



DRAFT EQUALITY SCHEME

MARCH 2013

Equality Scheme for
Moyle Policing and Community Safety Partnership

**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 10)**

Moyle PCSP
Sheskburn House
7 Mary Street
Ballycastle
BT54 6QH

Approved by the Equality Commission for Northern Ireland on
[insert date].

Foreword

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

In our equality scheme we set out how Moyle Policing and Community Safety Partnership (PCSP) propose to fulfil the Section 75 statutory duties.

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

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

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

We, the Chair of Moyle Policing and Community Safety Partnership, and the Chief Executive of Moyle District Council, 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

¹ See section 1.1 of our Equality Scheme.

influence how we carry out our functions in line with our Section 75 statutory duties. It also offers the means whereby persons directly affected by what they consider to be a failure, on our part, to comply with our equality scheme, can make complaints.

On behalf of Moyle Policing and Community Safety Partnership 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.

Cllr Cara McShane
Chair
Moyle PCSP

Mr Richard Lewis
Chief Executive
Moyle District Council

Signed:

Signed:

Date:

Date:

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Please note: Foreword and Appendices 3 and 4 form part of this equality scheme.

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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 Moyle Policing and Community Safety Partnership 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 Moyle Policing and Community Safety Partnership

1.2 Schedule 9 4. (1) of the Act requires Moyle Policing and Community Partnership 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 We, Moyle Policing and Community Safety Partnership are committed to the discharge of our Section 75 obligations in all parts of our organisation and we will commit the necessary available resources in terms of people, time and money to ensure that the Section 75 statutory duties are complied with and that our equality scheme can be implemented effectively.

Who we are and what we do

On 1 April 2012 – Policing and Community Safety Partnerships (PCSPs) were established through the legislation of the Justice Act (NI) 2011.

On 13 May 2012 –PCSPs were legally constituted following the appointment of independent members through a public appointments process carried out by the Northern Ireland Policing Board.

The work of Policing and Community Safety Partnerships is overseen by the Joint Committee. This is a group made up of representatives from Department of Justice (DOJ) and the Northern Ireland Policing Board (NIPB)

The functions of PCSPs as laid out in Justice Act (Northern Ireland) 2011 Part 3 and Schedule 1 outlines the functions of a PCSP are as follows.

21 – (1) The functions of a PCSP shall be-

(a) To provide views to a relevant district commander and to the Policing Board on any matter concerning the policing of the District

(b) To monitor the performance of the police in carrying out
(1) the policing plan in relation to the district; and
(!!) the local policing plan applying to the district or any part of the district

(c) to make arrangements for obtaining the co-operation of the public with the police in preventing crime and enhancing community safety in the District.

(d) to make arrangements for obtaining the views of the public about matters concerning the policing of the district and enhancing community safety in the district and to consider fully any views obtained.

(e) to act as a general forum for discussion and consultation on matters affecting the policing of the District and enhancing community safety in the District.

(f) to prepare plans for reducing crime and enhancing community safety in the District

(g) to identify targets or other indicators by reference to which it can assess the extent to which those issues are addressed by action taken in accordance with any such plans.

(h) to provide any such financial or other support as it considers appropriate to persons involved in ventures designed to reduce crime or enhance community safety in the district, and

(i) such other functions as are conferred on it by any other statutory provision.

(2) The functions of a PCSP mentioned in subsection (1)(a) (b) and (c) –

(a) are referred to in this part as its “restricted functions” and

(b) must be exercised , on behalf of the PCSP, by the Policing Committee of the PCSP.

(3) References, in this section to enhancing community safety in any district are to make the district one in which it is, and is perceived to be, safer to live and work, in particular by the reduction of actual and perceived levels of crime and other anti-social behaviour.

Employment and procurement functions

Staff of Moyle Policing and Community Safety Partnership are employed and are responsible to Moyle District Council, and benefit from and are subject to all employment policies of the Council.

Any goods and services required by Moyle Policing and Community Safety Partnership are subject to a procurement process and all procurement policies of Moyle District Council.



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 Consultation is in chapter 3, monitoring arrangements, assessment of impact of policies and publication arrangements in Chapter 4, staff training in chapter 5, access to information in Chapter 6, the PCSP complaints procedure in Chapter 8, and publication and Annual Review of PCSP Equality Scheme in Chapters 9 and 10.

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

Responsibilities and reporting

2.2 Moyle Policing and Community Safety Partnership is committed to the fulfilment of our Section 75 obligations in all parts of our work.

2.3 Responsibility for the effective implementation of our equality scheme lies with the Clerk and Chief Executive of Moyle District Council. Operational responsibility for the delivery of the Equality scheme lies with the PCSP Manager.

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

Bridgeen Butler
Moyle PCSP
c/o Sheskburn House
7 Mary Street
Ballycastle
BT54 6QH

Tel 028 2076 2225

Fax Number 028 207 62515

Type talk: 18001 028 20762225

E.mail – moylepcsp@moyle-council.org

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 Moyle Policing & Community Safety Partnership will prepare an annual report on the progress we have made on implementing the arrangements set out in this equality scheme to discharge our Section 75 statutory duties (Section 75 annual progress report).

The Section 75 annual progress report will be sent to the Equality Commission by 31 August each year and will follow any guidance on annual reporting issued by the Equality Commission.

Progress on the delivery of Section 75 statutory duties will also be included in our (organisational) annual report.

2.8 The PCSP Section 75 annual progress report will be available on our web-site when it has been compiled.

www.moyle-council.org or by contacting:

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

2.9 Moyle Policing and Community Safety Partnership will liaise closely with the Equality Commission to ensure that progress on the implementation of our equality scheme is maintained.

Action plan/action measures

2.10 Moyle Policing and Community Safety Partnership 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, however it does not form part of the Equality Scheme

2.11 The action measures that make up our action plan will be relevant to our functions. They will be developed and prioritised on the basis of an audit of inequalities. The audit of inequalities has gathered and analysed information across the Section 75 categories to identify the inequalities that exist for our services users and those affected by our policies

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

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

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

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

2.16 Moyle Policing and Community Safety Partnership will inform the Commission of any changes or amendments to our action plan and will also include this information in our Section 75 annual

progress report to the Commission. Our Section 75 annual progress report will incorporate information on progress we have made in implementing our action plans/action measures.

2.17 Once finalised, our action plan will be available for download from our website: www.moyle-council.org

Or by contacting:

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Type talk: 18001 028 20762225

E.mail – moylepcsp@moyle-council.org

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

The Action Plan will be available in alternative formats upon request.

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.

In addition to Equality Commission guidance referenced in this section you may find it useful to refer to:

ODI guidance on accessible consultation events for people with disability

<http://www.officefordisability.gov.uk/iod/channels/events.php>

Department for Business, Enterprise and regulatory Reform Code of Conduct on Consultation (2008)

<http://www.berr.gov.uk/files/file47158.pdf>

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

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

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

Initially all consultees (see Appendix 3), as a matter of course, will be notified (by email or post) of the matter/policy being consulted upon to ensure they are aware of all consultations. Thereafter, to ensure the most effective use of our and our consultees resources, we will take a targeted approach to consultation for

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

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

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

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

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

Information will be made available, on request, in alternative formats⁴, in 10 working days. We will ensure that such consultees have equal time to respond.

⁴ See Chapter 6 of our equality scheme for further information on alternative formats of information we provide.

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

3.2.5 To ensure effective consultation with consultees⁵ 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:

- Issue of a press release, which will also be placed as a news item on the PCSP web-site, when the Equality Scheme is approved by the Equality Commission for Northern Ireland.
- Inform all consultees of how to access a copy of our approved equality scheme and action plan following the equality scheme's approval by the Equality Commission for Northern Ireland.

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 commitments⁶.

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.

⁵ Please see Appendix 3 for a list of our consultees.

⁶ Please see below at 4.27 to 4.31 for details on monitoring.

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 will make all relevant information available to consultees in appropriate formats to ensure meaningful consultation. This will include 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 will take into account any assessment and consultation carried out in relation to the policy.

3.2.11 We will provide feedback to consultees in a timely manner. A feedback report will be 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 will be 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 obtainable at www.moyle-council.org . It can also be obtained by contacting

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E.mail – moylepcsp@moyle-council.org

3.4 Our consultation list is not exhaustive and will be 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 the PCSP Manager 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.

The policies adopted by Moyle Policing and Community Safety Partnership are policies which have been developed by; Moyle District Council, Northern Ireland Policing Board and the Department of Justice however we will review such policies we receive to ensure they do not adversely affect any section 75 groups.

Consequently, all these policies, where required, have already been through a screening process, and EQIA where required. However, if the Moyle Policing and Community Safety Partnership develops any additional policies it will use the tools of screening and equality impact assessment as detailed below.

4.3 Moyle Policing & Community Safety Partnership will use the tools of **screening** and **equality impact assessment** to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will also follow Equality Commission guidance:

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

Screening

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

4.5 Screening will be completed at the earliest opportunity in the policy development/review process. 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 will be 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 will be 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 will gather all relevant information and data, both qualitative and quantitative. In taking this evidence into account we will 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:

- the policy has been 'screened in' for equality impact assessment
- the policy has been 'screened out' with mitigation⁷ or an alternative policy proposed to be adopted
- 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 PCSP Manager.

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

⁷ 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.

and/or good relations categories, we will normally subject the policy to an equality impact assessment. This screening decision will be 'signed off' by the appropriate policy lead within Moyle Policing and Community Safety Partnership

4.12 If our screening concludes that the likely impact of a policy is 'none', in respect of all of the equality of opportunity and/or good relations categories, we may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, we will give details of the reasons for the decision taken. This screening decision will be 'signed off' by the appropriate policy lead within Moyle Policing and Community Safety Partnership.

4.13 As soon as possible following the completion of the screening process, the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on our website

www.moyle-council.org

and on request.

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

4.15 Our screening reports will be published quarterly

Equality impact assessment

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

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

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

Our arrangements for publishing the results of the assessments of the likely impact of policies we have adopted or propose to adopt on the promotion of equality of opportunity (Schedule 9 4. (2) (d); Schedule 9 9. (1))

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

What we publish

4.20 Screening reports

These will be published quarterly. Screening reports will detail:

- All policies screened by Moyle Policing and Community Safety Partnership over the three month period.
- A statement of the aim(s) of the policy/policies to which the assessment relates
- Consideration given to measures which might mitigate any adverse impact

- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity;
- Screening decisions, i.e:
 - whether the policy has been 'screened in' for equality impact assessment.
 - whether the policy has been 'screened out' with mitigation or an alternative policy proposed to be adopted.
 - whether the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.
- Where applicable, a timetable for conducting equality impact assessments
- A link to the completed screening template(s) on our website

4.21 **Screening templates**

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

4.22 **Equality impact assessments**

EQIA reports will be 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) will be available on our website

www.moyle-council.org

or by contacting:

Bridgeen Butler
Moyle PCSP
c/o Sheskburn House
7 Mary Street
Ballycastle
BT54 6QH

Tel 028 2076 2225

Fax Number 028 207 62515

Type talk: 18001 028 20762225

E.mail – moylepcsp@moyle-council.org

4.25 In addition to the above, screening reports (electronic link or hard copy on request if more suitable for recipients) which include all policies screened over a 3 month period will also be sent directly to all consultees on an quarterly basis.

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

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

4.27 Monitoring can assist us to deliver better public services and continuous improvements. Monitoring Section 75 information involves the processing of sensitive personal data (data relating to the racial or ethnic origin of individuals, sexual orientation, political opinion, religious belief, etc). In order to carry out monitoring in a confidential and effective manner, the Moyle Policing & Community

Safety Partnership follows guidance from the Office of the Information Commissioner and the Equality Commission.

4.28 We will 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 will establish to monitor the impact of policies and identify opportunities to better promote equality of opportunity and good relations are:

- The collection, collation and analysis of existing relevant primary quantitative and qualitative data across all nine equality categories on an ongoing basis
- The collection, collation and analysis of existing relevant secondary sources of quantitative and qualitative data across all nine equality categories on an ongoing basis
- An audit of existing information systems within one year of approval of this equality scheme, to identify the extent of current monitoring and take action to address any gaps in order to have the necessary information on which to base decisions
- Undertaking or commissioning new data if necessary.

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

4.31 We will review our EQIA monitoring information on an annual basis. Other monitoring information is reviewed annually such as NIRSA in relation to demographics, Partner organisation statistics such as Housing executive & Council in relation to ASB, Crime surveys and consultations carried out through PCSP members engagement relating to the section 75 groups.

Other additional arrangements for monitoring include:

All completed job applications for positions with Moyle Policing and Community Safety Partnership include a monitoring form. This data is collated and compiled by the Council's Human Resources Section.

The Council Human Resources Section operates a PAMS System that stores, updates and analyses data on employees. This system provides valuable data on the profile of employees and applicants

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 will be published as follows:

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

4.34 All information will be published and 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))

Training in Section 75 statutory duties and related issues will be developed and provided by the following; NI Policing Board, Department of Justice and/or the Council's Equality Officer (arranged through the Human Resources Section). Moyle PCSP staff and members will be able to avail of this training.

In order to ensure that staff are trained on both the equality of opportunity and good relations duties, the following may be provided;

- Effective internal and external communication of the commitment of the head of the public authority to the Section 75 statutory duties
- A section on the equality duties in the induction training for new staff
- More focused training for staff in management roles, and other specialist staff (such as trainers, lawyers and staff involved in research and data collection, policy development, service design, conducting equality impact assessments, consultation, monitoring and evaluation)
- Arrangements to ensure staff have access to a copy of, and understand, the equality scheme
- Arrangements to ensure staff are kept up to date with Section 75 developments
- Monitoring and evaluation of training.

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 Moyle Policing and Community Safety Partnership to the Section 75 statutory duties, both internally and externally.

To this end we will have 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 Moyle Policing and Community Safety Partnership will ensure that a detailed training plan is provided for its staff and members 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 mainstream the principles of the Section 75 statutory duties within the Council's policy development framework and to provide those staff involved in drafting PCSP policies with the necessary skills and knowledge to ensure a consistent approach to policy formulation
- 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 Moyle Policing and Community Safety Partnership equality scheme with the necessary skills and knowledge to do this work effectively.
- to provide those staff involved in screening and EQIAs

Awareness raising and training arrangements

5.4 The following arrangements are in place to ensure all our staff and PCSP Members will be 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 the Moyle Policing and Community Safety Partnership will receive a briefing on this equality scheme within three months or as soon as possible after approval of the scheme.
- The Section 75 statutory duties will form part of induction training for new staff and PCSP Members

-Focused training will be provided for key staff within Moyle Policing and Community Safety Partnership 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.

-Training in Section 75 statutory duties and related issues may be developed and provided by the following; NI Policing Board, Department of Justice and/or the Council's Equality Officer (arranged through the Human Resources Section). Moyle PCSP staff can avail of this training.

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, Moyle Policing and Community Safety Partnership 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 will be subject to the following monitoring and evaluation arrangements:

We will 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 as part of the Moyle Policing and Community Safety Partnership Section 75 Annual Progress Report to the Equality Commission.

Attendance at all training courses will be recorded to enable monitoring of attendees. This will ensure staff and PCSP Members are credited with attending and therefore receive training appropriate to their needs and those of the PCSP.



Chapter 6: Our arrangements for ensuring and assessing public access to information and services we provide (Schedule 9 4. (2) (f))

Please note:

Further information on producing alternative formats can be found at <http://www.officefordisability.gov.uk/iod/formats/index.php> though please note that audio tape is now not widely used in Northern Ireland and other formats such as CD, MP3 and DAISY are more appropriate.

6.1 Moyle Policing and Community Safety Partnership 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 will 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 will 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 Moyle Policing and Community Safety Partnership will liaise with representatives of young people and disability and minority ethnic organisations and will take account of existing and developing good practice.

We will acknowledge requests for information in alternative formats in a timely manner, usually within 7 days.

We will respond to requests for information in alternative formats in a timely manner, usually with twenty days (however, this may be dependent upon the agency providing the alternative format.)

We will request that training is reviewed to ensure the inclusion of communications module on written accessibility. This will provide staff with the knowledge, skills and ability on how to provide information to the range of S75 groups including children and young people, people with a learning disability, people with disabilities and the range of minority ethnic groups for whom English is not their first language

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

6.5 Moyle Policing and Community Safety Partnership will use a range of communication channels to enable wide access to information such as e-bulletins, websites, social media, leaflets, advertisements etc

Access to services

6.6 Moyle Policing and Community Safety Partnership are committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories.

Moyle Policing and Community Safety Partnership also adheres to the relevant provisions of current anti-discrimination legislation.

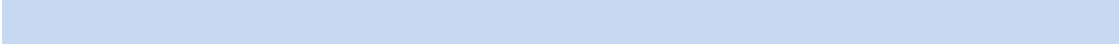
6.7 Moyle Policing and Community Safety Partnership will ensure that the public are able to easily access information and services by adopting a flexible and inclusive approach that ensures equality of opportunity and promotes good relations.

Assessing public access to information and services

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

6.9 This will be carried out when we are reviewing our functions and services as part of our Annual Progress Report to the Equality Commission.

The PCSP will also be regularly assessed by the Department of Justice and the Northern Ireland Policing Board regarding how effectively we are delivering our functions and services with due regard to equality of opportunity and the promotion of good relations.



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 Moyle Policing and Community Safety Partnership 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 the Moyle Policing and Community Safety Partnership has failed to comply with its approved equality scheme should contact:

Bridgeen Butler
Moyle PCSP
c/o Sheskburn House
7 Mary Street
Ballycastle
BT54 6QH

Tel 028 2076 2225
Fax Number 028 207 62515
Type talk: 18001 028 20762225

E.mail – Moylepcsp@moyle-council.org

8.4 We will in the first instance acknowledge receipt of each complaint within 7 days.

8.5 The PCSP Manager will carry out an internal investigation of the complaint and will respond substantively to the complainant within one (1) month of the date of receiving the letter of complaint. Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the

complainant may be extended to two (2) months. In those circumstances, the complainant will be advised of the extended period within one month of making the complaint.

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

8.7 In any subsequent investigation by the Equality Commission, the Moyle Policing and Community Safety Partnership will co-operate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

Similarly, the Moyle Policing and Community Safety Partnership 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 Moyle Policing and Community Safety Partnership will make all efforts to implement promptly and in full any recommendations arising out of any Commission investigation.



Chapter 9: Publication of our equality scheme (Schedule 9 4. (3) (c))

9.1 Our equality scheme is available free of charge in print form and alternative formats from:

Bridgeen Butler
Moyle PCSP
c/o Sheskburn House
7 Mary Street
Ballycastle
BT54 6QH

Tel 028 2076 2225
Fax Number 028 207 62515
Type talk: 18001 028 20762225

E.mail – Moylepcsp@moyle-council.org

9.2 Our equality scheme will also be available on our website at:

www.moyle-council.org

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

-We will make every effort to communicate widely the existence and content of our equality scheme. This may include press releases, prominent advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.

-We will email a link to our approved equality scheme to our consultees on our consultation lists. Other consultees without e-mail will be notified by letter that the scheme is available on request. We will respond to requests for the equality scheme in alternative formats in a timely manner, usually within 7 days.

Our equality scheme will be 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.

We will liaise and work with specific stakeholders to ensure that the arrangements we have in place for communicating our equality scheme effectively to children and young people and people with disabilities meets the needs required.

9.4 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme, or visit our website at

www.moyle-council.org

Or contact:
Bridgeen Butler
Moyle PCSP
c/o Sheskburn House
7 Mary Street
Ballycastle
BT54 6QH

Tel 028 2076 2225
Fax Number 028 207 62515
Type talk: 18001 028 20762225

E.mail – Moylepcsp@moyle-council.org



Chapter 10: Review of our equality scheme (Schedule 9 8. (3))

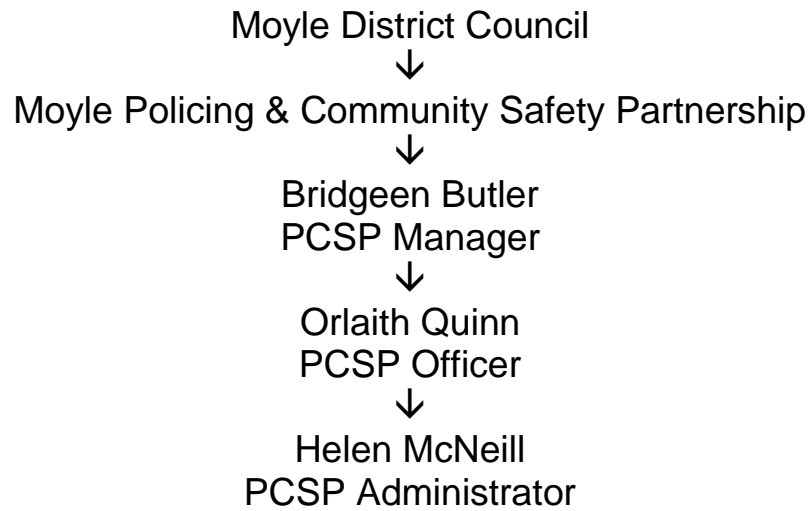
10.1 As required by Schedule 9 paragraph 8 (3) of the Northern Ireland Act 1998 we will conduct a thorough review of this equality scheme. This review will take place either within five years of submission of this equality scheme to the Equality Commission or within a shorter timescale to allow alignment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

Appendix 1 Organisations chart

Please insert a diagrammatical overview of your organisation (including people and functions).



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>⁸. 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 ⁹	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.

⁸ 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.”

⁹ *ibid*

Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientation	Bisexual people; heterosexual people; gay or lesbian people.

Appendix 3 List of consultees (Schedule 9 4. (2) (a))

Note: This consultation list is indicative, not exhaustive and will be reviewed on a regular basis to ensure it is relevant and up-to-date. List does not include those groups which have asked for their names to be removed.

Equality Commission for Northern Ireland
Equality Forum Northern Ireland
The Local Government Staff Commission for Northern Ireland
Community Relations Council
Northern Ireland Human Rights Commission
Help the Aged, Northern Ireland
Age Concern
Employers Forum on Disability
Disability Action
NSPCC
Children's Law Centre
The Blind Centre Northern Ireland
The British Deaf Association
Northern Ireland Gay Rights Association
Womens Forum Northern Ireland
Carers National Association
Northern Ireland Public Service Alliance
General Municipal Boilermakers
Amalgamated Transport and General Workers Union
Union of Construction Allied Trades
Northern Ireland Council for Voluntary Action
Altananam/Broombeg Community Association
Armoy Community Development Association
Ballintoy and District Community Development Association
Ballycastle Chamber of Commerce
Ballycastle Community Development Group
Bushmills and District Community Association
Bushmills Development Group
Bushmills Residents Group
Cairns Residents Association
Carey and Glenshesk Community Group
Carnanmore Community Group
Carnduff Residents Association
Cushendall Development Group
Cushendall Environment Group
Cushendun and District Development Association

Dundarave Residents and Environmental Forum
Glenariff Development Group
Glens Community Centre Group Ltd
Glens Rural Community Group
Liscolman Community Development Association
Mosside Entertainments Group
Moyle Womens Forum
North Antrim Community Network
Rathlin Development and Community Association
St Vincent De Paul
The Corrymeela Community
Moyle Sports Advisory Committee
Moyle District Partnership
Moyle Twinning Committee
Committee on the Administration of Justice
NI Council for Ethnic Minorities



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

Measure	Lead responsibility	Timetable
Section 75 Annual Progress Report [2.7]	PCSP Manager / Chief Executive	August (annually)
Action plan		
Consultation on draft action plan [2.15]	PCSP Manager	Oct 2012 – Jan 2013
Finalised action plan published [2.18]	PCSP Manager	October 2013 (on approval from Equality Commission)
Arrangements for monitoring progress in place [2.16]	PCSP Manager	August (annually)
Review of Equality Action Plan	PCSP Manager	Quarterly
Consultation list reviewed and updated [3.4]	PCSP Manager	October (annually)
Screening timetable [4.4]	PCSP Manager	Annually (when required)
Screening Reports [4.15]	PCSP Manager	Annually (when required)
EQIA timetable [4.16]	PCSP Manager	Annually (when required)
Monitoring	PCSP Manager	August (annually)

Review of monitoring information [4.31]	PCSP Manager	August (annually)
Publication of monitoring information [4.33;4.34]	PCSP Manager	August (annually)
Training	NIPB/DoJ/PCSP Managers	Reviewed annually
Development of summary scheme [5.4]	PCSP Manager	Jan 2014 (on approval of scheme)
Development of overall training programme [5.5]	NIPB/DoJ/PCSP Managers	Regionally organised
Focussed training [5.4]	NIPB/DoJ/PCSP Managers	Regionally organised
Update training [5.4]	NIPB/DoJ/PCSP Managers	Regionally organised
Evaluation of training [5.6]	PCSP Manager/NIPB/DoJ	August (annually)
Assessing access to information and services [6.9]	PCSP Manager	August (annually)
Communication of equality scheme [9.3]	PCSP Manager	Oct 2013-Jan 2014
Notification of consultees [9.3]	PCSP Manager	Oct 2012

Review of equality scheme [10.1]	PCSP Manager	August (annually)
Any other measures proposed in equality scheme	PCSP Manager	August (annually)



Action measures and outcomes

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

Action plan

A plan that sets out the 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.

Adverse impact

Where a Section 75 category has been affected differently by a policy and the effect is less favourable. 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 that is necessary to bring about positive change. It is a phrase used in the *Fair Employment and Treatment (NI) Order 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 Reviews

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 employers 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 that 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 (for example, 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 nine categories. Different circumstances will call for different types of consultation. Consultations could, for example, include meetings, focus groups, surveys and questionnaires.

Desk audit

An audit of a draft equality scheme to ensure that the scheme conforms to the requirements on form and content as detailed in the Equality Commission's guidelines.

Differential impact

Differential impact occurs where a Section 75 group has been affected differently by a policy. This effect could 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
- Victimisation
- Harassment

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
- 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 an 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 it has the effect of placing people who share a particular equality characteristic (for example, the same sex, religious belief or race) at a particular disadvantage compared with 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, indirect discrimination victimisation and harassment, discrimination against disabled people may also occur in two other ways:

- a. Disability-related discrimination - This generally occurs where a public authority, without lawful justification and for a reason that relates to a disabled persons 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 relevant 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 his/her dignity or creating for that person 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 the 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. EQIAs 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 Section 75 categories.

Equality scheme

A document that 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, EQIAs, monitoring, training and arrangements for ensuring access to information and services.

Good relations

Although not defined in the legislation, the Equality 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 everyday 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 EQIA 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.

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 the 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 1998

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

Northern Ireland Human Rights Commission

A statutory body established under Section 68 of the Act, which works to ensure that the human rights of everyone in Northern Ireland are fully protected in law, policy and practice.

Northern Ireland Statistics and Research Agency

The Northern Ireland Statistics and Research Agency (NISRA) is an executive agency within the Department of Finance and Personnel (DFP).

It provides statistical and research information regarding Northern Ireland issues, and it provides registration services to the public in the most effective and efficient way.

Office of the First Minister and Deputy First Minister

The Office of the First Minister and Deputy First Minister (OFMDFM) is responsible for providing advice, guidance, challenge and support on Section 75 issues to other Northern Ireland Civil Service departments.

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 rather than quantitative data.

Quantitative data

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

Screening

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

Screening template

A document that allows the screening results to be recorded.

Schedule 9

Schedule 9 of the Act 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 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
- 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 Act, 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 Equality Commission investigation:

1. An investigation of a complaint made 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 Equality Commission, where it believes that a public authority may have failed to comply with its approved equality scheme.

**MOYLE POLICING & COMMUNITY
SAFETY PARTNERSHIP**

**SECTION 75
AUDIT OF INEQUALITIES**

AND

**ACTION PLAN
FOR THE PERIOD
April 2013- March 2015**

DRAFT

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Section 2 WHAT PCSPs ARE RESPONSIBLE FOR

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**Section 4 ASSESSMENT OF KEY INEQUALITY ISSUES
FOR SECTION 75 CATEGORIES**

- **Facilities**
- **Membership/Structure**
- **Services/Functions**

Section 5 ACTION PLAN FOR S75 CATEGORIES

SECTION1 BACKGROUND TO INEQUALITY AUDIT

Section 75 of the Northern Ireland Act 1998 provides that:

(1) A public authority shall in carrying out its functions relating to Northern Ireland have due regard to the need to promote equality of opportunity-

(a) between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;

(b) between men and women generally;

(c) between persons with a disability and persons without; and

(d) between persons with dependants and persons without.

(2) Without prejudice to its obligations under subsection (1), a public authority shall in carrying out its functions relating to Northern Ireland have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

In 2010 the Equality Commission published revised guidance for public authorities to the implementation of Section 75 of the Northern Ireland Act 1998. This Guidance was developed in the light of the conclusions and recommendations of the Commission's Final Report of the Review of the Effectiveness of Section 75, published in November 2008. All public authorities have been required to submit new Equality Schemes to comply with this revised guidance.

One of the key recommendations of the Review related to the need to shift the focus of delivery of the section 75 duties from process to outcomes. The revised guidance recommended that public authorities developed action plans to address inequalities experienced across the section 75 categories, alongside the development of revised Equality Schemes. It further recommends that an Audit of Inequalities be conducted in order to inform the development of the Action Plan.

The Commission in its guide defines an audit of inequalities as a "systematic review and analysis of inequalities which exist for service users and those affected by a public authority's policies".

This Audit of Inequalities has enabled Moyle Policing & Community Safety Partnership to identify potential functional areas for further or improved discharge of its Section 75 duties and will inform the PCSPs equality action plan and also the key strategic actions of the PCSP's Action Plan for 2012-2013.

Development of the Inequalities Audit and Action Plan

The Equality Commission, in its correspondence to Moyle Policing & Community Safety Partnerships of 1 May 2012, recommended that all public authorities undertake an audit of inequalities to inform that identification and development of action measures for the Equality Scheme. They further advised that these measures should be relevant to our functions and should seek to address inequalities that exist for service users and also promote equality of opportunity.

The production of an inequalities audit was a new challenge for all PCSPs. A regional Manager working group comprising Equality Officers was set up to scope the areas for audit.

The regional working group recommended that, at this time, three primary areas be reviewed within the audit, namely;

- Facilities
- Membership/Structure
- Services

It was considered that the above areas were likely to have most impact on section 75 categories. However, the plan will be monitored and reviewed on an annual basis and any inequalities identified in other service areas will be investigated.

The working group developed the following model inequalities audit template for all PCSPs to use and tailor to their own needs.

PCSP Membership/Structure

Moyle PCSP is currently composed of 15 appointed members; 8 elected Members from the 4 main political parties and 7 independent Members from the community. In addition to the aforementioned members, the NI Assembly will decide later this year which organizations should be statutorily designated onto PCSPs (currently representatives from the proposed designated bodies attend on a voluntary capacity). Those organizations will become equal members of the PCSP once this process is complete.

Individual PCSPs will also have the opportunity to additional designate other local organizations if they so choose to do so.

PCSPs also operate a Policing Committee, which is made up solely of the elected members and the independent members. The Policing Committee is responsible for the delivery of the statutory functions (a) – (c) as detailed below and reports directly to the NIPB.

The PCSP reports to both the NIPB and the DoJ through the Joint Committee.

SECTION 2 – WHAT PCSPs ARE RESPONSIBLE FOR

As suggested by the *Equality Commission Guide on Section 75*, Moyle Policing & Community Safety Partnership has taken a systematic look at its functions and how they relate to the promotion of equality of opportunity and of good relations.

This audit of Section 75 inequalities has provided the basis for the development of the Action Plan in Section 5. The Action Plan provides action measures with associated performance measures and timescales to address the key inequalities identified.

The roles and functions of PCSPs, established in the Justice Act (NI) 2011 are as follows;

(a) to provide views to a relevant district commander and to the Policing Board on any matter concerning the policing of the district;

(b) to monitor the performance of the police in carrying out–

(i) the policing plan in relation to the district; and

(ii) the local policing plan applying to the district or any part of the district;

(c) to make arrangements for obtaining the co-operation of the public with the police in preventing crime and enhancing community safety in the district;

(d) to make arrangements for obtaining the views of the public about matters concerning the policing of the district and enhancing community safety in the district and to consider fully any views so obtained;

(e) to act as a general forum for discussion and consultation on matters affecting the policing of the district and enhancing community safety in the district;

(f) to prepare plans for reducing crime and enhancing community safety in the district;

(g) to identify targets or other indicators by reference to which it can assess the extent to which those issues are addressed by action taken in accordance with any such plans;

(h) to provide any such financial or other support as it considers appropriate to persons involved in ventures designed to reduce crime or enhance community safety in the district; and

(i) such other functions as are conferred on it by any other statutory provision.

In addition, the Joint Committee, which is responsible for overseeing PCSPs, has also developed a number of strategic objectives for PCSPs, in order to further develop the functions as laid down in legislation. These are as follows;

Strategic Objective 1 – to form, and successfully deliver the functions of, the Policing and Community Safety Partnership for the area by:

- Engaging with local community and statutory groups, to identify local concerns in relation to community safety, and to invite their contribution to addressing those concerns;
- Preparing the PCSP's plan, and organising the work of the partnership to meet priority needs; and
- Putting in place implementation structures and delivery mechanisms that will contribute to a reduction in crime and the enhancement of community safety in the Partnership's area, directly through the Partnership's own interventions, through the work of its delivery groups or through support for the work of others.

Strategic Objective 2 – to improve community safety by tackling crime and anti-social behaviour through:

- Ensuring that local statutory bodies and agencies deal with the anti-social behaviour and crime-related issues that matter in their area; and
- Working in partnership with the police, local statutory bodies, agencies and the community to reduce the impact of anti-social behaviour and crime on the community.

Strategic Objective 3 – to improve community confidence in policing through:

- Ensuring local accountability through the Policing Committee's role in monitoring police performance;
- Ensuring that policing delivery reflects the involvement, views and priorities of local communities;
- Ensuring improved policing service delivery in partnership with local communities;
- Ensuring effective engagement with the police and the local community, with specific emphasis on engagement with working class communities and young people.

SECTION 3 – REGIONAL & LOCAL DATA

Sources of Data used in this audit may include:-

- Census data (note: the results of the 2011 Census are not yet available so most of the data has been taken from the 2001 Census but updated where other statistics are available) Source: Northern Ireland Statistics website: www.nisra.gov.uk. Crown copyright material is reproduced with the permission of the Controller of HMSO.
- NINIS area profile – Northern Ireland level information (Crown copyright 2010)
- NINIS area profile – Moyle (Crown copyright 2010)
- Equality Commission for Northern Ireland Statement on Key Inequalities in Northern Ireland
- Mid-year population estimates 2010
- Continuous Household Survey
- Northern Ireland Life & Times Survey results (various years)
- Surveys and publications relating to specific service areas

Section 4 - Assessment of Key Inequality Issues for Section 75 Categories

Facilities

Section 75 category	Key impacts
Religious Belief/Community Background	<ul style="list-style-type: none"> • Location of some venues may act as a barrier to attendance – may be perceived as being linked to one particular community
Race	<ul style="list-style-type: none"> • Need for greater understanding of ethnic minority cultures • Need for more opportunities for ethnic minority cultures to participate in policing and community safety related events • Language barriers – provision of translation services
Disability	<ul style="list-style-type: none"> • Physical barriers – accessibility of facility; transport; parking; toilet facilities • Communications on venues/events may not be available in appropriate formats
Age	<ul style="list-style-type: none"> • Design and programming of events/meetings for different age groups • Physical barriers – accessibility of facility; transport; parking; toilet facilities – particularly for the elderly • Provision of information about events/meetings and communication methods appropriate to different age groups
Dependency	<ul style="list-style-type: none"> • Timing of events/meetings
Sexual Orientation	<ul style="list-style-type: none"> • Need for greater understanding of the LGBT culture • Need for more opportunities for LGBT community to participate in policing and community safety related events
Gender	<ul style="list-style-type: none"> • Timing of events/meetings – women specifically may find it difficult to attend due to caring duties
Marital Status	<ul style="list-style-type: none"> • No impact identified

Membership/Structure

Section 75 category	Key impacts
Religious Belief/Community Background	<ul style="list-style-type: none"> Religious/community make-up of elected and independent members may not accurately reflect the demographic make-up of the area
Race	<ul style="list-style-type: none"> Ethnic minority groups are under-represented in public life. Information on participating as a member may not be in appropriate format
Disability	<ul style="list-style-type: none"> One in five persons of working age are disabled in Northern Ireland - however in many areas of political and civic life disabled people are under-represented. Consultation on the Disability Discrimination (NI) Order in 2005 showed a marked discrepancy in the numbers of disabled councillors in Northern Ireland (2%) compared with GB (13%) In 2006 only 3% of public appointments were to people with a disability.
Age	<ul style="list-style-type: none"> Sections of the population may be less well represented in public appointments
Dependency	<ul style="list-style-type: none"> Those with dependents may find it difficult to play an active role in public life due to time constraints
Sexual Orientation	<ul style="list-style-type: none"> The LGBT community is under-represented in public life
Gender	<ul style="list-style-type: none"> Women are generally under-represented in public appointments
Marital Status	<ul style="list-style-type: none"> No impact identified

Services/Functions

Section 75 category	Key impacts
Religious Belief/Community Background	<ul style="list-style-type: none"> • Perceptions of policing related issues may vary across communities • Under-reporting/Engagement with the police may differ across communities
Race	<ul style="list-style-type: none"> • Need for greater understanding of ethnic minority cultures • Need for more opportunities for ethnic minority cultures to participate in policing and community safety related events • Language barriers
Disability	<ul style="list-style-type: none"> • Physical barriers – may act as a deterrent to participation in policing and community safety related events/meetings/initiatives • Communications barriers - barriers – may act as a deterrent to participation in policing and community safety related events/meetings/initiatives
Age	<ul style="list-style-type: none"> • Design and programming of events/meetings for different age groups • Physical barriers – may act as a deterrent to participation in policing and community safety related events/meetings/initiatives • Provision of information about events/meetings/initiatives and communication methods appropriate to different age groups
Dependency	<ul style="list-style-type: none"> • Timing of events/meetings
Sexual Orientation	<ul style="list-style-type: none"> • Need for greater understanding of the LGBT culture • Need for more opportunities for LGBT community to participate in policing and community safety related events
Gender	<ul style="list-style-type: none"> • Timing of events/meetings – women specifically may find it difficult to attend due to caring duties
Marital Status	<ul style="list-style-type: none"> • No impact identified

Section 5 – Action Plan

FACILITIES

The PCSP is responsible for organizing and hosting a wide range of meetings/events and community engagement opportunities.

The overarching aim of this section of the audit is to promote equality of opportunity with current and potential service users. For the purpose of this inequalities audit it has been agreed to review these service areas through an analysis of participation and access.

Inequality	Positive Action Measures	Performance Indicator/s	Timescale	Associated Research/Monitoring
Religious Belief/Community Background				
Venue may not be deemed to be neutral	Devise a schedule of meetings/events etc that takes into consideration balance of religious, political and community background in District	Balanced number of meetings/events etc held in areas that are in total reflective of the make-up of the District	Annual review	Equality Annual Progress Report Feedback pro-formas

Race				
Lack of understanding of ethnic minority cultures and associated language barriers	Proactively engage with ethnic minorities and provide/avail of interpretation facilities	Number of meetings/events held with ethnic minorities in suitable locations Interpretation facilities utilised	Annual review	Equality Annual Progress Report PCSP Annual Report
Disability				
Physical barriers and communications barriers	Ensure all venues are accessible and other aids such as loop system or signer are available on request	Number of venues utilized that are accessible to all	Ongoing	Equality Annual Progress Report Feedback Pro-formas
Age				
Under representation of different age groups at meetings/events	Organise specific engagement opportunities for a range of age groups in suitable locations	Number of meetings/events held for various age groups Variety of locations utilized	Annual Review	Equality Annual Progress Report Feedback Pro-formas

Dependency				
Timing of meetings/events	Hold meetings/events etc at different times and on different days	Number of meetings held at different times and on different days	Annual review	Equality Annual Progress Report Feedback Pro-formas
Sexual Orientation				
Lack of understanding of LGBT culture and associated issues	Organise specific engagement opportunities for the LGBT community in suitable locations	Number of meetings/events held with LGBT community Number of LGBT friendly locations utilised	Annual review	Equality Annual Progress Report PCSP Annual Report
Gender				
Timing of events/meetings	Hold meetings/events etc at different times and on different days	Number of meetings held at different times and on different days	Annual review	Equality Annual Progress Report Feedback Pro-formas
Marital Status				
No impact identified	-	-	-	-

MEMBERSHIP/STRUCTURE

The PCSP is currently composed of elected members and independent members. The Council employs the members of staff responsible for managing the PCSP.

The overarching aim of this section is to promote equality of opportunity with regards to the membership and the structure of the PCSP. For the purposes of this inequalities audit it has been agreed to review these service areas through an analysis of the representation. It is important to note that the NI Policing Board are responsible for the appointment of independent members to PCSPs and the Council are responsible for nominating elected members.

Inequality	Positive Action Measures	Performance Indicator	Timescale	Associated Research/Monitoring
Religious Belief/Community Background				
Demographic make-up of the PCSP members	NIPB to ensure robust appointments process that promotes equality of opportunity Council to ensure balanced nomination of elected members where possible PCSP to pro-	Demographic breakdown of PCSP members Review of engagement activities	At commencement of PCSP and subsequent reconstitutions	Impartial assessors reports Annual Report Equality Annual Progress Report

	actively engage with under-represented groups to address potential gaps in representation			
Race				
Under-representation of ethnic minorities	<p>NIPB to ensure robust appointments process that promotes equality of opportunity</p> <p>Council to ensure balanced nomination of elected members where possible</p> <p>PCSP to pro-actively engage with under-represented groups to address potential gaps in representation</p>	<p>Demographic breakdown of PCSP members</p> <p>Review of engagement activities</p>	At commencement of PCSP and subsequent reconstitutions	<p>Impartial assessors reports</p> <p>Annual Report</p> <p>Equality Annual Progress Report</p>

Disability				
Under-representation of members with a disability	<p>NIPB to ensure robust appointments process that promotes equality of opportunity</p> <p>Council to ensure balanced nomination of elected members where possible</p> <p>PCSP to pro-actively engage with under-represented groups to address potential gaps in representation</p>	<p>Demographic breakdown of PCSP members</p> <p>Review of engagement activities</p>	At commencement of PCSP and subsequent reconstitutions	<p>Impartial assessors reports</p> <p>Annual Report</p> <p>Equality Annual Progress Report</p>
Age				
Under-representation of young people on the PCSP	NIPB to ensure robust appointments process that	Demographic breakdown of PCSP members	At commencement of PCSP and subsequent	Impartial assessors reports

	<p>promotes equality of opportunity</p> <p>Council to ensure balanced nomination of elected members where possible</p> <p>PCSP to pro-actively engage with under-represented groups to address potential gaps in representation</p>	<p>Review of engagement activities</p>	<p>reconstitutions</p>	<p>Annual Report</p> <p>Equality Annual Progress Report</p>
Dependency				
<p>Time constraints may affect participation</p>	<p>PCSP Code of Practice advocates meetings/events etc held at different times and on different days</p>	<p>Number of meetings held at different times and on different days</p>	<p>Annual review</p>	<p>Equality Annual Progress Report</p> <p>Feedback Pro-formas</p>

Gender				
Under-representation of women	<p>NIPB to ensure robust appointments process that promotes equality of opportunity</p> <p>Council to ensure balanced nomination of elected members where possible</p> <p>PCSP to pro-actively engage with under-represented groups to address potential gaps in representation</p>	<p>Demographic breakdown of PCSP members</p> <p>Review of engagement activities</p>	At commencement of PCSP and subsequent reconstitutions	<p>Impartial assessors reports</p> <p>Annual Report</p> <p>Equality Annual Progress Report</p>
Marital Status				
No impact identified				

SERVICES/FUNCTIONS

The PCSP is responsible for carrying out arrange of specific services/functions as conferred to it within the Justice Act (NI) 2011

The overarching aim of this section of the audit is to promote equality of opportunity with current and potential service users. For the purpose of this inequalities audit it has been agreed to review these service/function areas through an analysis of participation and access.

Inequality	Positive Action Measures	Performance Indicator	Timescale	Associated Research/Monitoring
Religious Belief/Community Background				
Variance amongst perceptions of policing related issues	Effective communication of policing information in a consistent manner	Survey results/consultation feedback	Ongoing	Survey pro-formas Feedback/comments sheets NIPB Omnibus surveys
Under-reporting /Engagement	Continued awareness raising of PSNI contacts	Increase in reporting of incidents	6 monthly review	PSNI Statistical reports CJI Inspection reports
	Development of closer links between NPTs and community	Qualitative reports on NPT engagement with community	6 monthly review	Area Commander policing performance reports
Race				
Under-participation of	Proactively engage with	Number of meetings/events	Annual review	Equality Annual Progress Report

ethnic minorities Language barriers	ethnic minorities and provide interpretation facilities	held with ethnic minorities Interpretation facilities utilised		Annual Report
Disability				
Physical barriers and Communications barriers	Pro-actively engage with disabled community	Consultation feedback Number of meetings events held that address disability issues	Annual review	Equality Annual Progress Report Annual report
Age				
Lack of age appropriate initiatives, esp. young people	Development of initiatives and events that are age appropriate Development of engagement opportunities specifically with young people	Number of events/initiatives held for various age groups Ongoing engagement programme specifically focused on young people	Annual review 6 monthly review	Equality Annual Progress Report Annual report

Dependency				
Time constraints may affect participation	Hold meetings/events at different times and on different days	Number of meetings/events held at different times and on different days	Annual review	Equality Annual Progress Report Feedback forms
Sexual Orientation				
Under-participation and engagement with members who belong to the LGBT community	Organise specific engagement opportunities for the LGBT community in suitable locations	Number of events/initiatives organized with the LGBT community	Annual review	Equality Annual Progress Report Annual Report
Gender				
Under-representation of women and reduction of opportunities to engage	Organise specific engagement opportunities for women in suitable locations and at a variety of times	Number of events/initiatives organized with a specific focus on women	Annual review	Equality Annual Progress Report Annual report
Marital Status				
No impact identified	--	--	--	--

