Equality Scheme for Ulster Supported Employment Ltd. (Usel)

Drawn up in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998

This document is available in a range of formats on request. Please contact us with your requirements (see page 33 for contact details).

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Tel: 028 90 356600
Email: info@usel.co.uk

Approved by the Equality Commission for Northern Ireland on 4 October 2011.

Foreword

Section 75 of the Northern Ireland Act 1998 (the Act) requires public authorities, in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations across a range of categories outlined in the Act[1].

In our Equality Scheme we set out how Ulster Supported Employment Ltd **(Usel)** proposes to fulfil Section 75 statutory duties.

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

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

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

Ulster Supported Employment Ltd. is fully committed to effectively fulfilling our Section 75 statutory duties across all our functions (including service provision, employment and procurement) through the effective implementation of our Equality Scheme.

We realise the important role that the community and voluntary sector and the general public have to play to ensure the Section 75 statutory duties are effectively implemented. Our Equality Scheme demonstrates how determined we are to ensure there are opportunities for people affected by our work to positively influence how we carry out our functions in line with our Section 75 statutory duties. It also offers the means whereby persons directly affected by what they consider to be a failure, on our part, to comply with our Equality Scheme, can make complaints.

On behalf of Usel and our staff we are pleased to support and endorse this Equality Scheme which has been drawn up in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998 and Equality Commission guidelines.

[1] See section 1.1 of our Equality Scheme.

Chair	*William Leathem*
Chief Executive	*Scott Jackson (Interim)*
Date	*16th January 2024*

Contents

Foreword

Chapter 1 Introduction

Section 75 of the Northern Ireland Act 1998
How we propose to fulfil the Section 75 duties in relation to the relevant functions
Ulster Supported Employment Ltd
Who we are and what we do

Chapter 2 Our arrangements for assessing our compliance with the Section 75 Duties

Responsibilities and reporting
Action Plan/Action Measures

Chapter 3 Our arrangements for consulting

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

Our arrangements for assessing the likely impact adopted or proposed to be adopted on the promotion of equality of opportunity of policies
Screening
Equality impact assessment
Our arrangements for publishing the results of the assessments of the likely impact of policies we have adopted or propose to adopt on the promotion of equality of opportunity
What we publish
How we publish the information
Where we publish the information
Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity
Our arrangements for publishing the results of our monitoring

Chapter 5 Staff training

Commitment to staff training
Training objectives
Awareness raising and training arrangements

Monitoring and evaluation

Chapter 6	Our arrangements for ensuring and assessing public access to information and services we provide. Access to information Access to services Assessing public access to information and services
Chapter 7	Timetable for measures we propose in this Equality Scheme
Chapter 8	Our complaints procedure
Chapter 9	Publication of our equality scheme
Chapter 10	Review of our Equality Scheme
Appendix 1	Operational Structure Organisational chart
Appendix 2	Example groups relevant to the Section 75 categories for Northern Ireland purposes
Appendix 3	List of consultees
Appendix 4	Timetable for measures proposed
Appendix 5	Glossary of terms

Chapter 1 Introduction

1. Section 75 of the Northern Ireland Act 1998

1.1. Section 75 of the Northern Ireland Act 1998 (the Act) requires Ulster Supported Employment Ltd to comply with two statutory duties:

Section 75 (1)

- In carrying out our functions relating to Northern Ireland we are required to have due regard to the need to promote equality of opportunity between
  - persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation
  - men and women generally
  - persons with a disability and persons without
  - persons with dependents and persons without.

Section 75 (2)

- In addition, without prejudice to the obligations above, in carrying out our functions in relation to Northern Ireland we are required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
- "Functions" include the "powers and duties" of a public authority[2]. This includes our employment and procurement functions.

1.2. How we propose to fulfil the Section 75 duties in relation to the relevant functions of Ulster Supported Employment Ltd

- Schedule 9 4. (1) of the Act requires Usel as a designated public authority to set out in an Equality Scheme how it proposes to fulfil the duties imposed by Section 75 in relation to its relevant functions. This Equality Scheme is intended to fulfil that statutory requirement. It is both a statement of our arrangements for fulfilling the Section 75 statutory duties and our plan for their implementation. The Foreword and Appendices are fundamental elements of the Equality Scheme.

- Usel is committed to the discharge of its Section 75 obligations in all parts of our organisation, and we will commit the necessary resources in terms of people, time, and money to ensure that the Section 75 statutory duties are complied with and that our Equality Scheme can be implemented effectively.

[2] Section 98 (1) of the Northern Ireland Act 1998.

1.3. Who we are and what we do

- Usel was established in 1962 to fulfil an act of Parliament to promote paid employment for people with disabilities. Usel is an executive Non-Departmental Public Body (NDPB) and operates under the direction of the Department for Communities (DfC). The current landscape within which we operate has many uncertainties, from public funding constraints to unprecedented commercial marketplace pressures. In spite of these constraints, we do need to return margin which enables the company to be sustainable and to make less call on the public finances through the grant-in-aid provision.

- Usel *Supports & Provides* employment for people who live with disabilities or health conditions to find, secure, retain and grow in an employment opportunity of their choice. Usel *Promotes* the positive benefits of people with disabilities accessing work, both for themselves, their families and society as a whole. We support people to overcome the various barriers which their personal disability and/or health condition can create as they seek to gain or sustain employment.

1.4. Employment within external mainstream employment setting:

- Through the effective delivery of government programmes such as:
  - Workable (NI)
  - empower
  - Skills for Life and Work
  - Employment Support
  - Step Up
  - Job Start Programme
  - Disability Support Programme (SFLW)

- We have supported nearly 1,200 clients in the past year. Usel sources, matches, and places clients with prospective employers in job sampling, work experience, permitted work, long-term supported and unsupported employment opportunities.

- The broad range of support programmes offered ensures that each client is guided through the spectrum of employment opportunities from sampling to full time employment by a dedicated team of Employment Services Officers who, assisted by a marketing team, deliver a real chance for clients to be matched with employment opportunities and enjoy success in these opportunities.

- This is complemented by training delivery through short, accredited courses to meet the specific needs and promote the choice options gained through training which is appropriate to each individual client.

1.5. Direct Employment by Usel

- When Usel was first established in March 1962, direct employment was the core function of the organisation, providing employees the opportunity to gain transferable skills which they can utilise within Usel as their employer or, should they choose, take to an external employer.

- Over the years the core aim of this strand has shifted to allow Usel to be the employer of choice for those individuals who have a disability or health condition to be employed. Within the delivery strand individuals are fully employed and have all the usual employee rights and privileges. In return the employees make products or deliver services which are sold in a competitive marketplace.

- Each employee has a dedicated person-centred development plan which includes core skills and job centric skills. Any employee who does chose to leave Usel and enter external employment is supported and developed to ensure they have the confidence and skills to enter the external direct employment.

1.6. Circular Economy

- Usel's circular economy recycles the following materials:
- Mattresses
- Divan bases
- Bulky furniture, such as office furniture
- Dry mixed recycling i.e. paper, plastic, and cardboard

- Usel started mattress recycling in 2015-16, recycling approximately 3,000 mattresses. The mattress recycling team substantially increased the number of mattresses recycled to approximately 28500 in 2022/23matresses recycled.

- We have been successful in securing contracts with several Councils across Northern Ireland and are in negotiations with several others. We were also successful in securing deals with some large retailers operating in Northern Ireland, recycling the mattresses returned from its customers.

- 96% of materials extracted during the mattress recycling process are recycled into new non-mattress products.

1.7. Hospitality Sector

- The opening of our first Ability Café at the Knockbracken Healthcare Park was significant in terms of the Company's aim to develop its business offering in terms of catering facilities. As of October 2023, Usel have 6 Ability Cafes at the following locations:
- The Foundry Café, Shankill Road
- The Stables, Lady Dixon Park
- Tree Tops at Belfast Zoo
- Lion's Den at Belfast Zoo

The Ability Café's provide employment for 68 staff, 57% of which have a declared disability.

Chapter 2

2. Our arrangements for assessing our compliance with the section 75 duties (Schedule 9 4. (2) (a))

2.1. Some of our arrangements for assessing our compliance with the Section 75 statutory duties are outlined in other relevant parts of this Equality Scheme including our monitoring arrangements (Ch4), assessment of impact of policies arrangements (Ch4), consultation (Ch3), publication and complaints (Ch8).

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

Responsibilities and reporting

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

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

2.5. If you have any questions or comments regarding our Equality Scheme, please contact in the first instance, the address given below and we will respond to you as soon as possible:

Ulster Supported Employment Limited
182-188 Cambrai Street
Belfast
BT13 3JH
Tel: 028 90 356600
Email: info@usel.co.uk

2.6. Objectives and targets relating to the statutory duties will be integrated into our strategic and operational business plans[3].

2.7. Employees' job descriptions and performance plans reflect their contributions to the discharge of the Section 75 statutory duties and implementation of the equality scheme, where relevant. The personal performance plans are subject to appraisal in the bi-annual performance review.

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

2.8. Usel prepares an annual report on the progress we have made on implementing the arrangements set out in this Equality Scheme to discharge our Section 75 statutory duties (Section 75 annual progress report).

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

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

2.11. The latest Section 75 annual progress report is available on our website www.usel.co.uk

or by contacting:

Ulster Supported Employment Limited
182-188 Cambrai Street
Belfast
BT13 3JH
Tel: 028 90 356600
Email: info@usel.co.uk

2.12. Usel liaises closely with the Equality Commission to ensure that progress on the implementation of our Equality Scheme is maintained.

Action plan/action measures

2.13. Usel has developed an Action Plan to promote equality of opportunity and good relations. The Action Plan is a four-year plan, aligned to the Corporate Plan. It is a living document that can be added to and amended as other inequalities are identified.

2.14. The action measures that make up our Action Plan will be relevant to our functions. They have been developed and prioritised on the basis of an audit of inequalities. The Audit of Inequalities gathered and analysed information across the Section 75 categories[4] to identify the inequalities that exist for our service users and those affected by our policies[5].

2.15. The Audit of Inequalities is a "living" document that will be amended as continued evidence is gathered on newly identified inequalities.

[4] See section 1.1 of this equality scheme for a list of these categories.
[5] See section 4.1 of this equality scheme for a definition of policies.

2.16. We will commission new research if the audit of inequalities has identified information/evidence gaps.

2.17. Action measures are specific, measurable, linked to achievable outcomes, realistic and time bound. Action measures include performance outputs and timescales for their achievement.

2.18. We will develop an Action Plan to align the actions with our corporate and business planning cycles. Implementation of the action measures will be incorporated into our business planning process.

2.19. We will seek input from our stakeholders and consult on our Action Plan before we send it to the Equality Commission and thereafter when reviewing the plan.

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

2.21. Usel will inform the Commission of changes or amendments to our Action Plan and will also include this information in our Section 75 annual progress report to the Commission. Our Section 75 annual progress report will incorporate information on progress we have made in implementing our action plans/action measures.

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

Chapter 3
3. Our arrangements for consulting

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

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

3.1. We recognise the importance of consultation in all aspects of the implementation of our statutory equality duties. We will consult on our Equality Scheme, Audit of Inequalities, action measures, screening, equality impact assessments, and any other matter relevant to the Section 75 statutory duties.

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

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

3.4. Initially all consultees (see Appendix 3), as a matter of course, will be notified (by email) of the matter/policy being consulted upon to ensure they are aware of all consultations. Thereafter, to ensure the most effective use of our and our consultees' resources, we will take a targeted approach to consultation for those consultees that may have a particular interest in the matter/policy being consulted upon and to whom the matter/policy is of particular relevance. This may include for example regional or local consultations, sectoral or thematic consultation etc.

3.5. We are committed to pre-consultation and therefore will consult with all our stakeholders as early as possible in the policy development and decision-making process. All our consultees will be informed of our up-and-coming policies to ensure that they have the opportunity to comment and partake in the policy development process as early as possible.

3.6. We will engage with affected individuals and representative groups to identify how best to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these. Methods of consultation could include:

- Face-to-face meetings

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

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

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

3.9. Information will be made available, on request, in alternative formats[6], as early as possible and within a maximum of 20 working days (unless third party timescales dictate otherwise, e.g. translation providers). We will ensure that such consultees have equal time to respond.

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

3.11. To ensure effective consultation with consultees[7] on Section 75 matters, we will develop a programme of awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by ensuring that consultees are provided with such details in the consultation documentation and at public consultation meetings.

3.12. The consultation period will last for a minimum of twelve weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view. However, in exceptional circumstances when this timescale is not feasible (for example implementing EU Directives or UK wide legislation, meeting Health and Safety requirements, addressing urgent public health matters or complying with Court judgements), we may shorten timescales to eight weeks or less before the policy is implemented. We may continue

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

consultation thereafter and will review the policy as part of our monitoring commitments[8].

3.13. Where, under these exceptional circumstances, we must implement a policy immediately, as it is beyond our authority's control, we may consult after implementation of the policy, in order to ensure that any impacts of the policy are considered.

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

3.15. We are conscious of the fact that affected individuals and representative groups may have different needs. We will take appropriate measures to ensure full participation in any meetings that are held. We will consider for example the time of day, the appropriateness of the venue, in particular whether it can be accessed by those with disabilities, how the meeting is to be conducted, the use of appropriate language, whether a signer and/or interpreter is necessary, and whether the provision of childcare and support for other carers is required.

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

3.17. In making any decision with respect to a policy adopted or proposed to be adopted, we will take into account any assessment and consultation carried out in relation to the policy.

3.18. We provide feedback to consultees in a timely manner. A feedback report is prepared which includes summary information on the policy consulted upon, a summary of consultees' comments and a summary of our consideration of and response to consultees' input. The feedback is provided in formats suitable to consultees.

3.19. Our consultation list is not exhaustive and is reviewed on an annual basis to ensure it remains relevant to our functions and policies.

3.20. We welcome enquiries from any person/s or organisations wishing to be added to the list of consultees. Please contact us to provide your contact details and have your areas of interest noted or have your name/details removed or amended. Please also inform us at

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

this stage if you would like information sent to you in a particular format or language.

Chapter 4

4. Our arrangements for assessing monitoring and publishing the impact of policies.

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

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

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

4.3. Usel uses the tools of screening and equality impact assessment to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will also follow Equality Commission guidance:

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

Screening

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

4.5. Screening is completed at the earliest opportunity in the policy development/review process. Policies which we propose to adopt will be subject to screening prior to implementation. For more detailed strategies or policies that are to be put in place through a series of stages, we will screen at various stages during implementation.

4.6. The lead role in the screening of a policy is taken by the policy decision maker who has the authority to make changes to that policy. However, screening will also involve other relevant team members, for example, equality specialists, those who implement the policy and staff members

from other relevant work areas. Where possible we will include key stakeholders in the screening process.

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

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

4.8. In order to answer the screening questions, we gather all relevant information and data, both qualitative and quantitative. In taking this evidence into account we consider the different needs, experiences and priorities for each of the Section 75 equality categories. Any screening decision will be informed by this evidence.

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

- the policy has been 'screened in' for equality impact assessment.
- the policy has been 'screened out' with mitigation[9] or an alternative policy proposed to be adopted.
- the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

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

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

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

4.12. This screening decision will be 'signed off' by the appropriate policy lead within the Senior Management Team in Usel.

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

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

4.15. As soon as possible following the completion of the screening process, the screening template, signed and approved by the senior manager responsible for the policy, will be made available on our website. All consultees will be informed when screening forms are completed or posted on its website.

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

4.17. Our screening reports are published quarterly.

Equality Impact Assessment

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

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

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

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

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

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

What we publish

4.22. Screening reports are published quarterly. Screening reports detail:

- All policies screened by Usel over the three-month period.
- A statement of the aim(s) of the policy/policies to which the assessment relates.
- Consideration given to measures which might mitigate any adverse impact.
- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity.
- Screening decisions i.e.:
  - whether the policy has been ‘screened in’ for equality impact assessment.
  - whether the policy has been ‘screened out’ with mitigation or an alternative policy proposed to be adopted.
  - whether the policy has been ‘screened out’ without mitigation or an alternative policy proposed to be adopted.
- Where applicable, a timetable for conducting equality impact assessments.
- A link to the completed screening template(s) on our website

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

- A statement of the aim of the policy assessed.
- Information and data collected.
- Details of the assessment of impact(s)
- Consideration given to measures which might mitigate any adverse impact.

- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity.
- Consultation responses
- The decision taken.
- Future monitoring plans.

How we publish the information

4.24. All information we publish is accessible and can be made available in alternative formats on request.

Where we publish the information

4.25. The results of our assessments (screening reports and completed templates, the results of equality impact assessments) are available on our website.

www.usel.co.uk

contacting info@usel.co.uk

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

Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity.

(Schedule 9 4. (2) (c))

4.27. Monitoring can assist us to deliver better public services and continuous improvements. Monitoring Section 75 information involves the processing of sensitive personal data (data relating to the racial or ethnic origin of individuals, sexual orientation, political opinion, religious belief, etc). In order to carry out monitoring in a confidential and effective manner, Usel follows guidance from the Office of the Information Commissioner and the Equality Commission.

4.28. We monitor any adverse impact on the promotion of equality of opportunity of policies we have adopted. We are also committed to monitoring more broadly to identify opportunities to better promote equality of opportunity and good relations in line with Equality Commission guidance.

4.29. The systems we have established to monitor the impact of policies and identify opportunities to better promote equality of opportunity and good relations are:

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

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

4.31. We review our EQIA monitoring information on an annual basis. Other monitoring information is reviewed generally on an annual basis unless otherwise specified (for example if a project is of a two-year duration, monitoring information may be reviewed as part of the evaluation after the completion of the project).

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

4.32. Schedule 9 4. (2) (d) requires us to publish the results of the monitoring of adverse impacts of policies we have adopted.

4.33. EQIA monitoring information is published as part of our Section 75 annual progress report.

4.34. Other monitoring information will be made available on our website www.usel.co.uk with the exception of quantitative monitoring information that may otherwise compromise the identify of individuals (for example if only small numbers of people are involved).

4.35. All information published is accessible and can be made available in alternative formats on request.

Chapter 5 Staff training

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

5. Commitment to staff training

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

5.2. Our Office wishes to positively communicate the commitment of Usel to the Section 75 statutory duties, both internally and externally.

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

Training objectives

Awareness raising and training arrangements.

5.4. Usel will draw up a detailed training plan for its staff which will aim to achieve the following objectives:

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

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

- We will develop a summary of this Equality Scheme and make it available to all staff.
- We will provide access to copies of the full Equality Scheme for all staff; ensure that any queries or questions of clarification from staff are addressed effectively.

- Staff in Usel will receive a briefing on this Equality Scheme within 6 months.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within the Usel who are directly engaged in taking forward the implementation of our Equality Scheme commitments (for example those involved in research and data collection, policy development, service design, conducting equality impact assessments, consultation, monitoring and evaluation).
- Where appropriate, training will be provided to ensure staff are aware of the issues experienced by the range of Section 75 groups.
- When appropriate and on an ongoing basis, arrangements will be made to ensure staff are kept up to date with Section 75 developments.

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

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

Monitoring and evaluation

5.8. Our training programme is subject to the following monitoring and evaluation arrangements:

- We evaluate the extent to which all participants in this training programme have acquired the necessary skills and knowledge to achieve each of the above objectives.
- The extent to which training objectives have been met will be reported on as part of the Section 75 annual progress report, which will be sent to the Equality Commission.

5.9. We will also monitor the number of staff trained; the equality profile of staff trained as well as the job roles of staff trained.

Chapter 6

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

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

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

6.3. In particular:

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

Access to information

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

6.5. Alternative formats may include Easy Read, Braille, audio formats (CD, mp3 or DAISY), large print or minority languages to meet the needs of those for whom English is not their first language.

6.6. Usel liaises with representatives of young people and disability and minority ethnic organisations and takes account of existing and developing good practice.

6.7. We will respond to requests for information in alternative formats in a timely manner, usually within 20 working days (unless third party timescales dictate otherwise, e.g. translation providers).

6.8. For those not fluent in English, we have arrangements in place for accessing a regional contract for translation and interpreting services.

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

Public access to information can be made via the website at www.usel.co.uk or by or contacting info@usel.co.uk.

Access to services

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

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

6.12. We also ensure public access to our services through arrangements outside and inside our buildings such as providing signage, lowered reception desks and disabled car parking spaces.

Assessing public access to information and services

6.13. In line with our general arrangements for monitoring (see 4.31) we also monitor across all our functions, in relation to access to information and services, to ensure equality of opportunity and good relations are promoted.

6.14. This includes monitoring and reviewing complaints information and obtaining feedback from users (such as through surveys and user fora).

Chapter 7

7. Timetable for measures we propose in this equality scheme
(Schedule 9 4. (3) (b))

7.1. Appendix 4 outlines our timetable for all measures proposed within this Equality Scheme. The measures outlined in this timetable will be incorporated into our business planning processes.

7.2. This timetable is different from and in addition to our commitment to developing Action Plans/Action Measures to specifically address inequalities and further promote equality of opportunity and good relations. We have included in our Equality Scheme a commitment to develop an Action Plan. Accordingly, this commitment it is listed in the timetable of measures at Appendix 4.

Chapter 8

8. Our complaints procedure

(Schedule 9 10.)

8.1. Usel is responsive to the views of members of the public. We will endeavour to resolve all complaints made to us.

8.2. Schedule 9 paragraph 10 of the Act refers to complaints. A person can make a complaint to a public authority if the complainant believes they may have been directly affected by an alleged failure of the authority to comply with its approved Equality Scheme.

8.3. The complaint procedure is fully accessible, and the complainant will be supported in their complaint according to their support needs. We will include a statement on our website to proactively advise customers both internally and externally of the availability of support systems available if wishing to make a complaint.

8.4. If the complaint has not been resolved within a reasonable timescale, the complaint can be brought to the Equality Commission.

8.5. A person wishing to make a complaint that Usel has failed to comply with its approved equality scheme should contact info@usel.co.uk

8.6. We will in the first instance acknowledge receipt of each complaint within two working days.

8.7. Usel will carry out an internal investigation of the complaint and will respond substantively to the complainant within one (1) month of the date of receiving the letter of complaint. Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the complainant may be extended to two (2) months. In those circumstances, the complainant will be advised of the extended period within one month of making the complaint.

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

8.9. In any subsequent investigation by the Equality Commission, Usel will co-operate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

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

8.11. Usel will make all efforts to implement promptly and in full any recommendations arising out of any commission investigation.

Chapter 9

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

9.1. Usel's Equality Scheme is available free of charge in print form and alternative formats from:

Ulster Supported Employment Limited
182-188 Cambrai Street
Belfast
BT13 3JH
Tel: 028 90 356600
Email: info@usel.co.uk

9.2. Our Equality Scheme is also available on our website at: www.usel.co.uk

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

- We will make every effort to communicate widely the existence and content of our Equality Scheme. This may include press releases, prominent advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a link to our approved Equality Scheme to our consultees on our consultation list. Other consultees without e-mail will be notified by letter that the scheme is available on request. We will respond to requests for the Equality Scheme in alternative formats in a timely manner, usually within 20 working days (unless third party timescales dictate otherwise, e.g. translation providers).
- Our Equality Scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats (CD, mp3, DAISY) to meet the needs of people with a disability and in minority languages to meet the needs of those not fluent in English and in a format and language that is accessible to children and young people.

9.4. For a list of our stakeholders and consultees please see Appendix 3 of the Equality Scheme, visit our website at www.usel.co.uk or contacting info@usel.co.uk.

Chapter 10

10. Review of our Equality Scheme

(Schedule 9 8. (3))

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

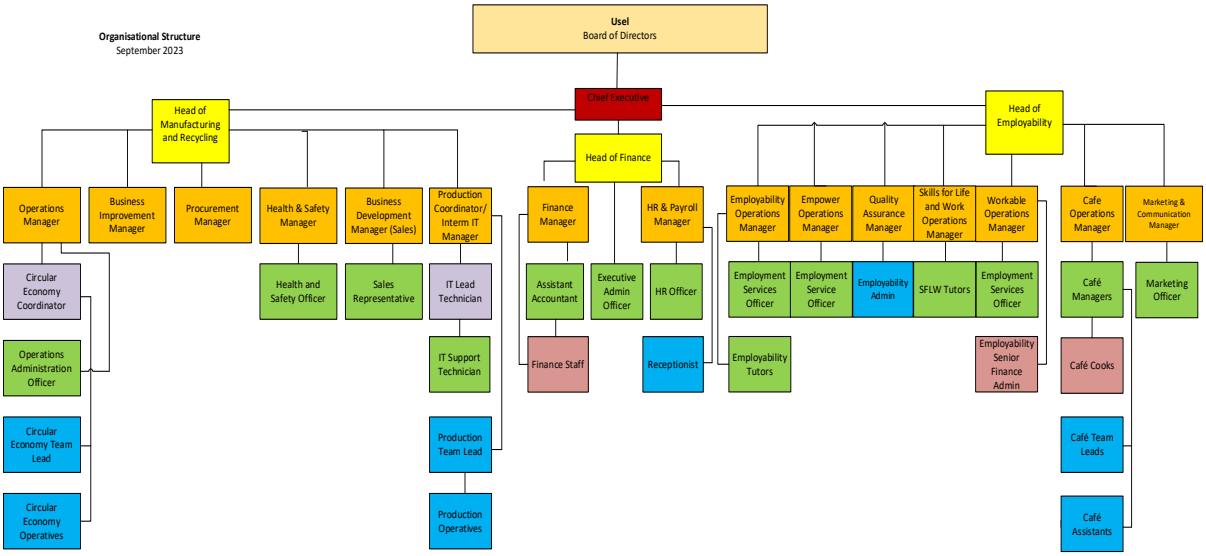
10.2. The review will evaluate the effectiveness of our scheme in relation to the implementation of the Section 75 statutory duties relevant to our functions in Northern Ireland.

10.3. In undertaking this review we will follow any guidance issued by the Equality Commission. A report of this review will be made public by placing it on our website and by informing our consultees via email or post of its availability. It will also be sent to the Equality Commission.

Appendix 1

Operational Structure:

We believe the structure of an organisation is a snapshot of that organisation at any one time. We are committed to shaping our organisation to fulfil the required outcomes. We are structured as shown, as at September 2023, but we reserve the flexibility to modify this as appropriate.



Appendix 2 Example groups relevant to the Section 75 categories for Northern Ireland purposes
Please note, this list is for illustration purposes only, it is not exhaustive.

Category	Example groups
Religious belief	Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths. For the purposes of Section 75, the term "religious belief" is the same definition as that used in the *Fair Employment & Treatment (NI) Order*[10]. Therefore, "religious belief" also includes any *perceived* religious belief (or perceived lack of belief) and, in employment situations only, it also covers any *"similar philosophical belief".*
Political opinion[11]	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people.
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls).
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientation	Bisexual people; heterosexual people; gay or lesbian people.

Appendix 3 Consultee List – USEL. This list is reviewed on an annual basis. Schedule 9 4. (2) (a))

[10] See Section 98 of the Northern Ireland Act 1998, which states: *"In this Act…"political opinion" and "religious belief" shall be construed in accordance with Article 2(3) and (4) of the Fair Employment & Treatment (NI) Order 1998."*

[11] ibid

List of Consultees

A
Action Mental Health
Age NI
Action MS NI
Alliance Party NI
Association for Spina Bifida and Hydrocephalus
Autism NI (PAPA)

B
Barnardo's NI
Belfast Baha'i Council for NI
Belfast Hebrew Congregation
Belfast Islamic Centre
Belfast Islamic Centre Women's Group
Belfast Travellers Education & Development Group
British Diabetic Association
British Red Cross

C
Cara-Friend
Cedar Foundation
Chest Heart and Stroke Foundation NI
Children's Law Centre
Chinese Welfare Association
Coalition on Sexual Orientation
Committee on the Administration for Justice
Community Relations Council
Community the Union for Life

D
Democratic Unionist Party
Disability Action
Down's Syndrome Association

E
Employers' Forum on Disability
Equality Commission

G
Gay & Lesbian Youth Northern Ireland (GLYNI)
Garden Reach Ltd
Gingerbread NI
GMB

I
Indian Community Centre

J
Jordanstown School for Children with Auditory/visual Disabilities

L
Labour relations Agency

M
MENCAP NI
Men's Advisory Project
Men's Action Network (MAN)
Methodist Church NI
Mindwise
Multi Cultural Resource Centre
Multiple Sclerosis Society

N
Ni Congress of trade Unions
NI Association for Mental Health (NIAMH)
NI Council for Ethnic Minorities (NICEM)
NI Council for Voluntary Action (NICVA)
NI Union of Supported Employment (NIUSE)

O
Orchardville Society

P
PHAB
PRAXIS NI
Presbyterian Church in Ireland
Progressive Unionist Party

R
Relate NI
Royal National Institute for the Blind (RNIB)
Royal National Institute for the Deaf (RNID)
Roman Catholic Diocese of Down and Connor
Rainbow Project

S
Save the Children NI
Sense NI
Sinn Fein
Social Democratic Labour Party (SDLP)

U
Ulster Unionist Party

W
West Belfast Economic Forum
Women's Forum Northern Ireland
Women's Information Group
Women's Resource & Development Agency (WRDA)
Women's Support Network NI
Workers Party NI

Y
Youth Council for Northern Ireland
Youth Initiative NI
Young Help Trust

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

Measure	**Lead responsibility**	**Timetable**
Section 75 Annual Progress Report [2.7]	*Usel Board*	*31 August (annually)*
Action plan *Consultation on draft action plan [2.15]* *Finalised action plan published [2.18]* *Arrangements for monitoring progress in place [2.16]*	*Usel Board & POD Manager* *Usel Board & POD* *Usel Board & POD*	*April to June* *July* *June (annually)*
Consultation list reviewed and updated [3.4]	*Usel Board & POD*	*Ongoing*
Screening timetable [4.4] *Screening Reports [4.15]*	*Usel Board & Executive Admin Officer* *Usel Board Executive Admin Officer*	*Ongoing* *Quarterly*
EQIA timetable [4.16]	*Usel Board & Executive Admin Officer*	*June*
Monitoring *Review of monitoring information [4.31]* *Publication of monitoring information*	*Usel Board & HR* *Managers*	*Annually* *Annually*

[4.33;4.34]		
Training *Development of overall training programme [5.5]* *Focussed training [5.4]* *Update training [5.4]* *Evaluation of training [5.6]*	*CEO & HR* *CEO & HR* *HR* *HR*	*Annually* *Annually* *Ongoing* *ongoing*
Assessing access to information and services [6.9]	*Managers*	*Annually*
Review of equality scheme [10.1]	*CEO & HR*	*Within 5 years after approval*

Appendix 5 Glossary of terms

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

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

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

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

e) **Equality of opportunity:** The prevention, elimination or regulation of discrimination between people on grounds of characteristics including sex, marital status, age, disability, religious belief, political opinion, dependants, race and sexual orientation.

The promotion of equality of opportunity entails more than the elimination of discrimination. It requires proactive measures to be taken to secure equality of opportunity between the categories identified under Section 75.

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

g) **Good relations**: Although not defined in the legislation, the Equality Commission has agreed the following working definition of good relations: 'the growth of relations and structures for Northern Ireland that acknowledge the religious, political and racial context of this society, and

that seek to promote respect, equity and trust, and embrace diversity in all its forms'.

h) **Inequality:** Where something an organisation does has a differential or unfair impact on anyone in any of the groups listed in **Section 75** definition below.

i) **Mainstreaming equality:** The integration of equal opportunities principles, strategies and practices into the every day work of public authorities from the outset. In other words, mainstreaming is the process of ensuring that equality considerations are built into the policy development process from the beginning, rather than being bolted on at the end. Mainstreaming can help improve methods of working by increasing a public authority's accountability, responsiveness to need and relations with the public. It can bring added value at many levels.

j) **Monitoring:** Monitoring consists of continuously scrutinising and evaluating a policy to assess its impact on the Section 75 categories. Monitoring must be sensitive to the issues associated with human rights and privacy. Public authorities should seek advice from consultees and Section 75 representative groups when setting up monitoring systems.

Monitoring consists of the collection of relevant information and evaluation of policies. It is not solely about the collection of data, it can also take the form of regular meetings and reporting of research undertaken. Monitoring is not an end in itself but provides the data for the next cycle of policy screening.

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

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

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

n) **Section 75**: Section 75 of the Northern Ireland Act provides that each public authority is required, in carrying out its functions relating to Northern

Ireland, to have due regard to the need to promote equality of opportunity between:-

- persons of different religious belief, political opinion, racial group, age, marital status and sexual orientation;
- men and women generally;
- persons with a disability and persons without; and
- persons with dependants and persons without.

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