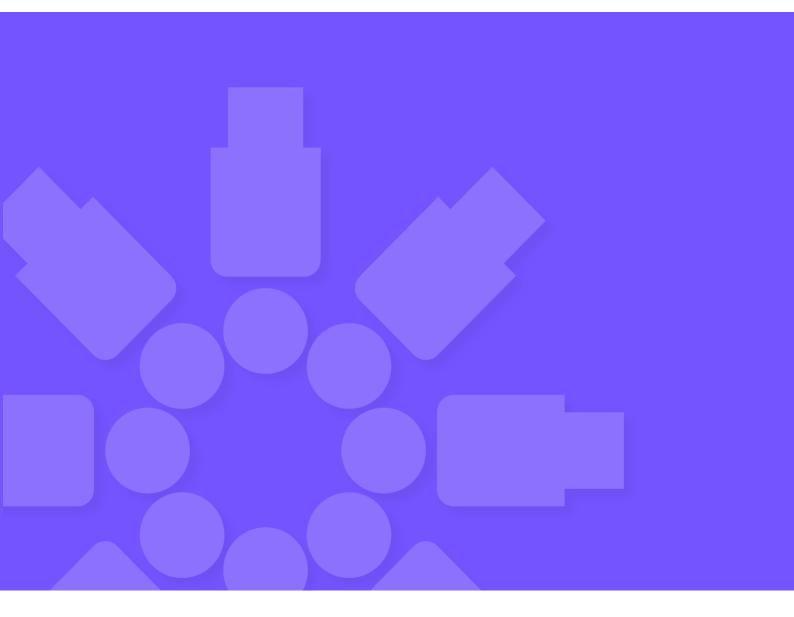
# **Section 75 Audit of Inequalities**



February 2022



### **Contents**

| 1 | Introduction   | 3  |
|---|--|----|
| 2 | NILGOSC and its Functions                            | 4  |
| 3 | Equality Scheme Commitments                          | 4  |
| 4 | Equality Action plan                                 | 5  |
| 5 | The Audit of Inequalities – approach and constraints | 6  |
| 6 | Findings of the Audit of Inequalities                | 7  |
| 7 | Action plan  | 11 |
| 8 | Monitoring and Review Process                        | 11 |

#### 1 Introduction

#### Introduction

- 1.1.1 This document presents the outcome of the Audit of Inequalities undertaken by the Northern Ireland Local Government Officers' Superannuation Committee (NILGOSC). The Audit of Inequalities has been used to inform the Section 751 Equality Action plan 1 April 2022-31 March 2025 (referred to as the Equality Action plan 2022-25), which follows on from NILGOSC's Action plan 1 April 2018- 31 March 2022.
- 1.1.2 The Audit of Inequalities was conducted during the period November 2021 to January 2022. The purpose of the audit was to identify inequalities that exist for those affected by the functions and policies of the NILGOSC pension scheme.
- 1.1.3 As part of this consultation exercise, NILGOSC is seeking the views and comments of all interested parties on its Equality Action plan 2022-2025. NILGOSC welcomes comments on any aspects of its Equality Action plan by post, email, phone, fax or in person. Please forward any comments you wish to make on the document to:

**Equality Team** Tel: 0345 3197 320 **NILGOSC** Fax: 0345 3197 321

Templeton House Typetalk: 18001 0345 3197 320 411 Holywood Road (for people using a textphone) Email: equality@nilgosc.org.uk Belfast

BT4 2LP

#### Alternative formats of communication

- 1.1.4 This document is available on the NILGOSC website www.nilgosc.org.uk and in paper format. The documentation is also available on request in alternative formats where reasonably practicable, such as large print, Braille, audio, disc and other languages for those whose first language is not English.
- 1.1.5 If you require the document in an alternative format, please do not hesitate to contact us via the details above.
- 1.1.6 Consultation on this document will run for 12 weeks until 24 June 2022. The final agreed action plan will be sent to the Equality Commission of Northern Ireland (ECNI).

<sup>&</sup>lt;sup>1</sup> Section 75 of the NI Act 1998

#### 2 NILGOSC and its Functions

- 2.1 NILGOSC is the administering body for the Local Government Pension Scheme in Northern Ireland. NILGOSC was set up by the Government in April 1950 to operate a pension scheme for the local councils and other similar bodies in Northern Ireland. The pension scheme is known as the Local Government Pension Scheme (Northern Ireland) and is a defined benefit scheme. The pension scheme is funded by contributions paid by both employees and the scheme employers.
- 2.2 The pension scheme is managed by a Committee<sup>2</sup> (similar to a board of directors or trustees) which consists of a chairman, five members nominated by employers' organisations, five members nominated by employees' organisations and two independent members. Committee members are appointed by the Department for Communities via the public appointments process. The day to day administration of the pension scheme is carried out by the Secretary, supported by approximately 90 staff members.
- 2.3 NILGOSC has two functions: to administer the scheme in accordance with regulations; and to manage and maintain a fund out of which benefits are met. As an administering body, NILGOSC's function is to comply with statutory regulations, which are made by the Department for Communities. NILGOSC therefore has limited discretion over how it administers the pension scheme on a day to day basis.

### **3 Equality Scheme Commitments**

- 3.1 Section 75 (1) of the Northern Ireland Act 1998 requires 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. Section 75 (2) also requires public authorities to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion, and racial group.
- 3.2 NILGOSC's Corporate Plan includes a specific objective on equality; To promote equality of opportunity, good relations and to fulfil Section 75 obligations. NILGOSC 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 the equality scheme can be implemented effectively.
- 3.3 NILGOSC's Equality Scheme is available on its website at http://www.nilgosc.org.uk/equality-scheme. The Equality Scheme sets out how NILGOSC proposes to fulfil its section 75 duties. NILGOSC also maintain a section 75 consultee list that is reviewed and updated annually.

<sup>&</sup>lt;sup>2</sup> The Committee is redesignated as the Pension Board from 1 April 2015, which was extended for a further period of 5 years at 20 March 2020.

### 4 Equality Action plan

- 4.1 An Equality Action plan sets out specific actions undertaken to promote equality and good relations. The last Audit of Inequalities was conducted in 2018 to formulate the 2018-2021 Equality Action plan. In agreement with ECNI, the Action plan was extended to 31 March 2022 to align with the review of the scheme. This Action plan is available on NILGOSC's website at https://nilgosc.org.uk/about-us/equality-scheme-reports.
- 4.2 The Equality Action plan is reviewed by the Senior Management Team bi-annually to monitor progress against actions. NILGOSC also submits an Annual Equality Progress report to the Equality Commission every year.
- 4.3 In line with the commitment in its Equality Scheme, NILGOSC is seeking comments from its stakeholders on the Action plan set out at Appendix A of this document.
- 4.4 Any actions that were not achieved in the previous Equality action plan have been carried forward into the Equality Action plan 2022-25. Other actions that are still applicable in any reporting period, such as training, were still considered to be relevant and have also been carried over into the new action plan. Some of the key actions delivered as part of the previous action plan are highlighted below:
  - a. Refurbishment work has been carried out to Templeton House to improve access to the conference room and disabled toilet facilities.
  - b. In terms of accessibility, NILGOSC's website was redesigned and launched in March 2021. The basic guide was reviewed, and images were updated to include disabled people. The guide was also translated into Lithuanian and Polish and published on NILGOSC's website. Recruitment documentation is also available in an accessible format to those who require it.
  - c. In respect of policies, the Good Relations Statement was revised. The Recruitment and Selection policy was also reviewed to ensure the needs of disabled applicants are considered. Applicants are also made aware at each stage of the recruitment process that reasonable adjustments can be made for those who require it. The Welcome Statement has also been updated to specifically welcome male applicants and those with a disability. The Purchasing Policy has been updated to reflect consideration of equality implications.

### 5 The Audit of Inequalities – approach and constraints

- 5.1 NILGOSC is not provided with, nor does it have access to any section 75 data regarding its members from the employing authorities. In terms of sections 75 data for its scheme membership, NILGOSC only collects and holds the necessary data it needs to administer the pension scheme, in line with data protection legislation. Therefore, the only section 75 categories of data available via NILGOSC records are gender, partnership status and age. The other categories of section 75 data are collected and held by employing authorities at an employer wide level, but NILGOSC does not have access to that data. For its last Audit of Inequalities exercise in 2018, a total of 12 employers responded to NILGOSC's request for monitoring data on the local government workforce, providing information on 50, 596 employees. This figure was then used as a proxy for the local government workforce in Northern Ireland, being the population who are eligible to join the NILGOSC Scheme.
- 5.2 In 2018, NILGOSC also issued a survey to scheme members to gather more section 75 data for its members but there was a very low response rate of 9%, which did not provide a sufficient dataset as a basis for comparison. Prior to undertaking the 2022 audit of inequalities, NILGOSC liaised with the ECNI due to the lack of pertinent section 75 data available to NILGOSC and the approach for the audit. It was agreed that a survey approach was not necessary but that instead NILGOSC should note the lack of pertinent section 75 data available in relation to its scheme membership and consider a scoping exercise to identify the possibility of working with employers to improve section 75 datasets in the future. This has been carried forward as an action in the new action plan.
- 5.3 To inform its Audit of Inequalities NILGOSC looked at the composition of scheme membership for any section 75 data that was available. Where possible, NILGOSC used relevant comparators against the data it had available. Where this was not possible, NILGOSC used the results of the 2018 eligible workforce data as a comparator, in order to assess whether any under-representations were likely to still exist.
- 5.4 NILGOSC also reviewed internal and external research to help inform the Action plan 2022-2025. A list of the sources reviewed is set out at Appendix B.

### **6** Findings of the Audit of Inequalities

#### **NILGOSC** membership composition

- 6.1.1 In terms of gender, NILGOSC scheme is comprised as follows; 28.8% male and 71.2% female. This male/female ratio for the member profile broadly reflects figures regarding the public sector workforce, provided by the ECNI.<sup>3</sup>
- 6.1.2 The partnership status of the current active membership was taken from the pension software system and compared to that of the eligible workforce figures taken from the 2018 employer survey. This was due to the lack of relevant comparative data available to NILGOSC for this section 75 category. In 2018, NILGOSC compared the partnership status profile of active members to the information provided by employers for the eligible workforce. Overall, there is no significant inequality identified in respect of partnership status.
- 6.1.3 The actual age profile of current active membership was again taken from the pension software system and compared to that of the eligible workforce figures taken from the 2018 employer data. Overall, there were no age-related inequality identified.

#### **NILGOSC** alternative communication data

- 6.1.4 NILGOSC records all requests for alternative communication formats on its pension administration database. A total of 80 alternative communication needs are currently recorded on the software database. It is important to note that this figure provides a snapshot in time and can change at any point. At the time of writing this report, NILGOSC fulfilled 61 requests for alternative communications and is broken down as follows: large print (50); audio (3); translation into another language (8). Out of a total of 137,6284 members including 35,380 pensioners, the 61 requests were made by a total of 45 individuals.
- 6.1.5 NILGOSC does not have access to data to identify the percentage of membership whose main language is not English. Statistics from the 2011<sup>5</sup> census highlighted that English was not the main language for 3.1% of usual residents aged 3 years and over, almost one quarter of whom (24%) lived in the Belfast Local Government District. The most prevalent main language other than English was Polish (17,340 people, which is 1.0% of the NI population) followed by Lithuanian (6,051 people which is 0.4% of the NI population).
- 6.1.6 Available data on the level of age-related disability in the UK suggests that the number of relevant alternative communication indicators recorded by NILGOSC remains lower than would be expected. Publicly available statistics show that "One in five people aged 75 and over are living with sight loss." 6 Approximately 8000 people in Northern Ireland are on the registers of blind and partially sighted

<sup>&</sup>lt;sup>3</sup> Figures provided by ECNI Fair Employment Monitoring Report No.30 as 65.8% female and 34.2% male in the NI public sector

<sup>&</sup>lt;sup>4</sup> Membership data as at February 2022

<sup>&</sup>lt;sup>5</sup> The 2022 census results for Northern Ireland will not be published until June 2022

<sup>&</sup>lt;sup>6</sup> Royal National Institute of Blind People <a href="https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics">https://www.rnib.org.uk/professionals/knowledge-and-research-hub/key-information-and-statistics</a>

- people.7 and "More than 40% of people over 50 years old have hearing loss, rising to 70% of people over the age of 70"8. The results of the Northern Ireland Survey of People with Activity Limitations and Disabilities (NISALD) which was conducted throughout 2006/07, showed that there is a clear increase in disability with age, rising to 60% amongst those aged 75 and above. Two-thirds of those aged 85 and above were living with a disability or disabilities. Again, NILGOSC does not have access to the members' data for this section 75 category.
- 6.1.7 Given the complexity of the pension scheme information and the overall number of alternative communication requests received, based on the statistics at 6.2.3 above, it is fair to assume that the full extent of the alternative communication needs of NILGOSC members and pensioners may not currently be met. Potential barriers may exist for those with an age-related disability and those not fluent in written English. However, it must be noted that the requests for alternative communication formats does not encompass those members who can access their personal information via My NILGOSC Pension Online and any information from the NILGOSC website with the use of adaptive software, if available to them. NILGOSC also relaunched its website in 2021, bringing it in line with (Website and Mobile Applications) Accessibility Regulations 2018 and thereby making it more accessible to members who fall into the section 75 disability category.

#### Staff monitoring data

- 6.1.8 The Audit of Inequalities included a review of staff monitoring data. The data was gathered on 26 January 2022 and 90% of staff completed the form. The male/female ratio for the workforce are within 5% of the figures regarding the public sector workforce, as provided by the ECNI.9
- 6.1.9 In terms of community background split, the percentage of NILGOSC workforce that identifies with the Protestant community (51%) is reflective of the data within the ECNI Fair Employment Monitoring Report No. 30 (50.2%). However, those from a Catholic background (33%) is not reflective of the ECNI data (49.8%) however this may be due to 16% of NILGOSC workforce declaring their background as 'neither'.
- 6.1.10 In Northern Ireland, 1 in every 5 people are disabled, however only 11.3% of those employed between the ages of 16-64 are people with a disability. 10 Northern Ireland has the lowest disabled employment rate (39%) of any UK region, and the widest employment rate gap between disabled and non-disabled persons.11 Of the NILGOSC monitoring return in 2022, 8.5% of staff declared a disability. It is worth noting that the number of staff declaring a disability over time has generally increased; from 0% of the workforce in 2014 to 2% of the workforce in 2017.
- 6.1.11 As highlighted in a range of research reports on sexual orientation inequality, there is a lack of reliable and comprehensive data on sexual orientation. For example, research commissioned by the Equality Commission for Northern Ireland on

<sup>7</sup> Ibid

<sup>&</sup>lt;sup>8</sup> Action on Hearing Loss <a href="http://www.actiononhearingloss.org.uk/about-us/our-research and-evidence/facts-and-evidence figures/

<sup>&</sup>lt;sup>9</sup> ECNI Fair Employment Monitoring Report No.30

<sup>10</sup> Disability Action, NI.

**<sup>11</sup>** Ibid.

employment inequalities in an economic downturn has highlighted that there is very little labour market data on employment rates and sexual orientation in the UK and very little evidence of the employment position of LBGT groups in Northern Ireland.<sup>12</sup>

#### **Committee monitoring data**

- 6.1.12 Since the last audit of inequalities exercise, NILGOSC has had an 85% change in composition, as all previous terms of appointment came to a natural end. A review of equality monitoring data gathered on the composition of NILGOSC's Management Committee, as at 1 January 2022, was also carried out.
- 6.1.13 The ECNI stated that women continue to be underrepresented when compared to their share of the population. Using NI Census data as a comparator, females are underrepresented on NILGOSC's Management Committee. The Committee is comprised of 8 male members and 3 female members (23.1%). Comparing the female composition to 51% of its population share, this gives a variance of 27.9%.
- 6.1.14 In its 2018 assessment Key Inequalities: In Participation in Public Life, the ECNI acknowledged the significant and specific data gaps across all areas of public life in relation to the participation of equality groups within the nine equality grounds. In the areas of public life where data is collected, the availability of data is often limited, patchy and often not disaggregated. In addition, there is a complete absence of data for the specific Section 75 grounds of marital status, dependent status and sexual orientation, across all areas of public life. Two of the key inequalities identified as part of this assessment are that there is an underrepresentation of persons with a disability in applications and appointments to government public appointments. In addition, women are underrepresented in Northern Ireland within government public appointments.<sup>13</sup>
- 6.1.15 The appointment of Committee members is outside NILGOSC's control as the Department for Communities are responsible for this via the public appointments process. NILGOSC can provide the Department for Communities with any relevant monitoring data it requires.

#### Other qualitative and quantitative data

6.1.16 A review of other relevant internal quantitative and qualitative data was carried out to identify any potential inequalities or opportunities to promote equality of opportunity and good relations. This included discussions with management and review of previous equality screening templates, equality action plans, staff surveys and the annual member stakeholder satisfaction surveys. It was noted that positive feedback was received from the 2021 member satisfaction surveys, with pensioners having the highest level of satisfaction with 97.1%. Those members who have a score of less than 'good' appear to have predominantly commented on the complexity of the literature which impacted their understanding.

The following was identified as potential areas where opportunities for further actions to promote equality of opportunity and good relations could be taken:

<sup>12</sup> ECNI.

<sup>12</sup> 

<sup>13</sup> ECNI Key Inequalities in Participation in Public Life, 2018.

- a. Since the last Audit of Inequalities exercise, all members can now access the pension scheme through our website and online member portal *My NILGOSC Pension Online*. NILGOSC has endeavoured to maximise the use of the digital platform as much as possible, for example by issuing payslips and publishing pension benefit statements. However certain barriers to communications exist and this must be considered, i.e., those members who do not have access to technology. This has been noted and identified as an action via the Corporate Plan 'To launch a reconnection programme for members not utilising the Member Self Service facility.' Action has been undertaken to write to non-registered deferred members by 31 March 2022 and active members by 31 March 2023 in an effort to reconnect with some members not utilising the online facility. Progress of this programme will be monitored.
- b. In March 2021, NILGOSC redesigned its website in line with the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations that came into effect on 23 September 2018. NILGOSC has consistently responded to requests for alternative communications within the agreed timescales. Given the overall low number of requests, the measures from the previous Action plan have been carried over with view to improving access to information for members with alternative communication needs.
- c. Maintaining the accessibility of documents on the website is an ongoing process and requires staff to have training on accessibility. NILGOSC has prioritised the documents that need to be made accessible for public use, e.g. forms, and continues to work on making all documents on the website accessible. Current constraints with the software are causing a disproportionate burden in time and effort to do this, which will delay this process. Pending the software issue being resolved, a need for further staff to be trained on making documents accessible has been identified and included as an action within the plan.
- d. A Good Relations Survey was conducted in January 2022 and an initial analysis of the results has been completed. This will be considered by management and any appropriate action will be identified. The Disability Action Plan has also been updated and discussed with the ECNI. Further amendments are being made before this is finalised for agreement and issued for consultation in April 2023.
- e. Actions have been included for the subsequent review of NILGOSC's Equality Scheme and Audit of Inequalities to align these with the corporate planning cycle. It is envisioned that the next review of the Scheme due for 2026 can be completed alongside the next Audit of Inequalities exercise.
- f. Given the lack of pertinent section 75 category data available to NILGOSC, the action plan includes an action to undertake a scoping exercise with scheme employers to identify the possibility of gathering section 75 datasets for NILGOSC scheme membership for future exercises.

#### Limitations to the exercise

- 6.1.17 As stated throughout, NILGOSC only had access to three Section 75 categories of data on their records for the audit of inequalities exercise: gender, age and partnership status. The lack of data on the other section 75 categories (religion, race, disability, political opinion, and sexual orientation) presents limitations in respect of reliability and in determining whether a potential inequality exists.
- 6.1.18 There are publicly available sources which provide useful comparators for the wider Northern Ireland population. NILGOSC's function as an administering body is to provide a service to those local government employees who choose to join the pension scheme. The relevant comparator for NILGOSC is therefore the demographic of the local government workforce rather than the wider population, which is not readily available.
- 6.1.19 NILGOSC has considered these limitations and carried them forward in the Equality Action plan attached at Appendix A.

### 7 Action plan

- 7.1 The NILGOSC Action plan 2022-2025 is set out at Appendix A. It has been developed using the findings set out at section 6 above. Taking into consideration the lack of available section 75 data available as noted in this report, the focus of the action plan is on continuing to improve access to NILGOSC and the pension scheme and its services via communications, physical access, recruitment as well as continuing to promote equality of opportunity, good relations and to fulfil Section 75 obligations. The actions from the 2018-2022 Action plan that were not fully completed or still relevant have been carried forward into the Equality Action plan 2022-25.
- 7.2 The actions in respect of staff training, the staff survey, the audit of inequalities and review of the Equality Scheme are relevant to both equality duties under Section 75 (1) and (2). The remaining actions are directly relevant to Section 75 (1), outside updating NILGOSC's Good Relations policy.
- 7.3 Responsibility for the delivery of the action plan lies with the Senior Management Team.

### 8 Monitoring and Review Process

- 8.1 The Action plan 2022-2025 will be monitored on a bi-annual basis by the Senior Management Team. The Senior Management Team will review the progress in implementing the agreed actions and will also consider any developments and the need for additional actions or monitoring data in the intervening period.
- 8.2 NILGOSC reports quarterly on its progress in implementing its Corporate Plan including the equality objectives.
- 8.3 In addition, NILGOSC will prepare an annual report on progress made over the previous year. This report will form part of the Annual Review of Progress on Section 75 implementation which is sent to the Equality Commission.

| 8.4 | The collation of information on progress will allow for regular and ongoing review of t action plan to ensure that it remains effective and relevant to NILGOSC's functions. A significant changes or amendments to the action plan will be reported to the Equalic Commission. |  |  |  |  |
|-----|---|--|--|--|--|
|     |   |  |  |  |  |
|     |   |  |  |  |  |
|     |   |  |  |  |  |
|     |   |  |  |  |  |
|     |   |  |  |  |  |
|     |   |  |  |  |  |
|     |   |  |  |  |  |

# **Equality Action Plan 1 April 2022 – 31 March 2025**

## Appendix A

| Ref | Identified<br>Inequality/<br>Area | Objectives/<br>Intended<br>Impact  | Action Required   | Performance Indicator                                  | Time scale   |
|-----|-----------------------------------|--|---|--|--|
| 1   |                                   |  | Deliver Equality and Good Relations individual e-learning training to new Committee Members               | 100% of new Committee members received training        | Within 2 months of taking up post  |
| 2   | Staff Training (All 9             | To improve staff awareness and skills of   | Deliver Equality and Diversity (Good<br>Relations) e-learning training to all<br>new and existing staff   | 100% of staff completed module                         | New staff – within<br>1 month of taking<br>up post<br>Existing staff –<br>annually |
| 3   | groups) equality related issues   | Deliver corporate training to all staff<br>on statutory equality obligations and<br>NILGOSC's equality-related policies,<br>including raising equality related<br>concerns | 100% of staff received training   | 31 December<br>2024                                    |  |
| 4   |                                   |  | Deliver training to policy owners who are responsible for screening policies for equality related matters | Number of policies screened in line with ECNI guidance | Within 2 months of taking up post  |

| Ref | Identified<br>Inequality/<br>Area  | Objectives/<br>Intended<br>Impact  | Action Required  | Performance Indicator  | Time scale  |
|-----|--|--|--|--|---|
| 5   | Potential barriers to members with alternative communication needs, particularly for people with a disability and/or whose first language is not English | 1. Access to information is improved for people with a disability or whose first language is not English | Ensure NILGOSC's communications (print and electronic) are clear and easy to understand, accessible and available in alternative formats | Number of requests received and successfully completed for information in an alternative/accessible format  Number of complaints received in relation to alternative/accessible communications | Ongoing to 31<br>December 2025<br>(annually)      |
| 6   |  | 2. Information in accessible formats is readily available  | Ensure NILGOSC's website remains accessible for people from s75 groups, including those with a disability                                | Website complies with the Public Sector Bodies (Website & Mobile Applications) Accessibility Regulations 2018  Number/% of accessible documents on website                                     | Ongoing to 31<br>December 2025<br>(annual review) |
| 7   |  | via the website  | Deliver tailored training to NILGOSC staff on making documents/communications accessible   | Number of staff trained  | 30 September<br>2022                              |

| Ref | Identified<br>Inequality/<br>Area  | Objectives/<br>Intended<br>Impact                 | Action Required   | Performance Indicator  | Time scale  |
|-----|--|---|---|--|---|
| 8   | Potential barriers to members with alternative communication needs   | negatively<br>impact on s75                       | Roll-out of reconnection programme as per Corporate Objective 5.2.4                             | Number of users registered on MSS  | 31 March 2023                                     |
| 9   |  |   | Training for members and pensioners on availability of electronic communications and use of MSS | Number of training sessions delivered on use of MSS                            | 31 March 2023                                     |
| 10  | Underrepresentation of applicants and staff employed with disabilities*  Underrepresentation of males at management  num employed ed g | applicants and staff employed from underrepresent | Positive targeting of underrepresented groups through job advertising                           | Increase in % of applicants applying and employed from underrepresented groups | Ongoing to 31<br>December 2025<br>(annual review) |
| 11  |  |   | Implement recruitment and selection actions in Disability Action Plan                           |  | As per Disability<br>Action Plan                  |
| 12  |  | Increase the no. of under-represented staff       | Positive targeting of underrepresented groups through job advertising                           |  | Ongoing to 31<br>December 2025<br>(annual review) |

 $<sup>\</sup>ensuremath{^{*}}$  Underrepresented by reference to the entire working population

| Ref | Identified<br>Inequality/<br>Area | Objectives/<br>Intended<br>Impact  | Action Required   | Performance Indicator   | Time scale                      |
|-----|-----------------------------------|--|---|---|---------------------------------|
| 13  | Working / Office<br>Environment   | To promote a positive working environment in NILGOSC for all existing and future staff | Review and action feedback based on<br>Good Relations survey results in<br>relation to the workplace environment<br>culture | Positive / improved responses in staff survey. Appropriate follow-up action taken | 30 June 2022                    |
| 14  | - Working / Office<br>Environment |  | Undertake new accessibility audit in line with ECNI 'Every Customer Counts' Initiative as per Disability Action Plan        | Audit completed and action plan developed   | 30 June 2022                    |
| 15  |                                   |  | Implement recommendations from the accessibility audit during the planned refurbishment, as considered appropriate          | Reasonable adjustments made   | In line with refurbishment plan |

| Ref | Identified<br>Inequality/<br>Area  | Objectives/<br>Intended<br>Impact  | Action Required   | Performance Indicator   | Time scale              |
|-----|--|--|---|---|-------------------------|
| 16  | Working / Office<br>Environment  | Improve<br>accessibility of<br>Templeton<br>House for staff<br>and the public                  | Ensure meetings held in public places are accessible for all stakeholders attending | Meetings held in accessible venues  Reasonable adjustments made as appropriate  Number of complaints received in relation to accessibility of venue | Per meeting<br>schedule |
| 17  |  | Keep equality related policies up-to-date and monitor and review the impact of positive action | Consult and Publish the updated<br>Disability Action Plan                           | Plan issued for consultation and final version published and issued to consultees   | 30 June 2022            |
| 18  | Policy – Monitoring & Review Access better quality section 75 data for member profile from employing authorities  Keep equality related policies up-to-date and monitor and review the impact of positive action | related policies up-to-date and  | Undertake audit of inequalities to inform new Equality Action Plan                  | Audit of Inequalities completed, and Action Plan agreed   | 31 Dec 2025             |
| 19  |  | Review of Equality Scheme  | Equality Scheme reviewed and published  | 31 Dec 2026   |                         |

| Ref | Identified<br>Inequality/<br>Area   | Objectives/<br>Intended<br>Impact  | Action Required  | Performance Indicator   | Time scale          |
|-----|---|--|--|---|---------------------|
| 20  | Policy - Monitoring &<br>Review<br>Access better quality<br>section 75 data for<br>member profile from<br>employing authorities | To identify or monitor any inequalities that may exist for our members and make better informed actions for equality related matters | Liaise with Equality officers of largest employing authorities to scope how we can gather s75 equality related data for NILGOSC members. | Improved access to s75 data to inform next Audit of Inequalities exercise | 31 December<br>2023 |

#### List of internal and external reports and datasets reviewed as part of Audit of Inequalities 2022

- NILGOSC Committee and Staff Equality Monitoring Data
- Statistical data from membership database
- NILGOSC Complaints Log
- NILGOSC Annual Progress Reports 2018-21
- Results of 2021 annual member stakeholder satisfaction surveys
- Northern Ireland Census 2011
- Northern Ireland Statistics and Research Agency (NISRA) 'Public Appointments: Annual Report for Northern Ireland, 2018/19' published 26 January 2022
- Disability Action Report on "The impact of COVID-19 on disabled people in Northern Ireland" September 2020
- "Accessing NISRA Population Section 75 Data" November 2020
- Disability Employment Gap in NI 2020, Labour Force Survey (NISRA)
- Fair Employment Monitoring Report No.30, 2019
- Public Appointments Annual Report for NI 2018/19
- Northern Ireland Survey of People with Activity Limitations and Disabilities 2006/07
- Action on Hearing Loss "Facts and Figures"
- ECNI Section Advice to Public Authorities: Approaching an "Audit of Inequalities"
   2012
- ECNI Statement of Key Inequalities in Employment in Northern Ireland 2018
- ECNI Key Inequalities in Participation in Public Life 2018