



**Northern Ireland Practice and Education Council  
for Nursing and Midwifery**

# **Five Year Review of Equality Scheme**

**March 2016**

**Name of public authority:**

Northern Ireland Practice and Education Council for Nursing and Midwifery

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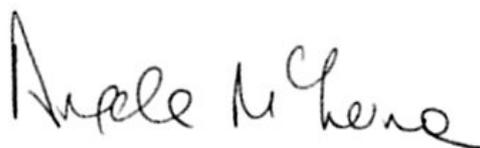
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## Executive Summary

- a) To what extent has your public authority's approved scheme provided a workable basis for mainstreaming the need to promote equality of opportunity and good relations into policy-making over the past five years?

NIPEC was established in 2002 with the aim of improving the quality of health and care by supporting the practice, education and performance of nurses and midwives. Accountable to the Department of Health, NIPEC leads and facilitates projects, initiatives and workstreams on behalf of the Department, HSC Trusts and other HSC organisations.

It is important to note that NIPEC does not provide front line services to patients, clients, service users and the general public and its main stakeholders are nursing and midwifery registrants working within the health and social care system, thus making it difficult at times to link its work to the equality agenda and the organisation's legislative responsibilities within Section 75 of the NI Act 1998.

However, NIPEC's Equality Scheme outlines how the organisation intends to meet its legislative duties and set out its commitment to making equality an integral part of its work.

Whilst the Scheme has provided a focus for mainstreaming equality and good relations in decision-making, the majority of time and effort has been spent on policy review and development and screening of same. As with other HSC organisations, NIPEC has a large amount of corporate and technical policies linked to regional policy, eg. information governance, human resources, finance procedures. In such cases, the lengthy screening template becomes a bureaucratic exercise with little added value. It is also felt that for such regional policies the responsibility for screening lies with the authority issuing such policy and should not need to be replicated by all relevant organisations when the impacts and issues will be the similar if not the same.

NIPEC has accessed and facilitated relevant staff to attend suitable training and strived to meet its commitment to increased awareness of the equality agenda throughout the organisation. Completion of modules 1-5 of the HSC Discovering Diversity e-learning programme is mandatory for all NIPEC staff, and whilst attendance at national disability awareness and information sessions is voluntary, all such training is important to increase staff awareness of equality and diversity issues. Facilitating staff to attend such sessions and develop specialist knowledge and skills is important in meeting the organisation's commitment to the equality agenda. In practice, the refinement of skills in undertaking equality screenings and equality impact assessments largely takes place on the job.

The rationale for inclusion of certain elements of the Scheme is not entirely clear. The reason for placing particular emphasis on ensuring and assessing access to services (Section 8 of the Scheme), as opposed to all aspects of service provision (that is the quality, experience and outcome of services alongside access), is unclear. At times, this has tended to lead staff to exclusively focus on access issues in screening and equality impact assessments. However, NIPEC's engagement and communication strategy outlines its commitment to actively engaging with its stakeholders and provides an opportunity to ensure equality considerations form part of this agenda.

Likewise, the rationale for placing the requirement on public authorities to develop a programme of awareness raising on the Section 75 statutory duties (Section 3 of the scheme) remains unclear. This results in duplication of effort across the HSC and indeed other public authorities. It could be argued that the Equality Commission should provide suitable materials, information and resources to raising awareness of Section 75 duties.

It seems reasonable to conclude that the good relations part of Section 75 has played a less prominent role than the promotion of equality of opportunity. NIPEC would argue that progress in this respect has been contingent less so on the Equality Scheme itself than on a fundamental caution to move away from the concept of a neutral work environment, given conflicting statutory requirements and the resulting risk of being in breach of these. NIPEC would welcome clearer guidance as to the implications for organisations which actively promote the discussion of religious and political identities in light of statutory requirements under fair employment legislation.

Ultimately, the question arises whether the Scheme itself adds value to the aim of mainstreaming, given that Schemes across many public authorities are largely uniform, driven by the existence of the Commission's model Scheme.

It could be argued that if the legislation itself was to bind public authorities directly into the key elements of mainstreaming, rather than requiring them to develop a Scheme that does so, further resources could be freed up to focus on implementation. From a corporate point of view, a diversity strategy and action plan could become a more meaningful manifestation and driver for implementation, specific to the functions of the organisation. It could also serve to bring together the range of equality related action plans currently in existence (including under Section 75, the Disability Discrimination Order, The Fair Employment and Treatment Order and others). Experience has shown that the existence of separate plans cause confusion to staff and external stakeholders alike.

b) What key lessons have been learnt over the past five years in terms of effectively implementing the approved equality scheme?

The implementation of Section 75 and meeting its commitments within its Equality Scheme has proved a challenge for a small organisation such as NIPEC both in terms of **resources** required and the **limitations** for effecting change given its role and function as outlined above.

However, on those areas that can be achieved through collaborative working, a partnership approach with other HSC organisations and supported by the BSO Equality Unit, allows the pooling of resources, creates economies of scale, enables the delivery of a rolling programme of training and the development of relationships with voluntary sector organisations. Most importantly, it facilitates shared learning and consistency where possible.

This partnership approach has also been beneficial to our organisation through easier and more efficient facilitation of regional work across HSC in Northern Ireland, including the 11 partnership organisations and the 6 Health and Social Care Trusts. For example areas of work that have been progressed across HSC NI include, a Trans Employment Policy, an Accessible Formats Policy and the development of a suite of eLearning modules for staff on Diversity, Disability and Cultural Awareness.

The partnership organisations have also facilitated engagement with targeted Section 75 groups as and when required. This approach not only maximises our own internal resources, but has proven beneficial to community and voluntary groups, who have limited resources, which has therefore enhanced their capacity and willingness to participate.

Screening of its policies and decisions has been a **particular challenge** for NIPEC as it does not provide front line health and social care services and is not a public facing organisation. As outlined above, nursing and midwifery registrants are one of its main stakeholder groups – limited equality and diversity data from their regulatory body, the Nursing and Midwifery Council, has presented problems and results in a less comprehensive screening outcome.

In addition, NIPEC finds the screening template **cumbersome** and **time consuming** to complete and, due to its role and function, in some respects brings limited added value in terms of the equality agenda. It is also important to note that this is taking place at a time of severe restrictions on the funding available within the Public Sector and increasing pressures from other work areas.

All senior professional and corporate services staff have undertaken screening training and ownership among professional staff in NIPEC has improved as demonstrated during 2015/16 with the development of a

screening programme and an increased in the number of projects and workstreams being screened.

c) **What more needs to be done to achieve outcomes for individuals from the nine equality categories?**

With regards to particular areas of Equality Scheme implementation, the review has shown that it may be most effective for the organisation to concentrate further efforts on:

- (1) screening and Equality Impact Assessments
- (2) monitoring
- (3) engagement – using existing structure and processes to engage on equality issues rather than creating additional processes.

With regards to screening activity we will:

- Once again screen the Business Plan 2016/17 and where necessary produce a screening programme to ensure projects and workstreams are screened.
- Revisit the scope for introducing a shortened template for evidencing the screening of policies that do not impact on people.
- Seek equality and diversity data from the Nursing and Midwifery Council as the UK regulatory body, as well as other professional bodies such as the Royal College of Nursing and Royal College of Midwifery, to bring added value to the screening process.

In relation to the regional level, we will:

- Seek to engage with DHSSPS policy leads on equality issues at consultation stage of strategies or policies, through the regional equality and human rights steering group.
- Seek to influence others by raising the need for the coordination of screening activities between the DHSSPS and HSC organisations as well as between individual HSC organisations, through the regional equality and human rights steering group.

With regards to individual groups, a particular focus on the following may achieve further important outcomes:

- Trans
  - Implementation of Regional Trans Policy
  - HSC LGB&T staff forum

- Sexual Orientation
  - HSC LGB&T staff forum
- Disability
  - Disability Staff Forum

### **Looking Ahead**

NIPEC is confident that its screening programme, drawn up in the screening of its Business Plan 2015/16 and plans to replicate this in 2016/17, will go a long way towards identifying potential and actual impacts and therefore achieving positive outcomes for the 9 groups by addressing those impacts.

In relation to monitoring, it is the view of NIPEC that the mainstreaming at DHSSPS-level of the requirement for HSC organisations to include equality data in relation to service reporting (including on performance) and the aggregation of such data for Northern Ireland as a whole could serve as a strong driver to progress on equality monitoring.

# **1. A general introductory statement specifying the purpose of the scheme and the public authority's commitment to the statutory duties**

## **1a) To what extent were senior management involved in ensuring scheme compliance over the 5 year period and what further steps could be undertaken to ensure effective internal arrangements?**

NIPEC's Head of Corporate Services is the equality lead and, supported by the Corporate Services Manager, has acted as the main driver in implementing Section 75 in the organisation throughout the five-year period. The equality lead and the Corporate Services Manager are members of the client equality forum convened by the Business Services Organisation's Equality Unit.

Throughout the five-year period the group met formally on a quarterly basis to share good practice in the implementation of Section 75 and to plan joint work. At a strategic level, the BSO's Equality Unit has represented clients on regional groups, such as the Equality and Human Rights Steering Group convened by the Department of Health, Social Services and Public Safety (DHSSPS).

Equality is a standing agenda item at NIPEC's Business Team meetings. Members of NIPEC's Senior Business Team have been involved in a number of ways:

- Annual progress reporting: scrutiny of progress and direction setting for the coming year
- Considering and taking action on Equality Scheme issues brought to the team by the equality lead/Corporate Services Manager and the BSO's Equality Unit
- Equality lead level engagement with the Equality Commission at key points
- Equality Screening of annual Business Plan and development of screening programme.

Senior managers played an important role by:

- Contributing to annual progress reporting by identifying relevant initiatives in their area of responsibility
- Undertaking quality assurance of quarterly equality screening reports
- Ensuring training attendance of relevant staff;

## Looking ahead:

NIPEC will undertake the following steps to further ensure effective internal arrangements:

- Continue with equality as a standing agenda item at all Business Team meetings.
- Screen NIPEC's Business Plan annually to ensure organisational priorities are captured in an annual screening programme

1b) Outline annual **direct** expenditure of resources to ensure that the statutory duties were complied with, in terms of staff and money over the past 5 years, and comment on the extent that all necessary resources were allocated.

As outlined above, NIPEC's Head of Corporate Services is the equality lead and supported by the Corporate Services Manager, manages the equality agenda within the organisation. NIPEC also has in place a Service Level Agreement with the Business Services Organisation (BSO) for the provision of equality and human rights support services, along with 10 other regional Health and Social Care organisations. The Unit employs four members of staff, three at senior level and one administrator. Overall, the partnership arrangements between the regional HSC organisations have produced significant economies of scale. Examples include the design and delivery of training and good practice initiatives, jointly for the organisations or holding two equality best practice conferences during the five year period.

The following table specifies the amount of the annual equality SLA over the past five years:

**Table 1:**

<b>Year</b>	<b>Expenditure</b>
2011/12	£8,730
2012/13	£6,840
2013/14	£6,601
2014/15	£6,697
2015/16	£6,855
<b>Total</b>	<b>£35,723</b>

However, the SLA with the BSO's Equality Unit is not the sole cost to NIPEC in meeting its commitments within the Equality Scheme. Significant time by the equality lead, Corporate Services Manager and other senior professional staff is devoted to equality screening, customising and disseminating generic information and materials expenditure, organising training and awareness/information sessions within the organisation, producing the annual

progress reports, researching, sourcing, collecting and monitoring equality and diversity data, and implementing the Equality and Disability Action Plans.

Whilst NIPEC does not have a definitive cost for the above, it has increased significantly over the five years of the Equality Scheme and is a substantial hidden cost within current restrictive financial resources. Monitoring the allocation of resources on equality scheme implementation becomes more difficult the more successful mainstreaming is. For example, the time spent on equality proofing policies as this becomes an integral part of the policy development process.

**2. An outline of how the public authority intends to assess its compliance with the Section 75 duties and for consulting on matters to which a duty under that section is likely to be relevant**

2a) Outline impacts and outcomes (for the public authority and/or individuals from the nine equality categories) over the past five years and what further steps could be undertaken to build on these or address underreporting?

**Outcomes for individuals from the nine equality categories**

Table 2 below provides an overview of key impacts and outcomes:

**Table 2:**

<b>Section 75 Equality Categories</b>	<b>Outcomes, impacts and good practice</b>
<b>Gender</b>	<p>Engagement with mothers (and some fathers) in developing the NI Community Maternity Care Strategy and developing resources aimed at meeting their needs and those of their babies, and improve their experience prior to and following birth.</p> <p>The introduction of e-learning training programmes in a range of mandatory and non-mandatory subjects in 2012 highlighted the need for additional training for staff who do not use IT equipment on a daily basis, ie. support services staff. Basic training in the use of the organisation’s IT systems was provided and a desktop PC made available for their use to facilitate the completion of e-learning training programmes.</p>
<b>Age</b>	<p>Engagement of young people in the development of a nursing and midwifery careers website brought added</p>

	<p>value to the creation of the site and ensured this met their needs and provided information they needed in a format that appealed to them and met their needs.</p> <p>The introduction of e-learning training programmes in a range of mandatory and non-mandatory subjects in 2012 highlighted the need for additional training for staff who do not use IT equipment on a daily basis, ie. support services staff. Basic training in the use of the organisation's IT systems was provided and a desktop PC made available for their use to facilitate the completion of e-learning training programmes.</p>
<b>Religious Belief</b>	---
<b>Political Opinion</b>	---
<b>Marital Status</b>	---
<b>Dependent Status</b>	---
<b>Disability</b>	<p>In 2013 NIPEC publish its 5-year Disability Action Plan – this was reviewed in 2015 and has resulted in numerous positive outcomes for the organisation and for people with a disability we work with, some of which are reported on elsewhere in this report. The full plan can be viewed on our website <a href="https://nipec.hscni.net/">https://nipec.hscni.net/</a></p>
<b>Ethnicity</b>	---
<b>Sexual Orientation</b>	---
<b>General / across several or all nine categories</b>	<p>In 2012, following a review of the organisation's Project Initiation Document (PID) template, project leads were asked to record their consideration of any equality issues, and where necessary undertake full equality screening of projects.</p> <p>The completion of modules 1-5 of the HSC Discovering Diversity e-learning training programme is mandatory for all staff. In addition, staff are encouraged to complete 6<sup>th</sup> module on cultural diversity.</p> <p>In 2013, a new electronic information system for reporting and recording Human Resources, Payroll, Travel and Subsistence (HRPTS) was introduced.</p>

This enables line managers to access information staff more easily and monitor access to and use of various family friendly policies, thereby ensuring consistent, fair and equitable implementation of these.

Whilst completion of the equality and diversity section within HRPTS is voluntary, staff are encouraged to do so, thereby providing the organisation with up-to-date information to inform equality screening of relevant policies and decisions. In 2014/15, we undertook a survey of NIPEC Council members and received 100% response, thus ensuring we have full equality and diversity data for our Council.

In 2014, the organisation adopted and published its Accessible Formats Policy for the provision of information which supports its commitment to provide information in alternative formats and ensure venues, information and the way meetings are conducted are accessible.

In 2013/14, the decision to consolidate the organisation's offices onto one floor, resulted in a number of human resource and employment issues in the form of a change of hours and duties for some members of support staff. The screening of this decision highlighted the need for regular meetings with those individuals affected as well as staff in general in order to ensure all changes in accommodation and employment were appropriately managed.

The importance of engaging, involving and working with stakeholders, internal and external, is central to the work of NIPEC, who leads and facilitates a range of projects and workstreams on behalf of the DHSSPS, HSC Trusts and other HSC bodies. Online and face to face consultations and engagement with nurses, midwives, services users and their carers have been conducted. In 2015 we established a PPI e-Forum, developing a password protected members are on our website to allow access to information and provide feedback.

## Looking Ahead

Based on the analysis of the information in the table, the organisation recognises that fewer outcomes have been achieved for a number of groups. NIPEC is confident that its screening programme, drawn up in the screening of its Business Plan 2015/16 and plans to replicate this in 2016/17, will go a long way towards identifying potential and actual impacts and therefore achieving additional positive outcomes for the 9 groups by addressing those impacts.

With regards to individual groups, a particular focus on the following may achieve further important outcomes:

- Trans
  - Implementation of Regional Trans Policy
  - HSC LGB&T staff forum
- Sexual Orientation
  - HSC LGB&T staff forum
- Disability
  - Disability Staff Forum

NIPEC will work with the BSO Equality Unit and its HSC Equality Forum colleagues to explore further the particular needs of these groups in relation to both employment and services and what additional action could be taken to address these.

NIPEC will also seek equality and diversity data from the Nursing and Midwifery Council as the UK regulatory body, as well as other professional bodies such as the Royal College of Nursing and Royal College of Midwifery, to bring added value to the screening process.

## Outcomes for the Public Authority

NIPEC's activities to deliver on the Section 75 commitments have also produced benefits for the organisation itself. The screening of NIPEC's Business Plan 2015/16 and development of a screening programme has resulted in a more robust and transparent process for NIPEC's projects and workstreams in terms of consideration of equality and diversity impacts and outcomes. The survey of NIPEC Council members and actions taken to encourage staff to update their equality and diversity section on HRPTS has resulted in improved data and therefore more robust screening of policies and decisions. In addition, the implementation of NIPEC's Disability Action Plan has resulted in improved awareness of the issues facing colleagues and stakeholders with disabilities and how the organisation can best support them through the work of NIPEC.

**2b) Outline the number of equality scheme related consultation exercises undertaken by your authority over the past five years. Set out the number and percentage related to screening exercises and to EQIAs and indicate the extent that your scheme helped you to engage with external stakeholders?**

Over the past five years, NIPEC carried out one consultation exercise that was directly related to the Equality Scheme; this consultation was on the new Equality Scheme and Equality Action Plan.

All screenings that NIPEC published in this period were included in quarterly equality and human rights screening reports, collated on our behalf by the BSO Equality Unit. These were issued to consultees with the invitation to comment.

The Equality Scheme contributed to both widening and strengthening our efforts to engage and consult: the maintenance of a Section 75 master consultation list helped us to include further groups in any mainstream policy consultations.

Face-to-face engagement continues to be particularly effective both in eliciting views and in building relationships with those impacted by what we do.

More recently, NIPEC has drawn on social media to offer young people in particular new ways of engaging with us and developed social media guidance to ensure best practice by staff at all times. This has allowed us to reach a wider range of consultees.

**2c) Indicate if your list of consultees was amended during the 5 year period and what further steps could be taken to develop your level of engagement and consultation?**

Over the five-year period, the consultation list was updated on a quarterly basis following the issuing of screening reports. Moreover, any requests by consultees to be added to or taken off the list were acted upon. In addition, new emerging groups were added to the list on a regular basis.

As indicated in the previous section, overall, NIPEC moved towards focused engagement to add to inclusive formal consultation.

Looking ahead, both NIPEC and consultees would benefit from integrating equality considerations within mainstream stakeholder engagement rather than being undertaken as stand-alone exercises. This would, NIPEC feels, result in more effective and meaningful engagement and ultimately more robust and comprehensive consideration of equality impacts and diversity issues.

2d) To what extent did your authority consult directly with directly affected individuals as well as with representative groups, particularly in relation to young people and those with learning disabilities, and was this sufficient?

With regards to decisions and policies impacting on staff, the organisation undertook direct one-to-one or focus group engagement and consultation with affected staff on staff issues. For example, consolidation of the organisation's offices onto one floor and the resulting human resource and employment issues, and more recently the Voluntary Exit Scheme.

As outlined above, the focus for engagement and communication is through NIPEC's Engagement and Communication Strategy, including the newly established PPI e-Forum and the various working groups set up to co-ordinate the projects and workstreams facilitated and led by NIPEC. In relation to young people, the development of its nursing and midwifery careers website was greatly enhanced through engagement with and feedback sought and provided by young people.

Furthermore NIPEC, facilitated by BSO Equality Unit, undertook direct engagement with a range of representative groups and individuals to inform the development of a Regional HSC Transgender Policy as well as the Accessible Formats Policy.

The organisation followed a robust process for providing feedback to consultees after the completion of consultation exercises. All those who provided comments during the consultation on the Equality Scheme and Action Plan were issued the Consultation report. In this, all comments were addressed. For any suggestions that the organisation did not take forward, a rationale was provided.

### **3. The authority's arrangements for assessing and consulting on the impact of policies adopted or proposed to be adopted on the promotion of equality of opportunity**

3a) Outline and discuss the number of policies your authority subjected to screening over the past five years, setting out the number and percentage of 'policies screened in' on the basis of equality considerations and the percentage 'screened in' on the basis of the good relations duty.

Over the five year period, the organisation screened a total of 27 policies. Table 3 below provides further details.

**Table 3:**

<b>Name of Organisation</b>	<b>2011-2012</b>	<b>2012-2013</b>	<b>2013-2014</b>	<b>2014-2015</b>	<b>2015 (Q1)</b>	<b>Total</b>
Total no of policies	15	7	4	0	1	<b>27</b>
Screening Decision 1 (screened in)	0	0	0	0	0	<b>0</b>
Screening Decision 2 (screened out with mitigation)	4 (27%)	5 (71%)	2 (50%)	0	1 (100%)	<b>12 (44%)</b>
Screening Decision 3 (screened out without mitigation)	11 (73%)	2 (29%)	2 (50%)	0	0	<b>15 (56%)</b>

The organisation did not screen in any policies on the basis of the good relations duty. All of the above policies can be viewed on the joint screening website, facilitated by the BSO Equality Unit at <http://www.hscbusiness.hscni.net/services/2166.htm> and will be provided as hard copy on request.

As stated earlier, NIPEC identified the need for improvement in relation to the screening of policies and decisions and this has been addressed by NIPEC's Business Team screening the annual Business Plan and developing a screening programme for the year. This approach will ensure that projects and workstreams facilitated and led by NIPEC will be screened.

Key factors contributing to this progress include:

- A screening workshop for senior staff in December 2015 focussing on the screening of key elements of the 2016/17 Business Plan
- availability of a number of specialised resources on screening developed by the Equality Unit
- staff training in equality screening
- one-to-one in-depth support and advice by equality professionals

- designing and implementing assurance processes, such as
  - quality assurance of quarterly screening reports
  - progress and update on screening activities at monthly Business Team meetings
  - integration of requirement to provide information on the outcome of screening as part of Project Initiation Document.

Staff value the centralised screening website maintained by the Equality Unit on behalf of all 11 regional organisations as a source of reference.

The full-length screening template has proved overly burdensome for policies that clearly do not impact on people. In the same way as EQIA reports are only completed for policies likely to have a major impact, full-length screening templates should be reserved for policies likely to have at least a minor impact. The introduction of a shortened template for policies that do not impact on people would address the risk of screenings being perceived as a paper exercise by policy leads. It would also serve to focus resources on areas where screening can make a difference.

A considerable share of policies screened relate to corporate affairs and, while policies and major changes in the delivery of functions are subjected to screening, the need to roll out screening further remains. NIPEC has experienced difficulties when evidence of key policies by other organisations that impact on the work of NIPEC having been screened is not available. This relates in particular to the regional and national level, such as strategies or policies emanating from the DHSSPS or GB-based regulators.

It seems fair to say that national decision-makers remain largely unaware of the statutory obligations that are unique to Northern Ireland. In many cases this means that, firstly, essential equality data to inform screenings at local or organisational level is missing. Secondly, the potential lack of screening when the strategy or policy is developed at regional or national level means that individual organisations do not have the authority to introduce mitigating measures if their assessments show that any Section 75 groups are affected differentially and unfairly by the implementation of the policy.

**In other words, the ownership of the policy lies outside the organisation as the organisation does not have any scope for making changes to the policy. Hence while the organisation technically ‘owns’ the policy (according to the Equality Commission’s guidelines) the de facto ownership remains at the regional or national level.**

These difficulties are exacerbated by the fact that key stakeholders impacting on the work of NIPEC are not designated under Section 75, including some of the regulators.

## Looking ahead

Notwithstanding these general constraints posed by the regional and national level, NIPEC recognises the scope for strengthening its own screening activities. To this end, we will seek to introduce the following set of measures:

- Increase the number of screenings relating to functions and service areas beyond corporate affairs.
- Revisit the scope for introducing a shortened template for evidencing the screening of policies that do not impact on people.

In relation to the regional level, we will

- Seek to engage with DHSSPS policy leads on equality issues at consultation stage of strategies or policies, through the regional equality and human rights steering group.
- Seek to influence others by raising the need for the coordination of screening activities between the DHSSPS and HSC organisations as well as between individual HSC organisations, through the regional equality and human rights steering group.
- Seek equality and diversity data from the Nursing and Midwifery Council as the UK regulatory body, as well as other professional bodies such as the Royal College of Nursing and Royal College of Midwifery, to bring added value to the screening process.

**3b) To what extent did your authority's consideration of the screening criteria not identify equal opportunity implications on any of s75 categories, but for which consultees then highlighted problems?**

In relation to screenings that are published as part of quarterly screening reports, NIPEC has to date received few comments from consultees. In the main, these were requests for further information and clarification rather than concerns as to a lack of consideration of particular issues.

The evidence base of screenings of policies that impact on staff has become significantly more robust with the introduction of a new Human Resources IT system, the Human Resources Pay and Travel System (HRPTS). Since then, data on all nine Section 75 groups has been captured and drawn upon. Summary equality data of our staff is made available to staff undertaking screenings on a quarterly basis.

At the same time, NIPEC recognises that the quality of data relies on staff completing and maintaining all areas within the equality and diversity section

on HRPTS by means of a self-service. Staff completion rates are particularly low in relation to the categories of dependants, disability and sexual orientation. In an effort to address and improve this situation, a dedicated campaign encouraging staff to complete the data was scheduled for Quarter 4 of 2015/16, whilst providing reassurance regarding the confidentiality of information and highlighting the benefits full data would bring to the development of policies and practices that support staff in the work place.

With regards to data collected to identify impacts on service users, progress has been made for policies that impact on the wider NI population as Census 2011 data became available.

Efforts to harmonise the collection of ethnic monitoring data across HSC IT systems, driven by the Health and Social Care Board in recent years, should result in more accurate data in the coming years. Fundamental gaps remain in the collection and collation of equality data at regional level in relation to other equality groups, including on carers and sexual orientation.

3c) Outline over the past five years how many EQIAs your authority commenced as a result of i) initial screening and ii) as a result of screening new/revised policies subsequently, and discuss the extent that your authority has become more effective at identifying equality of opportunity dimensions in its policies.

The organisation did not undertake any EQIAs during the five year period.

3d) Outline over the past five year period the percentage of your authority's initial EQIA timetable that reached i) stage 6 of the EQIA process i.e. decision making, and ii) stage 7 of the EQIA process i.e. annual monitoring & publication of results, and indicate the extent that your authority has become more effective at progressing EQIAs.

Not applicable.

#### **4. The authority's arrangements for monitoring any adverse impact of policies adopted by the authority on the promotion of equality of opportunity**

4a) To what extent were sufficient arrangements put in place to collect data relating to the nine equality categories to monitor the impact of policies and what could your authority do in future to develop monitoring arrangements?

Appropriate arrangements for monitoring staff impacts of policies were put in place with the introduction of HRPTS (see section 3b). As previously mentioned, a dedicated campaign to encourage staff to complete and maintain their equality data is planned for the latter part of 2015/16. However, it is recognised that reluctance to do so may be due to fear of

identification given the small size of the organisation (20 members of staff) and reassurance has been given regarding the robust arrangements in place to ensure their information is secure and confidential.

The most recent Annual Progress Report evidenced that monitoring is undertaken in practice only to a limited extent. This may be due to staff not necessarily making the link between monitoring and service improvement, equality and quality.

In some areas, monitoring arrangements have been established, examples of which include:

- staff provided with the opportunity to attend a range of mental health awareness and training sessions organised by the BSO
- establishment of a Health and Social Wellbeing Committee within NIPEC, with a remit of organising a range of activities aimed at improving the health and social wellbeing of individuals and the organisations as a whole – the group will be issuing the first end of year report in April 2016.
- In 2014/15, we undertook a survey of NIPEC Council members and received 100% response, thus ensuring we have full equality and diversity data for our Council.

The mainstreaming at DHSSPS-level of the requirement for HSC organisations to include equality data in relation to service reporting (including on performance) and the aggregation of such data for Northern Ireland as a whole could serve as a strong driver to progress on equality monitoring.

## **5. The authority's arrangements for publishing the results of equality impact assessments and of monitoring any adverse impact of policies adopted by the authority on the promotion of equality of opportunity**

5a) Indicate the number of reports published outlining the results of EQIAs and monitoring over the past five years, and outline what your authority could do in future in relation to improving the publication of EQIA results and monitoring.

Not applicable.

**6. A commitment that in making any decision with respect to a policy adopted or proposed to be adopted by it, that the public authority shall take into account any equality impact assessment and consultation carried out in relation to the policy**

6a) In terms of the number of EQIAs that reached stage 6 (i.e. decision making) to what extent were mitigation measures and alternative policies adopted?

Not applicable.

6b) To what extent did consideration of EQIAs and consultations contribute to a change in policy, as opposed to policy decisions which would probably have been made in any event by your authority?

Not applicable.

**7. The authority's arrangements for training staff on issues relevant to the duties**

7a) To what extent were sufficient arrangements put in place to develop and deliver a training programme in accordance with scheme commitments?

NIPEC and its partners implemented a comprehensive training programme over the five-year period. A training plan was developed on an annual basis jointly by the BSO Equality Unit and all partner organisations, thus ensuring the continuing learning and development of staff in relation to equality, good relations and human rights throughout the period.

Tables 4 and 5 below give an overview of the type of training and awareness raising delivered and its timing over the five year period.

It should be noted that completion of modules 1-5 of the Discovering Diversity e-learning programme is mandatory by all NIPEC staff. A number of staff completed this training prior to 2011 and therefore their data will not feature in Table 5. In addition, staff seconded to NIPEC to support specific projects and workstreams complete their training within their own organisation and therefore their data will not appear in Table 5.

**Table 4: Number of staff attending face-to-face training during the five year period by type of session**

<b>Type of Session</b>	<b>2011-2012</b>	<b>2012-2013</b>	<b>2013-2014</b>	<b>2014-2015</b>	<b>2015-2016 (Q1)</b>
Equality and Human Rights Screening	6	2	---	---	---
Equality Impact Assessments	---	---	---	2	---
Equality Awareness Training	---	2	---	---	---
Board Equality Scheme Briefing	1	6	---	---	---

**Table 5: Number of staff completing eLearning training during the five year period by module**

<b>ELearning Module</b>	<b>2011-12</b>	<b>2012-13</b>	<b>2013-2014</b>	<b>2014-2015</b>	<b>2015 (Q1)</b>
Module 1 to 4 – Diversity	4	3	4	5	---
Module 5 – Disability	3	3	3	4	---
Module 6 – Cultural Competencies	1	1	3	4	---

All training sessions were evaluated on a routine basis. It showed that staff found the sessions effective in meeting the set aims and objectives.

A rolling programme of specialised training was provided on particular aspects of equality scheme implementation including screening and EQIAs.

The economies of scale achieved by the partnership arrangements were particularly pronounced in the area of training, allowing the organisation to meet the training needs of staff in a highly cost-effective manner. It also allowed shared learning across partner organisations. This has enabled more staff to avail of face-to-face classroom based training than may have otherwise been the case.

Alongside face-to-face training, considerable efforts were spent on developing e-learning programmes within the Discovering Diversity framework. Table 5 provides details on the number of staff who completed a range of modules within the framework.

In addition, staff were facilitated in accessing an e-learning programme on sexual orientation and gender identity, developed by the Public Health Agency.

**7b) Have all staff received awareness training and what could your authority do in future to deliver an effective training programme?**

Following initial focus on raising staff awareness on the Equality Scheme commitments, including information materials in easy to understand format, efforts shifted in the latter part of the five year period to raising awareness on needs and experiences of one particular group under Section 75, namely people with disabilities. This was undertaken by a series of awareness days, in the main linking in with international awareness days and weeks.

A core element of this work was to bring in speakers and service users via representative groups. NIPEC worked collaboratively with a partner organisation, NIGALA, in organising a number of joint information and awareness sessions for their staff.

Given the effectiveness of this format the organisation will explore the scope for building on this in relation to other Section 75 groups.

In 2015/16, the BSO Equality Unit working with the HSC Equality Forum colleagues, produced an easy-to-read brief leaflet for staff on the Disability Duties and this was issued to all NIPEC staff and Council members. It is envisaged to complement the existing e-learning portfolio by development of a new module on general equality awareness.

As stated in previous sections, NIPEC has seen significant improvement in the screening of its policies and decisions, as demonstrated by the Business Team screening the annual Business Plan and developing a screening programme for the year. The BSO Equality Unit facilitated a screening workshop for the Business Team in December 2015, and a number of 1:1 brief sessions were also held with senior staff. This approach has led to a greater ownership among senior staff and improved screening of projects and workstreams facilitated and led by them.

## **8. The authority's arrangements for ensuring and assessing public access to information and to services provided by the authority**

### **8a) To what extent were sufficient arrangements put in place to ensure and assess public access to information and to services provided by the authority?**

All Section 75 related documents (including consultation documents, screening reports, correspondence with staff and service users) follow RNIB guidance. This involves, for instance, the use of Arial font size 14 and left alignment.

With regards to other documents, NIPEC adopted an Accessible Formats Policy for written information. The policy seeks to ensure that the approach to the provision of information either in written or alternative format is accessible, clear, balanced, fair, transparent and accurate.

It spells out criteria for making documentation available in accessible formats. Within the priority areas as identified in the policy where it is more effective, cost efficient or timely to do so it commits to ensuring that a reasonable alternative is provided.

Staff Guidance provides practical advice. The template policy and guidance was developed and publicly consulted on regionally, with adaptation to organisational circumstances. Alongside the policy, summary information for staff was developed, as well as a toolkit including a range of support products, such as practical guidance, flowcharts and monitoring databases.

NIPEC's main website and other websites developed on specific work areas and professional issues have all been developed using Web Content Accessibility Guidelines. The development of a new main website is near completion and, in addition to engagement with staff and NIPEC Council members and self-assessment using Web Content Accessibility Guidelines, nursing and midwifery

colleagues within the HSC will be asked to review and feedback on the accessibility of the new site in the early part of 2016/17.

Looking ahead, it will be vital that staff engage closely with individuals and representative groups to agree priorities in providing accessible written and electronic information.

Issues relating to access to services were examined in the context of individual equality screenings.

## **9. The authority's timetable for measures proposed in the scheme**

9a) Outline the extent to which measures set out in the original timetable have been implemented. Any detailed information should be included in as an appendix to the report.

NIPEC implemented the measures that were set out in the original timetable (as per the relevant Appendix in the Equality Scheme) as planned with one exception. This relates to monitoring.

While the audit of information system was completed within Year 1 of scheme implementation, the annual review and publication of monitoring information remains behind schedule.

9b) If your authority was to be reconstituted in the next five years what would be the main scheme actions/equality considerations that an incoming authority should address? Any detailed information should be included as an appendix to the report.

NIPEC would recommend that any incoming authority should pay particular attention to further embedding and mainstreaming work in the following areas of scheme implementation:

- screening and EQIAs
- monitoring.

Particular efforts should be placed on regional cooperation on equality screenings and EQIAs (top down and horizontally) as well as on monitoring.

## **10. Details of how the scheme will be published**

10a) Were scheme commitments in this section delivered and what evidence supports this view?

NIPEC closely followed its commitments for publishing the scheme:

- Systems were put in place for making the scheme available on request in alternative formats. Providers of translation services and services to produce the scheme in further alternative formats (including Braille and formats for Young People) were identified.
- An Easy Read version and an easy to understand summary of the scheme were produced.
- The scheme and its alternative versions were published on the organisation's website.
- Communication on the availability of the scheme was disseminated widely including to consultees.

## **11. The authority's arrangements for dealing with complaints arising from a failure to comply with the scheme**

11a) Outline the number and nature of complaints received by your authority, and what your authority could do in future to develop its complaints handling process and learn from complaints.

A complaints procedure for dealing with Section 75 complaints is set out in NIPEC's Equality Scheme and within its Handling of Complaints Procedure. NIPEC did not receive any complaints under the terms of Section 75 throughout the five-year period. If any complaints are received under Section 75, they are directed to NIPEC's Head of Corporate Services, who is the organisation's equality lead, who will report and monitor the level of complaints on an annual basis.

**12. A commitment to conducting a review of the scheme within five years of its submission to the Equality Commission and to forwarding a report of this review to the Equality Commission**

12a) What has been your authority's experience of conducting this review? To what extent has the Commission's guidance been useful in undertaking the review?

The review has proved a time and resource intensive undertaking. The template contains some 25 main questions plus a further 50 questions as prompts, which overall seems somewhat excessive and unwieldy. A theme-based approach, focusing, for instance, on ownership, equality proofing, monitoring and consultation, rather than following the intricate structure of the guidance on the form and content of Equality Schemes, may be preferable.

At the same time, the review served as an opportunity to hold discussions with senior staff and to jointly reflect on progress on equality matters. This in turn helped to raise the profile of the equality mainstreaming agenda.