



Rehabilitation and
Retraining Trust

Draft Equality scheme for Police Rehabilitation and Retraining Trust (PRRT)

**This scheme has been developed 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 8 for contact details).**

Police Rehabilitation and Retraining Trust,
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Approved by the Equality Commission for Northern Ireland on **[insert date]**.

Foreword

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

In our equality scheme we set out how PRRT proposes to fulfil the Section 75 statutory duties.

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

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

We will develop and deliver a programme of communication and training with the aim of ensuring that all our staff and board members are made fully aware of our equality scheme and understand the commitments and obligations within it. We will 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 and CEO of PRRT, 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 appreciate the important role that the community and voluntary sector and the general public have to play to ensure the Section 75 statutory duties are effectively implemented. Our equality scheme demonstrates how determined we are to ensure there are opportunities, for people affected by our work, to positively influence how we carry out our functions in line with our Section 75 statutory duties. It also offers the means whereby persons directly

¹ See section 1.1 of our Equality Scheme.

affected by what they consider to be a failure, on our part, to comply with our equality scheme, can make complaints.

On behalf of PRRT 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.

Ken Millar
Chairman

Eddie Gaw
CEO

Date

DRAFT

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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 PRRT 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 PRRT.

1.2 Schedule 9 4. (1) of the Act requires PRRT 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 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

1.4 Who we are

PRRT is an Executive Non Departmental Public Body fully funded by the Department of Justice (DoJ).

1.5 What we do

The Police Rehabilitation and Retraining Trust was established in 1999 to enable members and former members of the Police Service to achieve and sustain a successful transition into civilian life. To achieve this, PRRT assists its clients to recognise their potential, identify opportunities, set and achieve their objectives and enjoy optimum mental and physical wellbeing beyond policing.

We enable clients to achieve their goals by providing the following services:

- Personal Development, Coaching and Training service
- Physiotherapy
- Psychological Therapies

The Trust also provides services (whether directly or on a sub-contract basis) to non-police bodies within, or funded by, the Department of Justice for Northern Ireland.

1.6 Who we serve

We support police officers planning to retire from service, or those who have already retired from the Police Service of Northern Ireland (PSNI) or Royal Ulster Constabulary (RUC). We will offer support to partners and immediate family members of eligible clients, in specific circumstances. In addition, our Psychological Therapies department provides a children and young people's service to children of retired police officers.

Our services are also open on a self-funding basis to the following groups:

- Police staff
- Immediate family members of serving or retired police officers
- Part Time Reserve Officers
- Serving or retired officers who do not meet the eligibility criteria.

1.7 Our Board and Senior Management Team

Our Board is responsible for the control and strategic direction of PRRT. The Chief Executive is accountable to the Board of Directors, and manages the services with a dedicated Senior Management Team accountable to him.

The senior management team is comprised of the Head of Psychological Therapies, Head of Physiotherapy, Head of Personal Development & Training and Head of Finance and Support Services.

An organisation chart is included in appendix 1.

1.8 PRRT Procurement and Employment Arrangements

PRRT is committed to embedding procurement governance and awareness into everyday work and is keen that all staff understand the importance of robust procurement and contract management.

PRRT Procurement Policy is adhered to in accordance with all relevant government, industry and legislative requirements.

PRRT operates its own employment policies which have been developed in line with legislative requirements and best practice.

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. Key arrangements for compliance include: consulting (chapter 3); assessing, monitoring and publishing the impact of policies (chapter 4); ensuring and assessing public access to information and services (chapter 6); and the complaints procedure (chapter 8).

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

Responsibilities and reporting

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

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

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

PRRT Maryfield
100 Belfast Road
Holywood
Co. Down
BT18 9QY

Tel: 028 9042 7788
Text relay service: **18001 028 9042 7788**

Email: equality@prrt.org

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

2.7 Employees' job descriptions and performance plans will 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.

2.8 The PRRT 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). This will be available from Claire Murray (HR Manager) (see para 2.5 for contact details).

2.9 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. The annual progress report will be made available on request by contacting the human resources department (see paragraph 2.5). We will also publish the annual progress report on PRRT's website (www.prrt.org).

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

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

Action plan/action measures

2.12 The PRRT has developed a draft action plan to promote equality of opportunity and good relations.

2.13 The action measures that will make up our action plan will be relevant to our functions. They will be developed and prioritised

³ See Appendix 4 'Timetable for measures proposed' and section 2.15 of this equality scheme.

on the basis of an audit of inequalities. The audit of inequalities will gather and analyse information across the Section 75 categories⁴ to identify the inequalities that exist for our service users and those affected by our policies⁵.

2.14 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.

2.15 PRRT's action plan will be developed for a period of between one and five years and aligned with our business and corporate planning cycles. Implementation of the action measures will be incorporated into our business planning process.

2.16 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 2.17 below.

2.17 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.

2.18 The PRRT 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.

2.19 Once finalised, our action plan will be available from Claire Murray, HR Manager (see paragraph 2.5 for contact details).

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

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

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

Chapter 3 Our arrangements for consulting

(Schedule 9 4. (2) (a)) - on matters to which a duty (S75 (1) or (2)) is likely to be relevant (including details of the persons to be consulted).

(Schedule 9 4. (2) (b)) on the likely impact of policies adopted or proposed to be adopted by us on the promotion of equality of opportunity.

3.1 The PRRT recognises 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)*')

3.3 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.

3.4 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. However, we realise that many of our consultees may/may not wish to be contacted about all of PRRT's up-coming consultation exercises. Thereafter, to ensure the most effective use of our and our consultees' resources, we will take a targeted approach to consultation for those consultees that may have a particular interest in the matter/policy being consulted upon and to whom the matter/policy is of particular relevance. This may include for example regional or local consultations, sectoral or thematic consultation etc.

3.5 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.

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

Information will be made available, on request, in alternative formats⁶, in a timely manner, usually within 15 working days of the request. We will ensure that such consultees have equal time to respond.

PRRT will utilise engagement arrangements it already has in place with support groups, such as the Police Family Care Forum and existing partnership links with the Regional Child and Adolescent inpatient unit. Should other opportunities arise that would enable more effective consultation with stakeholders, for example by providing awareness raising sessions or using interpreters, PRRT will seek to do so.

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

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

3.8 To ensure effective consultation with consultees⁷ 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.

3.9 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 commitments⁸.

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.

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

3.11 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.

⁷ Please see Appendix 3 for a list of our consultees.

⁸ Please see below at 4.27 to 4.31 for details on monitoring.

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

3.13 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.

3.14 We will provide feedback to consultees in a timely manner in formats suitable to consultees. After the consultation, a report will be prepared which will include summary information on the policy consulted upon, a summary of consultees' comments and a summary of our consideration of and response to consultees' input.

3.15 A list of our consultees is included in this equality scheme at Appendix 3 or can be requested by contacting the Human Resources Department (see paragraph 2.5)

3.16 The consultation list is not exhaustive and is reviewed on an annual basis to ensure it remains relevant to PRRT's functions and policies.

3.17 We welcome enquiries from any person/s or organisations wishing to be added to the list of consultees. Please contact the Human Resources Department (see paragraph 2.5 above) to provide your contact details and have your areas of interest noted or have your name/details removed or amended. Please also inform us at this stage if you would like information sent to you in a particular format or language.

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

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

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

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

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

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

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

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

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

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

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

1. the policy has been 'screened in' for equality impact assessment
2. the policy has been 'screened out' with mitigation⁹ or an alternative policy proposed to be adopted
3. the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

4.10 If our screening concludes that the likely impact of a policy is 'minor' in respect of one, or more, of the equality of opportunity and/or good relations categories, we may on occasion decide to proceed with an equality impact assessment, depending on the policy. If an EQIA is not to be conducted we will nonetheless consider measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations.

Where we mitigate we will outline in our screening template the reasons to support this decision together with the proposed changes, amendments or alternative policy.

This screening decision will be 'signed off' by the appropriate policy lead within the PRRT.

4.11 If our screening concludes that the likely impact of a policy is 'major' in respect of one, or more, of the equality of opportunity and/or good relations categories, we will normally subject the policy to an equality impact assessment. This screening decision will be 'signed off' by the appropriate policy lead within the PRRT.

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

⁹ Mitigation – Where an assessment (screening in this case) reveals that a particular policy has an adverse impact on equality of opportunity and / or good relations, a public authority must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories.

relations categories, we may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, we will give details of the reasons for the decision taken. This screening decision will be 'signed off' by the appropriate policy lead within the PRRT.

4.13 As soon as possible following the completion of the screening process, the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on request from the Human Resources department (see paragraph 2.5). All signed off screening templates will also be made available via PRRT's website.

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

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

Equality impact assessment

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

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

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

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

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

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

What will be published by the PRRT

4.20 Screening reports

These will be prepared quarterly and uploaded to PRRT's website at www.prrt.org. Alternatively, quarterly screening reports may be requested from the Human Resources Department (see paragraph 2.5 above). Screening reports detail:

- All policies screened by the PRRT 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 will be published in the quarterly report.

4.21 Screening templates

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

4.22 Equality impact assessments

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

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

How we publish the information

4.23 All information we publish is accessible and can be made available in alternative formats on request. Please see 6.4 below.

Where we publish the information

4.24 The results of our assessments (screening reports and completed templates, the results of equality impact assessments) are available from the Human Resources department (see paragraph 2.5 above) and will be made available via PRRT's website.

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 be sent out via email to all consultees on a 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 PRRT 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:

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 with a view to ensuring in the future that:

- 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.

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.

Our arrangements for publishing the results of our monitoring
(Schedule 9 4. (2) (d))

4.32 Schedule 9 4. (2) (d) requires us to publish the results of the monitoring of adverse impacts of policies we have adopted. However, we are committed to monitoring more broadly and the results of our policy monitoring are published as follows:

4.33 EQIA monitoring information is published as part of our Section 75 annual progress report [see 2.8]

4.34 All information published is accessible and can be made available in alternative formats on request. Please see below at 6.4 for details.

Chapter 5 Staff training

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

Commitment to staff training

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

5.2 Our Chief Executive wishes to positively communicate the commitment of the PRRT to the Section 75 statutory duties, both internally and externally.

To this end we will introduce an effective communication and training programme for all staff and will ensure that our commitment to the Section 75 statutory duties is made clear in all relevant publications.

Training objectives

5.3 The PRRT will draw up a detailed training plan for its staff which will aim to achieve the following objectives:

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

Awareness raising and training arrangements

5.4 The following arrangements are in place to ensure all our staff and board members are aware of and understand our equality obligations.

- We will develop a summary of this equality scheme and make it available to all staff.
- We will provide access to copies of the full equality scheme for all staff; ensure that any queries or questions of clarification from staff are addressed effectively.
- Staff in the PRRT will receive a briefing on this equality scheme within 3 months of approval of the scheme.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within PRRT 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.
- Dignity at work and diversity awareness training is provided for all staff.

5.5 Training and awareness raising programmes will, where relevant, be developed in association with the appropriate Section 75 groups and our staff.

5.6 In order to share resources and expertise, the PRRT will, where possible, work closely with other bodies and agencies in the development and delivery of training.

Monitoring and evaluation

5.7 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 on as part of the Section 75 annual progress report, which will be sent to the Equality Commission.

DRAFT

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

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

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

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

In particular:

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

Access to information

6.3 To ensure equality of opportunity in accessing information, we provide information in alternative formats on request, where reasonably practicable. Where the exact request cannot be met we will ensure a reasonable alternative is provided.

6.4 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.

6.5 The PRRT will liaise with representatives of young people and disability and minority ethnic organisations and take account of existing and developing good practice.

6.6 We will review training to ensure that staff are equipped with the knowledge, skills and ability to provide information to the range of Section 75 groups including children and young people, people with a learning disability and people with disabilities.

6.7 We will respond to requests for information in alternative formats in a timely manner, usually within 15 working days.

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

6.9 PRRT will use a range of communication channels to enable wide access to information such as email, websites, leaflets, advertisements etc.

Access to services

6.10 We are committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories.

6.11 The PRRT also adheres to the relevant provisions of current anti-discrimination legislation.

Assessing public access to information and services

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

6.13 The PRRT will also monitor progress on any Section 75 complaints and issues raised in relation to access to PRRT information and services.

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

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 2.12 – 2.19.

Chapter 8 Our complaints procedure

(Schedule 9 10.)

8.1 The PRRT is 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 PRRT has failed to comply with its approved equality scheme should contact:

Head of Finance and Shared Services/Human Resources Manager at:

PRRT Maryfield,
100 Belfast Road,
Holywood
Co. Down,
BT18 9QY

Tel: 028 9042 7788

Text Relay Service: 18001 028 9042 7788

Email: equality@prrt.org

8.4 We will in the first instance acknowledge receipt of each complaint within 10 working days.

8.5 An internal investigation of the complaint will be carried out and we 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 (1) 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 PRRT will co-operate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

Similarly, the PRRT will co-operate fully with any investigation by the Equality Commission under sub-paragraph 11 (1) (b) of Schedule 9 to the Northern Ireland Act 1998.

8.8 The PRRT will make all efforts to implement promptly and in full any recommendations arising out of any Commission investigation.

DRAFT

Chapter 9 Publication of our equality scheme

(Schedule 9 4. (3) (c))

9.1 Once our equality scheme is approved by the Equality Commission for Northern Ireland, it available free of charge in print form and alternative formats from:

The Human Resources Department,
PRRT Maryfield,
100 Belfast Road,
Hoylwood,
Co. Down,
BT18 9QY

Tel: 028 9042 7788

Text relay service: 18001 028 9042 7788

Email: equality@prrt.org

9.2 Our equality scheme will also be made available on our website, www.prrt.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, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a copy of 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 15 working days.
- Our equality scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats (CD, mp3, DAISY) and in minority languages to meet the needs of those not fluent in English.

- 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, older people, people with disabilities and minority ethnic communities meets the needs required.

9.4 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme or contact:

Claire Murray
The Human Resources Department
PRRT Maryfield
100 Belfast Road
Holywood
Co. Down
BT18 9QY

Tel: 028 9042 7788
Text relay service: 18001 028 9042 7788
Email: equality@prrt.org

Chapter 10 Review of our equality scheme

(Schedule 9 8. (3))

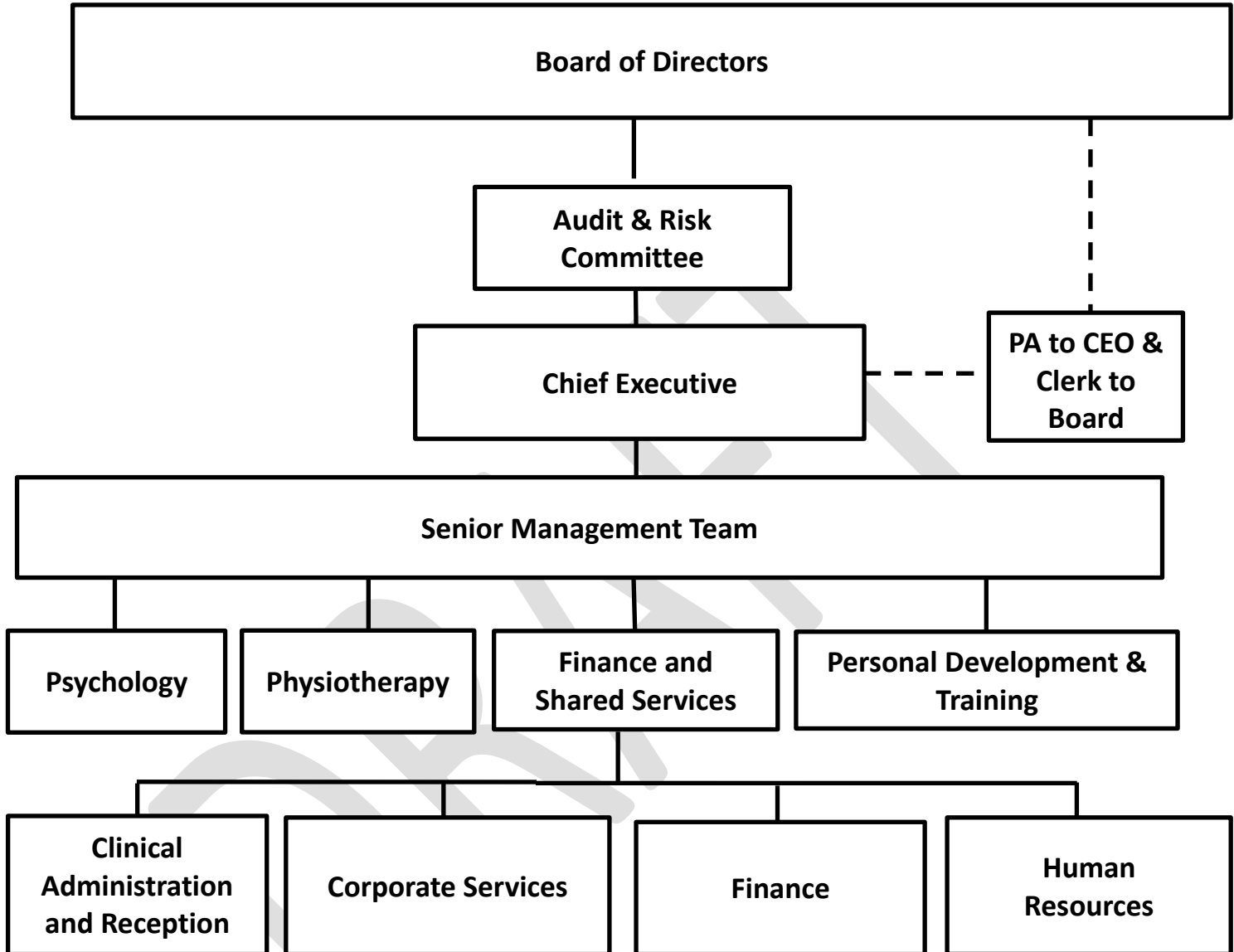
10.1 As required by Schedule 9 paragraph 8 (3) of the Northern Ireland Act 1998 we will conduct a thorough review of this equality scheme. This review will take place either within five years of submission of this equality scheme to the Equality Commission or within a shorter timescale to allow alignment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

10.2 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.

10.3 In undertaking this review we will follow any guidance issued by the Equality Commission. A report of this review will be made public via PRRT's website. The review will also be available on request from the Human Resources Department – see para 2.5 for contact details), consultees will be notified by email and a report will be sent to the Equality Commission.

Appendix 1 Organisation chart

1.8 Organisation Structure:



Total number of employees: 35

Full-time equivalent: 28.9

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>¹⁰. 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 ¹¹	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people.
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls).
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientaton	Bisexual people; heterosexual people; gay or lesbian people.

¹⁰ 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.*”

¹¹ *ibid*

Appendix 3 List of consultees

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

Action on Hearing Loss
Age NI
Alliance Party
Amnesty International
An Munia Tober – Belfast Travellers Education & Development Group
Autism NI
Bahai Office of NI
Baptist Church
Belfast Hebrew Congregation
Belfast Islamic Centre
Barnardos Northern Ireland
Beachcroft Regional Child and Adolescent Unit
British Deaf Association Northern Ireland
Catholic Church
Carers Northern Ireland
CCMS
Chair of the Police Family Care Forum
Children in Northern Ireland
Chinese Welfare Association Northern Ireland
Church of Ireland
Citizens Advice Bureau
Coalition on sexual orientation
Committee on the Administration of Justice
Commission for Victims and Survivors
Community Foundation for Northern Ireland
Community Relations Council
Conservative Party
Council for the Homeless NI
Criminal Justice Inspectorate Northern Ireland
Democratic Unionist Party
Department of Justice
Disability Action Northern Ireland
Disabled Police Officers Association
Disability Sport NI
Downs Syndrome Association
Early Years – the organisation for young children
Equality Coalition
Equality Commission NI
Evangelical Alliance Northern Ireland

Free Presbyterian Church
Gay and Lesbian Youth Northern Ireland
Gay Police Association
GMB
Green Party In Northern Ireland
Guide Dogs
Include Youth
Indian Community Centre
Men's Advisory Project
Mencap
Methodist Church
Mindwise
National Children's Bureau
National Police Chiefs Commission
National Society for the Prevention of Cruelty to Children (NSPCC)
NIPSA
Northern Ireland Association for Mental Health
Northern Ireland Commissioner for Children and Young People
Northern Ireland Council for Ethnic Minorities
Northern Ireland Gay Rights Association
Northern Ireland Human Rights Association
Northern Ireland Law Commission
Northern Ireland Muslim Family Association
Northern Ireland Police Fund
Northern Ireland Policing Board
Northern Ireland Prison Service
Northern Ireland Retired Police Officers Association
Northern Ireland Woman's Aid Federation
Northern Ireland Association for the Care and Resettlement of
Offenders (NIACRO)
Older People's Advocate Northern Ireland
Parenting Forum Northern Ireland
Phab Northern Ireland
Police Federation for Northern Ireland
Police Ombudsman for Northern Ireland
Polish Association Northern Ireland
Praxis
Presbyterian Church
Probation Board for Northern Ireland
Progressive Unionist Party
Queerspace
Rainbow Project
RNIB Northern Ireland

RUC George Cross Foundation
RUC George Cross Widows' Association
RUCGC/PSNI Benevolent Fund
Sikh Community Association
Sinn Fein
Social Democratic and Labour Party
Superintendent Association of Northern Ireland
Traditional Unionist Voice
Ulster Quaker Service
Ulster Scots Agency
Ulster Unionist Party
UNISON
Victim Support Northern Ireland
WAVE
Women's Forum Northern Ireland
Women's Police Association
Youth Action Northern Ireland
Youth Council Northern Ireland
YouthNet

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

Measure	Lead responsibility	Timetable (example)
Section 75 Annual Progress Report [2.8]	Chief Executive / HR Manager	31 August (annually)
Action plan	HR Manager	January 2017
Consultation on draft action plan [2.16]	HR Manager	September – December 2016
Finalised action plan published [2.19]	HR Manager	January 2017
Arrangements for monitoring progress in place [2.17]	HR Manager	January (annually)
Action Plan reviewed and updated	HR Manager	July (annually)
Consultation list reviewed and updated [3.4; 3.16]	HR Manager	August (annually)
Screening timetable [4.4]	HR Manager	Annually from scheme approval
Screening Reports [4.15]	HR Manager	Quarterly after approval of Equality Scheme
EQIA timetable [4.16]	HR Manager	Annually from scheme approval
Monitoring	HR Manager	August (annually)
Review of monitoring information [4.31]	HR Manager	August (annually)
Publication of	HR Manager	August (annually)

monitoring information [4.33;4.34]		
Training		
Development of summary scheme [5.4]	HR Manager	January 2017
Development of overall training programme [5.5]	HR Manager	January 2017 (on approval of scheme)
Focussed training [5.4]	HR Manager	Within 9 months of approval of the scheme
Update training [5.4]	HR Manager	Within 3 months of scheme approval
Evaluation of training [5.7]	HR Manager	August (annually)
Assessing access to information and services [6.12]	HR Manager	August (annually)
Communication of equality scheme [9.3]	HR Manager	January / February 2017 (on approval form Equality Commission)
Notification of consultees [9.3]	HR Manager	January / February 2017 (on approval form Equality Commission)
Review of equality scheme [10.1]	HR Manager	5 yearly
Any other measures proposed in equality scheme	HR Manager	August (annually)

Appendix 5 Glossary of terms

Action plan

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

Action measures and outcomes

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

Adverse impact

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

Affirmative action

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

Article 55 Review

Under the Fair Employment and Treatment (NI) Order 1998, all registered employers must conduct periodic reviews of the composition of their workforces and of their employment practices for the purposes of determining whether members of the Protestant and Roman Catholic communities are enjoying, and are likely to continue to enjoy, fair participation in employment in each employer's concern. These reviews, which are commonly known as Article 55 Reviews, must be conducted at least once every three years.

Audit of inequalities

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

Consultation

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

Council of Europe

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

Desk audit

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

Differential impact

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

Discrimination

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

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

Brief descriptions of these above terms follow:

Direct discrimination

This generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances, on one or more of the statutory non-discrimination grounds. A decision or action that is directly discriminatory will normally be unlawful unless:

- (a) in an age discrimination case, the decision can be objectively justified, or
- (b) in any other case, the public authority can rely on a statutory exception that permits it – such as a *genuine occupational requirement exception*; or, a *positive action exception* which permits 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 which is one that has the effect of placing people who share a particular equality characteristic (e.g. the same sex, or religious belief, or race) at a particular disadvantage compared to other people.

A provision, criterion or practice that is indirectly discriminatory will normally be unlawful unless

- (a) it can be objectively justified, or

(b) the public authority can rely on a statutory exception that permits it.

Disability discrimination

In addition to direct discrimination and victimisation and harassment, discrimination against disabled people may also occur in two other ways: namely,

- (a) *disability-related discrimination*, and
- (b) *failure to comply with a duty to make reasonable adjustments*.

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

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

Victimisation

This form of discrimination generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances, because the person has previously exercised his/her rights under the anti-discrimination laws, or has assisted another person to do so. Victimisation cannot be justified and is always unlawful.

Harassment

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

Economic appraisal

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

Equality impact assessment

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

Equality of opportunity

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

Equality scheme

A document which outlines a public authority's arrangements for complying with its Section 75 obligations. An equality scheme must include an outline of the public authority's arrangements for carrying out consultations, screening, equality impact assessments, monitoring, training and arrangements for ensuring access to information and services.

Good relations

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

Mainstreaming equality

The integration of equal opportunities principles, strategies and practices into the every day work of public authorities from the outset. In other words, mainstreaming is the process of ensuring that equality considerations are built into the policy development

process from the beginning, rather than being bolted on at the end. Mainstreaming can help improve methods of working by increasing a public authority's accountability, responsiveness to need and relations with the public. It can bring added value at many levels.

Mitigation of adverse impact

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

Monitoring

Monitoring consists of continuously scrutinising and evaluating a policy to assess its impact on the Section 75 categories. Monitoring must be sensitive to the issues associated with human rights and privacy. Public authorities should seek advice from consultees and Section 75 representative groups when setting up monitoring systems. Monitoring consists of the collection of relevant information and evaluation of policies. It is not solely about the collection of data, it can also take the form of regular meetings and reporting of research undertaken. Monitoring is not an end in itself but provides the data for the next cycle of policy screening.

Northern Ireland Act

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

Northern Ireland Human Rights Commission

A statutory body established under Section 68 of the Northern Ireland Act 1998, which works to ensure that the human rights of everyone in Northern Ireland are fully protected in law, policy and practice.

Northern Ireland Statistics & Research Agency (NISRA)

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

OFMDFM

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

PAFT

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

Policy

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

Positive action

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

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

Qualitative data

Qualitative data refers to the experiences of individuals from their

perspective, most often with less emphasis on numbers or statistical analysis. Consultations are more likely to yield qualitative than quantitative data.

Quantitative data

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

SACHR

The Standing Advisory Commission on Human Rights (SACHR) has now been replaced by the Northern Ireland Human Rights Commission. SACHR, as part of its review of mechanisms in place to promote employment equality and reduce the unemployment differential, recommended that the PAFT Guidelines should be made a statutory requirement.

Screening

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

Schedule 9

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

Section 75

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

- persons of different religious belief, political opinion, racial group, age,

marital status and sexual orientation;

- men and women generally;
- persons with a disability and persons without; and
- persons with dependants and persons without.

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

Section 75 investigation

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

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

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

Appendix 6



Rehabilitation and
Retraining Trust

Police Rehabilitation and Retraining Trust (PRRT)

Audit of Inequalities

September 2016

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1. Introduction

- 1.1 This document reports the outcome of the Police Rehabilitation & Retraining Trust's first audit of inequalities and the proposed Section 75 action plan 2016 - 2021. The purpose of the audit of inequalities is to provide a strategic picture of inequalities relevant to the role and functions of PRRT.
- 1.2 Section 75 of the Northern Ireland Act 1998 (the Act) requires all public authorities designated for the purposes of the Act, including the Police Rehabilitation and Retraining Trust, to comply with two statutory duties.
- 1.3 The first duty, the *Equality of Opportunity* duty, requires all public authorities in carrying out their functions to have due regard to the need to promote equality of opportunity between the nine 'equality categories' of 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; and persons with dependents and persons without.
- 1.4 The second duty, the *Good Relations* duty, requires all public authorities in carrying out their functions to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion and racial group.
- 1.5 In April 2010, following an Effectiveness Review, the Equality Commission for Northern Ireland (ECNI) published a revised guide to the two statutory duties.
- 1.6 This guide outlines what public authorities are required to do to comply with the statutory duties and also makes a number of recommendations in order to:

“Shift the focus within public authorities from concentrating primarily on the process of implementing Section 75, towards achieving outcomes within the Section 75 framework.” (pg. 5)
- 1.7 Public authorities must submit an equality scheme to the Equality Commission detailing their arrangements for fulfilling the Section 75 statutory duties and a plan for their performance in relation to the duties. In the revised guide,

the Equality Commission recommends that public authorities develop action measures to effectively demonstrate that they have paid due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations through the implementation of their equality scheme. In preparing action measures/action plans, the Equality Commission further recommends that public authorities:

“Undertake an audit of inequalities to identify the range of key inequalities which the discharge of the public authority’s functions is intended to or is likely to address.” (pg. 47)

- 1.8 This audit of inequalities has enabled the PRRT to identify areas for further or improved discharge of its Section 75 duties and will inform PRRT’s Equality Scheme and Action Plan.

2. The Process of Conducting the Audit - Methodology

- 2.1 To conduct the audit of inequalities, agree the draft Action Plan and draw up PRRT’s Equality Scheme, the HR Manager was appointed as lead officer by the Chief Executive.

- 2.2 To gather evidence specific to their service areas and to draw on the professional experience of staff, all Heads of Department were consulted as were key administration staff who deal with PRRT’s clients on a day to day basis.

- 2.3 As per the Equality Commission’s “Advice to Public Authorities on Approaching an ‘Audit of Inequalities’”, various sources of information were gathered as an evidence base to inform the audit. This included the following:

a) Internal information sources

- PRRT’s Article 55 review and monitoring returns,
- client satisfaction survey results,
- information from client focus groups,
- information gathered at exit interviews

b) External Information sources

- ECNI (2007) “Statement of Key Inequalities in Northern Ireland”
- ECNI (2007) “Monitoring Guidance for Use by Public Authorities”
- NISRA labour force data
- NISRA (2015) “Women in Northern Ireland”
- PSNI Workforce Composition Statistics
- OFMDFM (2015) “Gender Equality Statistics: 2015 Update”

3. PRRT’s role and functions

3.1. The Police Rehabilitation and Retraining Trust was established in 1999 to enable members and former members of the Police Service to achieve and sustain a successful transition into civilian life. It is a Non Departmental Public Body of the DoJ. The status and constitution of the Trust is set out in Section 11 of the Financial Provisions Act (Northern Ireland) 2014 and the Police Rehabilitation and Retraining Trust Regulations (Northern Ireland) 2014.

3.2 In carrying out its functions, the PRRT assists its clients to recognise their potential, identify opportunities, set and achieve their objectives and enjoy optimum mental and physical wellbeing beyond policing. PRRT does so by providing the following services:

- Personal Development, Coaching and Training service
- Physiotherapy
- Psychological Therapies

3.3 The Trust also provides services (whether directly or on a sub-contract basis) to non-police bodies within, or funded by, the Department of Justice for Northern Ireland. We will offer support to partners and immediate family members of eligible clients, in specific circumstances. In addition, our Psychological Therapies department provides a children and young people’s service to children of retired police officers.

3.4 Our services are also open on a self-funding basis to the following groups:

- Police staff
- Immediate family members of serving or retired police officers
- Part Time Reserve Officers
- Serving or retired officers who do not meet the eligibility criteria.

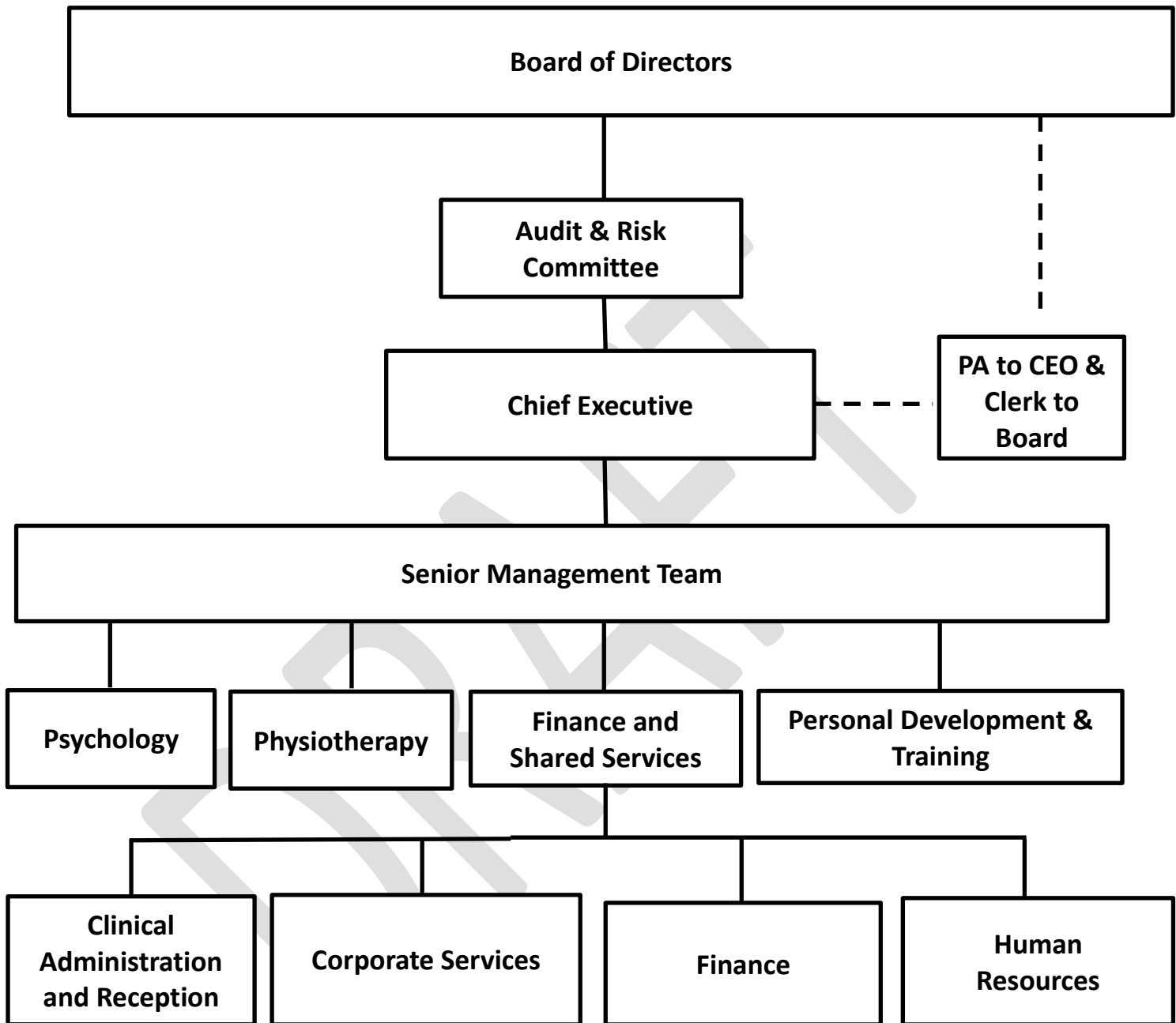
3.5 Our Board is responsible for the control and strategic direction of PRRT. The Chief Executive is accountable to the Board of Directors, and manages the services with a dedicated Senior Management Team accountable to him.

3.6 The senior management team is comprised of the Head of Psychological Therapies, Head of Physiotherapy, Head of Personal Development and Training and Head of Finance and Shared Services.

3.7 The Chief Executive is responsible for and reports on corporate governance to the Board and DoJ. The Department of Finance and Shared Services works to achieve our corporate governance aims and to ensure processes and systems are in place which support the core functions of PRRT. The Department of Finance and Shared Services is comprised of the Corporate Services Department (responsible for facilities, IT, security and health and safety), Finance department (responsible for finance and payroll), Human Resources (responsible for recruitment and monitoring, equality, employee relations and HR policy review and development) and the Clinical Administration Department.

3.8 PRRT's organisation chart is detailed below:

PRRT Organisation Chart



Total number of employees: 35

Full-time equivalent: 28.9

4. Key findings of the Audit of Inequalities

During the auditing process, four key themes were identified of particular relevance to PRRT's functions. These are:

1. Access to PRRT Facilities,
2. Access to, and awareness of, PRRT services,
3. Employment and
4. Finance.

The headings stated above form the primary focus of the outcome of PRRT's audit of inequalities and the subsequent action measures which have been identified. Where specific potential inequalities have been identified in relation to one or more of the section 75 categories, this is detailed below. It should be noted that no specific inequalities were identified in relation to marital status or sexual orientation.

In addition, whilst we have analysed the evidence specifically in relation to PRRT's functions, it is also recognised that in addition to the potential inequalities detailed below, there may be other barriers facing the section 75 groups that are not covered in detail here. Therefore, in addition to the measures identified to address the key inequalities considered below, our draft action plan (see appendix 7) also details PRRT's broader aspirations in relation to its equality objectives, to try to address more generally potential barriers experienced by Section 75 groups and to ensure the promotion of equality of opportunity and good relations.

4.1 Access to PRRT Facilities

4.1.1 The aim of this section of the audit is to analyse accessibility to PRRT's facilities for both staff and employees.

4.1.2 As detailed in chapter 3 above, PRRT has three departments directly responsible for service delivery; the Departments of Personal Development and Training, Physiotherapy and Psychology. For the 2015/2016 financial year approximately 1700 clients used PRRT's services. In addition approximately 30 external training courses were delivered by PRRT to the PSNI and DoJ.

4.1.3 PRRT's headquarters are based just outside Belfast. The majority of our clients attend for appointments at our headquarters or at one of the approved physiotherapy practices throughout Northern Ireland from which PRRT offers physiotherapy. PRRT employs 35 staff and all are based at PRRT headquarters.

4.1.4 It should be noted that, at present PRRT does not carry out equality monitoring of clients however feedback questionnaires do ask some questions relevant to Section 75 categories, for example with regard to gender and age. Our Physiotherapy Department also collects information in relation to disability. Going forward, therefore, PRRT is committed to carrying out a review of the monitoring information gathered from clients and to giving consideration to implementing a system of equality monitoring that can in turn be used help to analyse trends, and inform future planning.

4.1.5 To provide background information however with regard to our client profile, in the 2015/16 financial year, the majority of our clients were aged 50 and over (as would be expected given that our services are targeted at retiring and retired personnel) and approximately 77% are males (again as would be expected given the historical workforce composition of the RUC and current workforce composition of the PSNI). From the physiotherapy feedback questionnaires, 35% of physiotherapy clients considered that they had a disability.

4.1.6 In relation to accessibility, the following key potential inequalities were identified:

Disability and Age

As detailed above, PRRT's Headquarters are based at PRRT Maryfield, outside Belfast. This is PRRT's main base and there is the possibility that there could be a perception amongst potential clients that PRRT's services are only provided from this location. This could, in turn, act as a deterrent to those who have a disability which makes it difficult for them to travel long distances or to travel at all. Even for those who are able to travel, they may be unaware of the various measures that PRRT has in place to assist with accessibility, for example disabled parking spaces and induction loops at reception and in training suites. Similarly the location of

PRRT headquarters could act as a deterrent for our older clients who may not be as content to travel long distances or have access to suitable transport links to enable them to do so.

a) Measures already in place

As stated above, PRRT's headquarters are located just outside Belfast and many of our clients attend for appointments at this location. To ensure accessibility to all potential clients however we operate outreach clinics in Coleraine and Enniskillen for both our departments of Psychology and Personal Development & Training. In addition the Personal Development and Training department offers home visits for those who find it difficult to leave their home.

Similarly, for clients with specific needs or circumstances, our Physiotherapy Department can carry out an initial assessment in a client's home. Thereafter, physiotherapy can be offered from one of fifteen approved physiotherapy practices throughout Northern Ireland (in addition to PRRT headquarters) so that physiotherapy can be provided for our clients closer to their homes.

In relation to the built environment at PRRT, PRRT provides disabled access to PRRT Maryfield by providing disabled parking spaces, ramps to give access to buildings and touch buttons to assist with door opening. Downstairs consultation rooms are available to all departments for meetings with those who may have difficulty using stairs.

Clients are asked in advance of their initial appointment if they require any assistance to be able to attend their appointment thus ensuring that necessary arrangements can be put in place. This also ensures that clients are informed of the availability of disabled parking spaces and/or access to the building in advance.

When required, special access arrangements can be made and resources can be tailored accordingly, for example by providing large print documents.

To inform future planning and service provision, all clients are asked, via feedback surveys, of their opinions regarding access to PRRT and to comment on any additional support that was provided to enable them to access the service. To date no comments have been received in relation to improvements that could be made in this regard.

Induction loops are in operation at reception and in our training suite. In addition, a portable induction loop is available on request.

For employees, all are aware through a number of sources, for example PRRT's Equal Opportunities policy, through induction briefings and through the dissemination of information via team meetings, that PRRT is committed to supporting staff with a disability, that reasonable adjustments will always be considered, professional advice sought when necessary and that managers will be proactive in implementing measures to assist disabled employees in the workplace.

Whilst PRRT has worked to put into place a number of measures to ensure that PRRT is accessible to disabled people, it is recognised that there could also be additional measures which could be taken to remove barriers of which we may be unaware. PRRT is therefore committed to carrying out a full accessibility audit by a suitably qualified organisation to identify any gaps that need to be addressed and which could further reduce any barriers to accessibility at PRRT.

b) Additional action measures to be put in place going forward

- To conduct a full accessibility audit at PRRT.
- To review PRRT's website and other promotional material to ensure that potential clients are aware of the various locations in which we can offer our services and of assistance that can be provided to disabled people to enable them to access our services.
- To continue to monitor client feedback surveys with regard to identifying any issues in relation to accessibility that need to be addressed and for any suggestions for improvements that can be made.
- To monitor complaints both from staff and employees to identify any improvements that can be made in relation to accessibility.
- To monitor staff survey results for any issues identified in relation to access.

- To ensure the action measures detailed in PRRT's Disability Action Plan when finalised (due to be implemented at the same time as PRRT's Equality Scheme) are implemented in full.

4.2 Access to, and awareness of, PRRT Services

4.2.1 The overarching aim of this section of the audit is to promote equality of opportunity for service users by ensuring that PRRT is reaching all potential users of the service with information about our services.

4.2.2 PRRT has an ethos of supporting all eligible clients regardless of their background or identity. PRRT is therefore keen to reach all eligible clients to ensure that they are aware of the services that we provide.

4.2.3 Feedback from client surveys indicates that clients hear about PRRT from a number of sources making the wide variety of ways in which we communicate our services invaluable. The feedback does indicate however that the majority of PRRT's clients become aware of our services via word of mouth and through PRRT marketing information.

4.2.4 Recent focus groups have found that, for some, there had been a lack of knowledge about the services provided by PRRT with some participants expressing the view that they would have utilised PRRT's services earlier if they had been better aware of them. With this in mind, additional ways of publicising the services at PRRT are being considered, for example, the possibility of including information about the services of PRRT on the PSNI Health and Wellbeing hub and writing a personal letter to serving members of the PSNI who are within 3 years of retirement.

4.2.5 Following analysis, the following key potential inequalities were identified:

Disability

PRRT has recently implemented a new website which aims to give all instant and easy access to information about the services that PRRT provides. It is therefore of the utmost importance that all are able to use this information resource and that, as far as is possible

any barriers to do so are removed, for example for those with a disability which may impact upon their ability to use our website.

a) Action measures already in place

- The PRRT website is enabled with Browsealoud software and text can be displayed in different font sizes.
- In addition to our website, to ensure as widespread a reach as possible for informing eligible clients about PRRT's services, PRRT utilises many different methods including:
 - Promotion of PRRT's services through the PSNI retirement course,
 - Advertising in police magazines such as the Police Gazette, Re-Union and Police Beat,
 - Contributions to police publications,
 - Inclusion in the Police Directory,
 - Inclusion in Victims Directory,
 - Attending the Police Family Care Forum,
 - Adverts in wide range of regional newspapers (March 2016 and planned again for September 2016),
 - Speaking at professional conferences.

For our clinical teams additional methods are also used, for example:

- Leaflets sent to GPs
- Listings in professional accredited clinical directory (BABCP)
- Development of partnership links with organisations such as Carecall, the Regional Child and Adolescent inpatient unit and Childline.
- Going forward, there are also plans to attend Disabled Police Officer roadshows to further disseminate information regarding the services which PRRT provides.

b) Additional action measures to be put in place going forward

- To ensure that the website continues to conform to a high standard of accessibility for all, an annual review will take place into the accessibility and usability of PRRT's website. If it is identified that barriers exist to those with disabilities in the presentation and format of the website, consideration will be given to how these can be overcome and relevant organisations will be consulted as appropriate for any advice and guidance in relation to this.
- We understand that people use different sources to access information and we are committed to continuing to use a wide range of methods to ensure accessibility to information for all individuals. As stated above, consideration will also be given to new ways of ensuring clients are aware of our services, for example via PSNI Health and Well-being hub.
- To continue to review client feedback questionnaires and use focus groups to identify any areas for improvement in relation to ensuring all eligible clients are able to access information about our services, especially for hard to reach groups, for example the severely disabled or more elderly.

4.3 Employment

4.3.1 The key aim of this section of PRRT's audit of inequalities report is to promote equality of opportunity and good relations with regard to employment, and for all applicants for jobs, at PRRT. PRRT currently employs 35 members of staff and recruits to approximately five posts per year.

4.3.2 The following summarises the key inequalities issues that were identified in this area and action measures that are already in place:

Religious Belief

PRRT's first Article 55 review was carried out in May 2015. The review identified that there is under-representation of members of the Roman Catholic community in PRRT's workforce and under-representation of Roman Catholics amongst applicants for jobs at PRRT. As identified in PRRT's Article 55 review, one of the key reasons for this is because of the nature of PRRT's work and our links to the policing community. In Northern Ireland, working for policing related organisations has traditionally been associated

with the Protestant community which, in turn, can act as a deterrent to members of the Roman Catholic community.

This is an inequality which needs to be addressed. The measures that PRRT already implements to address this are summarised below:

a) Measures already in place

- PRRT is committed to the promotion, and implementation of, equality of opportunity in the workplace and through its recruitment and selection processes. This commitment is made from Board level through to all levels of the organisation and is underlined through the commitments made through many of PRRT's policies for example, equal opportunities, dignity at work and recruitment and selection policies. PRRT's draft Equality Scheme also demonstrates this commitment.
- Compulsory training in equality issues is provided for all PRRT staff however, for line managers and any members of staff involved in recruitment and selection, compulsory training focussed on fair recruitment and selection processes is provided. All must also undergo refresher training in recruitment and selection every three years.
- Since PRRT's Article 55 Review, PRRT has included a statement in recruitment advertisements and application packs specifically welcoming applications from the Roman Catholic community. PRRT also includes a statement in job adverts that PRRT is an equal opportunities employer.

b) Additional action measures to be put in place going forward

- Training in relation to equality issues and fair recruitment to be provided to all new members of staff involved in recruitment. Refresher training to be undertaken every three years.
- To continue to use a welcoming statement specifically welcoming applicants from the Roman Catholic community in job adverts and to include a statement demonstrating PRRT's commitment to equal opportunities.

- To review annually monitoring statistics to measure progress in relation to attracting a higher proportion of applicants from the Roman Catholic community.

Gender and Dependents

The March 2016 NI Labour Market Report reported that, in January 2016, the male employment rate in Northern Ireland was 75.1% and the female employment rate in Northern Ireland was 63.1%. The Equality Commission for Northern Ireland's Statement on Key Inequalities in Northern Ireland states that part of the reason for the difference in employment rates between males and females is because of the unequal sharing of care responsibilities and that, at the time of the report, of those females who are economically inactive, almost half are unavailable to work due to family/home commitments. Whilst the ECNI Statement of Key Inequalities was published in 2007, research, for example the "Gender Equality Statistics: 2015 Update" published by OFMDFM, continues to find that the most common reason for working age economic inactivity among females in 2014 was family/home responsibilities. It is also noted that research continues to find an under representation of women in public life.

PRRT is conscious that the impact of caring responsibilities can act as a barrier to employment for some and has worked to foster a workplace culture that embraces flexible working practices whilst continuing to ensure that PRRT fulfils its strategic objectives and delivers a service of excellent quality to clients.

In relation to our workforce, 54% of PRRT's staff work alternative work patterns and/or reduced hours (varying from 0.4 full time equivalent to 0.95 full time equivalent) and, in the last five years, PRRT has had a 100% rate of return from maternity leave.

With regard to the gender composition of PRRT's workforce, 41% of PRRT's Directors and members of the Senior Management Team are female. Of PRRT staff, however, excluding directors, 85% are female. The reason for the high proportion of female staff is because many of the job roles at PRRT are those which have traditionally attracted more females than males, for example administrative roles and roles related to healthcare. The Northern Ireland Statistics and Research Agency "Women in Northern Ireland" report, published in September 2014, reported that "Of all females full-time employees, 57% are employed in public

administration, education and health service section. This compares with 25% of men” (pg. 8). The report also stated that “73% of all those employed in administrative and secretarial occupations are women” (pg. 9).

As the ECNI 2007 Statement on Key Inequalities in Northern Ireland states, while much of the research “largely points to the challenges of access and progression for women, it is also true that a complex picture exists in relation to gender and employment. As the labour market reflects increasing participation rates by women, attention must also be paid to issues of access for men” (pg. 11). PRRT’s workforce is predominantly female but is generally reflective of trends within the Northern Irish workforce. Nevertheless, the low number of male employees is taken into account.

a) Action Measures already in place

- The option to work flexi-time is offered to all posts.
- PRRT operates a childcare voucher scheme.
- Reference to our flexi-time scheme, childcare voucher scheme and PRRT’s willingness to consider roles on a job share basis is made clear in our adverts and recruitment paperwork.
- PRRT is committed to continuing to foster a workplace culture which embraces flexible working practice where possible.

b) Additional action measures to be put in place going forward

- To address the low number of males in PRRT’s workforce, we will continue to ensure the implementation of fair recruitment practices. We will also seek advice from the ECNI in relation to the possibility of including a welcoming statement in recruitment advertisements to encourage a higher number of male applicants.

Disability

The April – June 2016 Labour Force Survey reported the overall disability rate amongst those aged 16-64 to be approximately 21%. The ECNI reported in its statement of Key Inequalities in Northern Ireland that the employment rate of those without disabilities is

over twice that of people with disabilities and that 13% of economically active people with disabilities were unemployed, more than double the 6% of economically active people who did not have a disability and were unemployed.

As both an employer and, as a potential employer, for those who are looking for employment, PRRT is committed to fulfilling its legal obligations in relation to its disability duties and to ensuring the promotion of equality of opportunity for those with a disability.

The audit of inequalities has identified a gap in the currency of PRRT's monitoring information for employees in relation to disability. Also, PRRT does not carry out equality monitoring in relation to disability during the recruitment process.

a) Measures already in place

- PRRT's commitment to the promotion of equality of opportunity is made from the Chair of the Board to all levels throughout the organisation. This is already demonstrated through many of the policies and procedures adopted at PRRT as detailed, for example, in our Equal Opportunities and recruitment & Selection Policies.
- Although PRRT does not carry out equality monitoring in relation to disability during the recruitment process, applicants are asked if any reasonable adjustments can be put in place during the recruitment process. In addition, PRRT's commitment to the implementation of reasonable adjustment is made clear during the recruitment process.

b) Additional action measures to be put in place going forward

- PRRT's draft Disability Action Plan, which will be consulted on at the same time as our draft Equality Scheme, will detail in full:
 - The measures that PRRT already takes to promote equality of opportunity and to remove barriers for those with disabilities when carrying out its functions. For example, see section 4.1.6 (a), pg 58 above.

- The specific actions that PRRT proposes to take forward to address disability inequalities, to increase participation levels and to promote positive attitudes towards people with disabilities will be set out in the plan.
- A commitment in PRRT's Equality Scheme to ensure the attainment of the targets from the Disability Action Plan will therefore be included in the Equality Scheme action plan.
- To ensure that PRRT is collating sufficient information to be able to more effectively identify any action measures that can be taken in respect of disability, a review of PRRT's monitoring arrangements will take place both in relation to employees and applicants.

4.3.4 Race

OFMDFM's 2011 "Guidance for Monitoring Racial Equality" states that "over the last few years the lack of available data on minority ethnic and migrant people has been recognised as a significant barrier to the full implementation of racial equality".

In relation to employment at PRRT, the audit of inequalities has identified a gap in the currency of its monitoring information for employees in relation to race. PRRT also does not currently carry out monitoring of applicants for jobs with regard to race. Therefore, to ensure a more robust evidence base for future analysis and to assist in identifying action measures that can be taken in the future, a review of PRRT's monitoring arrangements will take place and any associated actions, following review, will be implemented.

4.4 Finance

With regard to the management of PRRT's budget and administering payroll, no adverse impact in relation to the Section 75 categories has been identified. PRRT does not specifically request Section 75 equality monitoring data from contract providers and suppliers however PRRT's procurement procedures conform to public sector standards and PRRT works in partnership with CPD and incorporates its principles of integrating equality of opportunity and value for money into all procurement activity.

To ensure that PRRT continues to promote equality of opportunity in respect of its finance and procurement functions, PRRT will continue to follow CPD policy and any reviews in relation to equality of opportunity in public procurement as well as ECNI guidance. PRRT will also continue to monitor all equality of opportunity complaints to identify any issues in this area that need to be addressed.

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Appendix 7 Action plan/action measures

The Action Plan is not considered by the Equality Commission for Northern Ireland as part of the approval process for equality schemes, however PRRT's action plan has been attached to our Equality Scheme for ease of reference for our stakeholders.

This Action Plan is a living document that will be added to and extended if other inequalities are identified.

As detailed in PRRT's audit of inequalities a number of potential inequalities were identified and these were structured under the headings of access to PRRT Facilities, access to, and awareness of, PRRT services, Employment and Finance. In addition however, it has been agreed that to further demonstrate PRRT's commitment in relation to its equality duties as detailed in the draft Equality Scheme that PRRT's broader aspirations in relation to its equality objectives will also be included in this Action Plan and are therefore covered at the start of the plan.

1. General Action Plan Measures

	Action Point	Intended Outcome	Performance Indicator	Timescale
1	Policy Development and review	All policies will be reviewed via the screening process to mainstream the Section 75 equality and good relations duties into policy development and service delivery. All new policies developed will	All existing policies will be screened by 31 March 2017 100% of policies being developed will be equality screened. All screening templates will be published on PRRT's website.	For existing policies, by 31 March 2017 Ongoing for all new policies developed

		<p>promote equality of opportunity and good relations.</p> <p>No individual will feel that they have been discriminated against on account of belonging to a Section 75 category.</p>		
2	<p>Equality is owned and championed throughout PRRT and all staff are aware of PRRT's equality duties.</p>	<p>All staff are aware of and committed to PRRT's Equality Scheme</p> <p>All staff feel they are treated, fairly with dignity and respect and equally regarding training opportunities, promotion opportunities and at work in general.</p>	<p>100% to have received equality and diversity refresher training, a briefing in relation to PRRT's Section 75 duties and made aware of PRRT's Equality Scheme</p>	<p>May 2017</p>
3	<p>Objectives and targets relating to the Section 75 statutory duties to be incorporated into strategic and operational business plans</p>	<p>Mainstreaming of Section 75 equality and good relations duties and prioritisation of equality and diversity throughout PRRT.</p>	<p>Objectives in relation to Section 75 duties included in corporate and business plans</p>	<p>April 2017</p>
4	<p>Progress on the delivery of section 75 statutory duties to be included in PRRT's annual report</p>	<p>Mainstreaming of Section 75 equality and good relations duties and prioritisation of equality and diversity throughout PRRT.</p>	<p>Progress on Section 75 included in annual report.</p>	<p>July 2017</p>

5	To review PRRT's current monitoring arrangements for employees, clients and applicants	<p>Demonstration of PRRT's established commitment to promoting equality of opportunity.</p> <p>A consistent approach to the collection of useful and relevant equality information from clients which can be utilised to assist the development of any new policies and practices, to assist in measuring the effectiveness of our Equality Scheme and to take actions to remove barriers where necessary.</p>	<p>Review of current arrangements to take place by March 2017.</p> <p>New monitoring arrangements, if required, to be in place by May 2017.</p>	May 2017
6	Staff equality and good relations training, briefings in relation to Section 75 duties and implementation of PRRT's Equality Scheme	Staff fully aware of equality obligations	100% of staff to have received equality and diversity refresher training and Section 75 training relevant to their roles by April 2017	April 2017 and ongoing thereafter
7	To update employee job descriptions and performance plans to reflect contributions to discharge of Section 75 duties where relevant	Demonstration of PRRT's established commitment to promoting equality of opportunity and implementation of its Section 75 duties	All job descriptions and performance plans updated where relevant	December 2017

8	Maintain effective links with and liaise with the ECNI to ensure PRRT keeps up to date with developments in the law and in policy on equality and diversity.	PRRT's Equality Scheme remains up to date and reflective of good practice	Annual Section 75 progress report submitted to ECNI	Annually
9	Ensure that all PRRT communications and marketing materials communicate positive images of the various Section 75 categories	PRRT portrayed as an organisation committed to equality of opportunity	Client Feedback	Ongoing
10	Commitment to equality on website and in Corporate Plan	Public statement of commitment to equality of opportunity and Section 75 duties	Statement of commitment to the discharge of PRRT's Section 75 duties added to website and Corporate Plan	March 2017
11	All clients to feel they are treated fairly and with dignity and respect	All clients feel respected by PRRT staff	Client feedback	Feedback reviewed on an ongoing basis
12	Review of PRRT's Audit of Inequalities and Action Plan	Equality Scheme and Action Plan are kept relevant as the implementation of PRRT's equality objectives progresses, kept up to date in line with new research and updated should new inequalities be identified as per PRRT's Audit of	Annual review completed	Annually, first review to take place by January 2018

	Inequalities.		
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2. Access to PRRT Facilities

	Inequality Identified	Evidence or Research	Section 75 Categories	Performance Indicator	Action measures	Timescale
1	Potential lack of awareness of range of locations available to avail of PRRT's services	Analysis of internal data	Disability and Age	Client feedback Monitoring of complaints	Review website and other promotional material to ensure it is clear that services can be provided from a range of locations and that assistance can also be provided to enabled disable people to use of PRRT's services.	July 2017 (and annually thereafter)
2	Accessible Premise for all	Internal information sources and external research	Disability	Implementation of suggestions made as outcome of accessibility audit. Results of staff survey Client feedback	Conduct accessibility audit of PRRT Monitor staff survey results for any issues identified in relation to access Monitor client feedback	By January 2018 Carry out staff survey by August 2017 Annually in line

				Implementation of action measures identified in PRRT's Disability Action Plan	regarding accessibility and consider any suggestions for improvements. To ensure action measures detailed in PRRT's Disability Action Plan are implemented in full	with operational reporting and business planning processes Ongoing and as per timescales identified in Disability Action Plan
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3. Access to, and awareness of, PRRT services

	Inequality Identified	Evidence or Research	Section 75 Categories	Performance Indicator	Action measures	Timescale
1	Potential to improve accessibility to PRRT's website for some disabled people	Internal review	Disability	Accessibility for all to PRRT's website Client feedback Client complaints	Annual review of PRRT's website in line with any developments in on-line accessibility seeking advice from specialist organisations where necessary. Monitor client feedback and client complaints	Annually from September 2017 Annually in line with

						operational reporting and business planning processes
2	Potential for general lack of awareness of services that PRRT provides	Focus groups, client feedback surveys	All	Improved awareness of PRRT services (assess via feedback survey and focus groups)	To continue to use a wide range of methods to inform eligible clients of the services that are available to them. Consider new way of ensuring that clients are aware of our services.	Ongoing March 2017

4. Employment

	Inequality Identified	Evidence or Research	Section 75 Categories	Performance Indicator	Action measures	Timescale
1	Under-representation of members of the Roman Catholic community in PRRT's workforce	Evidence from annual monitoring returns to the Equality Commissions and analysis of information from trends	Religious Belief	Increase in the proportion of people from the Roman Catholic community at PRRT	To continue to include a statement in public advertisements specifically welcoming applications from the Roman Catholic community. To continue to include	Already in place and ongoing

		from Article 55 review			<p>statement in job adverts that PRRT is an equal opportunities employer</p> <p>PRRT to ensure a robust appointment process that promotes equality of opportunity in line with best practice, statutory obligations and Equality Commission guidance.</p> <p>All new managers and new to the recruitment process to receive training in recruitment & selection.</p> <p>All existing managers to receive refresher training in recruitment and selection every three years.</p> <p>All involved in the recruitment process to complete Diversity Now training on an annual basis.</p>	
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2	Under-representation of Roman Catholics amongst applicants for jobs at PRRT	Evidence from annual monitoring returns to the Equality Commissions and analysis of information from trends from Article 55 review	Religious Belief	Increase in the proportion of applicants from the Roman Catholic community at PRRT	<p>To continue to include a statement in public advertisements specifically welcoming applications from the Roman Catholic community</p> <p>To continue to include statement in job adverts that PRRT is an equal opportunities employer</p>	Already in place and ongoing
3	Underrepresentation of women in general in the NI workforce	External research, for example from Equality Commission, NISRA, Labour Force Surveys	Gender and Dependents	Staff feedback via employee survey and exit interviews	<p>To continue to foster a workplace culture that, where possible, embraces flexible working practices</p> <p>To review PRRT's suite of family friendly policies</p> <p>To continue to ensure that staff are aware of PRRT's family friendly policies and of their right to request flexible working arrangements</p>	<p>Ongoing</p> <p>March 2017</p> <p>Ongoing via team meetings and email updates to staff</p>

4	Low number of males in PRRT's workforces	Article 55 review, annual monitoring returns	Gender	Increase in the proportion of males in PRRT's workforce	To seek advice from ECNI in relation to possibility of including a welcoming statement specifically welcoming applicants from males.	Annual review from March 2017
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