

Summary of review of Equality Scheme

Overview

There have been a number of arrangements that NILGOSC has established, developed, applied and followed, since implementation of the revised Equality Scheme in 2012, as a means of fulfilling the requirements and associated duties set out in Section 75 of the Northern Ireland Act 1998 i.e. to have due regard to the need to promote equality of opportunity, and regard to the desirability of promoting good relations.

The purpose of this report is to provide a summary of the main findings of the review of the Equality Scheme. A detailed report on the review of the Scheme, including evidence reviewed, is available on request. Contact details, including information on alternative formats, are available at <http://www.nilgosc.org.uk/contact.aspx>. Requests can also be emailed to equality@nilgosc.org.uk.

This review is effective from the revision of the previous scheme in 2012. It should be noted that all arrangements have been carried out in line with the requirements of the Equality Scheme, Section 75 and Equality Commission guidance. NILGOSC has also not received any complaints in relation to equality issues since 2012.

1. How the scheme's implementation has benefitted individuals within the Section 75 groups

Evidence to demonstrate how the scheme has benefitted individuals within the Section 75 groups has been summarised below.

1.1 Leadership commitment

The equality agenda continues to be promoted and supported by the most senior levels of the organisation. Objectives, targets and measures relating to the promotion of equality of opportunity and desirability of promoting good relations, have continued to be reviewed, monitored and reported on in the Corporate Plan and Equality Action Plan, on a quarterly and bi-annual basis respectively, by senior management. Substantial progress has continually been reported and only three actions from the 2012-2015 Equality Action plan were not implemented and carried forward to the 2015-2018 plan. The Committee also reviews progress on equality through its review of progress against the Corporate Plan and annual Equality Statements. NILGOSC has appointed a dedicated Equality Officer (one of the roles undertaken by the Governance Manager) to monitor and report on compliance with the Equality Scheme and Section 75 duties.

1.2 Training

A wide range of equality related training has been provided to staff to raise awareness of the Section 75 duties and requirements of the Equality Scheme. This is regularly reviewed and monitored. Training has helped ensure staff understand their roles and responsibilities and have the appropriate knowledge and skills, when dealing with customers representing the various Section 75 groups. In 2015, NILGOSC introduced an e-learning training module and assessment on 'Equality and Diversity in the Northern Ireland Workplace', endorsed by the Equality Commission, for both staff and the Committee. Staff are required to complete this on induction and undertake refresher training on an annual basis. Specific training has also been provided to management and staff with additional equality related responsibilities e.g. equality impact assessments.

1.3 Assessing and consulting on the likely impact of policies adopted or proposed to be adopted by the authority on the promotion of equality of opportunity

NILGOSC has implemented measures to ensure that all policies and procedures (both written and unwritten) have no adverse impact on the promotion of equality of opportunities or good relations, and to also identify any potential opportunities to promote this. NILGOSC completed an audit of inequalities in 2011 and 2015 to gather monitoring information, to identify inequalities in services provided. Findings were used to inform relevant policies adopted, including measures contained on the equality action plans. The findings and action plans were issued for consultation and NILGOSC used this feedback to further identify issues and take action to address potential inequalities. This included improvement of the format of NILGOSC's website, following accessibility issues being identified. An alternative communications leaflet, containing headline information in alternative formats and languages, was also introduced and is now included in member correspondence. Inequalities were also identified in the Scheme regulations drafted by the Department, and in the Committee and staff composition. This led to feedback being provided to the Department to seek to highlight the potential inequalities and positive targeting by NILGOSC of underrepresented groups in job advertising. Evaluation and review of the comprehensiveness of monitoring data and underrepresented groups in the pension scheme is ongoing and actions to address these areas have been included in the 2015-18 action plan, in order to further fulfill the Section 75 duties.

NILGOSC has carried out screening of new and revised policies to enable an appropriate assessment and sufficient measures to be taken, where required, to better promote and ensure there is no adverse impact on equality of opportunity or good relations. NILGOSC has ensured this has been effectively assessed through the screening process, effective scrutinisation, the use of monitoring data and other relevant information. Screening reports are published quarterly on the NILGOSC website and issued to consultees who have requested these in alternative formats. This is a further means of obtaining feedback on screening methods applied and potential inequalities not considered. NILGOSC received comments from one consultee in August 2013, recommending the redesigning of the NILGOSC website to at least AA standard, which was already on the agenda and implemented accordingly. No feedback in relation to screening reports has been received since this. From 2012/13 to 2015/16, the outcomes of equality screening lead to a total of 28 policies being screened out and 9 policies being screened out with mitigation. New or revised staff policies have also been issued for consultation to staff and the Trade Union for feedback. This is a further means of identifying potential inequalities.

1.4 Monitoring any adverse impact of those policies that have been adopted

NILGOSC has taken appropriate measures to ensure there has been no adverse impact on policies adopted, as detailed above. These have been relatively effective, particularly when taking into consideration the limited scope of NILGOSC's functions. It is NILGOSC policy to review equality impact assessment monitoring information on an annual basis, where applicable. Since revision of the Equality Scheme in 2012, no equality impact assessments have been required as none of NILGOSC's policies have been determined to have had a major impact on the Section 75 categories.

1.5 Communications

NILGOSC has continued to provide its publications in alternative formats on request and openly promotes this on the NILGOSC website and member correspondence. A slight increase in the number of alternative communication requests since 2011/12 has been noted and these are recorded, monitored and reported on annually.

NILGOSC has sought to raise awareness on its Equality Scheme and the Section 75 statutory duties by including relevant updates and publications on its website and in stakeholder communications.

1.6 Feedback

A positive response in relation to NILGOSC communications and ease of understanding/finding online information has been noted in annual stakeholder satisfaction surveys. This has further demonstrated effectiveness of communication. Findings have also been used to improve accessibility of information.

NILGOSC issued a staff survey on Equality and Good Relations in May 2015. The results were generally positive and were used to help identify any actions that could be taken to improve NILGOSC's implementation and promotion of Section 75 duties, including good relations among staff.

1.7 Action Plan

Others actions implemented as part of the objectives contained in the Equality Action Plan, outside those mentioned above, include;

- Job descriptions being updated on an ongoing basis to include responsibilities in relation to equality duties
- Improved markings and signage in respect of the disabled parking space at NILGOSC's premises
- Updating of NILGOSC's policies to reflect the Shared Parental Leave arrangements, applicable from 5 April 2015

2. **How leaders within the authority are engaged in the scheme's implementation**

NILGOSC management are committed to implementation of the Equality Scheme and Section 75 duties, as part of their roles and responsibilities. NILGOSC has appointed a dedicated Equality Officer to co-ordinate and ensure compliance with the Equality Scheme and Section 75 duties, in line with Equality Commission guidance.

Further evidence that leaders are effectively engaged in the Equality Scheme's implementation includes;

- Inclusion of equality objectives in the Corporate Plan and Equality Action Plan as detailed in Section 1
- Full compliance with statutory reporting requirements relating to equality duties
- Openness and transparency of commitment to the scheme through publishing equality related updates/reports and ensuring these are as accessible to the public as possible
- Management undertaking both the mandatory and specific equality related training for their role e.g. equality impact screening, ensuring their staff complete all training required

- Regular evaluation of the implementation of the equality scheme through relevant staffs surveys, consultation and annual stakeholder surveys, openly responding to feedback and taking action where appropriate
- Management having carried out equality screening as early as possible for new policies or policies which have undergone significant changes, to identify opportunities to promote and ensure there is no adverse impact on equality of opportunities or good relations

3. Challenges and how they have been overcome

NILGOSC has undergone a number of significant changes in recent years, mainly as a result of external factors including changes in legislation and public sector reform. This resulted in a material increase in demand for services and brought significant challenges in maintaining the required standards of service delivery and meeting organisational objectives, including equality duties. NILGOSC continued to implement, monitor and report on equality duties as a priority, meeting all internal and statutory reporting requirements, through effective planning and risk management.

Other challenges in implementing the scheme have included the following;

3.1 Ensuring that the information disseminated and the services provided are fully accessible

In the 2011 audit of inequalities, potential barriers were identified in relation to those with an age related disability and not fluent in English. NILGOSC took steps to address this, where possible, given the technical nature of the pension scheme, through redesigning the website, ensuring publications are as accessible as possible e.g. the alternative communications leaflet and openly publicising the availability of alternative formats on NILGOSC's website and communications. A slight increase in the number of requests for information in alternative formats and positive feedback from the annual stakeholder surveys has been noted.

3.2 Comprehensiveness of equality monitoring information

There were concerns over the reliability and completeness of the information collected in the audit of inequalities in both 2011 and 2015, particularly due to poor response rates, concerns over placing sole reliance on the members who had responded and lack of information on certain section 75 groups. A review of equality monitoring data and a gap analysis has been included in the 2015-18 Action Plan. NILGOSC has taken some steps to address the lack of monitoring information, including increasing the number of members who were issued questionnaires in the 2015 audit of inequalities. Member opt out forms were also expanded with a view to addressing any potential inequalities. Further monitoring information is however required and actions are ongoing.

4. Lessons learned

The following have been identified as areas for improvement;

4.1 Staff feedback

A number of areas for improvement were identified from the 2015 staff survey on "Equality and Good relations". NILGOSC has implemented actions based on this, where appropriate, of which some actions are ongoing. The responses from the survey highlighted the usefulness and importance of obtaining regular feedback from staff on

this area and NILGOSC will continue to seek methods to collect this on a more regular basis.

4.2 Engagement with stakeholders

Similar limitations were highlighted in the 2011 and 2015 audits of inequalities, in using the information collected for identifying inequalities in the pension scheme. NILGOSC will review alternative methods of engaging with stakeholders to gather monitoring information going forward, including consideration of issuing surveys online to improve response rates. This will be done as part of the review of monitoring data and gap analysis included in the 2015-18 action plan.

NILGOSC will also consider other alternative methods of gathering equality related information and stakeholder views. This includes increased engagement with stakeholders, such as other public bodies who have encountered similar issues and overcome these, or focus groups.

5. Good practices

The following are examples of good practice, in relation to the implementation of the equality scheme and section 75 duties within NILGOSC;

- Regular monitoring and reporting on equality through the Corporate Plan and Equality Action Plan.
- A dedicated Equality Officer to provide advice, monitor and report on the implementation of equality duties including screening of policies.
- Inclusion of detailed guidance and a flowchart for each stage of policy review in screening templates, to assist in decision making.
- Publishing screening forms and quarterly screening reports on NILGOSC's website, and issuing alternative formats to consultees that have requested this
- Publishing updates and reports on equality on the NILGOSC website and including these in stakeholder communications.
- An "Equality and Good relations" survey tailored for NI, issued to staff in 2015. Findings, including NILGOSC's responses, were issued to all staff and actions have been taken to address issues raised, where appropriate.
- A regular staff newsletter and the recent implementation of a Staff Forum, which has helped promote a sense of community and good relations in the workplace. The Staff Forum encourages staff to openly discuss issues within NILGOSC and suggest areas for improvement. Feedback can also be provided anonymously. Findings have been reported back to senior management for action, where appropriate.
- Regular training on the equality scheme and duties for all staff, through induction training and the "Equality and Diversity in the Northern Ireland Workplace" e-learning module, which must be completed by staff annually. External training was also provided at the 2016 Staff Conference, on practical customer care when dealing with members with different disabilities or communication barriers.

- Completion of an audit of inequalities in 2011 and 2015, to collect monitoring data and identify potential inequalities within the scheme and internally in NILGOSC. The results of these were used as key information for updating the Equality Action Plans, of which both were issued for consultation. Feedback, along with NILGOSC's responses was published and communicated to NILGOSC's stakeholders, and action taken accordingly.
- Inclusion of information on the availability of alternative formats in key NILGOSC publications. These are provided, where reasonably practicable. Requests are recorded, monitored and reported on annually.
- Implementing actions to ensure that public documents are as accessible as possible, including redesigning the NILGOSC website to AA accessibility standards and including an Alternative Method of Communications leaflet (containing headline information in alternative formats/languages) in member correspondence.
- Issue of annual stakeholder satisfaction surveys to all employers and a sample of members. This seeks feedback on publications and the NILGOSC website, including presentation, layout and ease of understanding. Responses have also been used to improve accessibility of information.
- NILGOSC has implemented a Disability action plan of which progress is routinely monitored and reported on annually to the Equality Commission.

6. Conclusion

NILGOSC has embedded processes within the organisation for planning, monitoring and implementing the equality scheme, to ensure the requirements of the Section 75 duties are met. These have been effective in making progress to benefit individuals within the Section 75 groups, ensuring that relevant statutory reporting requirements, and both strategic and operational equality related objectives have been met. NILGOSC recognises that there are areas for improvement and actions are ongoing to address these, as detailed in the 2015-18 Equality Action Plan.