**Belfast**  
**BT10 0BY**

## **FOREWORD**

Section 75 of the Northern Ireland Act 1998 requires public authorities, in carrying out their functions, powers and duties, to promote equality of opportunity and good relations among a range of groups. Public Authorities, as defined by the legislation, are required to send an Equality Scheme to the Equality Commission, showing how they intend to carry out their new duties.

Mr Robert Moore, Chairman and Mr Arthur Canning, Chief Executive of Trinity Housing are pleased on behalf of the Board of Management and staff to support this Equality Scheme which arises out of the implementation of Section 75 of the Northern Ireland Act 1998.

Commitments made in the Equality Scheme refer to how Trinity Housing carries out its functions, powers and duties relating to Northern Ireland. Trinity Housing is committed to ensuring that all necessary resources (in terms of people, time and money) are made available to support the effective promotion of equality of opportunity and good relations in all its policies and practices. This also includes making sure there are effective internal arrangements in place to ensure that the duties are effectively complied with and for monitoring and reviewing progress.

Trinity Housing will actively seek to develop a programme of communication and training with the aim of ensuring all staff are made aware and understand the new equality obligations. The purpose of this Equality Scheme is to set out how Trinity Housing will fulfil the new statutory duties.

Trinity Housing will make its scheme available on request in formats such as large print, Braille, on disk, or audiocassette and in minority languages to meet the needs of those not fluent in English. The scheme will also be available on the association's website.

Chair

Chief Executive

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## **1.0 INTRODUCTION**

- 1.1 Section 75 of the Northern Ireland Act 1998 ('the Act') requires Trinity Housing in carrying out all its functions, powers and duties 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;
  - between men and women generally;
  - between persons with a disability and persons without; and
  - between persons with dependants and persons without.
- 1.2 Also, without prejudice to its obligation above, Trinity Housing will, in carrying out its functions, power and duties relating to Northern Ireland have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
- 1.3 Schedule 9 of the Act requires Trinity Housing to set out in an Equality Scheme how Trinity Housing proposes to fulfil the duties imposed by Section 75. This scheme has been developed to satisfy that statutory requirement.

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## **2.0 DUTIES AND RESPONSIBILITIES**

Trinity Housing was established in 1977 and registered with the Department for Social Development for the provision of housing for elderly persons and for others in housing need.

- 2.1 The role of Trinity Housing today, remains the provision of housing for elderly persons but also includes, in consultation with its care partners, the provision of supported housing for people with special housing needs and general family housing. Trinity Housing works in partnership with both statutory and other charitable and voluntary agencies for the provision of care and support in its supported housing schemes.
- 2.2 The Association is governed by a Board of Management, which comprises a Chairperson and a Board of between 7 and a maximum of 15 members (including Chair). The Board as and when vacancies arise or when additional skills are deemed necessary will make appointments to the Board in accordance with the requirements of the Association. Board membership will include a range of expertise including for example, finance, legal construction/engineering, medical, housing, human resources, and general business skills and representation from society both church and lay.

The current Board membership is 14.

- 2.3 The functions of Trinity Housing for purposes of the Act include its powers and duties. In this Scheme the following are to be regarded as the functions:
1. Corporate Functions – the governance and policies of the Association
  2. Finance and administration
  3. The development of housing schemes
  4. The management of housing and provision of housing support services
  5. Information Technology
  6. Human Resources function

### **Chief Executive**

- 2.4 The Chief Executive is responsible to the Chairman and the Board of Management of Trinity Housing as a corporate body.

### **Senior Management Team**

- 2.5 Trinity Housing Senior Management Team includes the following officers:-
- |                |  |
|----------------|--|
| Arthur Canning | Chief Executive Officer                  |
| Helen Colville | Deputy Chief Executive & Head of Housing |
| Kathy Brough   | Property Services Manager                |
| Andrew Bassett | Finance Manager                          |
| John Cochrane  | Development Manager                      |

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### **3.0 ARRANGEMENTS FOR ASSESSING COMPLIANCE WITH SECTION 75 DUTIES**

#### **Organisational Arrangements**

- 3.1 Trinity Housing is committed to the fulfilment of its Section 75 obligations in all parts of its work. Statutory responsibility for the effective implementation of the Scheme lies with the Chair of Trinity Housing and the Chief Executive.
- 3.2 The Chief Executive will be accountable to the Association's Board for the development, maintenance and review of the Scheme in accordance with the legislation, including any good practice or guidance that may be issued by the Equality Commission.
- 3.3 Responsibility for driving forward implementation of the Equality Scheme and the point of contact within Trinity Housing will be,

**Name** Mr A D Canning  
**Title** Chief Executive  
**Address** 95A Finaghy Road South, Belfast, BT10 OBY

**Tel No** (028) 90308140  
**Fax No** (028) 9030 6929  
**E- Mail** arthurcanning@trinityha.org

- 3.4 The above named and the Senior Management Team will meet regularly and as one of its objectives will report and respond to any queries for all those affected by the statutory duties.
- 3.5 Objectives and targets relating to the statutory duties will be integrated into Trinity Housing strategic and operational plans. Staff who are directly engaged in this work will include implementation of the statutory duties in their personal performance plans, which are subject to appraisal in the annual performance review. In addition, a commitment to the statutory duties will be included in all job descriptions. Progress on meeting the range of objectives will be monitored and reported upon to Trinity Housing SMT on a quarterly basis.

#### **Progress Reporting**

- 3.6 Trinity Housing will conduct an Annual Review of Progress in relation to the implementation of the Equality Scheme, in complying with the statutory duties. Trinity Housing will forward a report of this review to the Equality Commission by 31 July each year. This report, which will follow any guidance on annual reporting issued by the Equality Commission, will be presented to the Board of Trinity Housing and will be included in the Association's Annual Report.

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- 3.7 Moreover, Trinity Housing will liaise closely with the Equality Commission to build a close working relationship so that progress on the implementation of the Scheme is maintained.

### **Consultation**

- 3.8 Trinity Housing acknowledges the emphasis on consultation in the development and implementation of the Scheme, and is committed to full and meaningful consultation on its Equality Scheme, equality impact assessments and monitoring arrangements. Details of this commitment are set out in the following section.

### **Complaints**

- 3.9 When a complaint is made on the grounds that Trinity Housing has failed to comply with the Scheme, the point of contact will be:

<b>Name</b>	<b>Mrs Gail Hanna</b>
	<b>The Equality Officer</b>
<b>Address</b>	<b>Trinity Housing</b>
	<b>95A Finaghy Road South, Belfast. BT10 0BY</b>
<b>Tel No</b>	<b>(028) 9030 8140</b>
<b>E-mail</b>	<b><a href="mailto:gailhanna@trinityha.org">gailhanna@trinityha.org</a></b>
<b>Fax No</b>	<b>(028) 9030 6929</b>

- 3.10 This Officer will carry out an internal investigation of the complaint and respond to the complainant within one month. During this process, the complainant will be kept fully informed of the procedures for dealing with the complaint under Schedule 9 of the Northern Ireland Act. Trinity Housing will also undertake to provide assistance to any complainant who requires information in a format that ensures equality of opportunity.
- 3.11 In any subsequent investigation by the Equality Commission, Trinity Housing will co-operate fully, providing access to any relevant documentation that the Equality Commission may require. Similarly, Trinity Housing will co-operate fully with any investigation by the Equality Commission under sub-para 11 (1) (b) of Schedule 9 to the Northern Ireland Act 1998. The outcomes of all investigations will be fully reported to the Association's Board and subsequent remedial actions agreed.

### **Review of the Scheme**

- 3.12 Trinity Housing will conduct a thorough review of the Scheme within five years of its submission to the Equality Commission. This review will

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evaluate the effectiveness of Trinity Housing in meeting its Section 75 obligations. In undertaking this review Trinity Housing will follow any guidance issued by the Equality Commission. A report of this review will be made public and sent to the Equality Commission.

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## **4.0 CONSULTATION**

- 4.1. Trinity Housing recognises the importance of consultation in all aspects of the implementation of its statutory equality duties. It affirms that all consultation will be carried out in accordance with the Equality Commission's Guiding Principles as detailed in its 'Guide to Statutory Duties' (Blue Section 2c). In particular, it will endeavour to conduct all consultations in a timely, open and inclusive way in accordance with the Equality Commission's Guiding Principles.
- 4.2. Trinity Housing will consult as widely as possible to ensure that any organisation or group which has a legitimate, particular interest in its work and /or the likely impact of its policies on the promotion of equality of opportunity and good relations will be included in the process of engagement.

### **Those Being Consulted**

- 4.3. A list of those being consulted on matters relevant to Trinity Housing equality duties, including screening and equality impact assessments and the Scheme itself, is detailed in Appendix 2. The list is not exhaustive and may be amended and reviewed throughout the lifetime of the equality scheme to promote inclusive consultation. Trinity Housing welcomes enquiries from any organisation wishing to be added to the list of consultees, and should contact the Equality Officer in Trinity Housing to have their interest noted.
- 4.4. Trinity Housing will include the Equality Commission, the Community Relations Council, voluntary groups, community groups and Trade Union groups in all consultations whether or not they have a direct economic or social interest in the work of Trinity Housing. Organisations representing the various categories included in Section 75 will also be included in any consultation carried out.

### **Timescale for Consultation**

- 4.5. In order to facilitate meaningful consultation, Trinity Housing will ensure that consultation with groups and individuals will begin as early as possible.
- 4.6. Trinity Housing is conscious that some groups will need sufficient time to consult among themselves in order that their contributions to any consultation may be informed. All consultations will aim to allow a period of at least eleven weeks except in emergencies. Such situations will include:
  - policies which have to be implemented urgently to protect health and safety;

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- policies which have to be implemented urgently to comply with court judgements.
- 4.7. Trinity Housing wishes to minimise the number of exceptions to good practice guidelines on the timescale for consultation. When exceptions do occur, Trinity Housing will report such instances. Exceptions to the normal eight week consultation period will be monitored, kept under review, justified very clearly and reported by Trinity Housing in its annual report to the Equality Commission.

### **Procedures for Ensuring Inclusive Consultation**

- 4.8. In consulting on any matter to which this scheme relates, Trinity Housing will work with representative groups and individuals of the Section 75 categories in order to identify how best to obtain their views. This may involve face-to-face meetings, advisory groups, surveys, consultative panels, Internet discussions and other innovative ways of consulting as there will be different means of consultation for different groups and it will be important to establish the basis for dialogue and engagement during the life of the scheme.
- 4.9. It is intended that obstacles to proper consultation will be removed by ensuring that language is as clear as possible. Systems will be established to make presentations on this Scheme, if requested, available in an appropriate format to representatives of people with learning disabilities, minority community language speakers, people with disabilities, young people, and Travellers.
- 4.10. To ensure the highest level of inclusivity in any policy decision-making, information will be made available in consultation with groups affected by Section 75. Systems will be in place to ensure that information will be available on request in accessible formats in a timely fashion such as Braille, disc, and audiocassette and in minority languages to meet the needs of those who are not fluent in English.
- 4.11. Extra consideration will be given to ensuring that all consultations reflect the needs of young people and those with learning disabilities through the provision of accessible formats in a timely manner. Trinity Housing will liaise with representatives of young persons and learning disability organisations in the first place (by correspondence/direct communication) and take account of good practice elsewhere (e.g. Lead Report/MENCAP's guidance on accessible formats), in order to reflect the needs of these groups in consultations.

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- 4.12. Trinity Housing believes it especially important that sufficient timely and appropriate information is provided to enable all affected groups and individuals to consider the full implications of proposals, and it will take steps to ensure this. This will include quantitative and qualitative data that Trinity Housing holds or has collated, and other documents such as consultants' reports. This will apply to all consultations.
- 4.13. Specific training will be arranged for Trinity Housing staff undertaking consultation exercises to ensure they have the necessary skills to communicate effectively. Any training delivered will be developed in consultation with relevant Section 75 groups.
- 4.14. Steps will also be taken to ensure full participation in any consultation meetings that are held. Trinity Housing will consider the time of day, the suitability of the venue, whether it can be accessed by those with disabilities, how the meeting is to be run, the use of languages other than English, whether a signer is needed, and childcare arrangements and will recognize and in good faith meet access related costs.

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## **5.0 ASSESSING THE IMPACT OF POLICIES ON THE PROMOTION OF EQUALITY OF OPPORTUNITY**

### **Screening**

- 5.1 Trinity Housing has been designated as a public authority for the purposes of Section 75 of the Northern Ireland Act 1998. Many of the policies, which the Association follows, are in compliance with the Department for Social Development's Housing Policy Division which regulate the activities of Housing Associations and the Northern Ireland Regional Strategic Housing Authority the N.I. Housing Executive which regulates the location, type and size of development and the allocation of housing.  
Trinity Housing is committed to carrying out a systematic review of all its existing and new/proposed policies to determine whether there are any equality of opportunity implications.
- 5.2 The definition of a 'policy' under the Equality Commission's Guide to the Statutory Duties has a wide remit and includes policies relating to all functions and activities. Trinity Housing will monitor the implementation of a policy that it operates on behalf of another public authority, and will work in partnership with other bodies where such a policy is subject to an equality impact assessment.
- 5.3 Trinity Housing will consider the impact of each current and new/proposed policy on equality of opportunity in terms of the nine categories listed at Section 75 of the Act when considering which policies will be subject to equality impact assessment. A systematic review of each policy is required and Trinity Housing will take the following steps when screening:
- 5.4
- identify all policies, written and unwritten;
  - internally appraise the significance of equality of opportunity and good relations for each policy, taking account of the screening criteria and prioritisation factors detailed below;
  - produce a list detailing policies to be subject to equality impact assessment, together with a draft timetable for conducting the assessments. This should take account of the need to join up equality impact assessments of related policies;
  - consult with Section 75 groups to seek their views on whether all policies have been identified, whether all equality impacts have been identified, and whether they agree with the list of policies to be subject to equality impact assessment and the proposed timetable;
  - consider and take account of feedback from the consultation exercise;
  - provide information to consultees on the conclusions reached following the initial consultation on screening, on amendments made to the list of policies, and on the final equality impact assessment timetable, in a screening report.
- 5.4 For each policy the following criteria will be applied:

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- is there any indication or evidence of higher or lower participation or uptake by different groups\*?
  - is there any indication or evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy?
  - have previous consultations with relevant groups, organisations or individuals indicated that particular policies create problems that are specific to them?
  - is there an opportunity to better promote equality of opportunity or good relations by altering the policy or working with others in government or in the larger community?

\* The main groups within each of the nine categories are identified at Appendix 4.

If the answer to any of these four questions is yes, consideration will be given to whether to subject the policy to the equality impact assessment procedure.

#### Evidence

- 5.5 Trinity Housing will make arrangements to obtain relevant information, whether quantitative or qualitative, so that it can clearly demonstrate why a policy is screened in for impact assessment or screened out as not requiring an equality impact assessment.
- 5.6 Evidence may include information from Trinity Housing's own information management systems, including service monitoring and complaints handling systems, or from engagement in research, surveys or consultation exercises. Information may also be sourced from commissioned research or from research produced by other public authorities, representative groups, umbrella groups, and trades unions or universities. Information from consultation exercises on previous equality impact assessments, or those undertaken by other public authorities within the same sector will also be considered. Anecdotal evidence, feedback from service users and affected groups or ongoing experience within the authority will also be considered.

#### **Prioritisation & Timetabling**

- 5.7 Having screened existing policies or new policies using the four criteria set out above, a view must then be reached on prioritising policies for equality impact assessment. Priorities may be established based on factors such as:
- Social need;
  - effect on people's daily lives;
  - effect on economic, social and human rights;
  - significance of the policy in terms of expenditure;
  - significance of the policy in terms of strategic importance.

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- 5.8 An initial timetable will be developed setting out a programme and timescale for equality impact assessments, see appendix 5.

### **Screening Report**

- 5.9 A detailed report of the screening exercise will be provided to consultees and included in the Annual Report sent to the Equality Commission. The report will include details of: (1) those policies which will be subject to equality impact assessment, (2) those policies proposed by those consulted, as appropriate for impact assessment, but have not been subsequently included – giving a explanation for this course of action, (3) the factors for prioritising assessments, and (4) the timetable for equality impact assessments.
- 5.10 Consultation on screening will allow at least eight weeks, and will comply with the Equality Commission’s ‘Guiding Principles of Consultation’. Consultations will seek the views of the Equality Commission, representative groups of Section 75 categories, other public authorities, voluntary groups, community groups, Trade Unions and other groups with a legitimate interest in the matter including those directly affected by the policy whether or not they have a direct economic or personal interest (see Appendix 2).

### **The Conduct of Equality Impact Assessments**

- 5.11 All equality impact assessments carried out will be conducted in accordance with all the procedures outlined in Annex 1 of the Equality Commission’s ‘Guide to the Statutory Duties’.
- 5.12 In common with other aspects of the statutory equality duties, Trinity Housing will ensure that any equality impact assessment will be subject to consultation. All consultations will seek the views of the Equality Commission, representative groups of Section 75 categories, other public authorities, voluntary groups, community groups, Trade Unions and other groups with a legitimate interest in the matter whether or not they have a direct economic or personal interest and those directly affected by the policy (see Appendix 2).
- 5.13 In making any decision on a current or proposed policy, Trinity Housing will take into account any relevant equality impact assessment and the outcome of associated consultation.

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## **Monitoring Adverse Impact and Access to Services**

- 5.14 A system will be established to monitor the impact of policies and access to services across all functions in order to identify their effects on the relevant groups and ensure equality of opportunity. This system will involve:
- an audit of existing information systems within one year of approval of the scheme, similar to that included in Appendix 4 of the Commission's Practical Guidance on EQIA, to identify the extent of current monitoring and a plan to address any gaps so that impacts can effectively be monitored through equality impact assessments.
    - the collection and collation of existing relevant primary quantitative and qualitative data across all nine equality categories on an ongoing basis;
    - the collection and collation of existing relevant secondary sources of quantitative and qualitative data across all nine equality categories on an ongoing basis;
    - identifying where more detailed data is needed in order to have the necessary information on which to base decisions;
    - undertaking or commissioning new data if necessary.
- 5.15 If over a three 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, Trinity Housing will ensure that the policy is revised.
- 5.16 This system will be reviewed on an annual basis and the results will be published as part of Trinity Housing's annual report to the Equality Commission. In all cases relating to the holding of monitoring information or the collection of data, Trinity Housing will act sensitively in accordance with Equality Commission guidance and the wishes of representatives from S75 organisations.

## **Publication of Equality Impact Assessments and Monitoring**

- 5.18 Trinity Housing will make available via its annual report, newsletter, website and by any other targeted means the outcome of any equality impact assessment and of any monitoring undertaken to measure the adverse impact of policies. Systems will also be established to make available, on request, impact assessments in accessible formats and a timely fashion (i.e. hardcopy, Braille, disk, audio cassette and minority languages) from the responsible officer – The Equality Officer, Trinity Housing, 95a Finaghy Road South, Belfast.
- 5.19 Extra consideration will be given to ensure that young people and those with learning disabilities are able to access impact assessments in a timely fashion.
- 5.20 Trinity Housing will inform the general public about the availability of this material via its annual report, newsletter, website and by any other

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targeted means. It will also directly inform bodies listed in Appendix 2 when this material is available and it will place information in publications associated with Section 75 categories.

- 5.21 All published information will comply with guidance outlined by the Equality Commission in its 'Guide to Statutory Duty' (Section 1). Trinity Housing will publish information on equality impact assessments that:
- includes the aims of the policy to which the assessment relates;
  - details any consideration given to mitigating adverse impact of the policy on the promotion of equality of opportunity;
  - details any consideration given to the consideration of alternative policies which might better achieve the promotion of equality of opportunity.

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## **6.0 PUBLIC ACCESS TO INFORMATION AND SERVICES**

- 6.1 Trinity Housing is committed to ensuring that the information it disseminates and the services it provides are made accessible to ensure equality of opportunity. It is aware that some groups will not have the same access to information as others. These include:
- children and young people who may have difficulties in accessing or understanding information;
  - people with sensory and learning disabilities that may have difficulties with information in print;
  - members of minority ethnic groups, whose first language is not English, and who may have difficulties with information provided only in English.

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

- 6.2 Trinity Housing will, within a year of approval of this scheme, review its arrangements for providing information in Braille, large print, audio cassette and minority ethnic language formats. The assessment will take account of:
- the statutory requirements of the Disability Discrimination Act 1995; the likely demand for information of various formats across its main policy areas;
  - the resource implications and recommendations from the Northern Ireland cross-departmental Promoting Social Inclusion (PSI) working groups on minority ethnic people and on access to information.
- 6.3 The review will make recommendations on how public access to information can be better ensured by improving arrangements for providing information in different formats and languages. Trinity Housing will ensure that it will publicise the current situation, the findings of its review, and any proposed changes to any aspect of information and services to such groups and individuals.
- 6.4 In disseminating information, Trinity Housing will seek to make the information available via its web site, annual reports, newsletters and by any other relevant and cost effective targeted means. This arrangement will be kept under review, in terms of promoting wide access throughout the implementation of statutory equality duties. Trinity Housing intends that all of its services are fully accessible to all parts of the community in Northern Ireland.
- 6.5 Trinity Housing will ensure that no section of the community is deterred from visiting Trinity Housing's offices. Trinity Housing's offices will maintain a welcoming and harmonious environment. Trinity Housing will adhere to relevant provisions of the Disability Discrimination Act 1995.

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## **7.0 TRAINING AND COMMUNICATION**

- 7.1 Trinity Housing will ensure that an effective communication and training programme will be developed for all staff. A series of targets for the implementation of the commitment to training and communication will be outlined in Equality Scheme Action Plan section of this document (Appendix 5).
- 7.2 In order to share resources and expertise, Trinity Housing will work closely with other bodies and agencies in the development and delivery of training.

### **Training**

- 7.2 Trinity Housing will draw up a detailed training plan for all its staff over the 5 year period to which this Scheme refers which will aim to achieve the following objectives:
- to raise awareness of current anti-discrimination legislation, including the provisions of Section 75 and Section 76 of the Northern Ireland Act 1998. This will include an explanation of the duties and their implications for all employees;
  - to provide those employees involved in screening of policies with the necessary skills and knowledge to do this work effectively;
  - to provide those employees involved in the equality impact assessment of policies with the necessary skills and knowledge to do this work effectively;
  - to provide those employees who deal with complaints in relation to the implementation of Trinity Housing's Scheme, with the necessary skills and knowledge to investigate and monitor complaints effectively;
  - to provide those employees involved in consultation processes with the necessary skills and knowledge to do this work effectively;
  - to provide those employees involved in the implementation and monitoring of the effective implementation of Trinity Housing's Equality Scheme to do this work effectively; and
  - to 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.
- 7.3 A report indicating the extent to which training objectives have been met will be reported on as part of the Annual Review of the implementation of the statutory duties, which will be sent to the Equality Commission.
- 7.4 All staff in Trinity Housing will receive training within one year of the approval of the Scheme (including those being inducted). Thereafter focused training will be provided for all specialist staff within Trinity Housing, and specific training will also be provided for those engaged in consultation.

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7.5 All training will be developed in association with the appropriate Section 75 groups.

7.6 The Chief Executive wishes to positively communicate the commitment of Trinity Housing to the statutory duties (both internally and externally). Trinity Housing will:

- develop a summary of the Scheme and make it available to all staff ;
- provide access to copies of the full Scheme for all staff;
- ensure that Trinity Housing's commitment to the statutory duties are made clear in Trinity Housing's publications (such as the Annual Report); and
- will ensure that any queries or questions of clarification from staff are addressed effectively.

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## 8.0 **IMPLEMENTING THE SCHEME**

### **Publication of the Scheme**

8.1 Following submission to the Equality Commission, this scheme will be available in print form and alternative formats free on request from Trinity Housing.

8.2 The following arrangements will be made for the publication of the Scheme and to ensure equality of access:

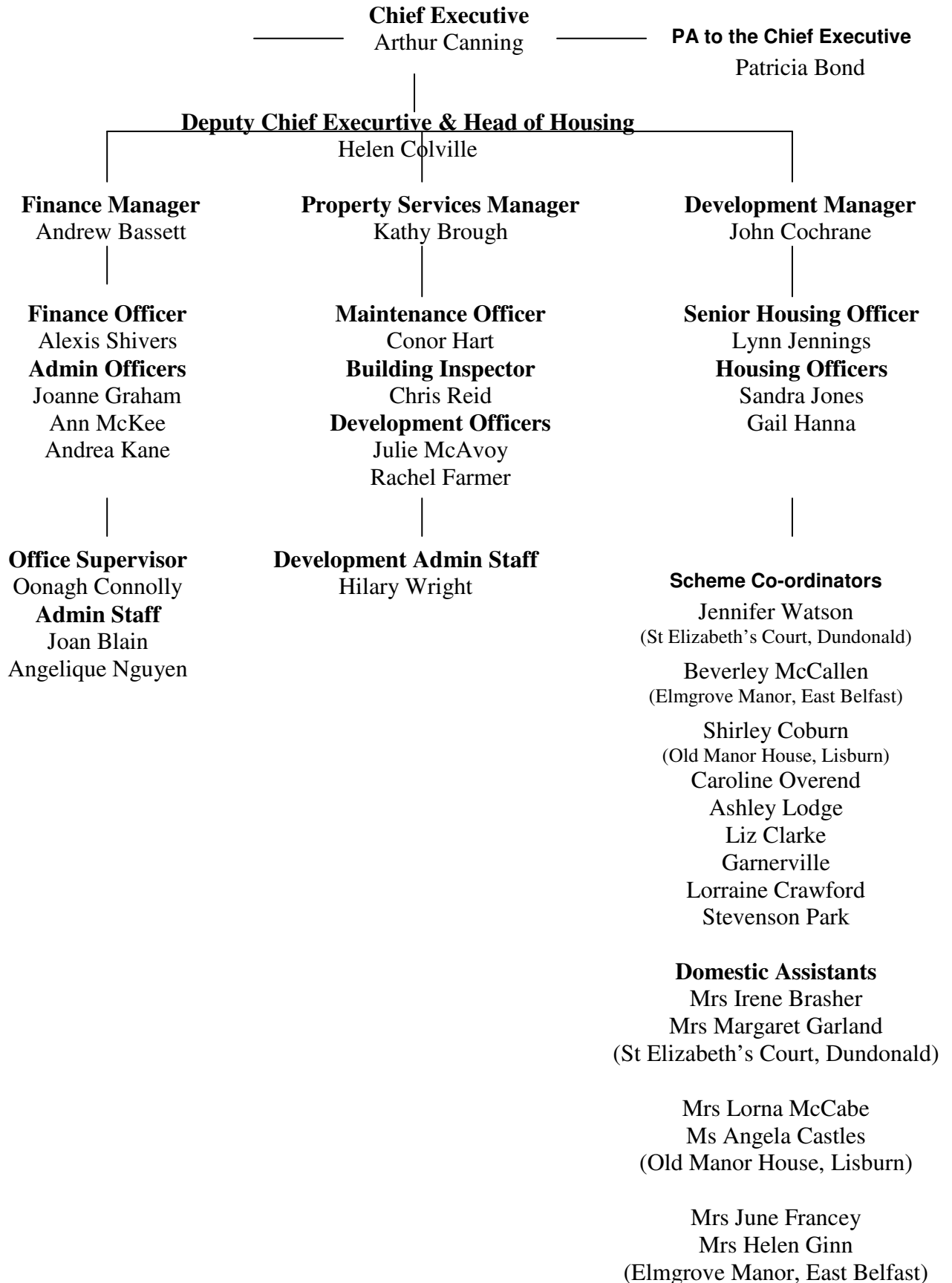
- the Scheme will be available on request in formats such as Braille, disc, and audiocassette and in minority languages to meet the needs of those not fluent in English;
- systems will be in place to ensure that requests for the Scheme in accessible formats will be dealt within a timely manner;
- specific consideration will also be given to how best to communicate the Scheme to young people and those with learning disabilities;
- Trinity Housing will develop a plain English summary of the Scheme;
- a press release and a prominent advertisement in the press will be placed by Trinity Housing whenever the Scheme is approved by the Equality Commission;
- a copy of the Scheme will also be posted on Trinity Housing website;
- copies of the approved Scheme will be made available to key stakeholders

### **Timetable for Implementing the Scheme**

8.3 Appendix 5 outlines an action plan for implementing the Scheme including date milestones and performance indicators for each task.

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**APPENDIX 1: ORGANISATIONAL CHART**



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## **APPENDIX 2: LIST OF ORGANISATIONS TO BE CONSULTED**

Age Concern Northern Ireland
Alliance Party for Northern Ireland
Altnagelvin Area Hospitals HSST
Amalgamated Engineering & Electrical Union
Amalgamated Transport & General Workers Union
Antrim Borough Council
Armagh & Dungannon HSST
Armagh District Council
Association of Chief Officers (ACOVO)
Association of Independent Advice Centres
Bahai Council for Northern Ireland
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Baptist Union of Ireland
Barnardos
Belfast City Council
Belfast City Hospital HSST
Belfast Hebrew Congregation
Belfast Islamic Centre
Belfast Trade Unions Council
Belfast Travellers Education & Development Group
Blind Centre for NI
BOBAL
Brainwaves Northern Ireland
British Deaf Association (NI)
Carafriend
Carers Northern Ireland
Carrickfergus Borough Council
Castlereagh Borough Council
Causeway HSST
Central Services Agency
Chartered Institute of Housing
Child Poverty Action Group (NI)
Children's Law Centre
Chinese Welfare Association
Coalition on Sexual Orientation (CoSO)
Coleraine Borough Council
Committee on the Administration of Justice (CAJ)

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Community Development & Health Network (NI)
Community Relations Council (CRC)
Community Relations/Training Learning Consortium
Cookstown District Council
Council for the Homeless (NI)
Craigavon & Banbridge Community HSST
Craigavon Area Hospital Group HSST
Craigavon Borough Council
Democratic Unionist Party
Department for Social Development
Derry City Council
Derry Well Woman
Disability Action, Belfast
Disability Action, Derry
Down District Council
Down Lisburn HSST
Down's Syndrome Association
Dungannon District Council
East Belfast Community Development Agency
Eastern Health & Social Services Board
Employers' Forum on Disability
Equality Commission for NI
Equality Forum NI
Falls Community Council
Family Planning Association (NI)
Fermanagh District Council
Fermanagh Women's Network
First Key
Foyle Friend
Foyle HSST
Free Presbyterian Church of Ulster
Gay & Lesbian Youth Northern Ireland
General Consumer Council
Gingerbread Northern Ireland
Green Park Healthcare HSST
Help the Aged Northern Ireland
Homefirst Community HSST
Housing Rights Service
Indian Community Centre
Irish Council of Churches
Larne Borough Council
Lesbian Line
Limavady District Council
Lisburn Borough Council
Magherafelt District Council

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Magheraflet Women's Group
Mater Infirmorum Hospital Trust
MENCAP
Methodist Church in Ireland
Moyle District Council
Multi-Cultural Resource Centre
Newry & Mourne District Council
Newry & Mourne HSST
Newtownabbey Borough Council
Newtownards Borough Council
NIGRA (Northern Ireland Gay Rights Association)
NIPSA
NITAP
North & West Belfast HSST
North Down Borough Council
North West Community Network
North West Forum of People with Disabilities
Northern Health & Social Services Board
Northern Ireland African Cultural Centre
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health
Northern Ireland Association of Citizens Advice Bureaux
Northern Ireland Committee, Irish Congress of Trade Unions (NIC-ICTU)
Northern Ireland Council for Ethnic Minorities (NICEM)
Northern Ireland Council for Voluntary Action (NICVA)
Northern Ireland Filipino Association
Northern Ireland Housing Council
Northern Ireland Housing Executive
Northern Ireland Human Rights Commission (NIHRC)
Northern Ireland Mixed Marriage Association
Northern Ireland Office
Northern Ireland Policing Board
Northern Ireland Statistics & Research Agency (NISRA)
Northern Ireland Women's Aid Federation
Northern Ireland Women's European Platform (NIWEP)
Northern Ireland Youth Forum
NUS USI
Office of the First Minister & Deputy First Minister
Omagh District Council
Omagh Women's Area Network
Parents & Professionals & Autism
PHAB Northern Ireland
POBAL
PRAXIS
Press for Change

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Probation Board for Northern Ireland
Progressive Unionist Party
Queer Space
Royal Group of Hospitals & Dental Hospital HSST
Royal Institute for Deaf People (NI)
Royal National Institute for the Blind (NI)
Rural Community Network
Sense NI
Sikh Cultural Centre
Simon Community
Sinn Fein
Social Democratic & Labour Party
South & East Belfast HSST
Southern Health & Social Services Trust
Sperrin Lakeland Health & Social Care Trust
Staff Commission for Education & Library Boards
Strabane District Council
The Cedar Foundation
The Guide Dogs for the Blind Association
The Local Government Staff Commission for Northern Ireland (LGSC)
The Rainbow Project
The Women's Centre
Traveller Movement Northern Ireland
UCATT
Ulster Community & Hospitals HSST
Ulster Democratic Party
Ulster Scots Heritage Council
Ulster Unionist Party
UNISON
United Hospitals Group HSST
United Kingdom Unionist Party
West Belfast Economic Forum
Western Health & Social Services Board
Women's Forum Northern Ireland
Women's Information Group
Women's Resource & Development Agency (WRDA)
Women's Support Network
Workers Party
Youth Action
Youth Council for NI

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***PUBLIC CONSULTATIONS ATTENDED***

<b>VENUE</b>	<b>DATE</b>	<b>ATTENDED BY</b>
The Interpoint Centre York Street Belfast	24 June 2004 10.00am – 1.00pm	Ann Fleming Finance Manager Joanne Graham Administration Officer
The City Hotel Queens Quay Londonderry	21 July 2004 10.00am – 1.00pm	Helen Colville Housing Manager Kathy Brough Property Services Manager
Armagh City Hotel 2 Friary Road Armagh	11 August 2004 6.00pm – 9.00pm	Joanne Graham Administration Officer

***CONSULTATION WITH SECTION 75 ORGANISATION***

<b>VENUE</b>	<b>DATE</b>	<b>ATTENDED BY</b>
CoSO The Rainbow Project 2-6 Union Street Belfast BT1 2JF	19 August 2004 4.30pm – 5.45pm	Joanne Graham Administration Officer

**APPENDIX 3: COMMENTS RECEIVED FROM CONSULTATION WITH  
THE ORGANISATIONS RESPONSE**

<b>ORGANISATION</b>	<b>SUMMARY OF COMMENTS RECEIVED</b>	<b>OUR RESPONSE</b>
Disability Action	<ol style="list-style-type: none"> <li>1. The name of the Chairperson should be included</li> <li>2. Information on the composition of the Board of Management</li> <li>3. The contact details should include a textphone number to enable deaf people the same access.</li> <li>4. Progress on meeting the range of objectives must be reported to the board on a quarterly basis.</li> <li>5. A statement offering a range of accessible formats should be placed at the beginning of the main consultation document and the Association will accept feedback in the format preferred by the consultee.</li> <li>6. Complaints procedure should outline how it will support the individual to bring their complaint e.g. interpreter support, specialist transport costs, advocacy services.</li> <li>7. It is unacceptable that there is a 5 year period to assess the effectiveness of the Association in meeting its section 75 duties. The Statutory Duty guidelines state that equality scheme measures are implemented in a 'timely fashion'</li> </ol>	<p>The name of the Chairperson is included.</p> <p>The Chairperson's name and the number of members are included. Details on Board members are available from other sources</p> <p>E-mails are now more commonly used but the provision of a textphone will be kept under consideration.</p> <p>Reports will be submitted to the board as appropriate.</p> <p>A statement offering a range of accessible formats is now included in the forward and there are no restrictions on the format of feedback.</p> <p>The complaints section says the Association will offer assistance. This is a policy not a procedure so it will not outline everything in detail.</p> <p>The Association believes that this time period is acceptable given the non-strategic nature of the Association and this is also in accordance with the statement in the Equality Commission's model scheme.</p>

<b>ORGANISATION</b>	<b>SUMMARY OF COMMENTS RECEIVED</b>	<b>OUR RESPONSE</b>
Disability Action	<p>8. The Association should purchase the Bobby standard programme to ensure that their website is fully accessible to people with disabilities.</p> <p>9. Exceptions to the normal 8 week consultation period with appropriate and careful planning reduced periods should be unusual.</p> <p>10. Disability action requests that large print be included in the list of accessible formats available.</p> <p>11. The use of simple language and availability of accessible formats should have commenced with this Equality Scheme.</p> <p>12. It is Disability Action's view that each public authority will be responsible for complying with Equality Scheme duties for any policy formulated, adopted or imposed on the authority. Such policies once accepted and put into practice become its policy.</p> <p>13. Please amend persons with a disability to read persons with a physical, sensory, mental or learning disability (Appendix 4).</p> <p>14. Any consultant commissioned for research should be fully conversant with specific equality issues pertinent to the target groups.</p>	<p>The Association is already considering this in the development of its website.</p> <p>The Association has made a note of this comment.</p> <p>This has now been included.</p> <p>The availability of formats is adequately covered.</p> <p>The Association is not a public authority, however the Association has made a note of this comment and is committed to highlighting inequalities caused by such policies.</p> <p>The appropriate amendment has been made.</p> <p>The Association has made a note of this comment.</p>

ORGANISATION	SUMMARY OF COMMENTS RECEIVED	OUR RESPONSE
Disability Action	<p>15. Disability Action would query the decision to review the arrangements for providing a range of accessible formats. The Equality Commission guide states that a public authority should make a commitment to the allocation of necessary resources in terms of money, time and people.</p> <p>16. Disability Action would recommend the use of specialist press of the 9 affected groups</p> <p>17. Regarding training and communication Disability Action requires specific actions, targets and a timeframe to enable informed comment to be made.</p> <p>18. Disability Action is concerned that access to copies was provided rather than giving a copy to all staff.</p>	<p>As stated in the scheme the intention of the review is to make recommendations on how public access to information can be better ensured by improving arrangements for providing information in different formats.</p> <p>The Association has made a note of this comment.</p> <p>Appendix 5 outlines the Association's implementation plan.</p> <p>The Association has made a note of this comment.</p>
NI Mixed Marriage Assoc	<p>1. Associations should bear in mind needs of mixed couples and their families who make up around 1 in 10 marriages and may need a safe space. This is an availability issue as public housing is estimated to be 5% mixed.</p>	<p>This is a strategic issue, however the Association is not strategic body.</p>
Coalition on Sexual Orientation	<p>1. Many schemes repeat the terminology of the guidelines without explaining how these requirements will operate in practice e.g. necessary resources – what precise resources are being made?</p>	<p>The Association's scheme is a policy document and cannot be intended to outline every process in detail. The scheme clearly makes a commitment to making available necessary resources.</p>

<b>ORGANISATION</b>	<b>SUMMARY OF COMMENTS RECEIVED</b>	<b>OUR RESPONSE</b>
Coalition on Sexual Orientation	<p>2. Due to the new agenda of issues surrounding sexual orientation, your first annual review should include a re-evaluation of any previous screening/scoping decisions as a result of which sexual orientation was deemed irrelevant to particular policies.</p> <p>3. We require a commitment that adequate time, which may be more than 2 months, be allowed for consultation.</p> <p>4. An example of “necessary resources” to underpin face-to-face meetings would be reasonable travel expenses for CoSO representatives.</p> <p>5. Many public authorities have failed to include CoSO on their list of consultees.</p> <p>6. Public authorities should either defer their screening processes until greater consideration can be given to them or approach any screening conducted in this stage in an inclusive fashion.</p> <p>7. Policies to be screened should include employment, procurement, equal opportunities (equal opportunities policy should be expanded to include discrimination on grounds of sexual orientation), health &amp; safety, harassment, purchasing and contracting-out policies.</p> <p>8. You should pay attention to informal policies including undocumented procedures and protocols.</p>	<p>The Association is of the opinion that this does not apply given that no prior responsibilities to Section 75 existed.</p> <p>It is the Association’s opinion that adequate time for consultation has been allowed but will consider requests for increased time.</p> <p>The Association will consider any reasonable requests for travel assistance.</p> <p>The Association has included CoSO on their consultee list.</p> <p>Appendix 5 states that screening will not commence until after the scheme has been approved.</p> <p>The Association has made a note of this comment.</p> <p>The Association has made a note of this comment.</p>

<b>ORGANISATION</b>	<b>SUMMARY OF COMMENTS RECEIVED</b>	<b>OUR RESPONSE</b>
Coalition on Sexual Orientation	<p>9. Respect for the statutory duty involves an on-going review and dialogue on questions of inequality rather than a once in 5 year decision.</p> <p>10. CoSO is worried that policies will be excluded from impact assessment on grounds of sexual orientation on the basis that they have no evidence of adverse impact.</p> <p>11. Equality impact assessments should operate on the basis that those policies, which have the greatest impact, should be assessed at the earliest possible stage.</p> <p>12. CoSO consider it essential that a sensitive system of voluntary and confidential indicators of sexual orientation in close consultation with LGBT groups (lesbian, gay, bisexual and transgendered)</p> <p>13. There must be the necessary funds to research into the impact of your policies on the LGBT community.</p> <p>14. Many schemes set down criteria in relation to consideration of their impact assessments including “rights, resources, participation, values and norms”. CoSO would wish to see a fuller explanation of these terms.</p> <p>15. In CoSO view draft schemes are universally sparse on the mechanics of impact assessment.</p>	<p>The Association has made a note of this comment</p> <p>The Association will give full consideration to all aspects when screening policies.</p> <p>The Association has made a note of this comment.</p> <p>NIFHA is working with CoSO on behalf of the Association to address this issue.</p> <p>The Association has made a note of this comment.</p> <p>The Association has made a note of this comment.</p> <p>The equality scheme is not intended to be a procedure but a policy.</p>

<b>ORGANISATION</b>	<b>SUMMARY OF COMMENTS RECEIVED</b>	<b>OUR RESPONSE</b>
Coalition on Sexual Orientation	<p>16. CoSO is disappointed at the lack of detail in relation to the way authorities propose to deal with mitigation and alternatives.</p> <p>17. CoSO feels strongly that there may be instances where it would be preferable if meetings were publicised only in LGBT press.</p> <p>18. CoSO objects strongly to the indication in some schemes that a charge may be made for the documentation.</p> <p>19. Results of impact assessments should not be regarded as insignificant on any of the following grounds:</p> <ol style="list-style-type: none"> <li>a. that there is only a small amount of data</li> <li>b. that there have been difficulties in the gathering of data</li> <li>c. that there have been difficulties in interpreting data due to unfamiliarity with the issues.</li> </ol> <p>20. Public authority should work closely with CoSO to ensure that the results of impact assessments will be accurately interpreted.</p> <p>21. Training should be provided for all staff around LGBT issues.</p> <p>22. CoSO would like to see information being given to relevant community groups.</p>	<p>The Association does not wish to pre-empt the outcome of impact assessment.</p> <p>The Association appreciates the concerns raised by CoSO and recognises the need for a safe environment but the Association sees no reason to exclude other press over LGBT.</p> <p>This is not mentioned in our scheme.</p> <p>The Association has made a note of this comment.</p> <p>The Association will involve all organisations as deemed appropriate.</p> <p>The Association has made a note of this comment, however it is not our intention to provide specific training relating to one issue.</p> <p>The Association will make available any information relating to a particular group.</p>

ORGANISATION	SUMMARY OF COMMENTS RECEIVED	OUR RESPONSE
Coalition on Sexual Orientation	<p>23. Would like to see detailed reference to the process for establishing and maintaining an ongoing dialogue with the LGBT community.</p> <p>24. Complaints procedure should allow complaints to be made on behalf of individuals by representative groups.</p>	<p>The Association will keep and maintain contact with relevant groups as appropriate.</p> <p>The complaints procedure does not seek to exclude complaints from anyone.</p>
West Belfast Economic Forum	<ol style="list-style-type: none"> <li>1. The equality scheme must actively promote equality of opportunity and take affirmative action to redress imbalances.</li> <li>2. All schemes must be made available in Irish in order to promote Irish language.</li> <li>3. Appropriate financial resources should be made available for community organisations that are key stakeholders.</li> <li>4. Your scheme must be written in clear and accessible language.</li> <li>5. Clear and workable timeframes must be established.</li> <li>6. Effective implementation of equality scheme must be taken into account at staff appraisals.</li> <li>7. Your scheme must acknowledge that procurement is a function that the equality duty applies to.</li> <li>8. Objectives and targets must be realistically timetabled.</li> <li>9. Yours scheme needs to state that employees have to disclose membership of oath-bound organisations.</li> </ol>	<p>The Association has made a note of this comment.</p> <p>All reasonable requests for translation into alternative languages will be considered.</p> <p>The Association would consider reasonable requests for financial assistance from key stakeholders.</p> <p>The Association has made a note of this comment.</p> <p>This has been included in appendix 5.</p> <p>This has been included in our scheme.</p> <p>The Association has made a note of this comment and it will be considered during screening.</p> <p>The Association has made a note of this comment.</p> <p>This comment is noted but the Association's scheme has been written to balance its obligations under Section 75 and the rights of individuals.</p>

ORGANISATION	SUMMARY OF COMMENTS RECEIVED	OUR RESPONSE
West Belfast Economic Forum	<p>10. Methods of consultation should be designed so there are no barriers for those affected by your policies.</p> <p>11. You should advertise in newspapers specific to each constituent group.</p> <p>12. There must be a clear commitment to apply equality assessment criteria to all policies and functions.</p> <p>13. There should be more clarity on impact assessments.</p> <p>14. Targeting social need is a non-legislative policy initiative and is subordinate to and an expression of the equality duty.</p> <p>15. The results of the monitoring process need to be seen to have an effect on the review and development of policies.</p> <p>16. Equality training has to involve trainers from the named categories in Section 75.</p>	<p>This has been included in points 4.8 – 4.14 have tried to remove any barriers to ensure the highest level of inclusivity.</p> <p>Point 6.4 states the Association’s commitment to make public, information relevant to the Association’s scheme.</p> <p>The Association has made a note of this comment.</p> <p>The Association’s scheme is a statement of policy intent and should not be read as a procedure.</p> <p>The Association has made a note of this comment.</p> <p>The Association has made a note of this comment.</p> <p>Equality awareness training is planned within the Association.</p>
Housing Rights Service	<p>1. Briefly, reviewed scheme on disk at time of issue. Unable to make a written response due to other consultation priorities during the Association’s public consultation period.</p>	

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<b>ORGANISATION</b>	<b>SUMMARY OF COMMENTS RECEIVED</b>	<b>OUR RESPONSE</b>
Irish Congress of Trades Unions	1. Daunted at receiving 37 Equality schemes at once and even though it is possible to submit a general response, all 37 schemes need to be read in order to collate that general response. Appreciate that NIFHA has allowed 11 weeks instead of the usual 8 for consultation, but it may be rather difficult to respond in a meaningful manner. Will try to make a response.	

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**APPENDIX 4: MAIN GROUPS RELEVANT TO THE SECTION 75  
CATEGORIES FOR NORTHERN IRELAND PURPOSES**

<b>Category</b>	<b>Main Groups</b>
Religious belief	Protestants; Catholics; people of non-Christian faiths; people of no religious belief
Political opinion	Unionists generally; Nationalist generally; members/supporters of any political party
Racial group	White people; Chinese; Travellers; Indians; Pakistanis; Black people
Men and women generally	Men (including boys); women (including girls), Trans-gendered people, Transsexual people
Marital status	Married people; unmarried people; divorced or separated people; widowed people
Age	Children under 16; people of working age (16/65); people over 65
Persons with a disability	Persons with a physical, sensory, mental or learning disability as defined in sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995
Persons with dependants	Persons with personal responsibility for the care of a child; persons with personal responsibility for the care of a person with an incapacitating disability; persons with personal responsibility for the care of a dependant elderly person
Sexual orientation	Heterosexual people; homosexual people; bisexual people

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*APPENDIX 5 – ACTION PLAN FOR IMPLEMENTING EQUALITY SCHEME*

<b>Area of Implementation</b>	<b>Element</b>	<b>Performance Indicator</b>	<b>Milestone</b>	<b>Responsibility</b>
Organisational Arrangements	<ul style="list-style-type: none"> <li>Integration of equality objectives into departmental business plans</li> <li>Integration of equality objectives into personal performance plans</li> </ul>	<ul style="list-style-type: none"> <li>SMT agrees equality objectives</li> <li>Equality objectives included in business plans for 2004-2005</li> <li>Equality objectives reviewed annually in consultation with SMT and included in business plans in years 2003-2004</li> <li>SMT agrees draft guidance for staff</li> <li>Objectives included in personal performance plans</li> </ul>	<ul style="list-style-type: none"> <li>annually</li> <li>annually</li> <li>annually</li> <li>ongoing</li> <li>annually</li> </ul>	Corporate Services and SMT
Progress Reporting	<ul style="list-style-type: none"> <li>Regular reports to Sanctuary Board</li> <li>Annual reports to Equality Commission</li> <li>Review of Scheme</li> </ul>	<ul style="list-style-type: none"> <li>Minuted reports at least quarterly</li> <li>Report sent after approval by Trinity Housing</li> <li>Summary of Annual Progress Report to Equality Commission incorporated in Association's Annual report</li> <li>Review conducted, published and sent to Commission</li> </ul>	<ul style="list-style-type: none"> <li>ongoing</li> <li>annually in July</li> <li>annually (September)</li> <li>09/10</li> </ul>	Corporate Services and Board of Management  Trinity Housing

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Consultation	<ul style="list-style-type: none"> <li>• Overview Consultation of</li> <li>• Consultation on Equality Impact Assessments</li> </ul>	<ul style="list-style-type: none"> <li>• Meeting takes place to consider joint approaches to consultation with other Registered Housing Association Bodies</li> <li>• Consultation takes place for Screening of policies in line with the 2 stage approach (see p.13)</li> <li>• Report of consultation on screening exercise to be included as part of annual report to Equality Commission</li> <li>• Consultation takes place on each Equality Impact Assessment</li> </ul>	<ul style="list-style-type: none"> <li>• 06/04</li> <li>• 09/05</li> <li>• Report 07/06</li> <li>• ongoing</li> </ul>	Corporate Services and SMT
Training	<ul style="list-style-type: none"> <li>• Training programme</li> <li>• Top Level briefing on Equality Scheme</li> <li>• Awareness training</li> <li>• Specialised/focused training</li> </ul>	<ul style="list-style-type: none"> <li>• Training programme agreed by Board and SMT</li> <li>• Briefing on Equality Scheme for Trinity Housing members and Senior Managers takes place</li> <li>• All staff trained by end 2005</li> <li>• All new staff to receive equality awareness training within 1 year of joining.</li> <li>• Specialised/focused training (see Section 8 of Scheme for types of training) for key staff (minimum of 1 in year 1)</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing</li> <li>• 04/04</li> <li>• 05/04</li> <li>• 06/04</li> <li>• 12/05</li> <li>• ongoing</li> <li>• ongoing</li> </ul>	Corporate Services and SMT

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Equality Impact Assessments (EQIAs)	<ul style="list-style-type: none"> <li>• Screening</li> </ul>	<ul style="list-style-type: none"> <li>• Finalise screening instrument and procedures, and pilot with sample of policies</li> <li>• Screen all policies</li> <li>• Prioritise policies for EQIA</li> <li>• Consult with relevant interest groups on outcome of screening exercise (including proposed priorities for EQIA)</li> </ul>	<ul style="list-style-type: none"> <li>• 01/05</li> <li>• 06/05</li> <li>• 06/05</li> <li>• 06/05 – 09/05</li> </ul>	Corporate Services and SMT
	<ul style="list-style-type: none"> <li>• Plan for EQIAs</li> </ul>	<ul style="list-style-type: none"> <li>• Develop plan for carrying out EQIAs, taking account of consultation responses</li> <li>• Agree plan for EQIAs with SMT</li> <li>• Agree plan with Registered Housing Associations</li> </ul>	<ul style="list-style-type: none"> <li>• 10/05</li> <li>• 10/05</li> <li>• 10/05</li> </ul>	Corporate Services and SMT and Registered Housing Associations
	<ul style="list-style-type: none"> <li>• Carrying out EQIAs</li> </ul>	<ul style="list-style-type: none"> <li>• Begin EQIAs</li> <li>• Review Plan for EQIAs</li> <li>• Carry out EQIAs in accordance with the guidance for EQIAs</li> </ul>	<ul style="list-style-type: none"> <li>• 10/05</li> <li>• annually in May</li> <li>• ongoing</li> </ul>	Trinity Housing corporately in conjunction with housing associations through a joint process

<b>Area of Implementation</b>	<b>Element</b>	<b>Performance Indicator</b>	<b>Milestone</b>	<b>Responsibility</b>
Communication	<ul style="list-style-type: none"> <li>• Publication of Equality Scheme</li> <li>• Dissemination to key stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>• Scheme to be published after approval from the Equality Commission</li> <li>• Summary of Scheme to be developed and made available</li> <li>• Scheme to be made available in accessible formats on request</li> <li>• Scheme to be published on website</li> <li>• Copy of Scheme to be made available to all staff</li> <li>• Copy of Scheme mailed to all those consulted on the Scheme, and to others on request</li> <li>• Press Release to the media informing them of the publication of the Equality Scheme</li> </ul>	<ul style="list-style-type: none"> <li>• 10/05</li> <li>• 11/05</li> <li>• ongoing</li> <li>• 12/05</li> <li>• 11/05</li> <li>• 11/05</li> <li>• 10/05 or when all HA schemes are approved</li> </ul>	<p>Corporate Services</p> <p>NIFHA to issue joint press release on behalf of Housing Associations</p>
Access	<ul style="list-style-type: none"> <li>• Review of Access to Information and Services</li> </ul>	<ul style="list-style-type: none"> <li>• To conduct a review within one year of the implementation of the scheme covering all aspects of access to information and services, and produce report making recommendations</li> <li>• To consult on review with key stakeholders</li> <li>• Produce action plan for acting on review recommendations</li> <li>• Implementation of action plan begins</li> <li>• Carry out action plan to meet performance indicator targets</li> </ul>	<ul style="list-style-type: none"> <li>• 10/06</li> <li>• 03/07</li> <li>• 06/07</li> <li>• 07/07</li> <li>• ongoing</li> <li>• ongoing</li> </ul>	Corporate Services
Complaints	<ul style="list-style-type: none"> <li>• Complaints procedure</li> </ul>	<ul style="list-style-type: none"> <li>• To respond to any complaints of non-compliance within one month of complaint being made</li> <li>• To report on complaints made on an annual basis to the Equality Commission as part of annual report</li> </ul>	<ul style="list-style-type: none"> <li>• ongoing</li> <li>• annually in July</li> </ul>	Chief Executive