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A Review of Action Plans developed by public authorities in relation to their statutory equality and good relations duties

For

The Equality Commission for Northern Ireland



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Executive Summary

The Equality Commission for NI (Commission) has commissioned this review to examine the development of Equality Action Plans (EAPs) and Disability Action Plans (DAPS) by public authorities in Northern Ireland as part of their commitment to implement their statutory equality and good relations duties set out in s.75 of the Northern Ireland Act 1998 and 49B of the Disability Discrimination Act 1995 (as amended).

The research developed to conduct the review adopts a quantitative first stage methodology and a qualitative second stage. The first stage constructed a structured database which provided numerical data on the activity in relation to s. 75 for each of the 127 public authorities covered by the legislation. The second stage involved documentary analysis and semi-structured interviews with equality officers in 17 case study authorities. The main research findings are:

- Our main observation from the quantitative data was of variation in the development and publication of equality documentation between authorities. A small number (15%) had not met the minimum standards in publishing their equality documentation. Criminal Justice and Health had best engaged with making their equality action plans accessible online, either as an appendix to their original Equality Scheme, or as a separate document. At the time of the research the majority of EAPs were due, or overdue, for renewal.
- The qualitative data confirmed the differences between levels of engagement of public authorities with s.75 identified in the quantitative analysis. Most public authorities were highly committed to the implementation of s. 75, whilst a small number were disengaged. Most equality officers commented on the impact of budget cuts and restructuring on their ability to implement action measures, directly affecting continuity in s.75 implementation in several cases.
- Although most equality officers felt there was senior level for support in their organisations for s.75, there was a feeling that equality had fallen down the list of priorities. In a minority of authorities equality officers felt that senior level support for s.75 was absent.
- The content of EAPs was quite variable between case study authorities, with some more detailed and complex than others. There was a tendency for action measures to be process oriented with performance indicators that could not be easily measured and very few with targets. There was uneven coverage of the 9 s.75 categories in action measures and between employment focussed and service delivery focussed action measures. Equality officers varied in the value they placed on the use of guidance and templates.
- DAPs were more homogenous than EAPs, reflecting the greater level of statutory direction required for their development and implementation. However, there were similar issues in relation to measurable performance indicators and lack of targets.

- The report concludes that s.75 remains influential on public authorities but the difficult political and economic context has discouraged critical self-reflection in public authorities that is key to the success of the legislation.

Based on our findings, 9 recommendations are made to improve the quality of action measures in EAPs and DAPs as follows:

- **Leadership:** At a political level it is recommended that there is a reaffirmation of the importance of s.75 to the continued success of the Belfast Agreement. At the level of public authority leadership, it is recommended that senior managers reaffirm their commitment to s.75, prioritise adequate resources for the implementation of s.75 duties and to engage actively with the process of its implementation. One example from this research identified that performance incentives for senior managers encourage this behaviour.
- **Breaking down silos:** Several equality officers noted a division of duties between their work on s.75 and the work of HR teams on compliance with anti-discrimination legislation. Since there may be a useful overlap in the data gathered, for example in Article 55 reports, and measurable objectives for EAPs/DAPs, it is recommended that closer working between HR and equality teams is established in relation to the exchange of data.
- **Availability of documentation:** The research identified that a sizeable proportion of public authorities do not make current equality documents available on their websites, although part of the commitment to develop EAPs and DAPs is that they should be published for the benefit of the communities they serve. Furthermore, the qualitative data indicate that the failure to publish documents on websites signals a weakening of commitment in the authority to implementing s.75. It is therefore recommended that public authorities implement regular monitoring to ensure that the equality documentation on their websites is current and available to all staff and service users.
- **Critical reflection, performance indicators and targets:** The guidance for action plans recommends public authorities to adopt a self-critical approach to developing and reporting on the progress of action measures. It is recommended that, when developing action measures, public authorities consider how they are meant to benefit one or more of the 9 equality categories and develop clearer, measurable performance indicators and numerical targets to demonstrate how this can be achieved over time. It is recommended that public authorities should provide statistical evidence of progress towards action measure targets in each APR.
- **Extending process based action measures:** Public authorities tend to develop process based action measures that are designed to initiate new or enhance existing internal systems (e.g. monitoring data, collecting data, reviewing policy, setting up working parties). Public authorities are recommended to link process based action measures to the impact they are intended to have on one or more of the 9 equality categories. For example, if an action measure is to collect data on one of the 9 groups, public

authorities should also identify how it is intended that the data will be used. Once the data is collected and the process action measure has been completed, a replacement action measure on the use of the data should be developed to update the EAP/DAP, providing continuity from process towards impact.

- **Measuring the progress on mainstreamed action measures:** It is recommended that evidence to support the progress on or completion of action measures should be collected by the equality officer responsible for the EAP/DAP and reported on in the APR, even if the action measure is mainstreamed to a different area of the authority.
- **Achieving a balance between service users and employees:** Public authorities are recommended to satisfy themselves that they have considered actions for all relevant functions, in particular for both public service users and employees in their EAPs/DAPs.
- **Reporting Progress:** Section 1 of the APR is often completed in a very detailed way that is not always directly related to s.75, whilst the questions on action plans in Section 2 of the APR is often completed in a perfunctory way, referring the reader to a separate document. Public authorities are recommended to ensure that activities reported in section 1 of the APR are directly related to their equality schemes and that documents referred to in section 2 are appended in the APR provided on their website and relate specifically to action measures in EAPs. The Commission should consider putting a word limit on the sections to indicate the importance that they place on each section.
- **Support for smaller authorities:** Smaller authorities may benefit from joint working with similar authorities on the development and implementation of EAPs/DAPs. It is recommended that a relevant professional body or association, where one exists, would be well placed to co-ordinate support.

1. Introduction and Background

This review, commissioned by the Equality Commission for NI (Commission), examines the development of Equality Action Plans (EAPs) by public authorities in Northern Ireland. The statutory equality and good relations duties set out in s.75 of the Northern Ireland Act 1998 (the Act) have been requirements on public authorities in carrying out their functions for more than 15 years. The Commission continues to advise public authorities on the implementation of their Equality Schemes to fulfil the duties to pay due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations, and continues to keep the effectiveness of the duties under review.

Following a review of the duties on public authorities, the Commission recommended in 2010 that public authorities should develop action plans/action measures that focus on the promotion of equality of opportunity and good relations. The Commission also recommended that in preparing action plans, public authorities should “undertake an audit of inequalities to identify the range of key inequalities which the discharge of the public authority’s functions is intended to or is likely to address” and develop action plans based on functions and key inequalities identified¹.

This recommendation to public authorities comes from the Commission’s earlier review of the duties and the emphasis on equality and good relations outcomes. It was one element developed to contribute to a “shift in gear” needed within public authorities “away from concentrating on the process of implementing s.75, towards achieving outcomes”². The review also found that while s.75 had a clear and very positive impact on policy development, its impact on individuals was less in evidence and the impact on individuals should be a priority for public authorities as a result.

The framework of s.149 of the Disability Discrimination Act 1995 (as amended) also includes “due regard” duties on public authorities, but requires an action plan from them to show how they proposed to fulfil them³. The Commission advises public authorities on these plans, and in its Guide anticipates the duties “can make a substantial and tangible difference to the lives of a large number of disabled people in Northern Ireland”⁴.

The purpose of this project is to gather evidence of not only the extent to which the recommendations in its Guides have been adopted and implemented, but also whether the processes recommended have helped public authorities to focus on improving equality

¹ *Section 75 of the Northern Ireland Act 1998: A Guide for Public Authorities*, ECNI, 2010, page 48

² *Section 75 – Keeping it Effective*, ECNI 2008, page 4

³ See *A Guide for Public Authorities – Promoting positive attitudes towards disabled people and...*, ECNI 2007

⁴ *A Guide for Public Authorities – Promoting positive attitudes towards disabled people and...*, ECNI 2007Page 8

outcomes: having tangible positive impacts on those who have experienced inequalities and made improvements for people.

The timing of this review coincides with the May 2016 Assembly elections and the draft Programme for Government subsequently consulted upon. Therefore, it is important that the Commission's evidence base on outcomes is coherent with or allows reference to the approach being taken by Government.

Section 2 of this report details the methodology by which the data for this report was gathered and analysed. The results on the quantitative analysis are reported on in section 3 and the results of the qualitative analysis are reported in section 4. Conclusions are presented in section 5 and recommendations made in section 6.

2. Methodology⁵

Objective 1:

To review the response by public authorities to the recommendation that in their Equality Scheme they commit to develop an Action Plan. This will be achieved first by illustrating the breadth of that response from the numbers of plans developed, published, reviewed etc.; and second, by illustrating the depth of the response through assessing the approach to these Action Plans and their implementation, using an appropriate sample.

The research methodology to achieve this objective was to develop a structured database using Microsoft Access, which provided numerical data on the activity in relation to s.75 for each of the 161 public authorities in *List of Public Authorities designated for the purposes of section 75 of the Northern Ireland Act 1998* (ECNI, 2016) that have not been formally exempted from producing an Equality Scheme. The database records which of these authorities have produced, published and reviewed, audits of inequality and action plans. The database allowed us to extract and analyse statistical data, which is presented in section 3.

In order to add depth to this quantitative analysis a sample of 18 authorities was selected and agreed with the Commission for more in-depth qualitative case-study research. The sample was a purposive stratified sample which aimed to cover large and small public authorities across the full range of public functions. The sectors of *Criminal Justice, Education, Government, Health, Local Government* and *Other* were used to stratify the sample. Three case study authorities were selected from each sector and agreed with the Commission (see section 4). Three of the original selection did not participate and

⁵ Full ethical approval for the research was granted by the University of the West of England Research Ethics Committee

substitutes were made in 2 cases. The final sample therefore consisted of 17 case studies. The intention was to include 2 case study authorities that had not completed action plans. Unfortunately, 2 of the cases studies that did not participate were those authorities that had not completed action plans. The final sample, therefore, consisted only of public authorities that had completed action plans at some stage, although some had out-of-date action plans published on their web sites at the time of the research. In each of the case study authorities the Equality Scheme and, where available, the Audit of Inequalities (Aol), Equality Action Plan (EAP), Disability Action Plan (DAP) and last Annual Progress Report (APR) were tracked from authority websites, recorded and analysed in relation to the Guidance issued by the Commission. The analysis noted how far proactive, measurable actions for the promotion of equal opportunities and good relations have been developed by authorities and for which equality groups. The results of this analysis are contained in section 4.2.

Objective 2:

To make an assessment of the nature of the actions, from an appropriate sample of action plans from Equality Schemes. This assessment will look at the extent to which actions focus on or link to the delivery of an identifiable outcome, whether they are measurable, and whether there is any evidence that implementation has had an impact on those in the equality groups intended or the delivery of the outcomes identified.

To meet this objective, the case-study authorities selected and agreed for objective 1 were developed by using further documentary analysis to establish links between the key functions of the authority, inequalities identified in audits, specific measures to address any identified inequalities and performance indicators to assess progress and outcomes. Annual progress reports were analysed to track monitoring and reviews of action plans. Since the production of action plans is not mandatory and outcomes may be particularly difficult to trace from documentary sources, gaps in the documentary data were filled by interviewing key respondents in each authority, introduced by the Commission. Telephone interviews were used to maximise cost-effectiveness and flexibility of the research. An interview schedule was developed and agreed with the Commission (see Appendix 1). In addition to the general topics contained in the interview schedule, supplementary questions raised from the documentary analysis and specific to each public authority were added prior to the interview. Interviews lasted between 45 minutes and 1.5 hours and followed a semi-structured format, which explored the impact and outcomes of action plans not identifiable from documentary sources. Interviews were not audio recorded but field notes were taken to aid analysis. The interviews further facilitated a qualitative exploration of how far authorities found the Guidance useful and overall perceptions of the process of meeting the requirements of the legislation. Qualitative data analysis software, NVivo, was used to analyse documentary and interview data. The results of this analysis are contained in

section 4. Results are aggregated and do not report on any specific public authorities by name or sector.

Objective 3: To apply objective 2 to an appropriate sample of Disability action plans.

The case-study research included disability action plans in the documentary and interview data analysis for each of the case study authorities and is reported on in section 4.4.

Objective 4: To make any recommendations, arising from the review, for public authorities on setting equality related outcomes, and/or ensuring equality and good relations are reflected in outcomes, in the context of having statutory equality and good relations duties to fulfil.

The report culminates in the provision of recommendations in section 6 based on the findings of the research.

3. Quantitative Analysis: Introduction

The methodology utilised to research Objective 1 was to develop a structured database using Microsoft Access. The database provided numerical data on the activity in relation to s.75 for each of the public authorities (PAs) in *List of Public Authorities designated for the purposes of Section 75 of the Northern Ireland Act 1998* (ECNI, 2016) that had not been formally exempted from producing an Equality Scheme. The database was populated with initial data provided by the Commission and with records and documents produced by public authorities available from their websites. The database has allowed the research team to collate this information and then to extract and analyse statistical data.

3.1 Sector Overview

The total number of public authorities (PAs) designated for the purposes of s.75 is 161, of which 12 were classified as exempt and 22 were not yet approved. Consequently, 127 public authorities were included in the database.

The 127 PAs were then grouped into six sectors as chosen by the Commission: *Criminal Justice, Education, Government, Health, Local Government* and *Other*. Table 1 shows a breakdown of the numbers of PAs in each sector.

3.2 Equality Documentation

An online search was conducted which looked for three pieces of equality documentation for each of the 127 PAs included in the database: 1) Equality Action Plan (EAP); 2) Annual Progress Report (APR); and 3) Disability Action Plan (DAP). In addition, links to dedicated equalities web pages were recorded where appropriate.

In all, 77% of the PAs (98) had dedicated equality web pages (100% of those within the Criminal Justice and Government sectors) and this is where the majority of the

documentation was found. PAs with a corporate website design or template had a 'home' for the equality documents and had populated these - this includes most of the colleges grouped under Education, the Health sector, and the majority of Local Government PAs.

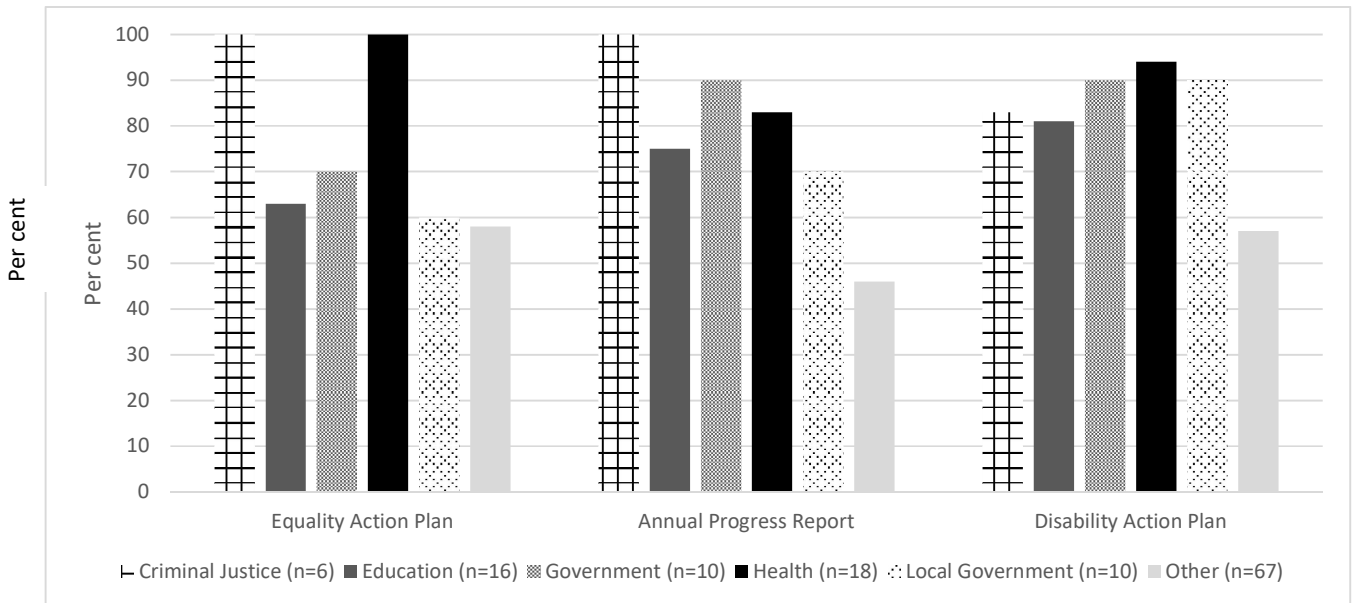
Nearly half of the PAs (48% n=61) had all three of the searched documents publicly available online. A smaller number (13% n=10) had links to two of the documents, the EAP and DAP. No equality documentation was found on websites for 15% of PAs (n=20). Equalities documents from the 'Other' sector proved to be the most difficult to find of the 6 groups. Within this sector of 42 PAs, nearly half (21) were housing associations, of which 5 had the trinity of EAP/APR/DAP, 6 had a variation of 2 out of 3 documents, 4 with just the EAP, and 6 had no equality documents visible on their websites (See Table 1 for an overview).

Table 1: Sector overview

Sector	Total PAs	Equalities Web Page	EAP (separate doc or appendix)	(A) All 3 docs (EAP/APR/DAP) online		(B) EAP & DAP	A+B %	EAP & APR	APR & DAP	EAP only	APR only	DAP only	No EAP/APR/DAP found
Criminal Justice	6	6	6	5	83%	-	83%	1	-	-	-	-	-
Education	16	14	10	9	56%	1	63%	-	2	-	1	1	2
Government	10	10	7	7	70%	-	70%	-	2	-	-	-	1
Health	18	15	18	14	78%	3	94%	1	-	-	-	-	-
Local Government	10	9	6	5	50%	1	60%	-	2	-	-	1	1
Other	67	44	39	21	31%	7	42%	5	3	6	2	7	16
Total	127	98	86	61	48%	12	57%	7	9	6	3	9	20

A further breakdown of the three pieces of equality documentation found by sector is illustrated in Figure 1.

Figure 1: Equality documentation by sector



Whilst some Equality Action Plans were produced as a separate document, some PAs included theirs as an appendix to their original Equality Schemes accounting for a total of 86 of the 127 PAs. Of the remaining 41, 22 provided a link to their Equality Scheme that recorded an action to produce an EAP at a future date, with no Equality Scheme nor EAP documents found for the remaining 19 PAs.

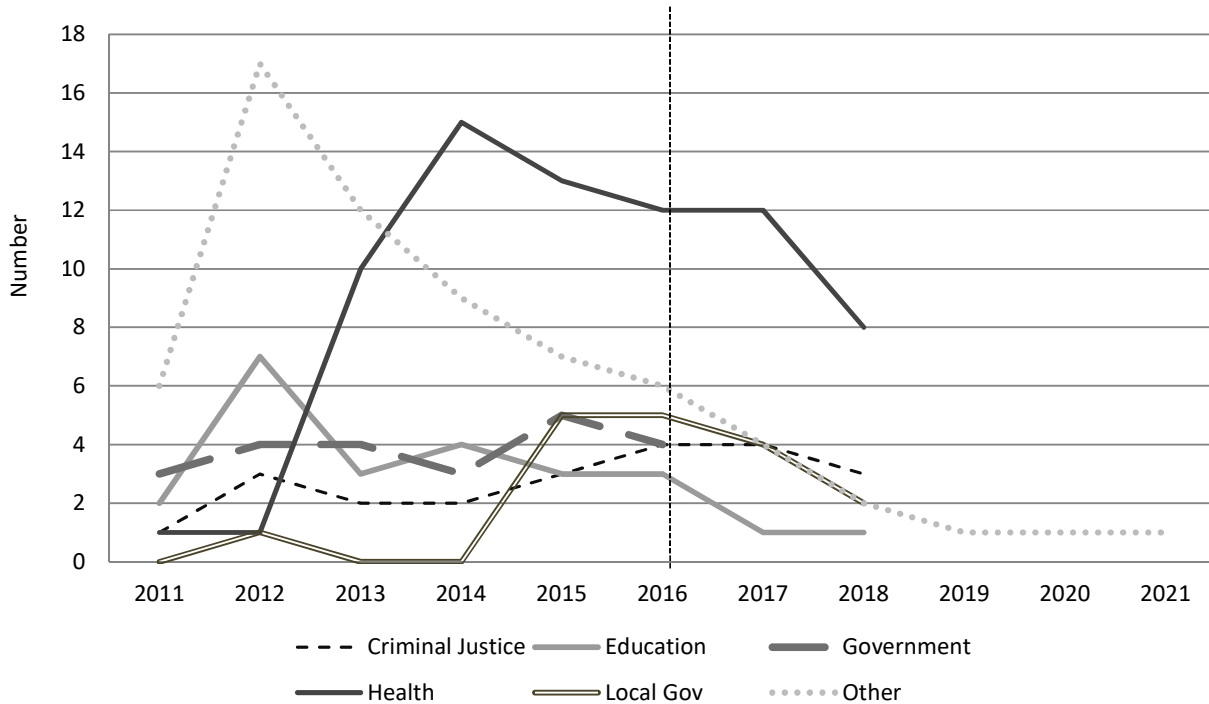
Table 2: Location of Equality Action Plan documentation

Sector	EAP as separate doc	EAP in appendix
Criminal Justice	2	4
Education	6	4
Government	5	2
Health	17	1
Local Government	5	1
Other	6	33
Total	41	45

3.3 Longevity of Equality Documentation

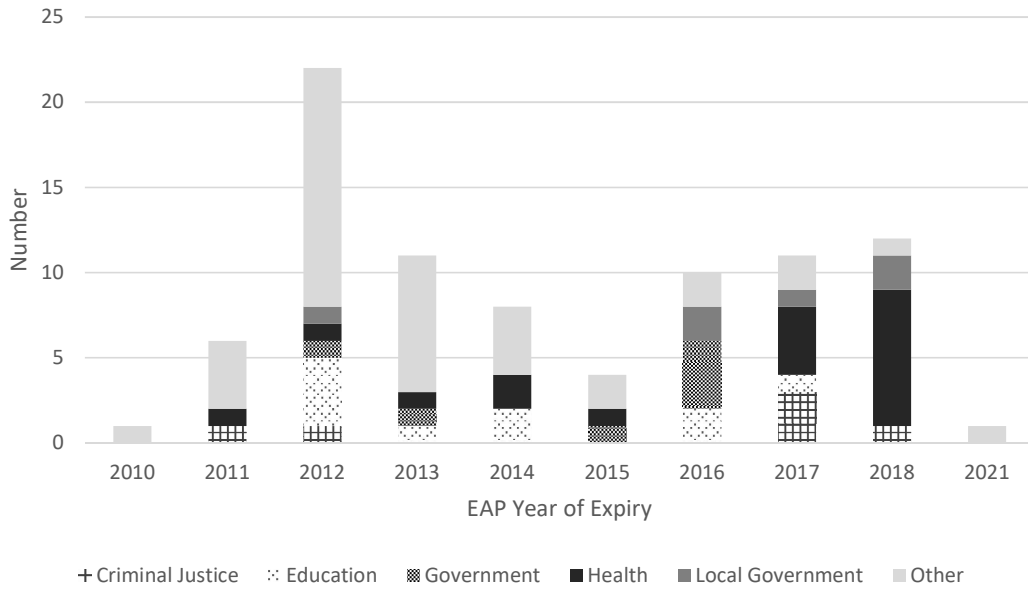
The dates covered by the EAP documents were recorded in the database; some covered a range of 2-5 years (for example, 2014-2016), but others only a single year; the year of publication. It was noted that there were two 'spikes' - when the Commission requested revised equality schemes from public authorities (see Figure 2). The outlier is the Northern Ireland Assembly Commission (Other) whose EAP covered 2016-2021.

Figure 2: Years covered by Equality Action Plans by Sector



Further analysis focused on the end year of each EAP to assess the currency of the EAPs. The data showed only a minority were still current at the time of the initial query, with only 34 of the 86 (40%) covering 2016 and/or further and 10 of these 'expired' at the end of 2016, leaving just 24 (28%) current EAPs covering 2017 and beyond (see Figure 3).

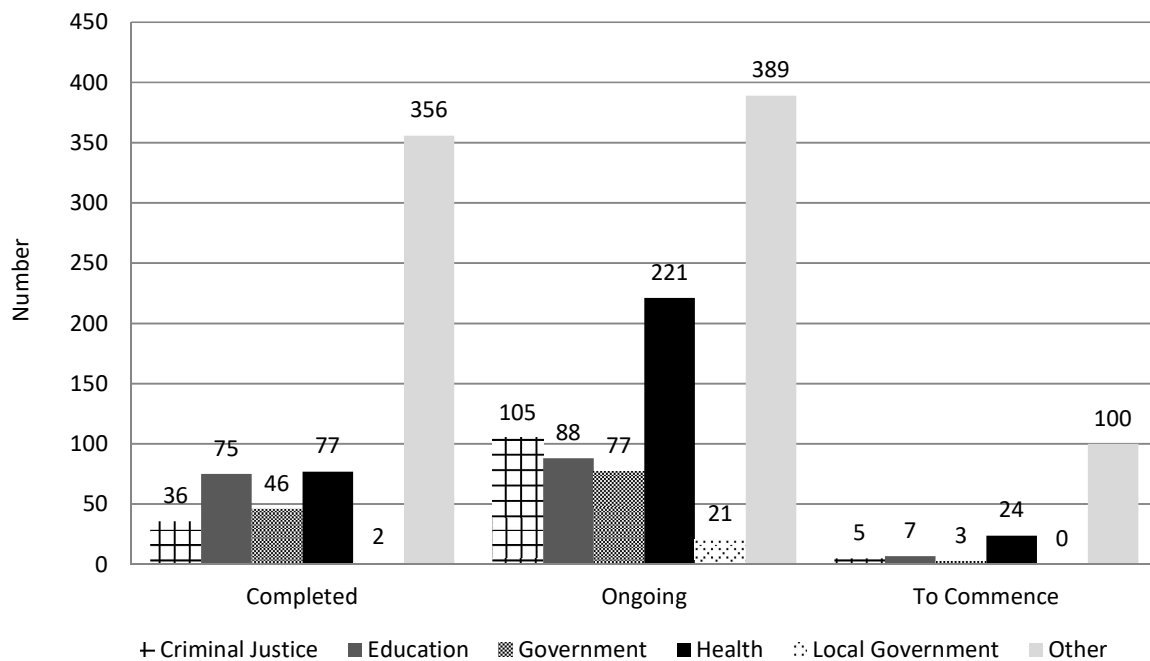
Figure 3: Currency of Equality Action Plans by Sector



3.4 Progress on Actions

Within the Annual Progress Report template that the Commission provides (question 7), PAs are asked to present figures showing the number of actions completed, still in progress or yet to commence. The Commission provided the data recorded from APRs it received for 2014-2015 and a breakdown by sector is illustrated in Figure 4.

Figure 4: Progress on Actions as reported in APR by sector



A few individual PAs were responsible for the high number of actions reported. For instance, one PA in the Criminal Justice sector reported 91 ongoing actions, representing 87% of the total in that sector. Similarly, one college reported 48 completed actions, 64% of Education’s total. In the Other sector, the 21 housing associations combined were responsible for nearly half of the actions reported in each of the three categories.

3.5 Summary of Quantitative Analysis

Our main observation from the quantitative data was of variation in the development and publication of equality documentation between authorities. Some have numerous detailed documentation that substantially exceeds the publication standards anticipated from Equality Scheme commitments and DAP guidance. A small number (15%) had not met the minimum expectations. Of the 127 public authorities included in the quantitative analysis, it was noticeable that those with a dedicated equalities web page were more likely to have uploaded their equality documentation than those without. Within the 6 sectors, Criminal Justice and Health had best engaged with making their equality action plans accessible online, either as an appendix to their original Equality Scheme, or as a separate document. Equality action plans covered a range of time, from just the year of publication up to a six-year period, but by the beginning of 2017, the majority of EAPs were due, or overdue for renewal. The qualitative analysis section provides detail on the content and structure of actions reported in the Annual Progress Reports for each of the case study authorities, but it was noted that a small number of individual public authorities skewed the aggregate totals in each sector, accounting for the majority of the total reported actions.

4. Qualitative Analysis: Introduction

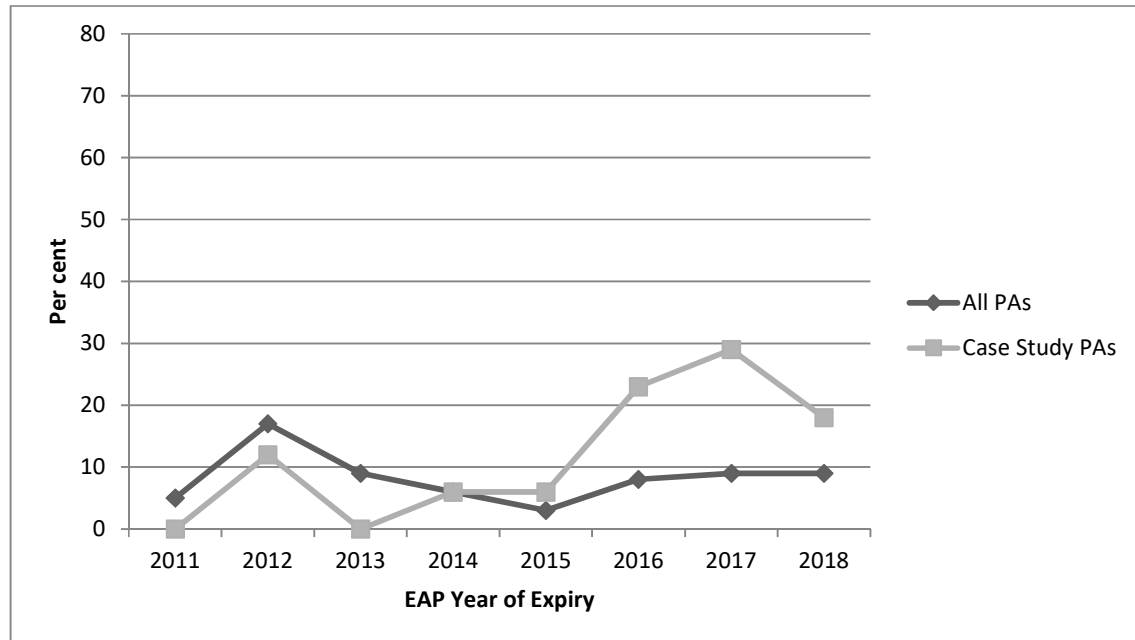
Our qualitative data is drawn from 17 case study authorities. Table 3 provides a summary of the numbers from each sector. All but one of our case study authorities had a dedicated equalities web page and only one of these did not have an EAP online.

Table 3: Case study overview

Sector	Total PAs	Equalities Web Page	EAP	APR	DAP
Criminal Justice	3	3	3	3	2
Education	4	4	3	2	4
Government	2	2	2	2	2
Health	3	3	3	3	2
Local Government	3	3	3	3	3
Other	2	1	2	2	1
Total	17	16	16	15	14

As noted in section 3 (pg. 5) our sample of authorities was generally more likely to have documentation on their websites. However, there were some similarities between our case studies and the total population of authorities in relation to EAPs that were not current. Figure 5 below shows that there were similar percentages of public authorities with EAPs that expired before and including 2015. The numbers are small, but our case study authorities (71%) were more likely to have EAPs for 2016 and beyond than the total population (25%).

Figure 5: Comparison of currency of EAPs: All PAs v case study PAs



Within our case study sample the wide variation between authorities in our quantitative analysis was also evident in our qualitative analysis. There were extensive differences in the availability, length, complexity and currency of the documents we examined. The interview data also elicited a wide range of views about what makes a good EAP, what impact is and what future developments are required in relation to developing and monitoring EAPs. There were some issues that united interviewees. The first was a continuing passion for equality and “doing the right thing”. The second was the challenge of delivering equality outcomes in a difficult economic and political climate. The third was respect for and value of the Equality Commission for Northern Ireland.

Section 4.1 provides an analysis of the organisational context under which EAPs are developed and approved. Section 4.2 provides a qualitative analysis of the case study documentation and particularly the structure and content of EAPs. The analysis in section 4.3 focuses on the APR and how action measures were reported. Section 4.4 meets Objective 3 by applying the same analysis to the case study DAPs. Section 4.5 provides

analysis of data from interviewees about their views on managing s.75 processes and section 4.6 provides a summary of the key points drawn from the qualitative data.

4.1 Organisational Processes for Developing Action Plans

For all the case study authorities, the ultimate responsibility for the EAP lay at a senior level with 'sign-off' being made in most cases by the head of the authority. In most cases before sign-off a draft EAP is scrutinised via a senior management team or committee depending on the management structure of the authority. At an operational level the drafting and day-to-day responsibility for EAPs sits with an equality officer or small team of officers. In some cases the equality officer(s) were part of a corporate management team but in most cases they were attached to the HR function.

It was noted by some equality officers that there was a different approach to equality in HR than in equality teams. One equality officer felt that HR were more likely to view the law "as a barrier" rather than "the right thing to do" and were more likely to see "equality as a problem rather than the solution". Another felt that the HR approach to equality was reactive rather than proactive. It was clear from interview data that the Article 55 Report was considered to be the responsibility of the HR team whilst s.75 duties, including, the EAP, were the responsibility of the equality teams in what was considered to be a "silos mentality".

In some cases the role had the title of 'quality' or 'compliance' rather than 'equality' officer. In one case study authority the EAP had been drafted by an external consultant and in this case there seemed to be limited engagement with the EAP by the equality officer. In a small number of cases the equality documentation that was available on authority websites was considerably out-of-date.

The content of action measures was, in most cases, based on an Audit of Inequalities (AoI) as per the Commission Guidance. However, AoIs were less likely to be publicly available or accessible than EAPs. During interviews there was some reticence about AoIs. In one authority the process and report had been given an alternative, less pejorative, name. In another interview the equality officer felt that AoIs were no longer appropriate and reflected the "negativity" of an equality agenda based on legal structures and litigation.

In most cases equality officers responsible for drafting the EAP had consulted internally and externally on the content of action measures. Whilst equality officers drew up the EAPs, responsibility for completing actions was 'mainstreamed' to other sections or individuals within the authority. There were different views on the processes of consulting. In some authorities consultation was considered to be "the key for keeping the EAP on track". In others, whilst the concept of consultation was valued, the practice was considered to "have lost its way" and exhausted by "consultation overload".

In most cases there had been significant restructuring in the case study authorities. In some cases restructuring had not had a significant impact on the equality role, but in one case the interview with the equality officer and documentary analysis the APR for this authority highlighted that cuts to funding and restructuring had led to the curtailment of some equality actions with the equality officer stating “the focus in the new authority is about voluntary redundancy and saving money”. Interviewees also highlighted that, where action measures were intended to address fair representation in employment, recruitment freezes had prevented progress.

In a substantial amount of cases the equality officer in post at the time of the interview was not the person who had drafted the EAP. In two cases the equality officers felt that there had been little or no handover of duties when the role changed hands. In one case there had been a significant gap in covering the equality officer role in their authority explaining the out-of-date documentation available on the website. This indicates that s.75 duties often lie with a single individual in authorities making them vulnerable to the loss of key skills, organisational memory and meeting their duties in relation to s.75.

In a majority of the cases equality officers held other duties in addition to their equality role and/or worked part-time. Although equality was the main aspect of their jobs in most cases, officers reported that the amount of time they were allocated to spend on equality work had diminished, often after a process of restructuring. In one case the equality officer noted that restructuring and uncertainty had rendered their job temporary for four years and a small number of other equality officers in other authorities were in “acting” roles.

In interviews with equality officers the general feeling was that it was important that equality in authorities was “politically led” with “top level support” and that equality was taken seriously by the senior management team in their authority. However, in a couple of cases, equality officers noted that their position and the equality function had moved further away from the senior management team following restructuring. In one case restructuring had resulted in two additional layers of management between the equality officer and the Director responsible for equality, which they felt was symbolic of its declining priority in their authority. This concern was expressed by other equality officers, one of whom recounted that they had fought and, for the first time, failed to have the word ‘equality’ feature in their organisation’s Strategic Plan. In this authority the equality officer felt that the EAP was not taken seriously by senior managers because it was not a statutory requirement. In another case an equality officer felt that the equality role had not been valued by the previous Head of the authority who had been reluctant to “share equality documents”. Following restructuring this officer found that they no longer had permissions to update the authority’s website, again explaining the out-of-date equality documents that were publicly available. In two other interviews the equality officers felt that extended and repeated restructuring of their authorities had led to a lack of strategic leadership and no overall strategic plan, making it difficult to draw up the EAP and mainstream equality actions

in the way that the Commission had recommended in their guidance. As a result one officer felt that s.75 compliance was barely “ticking over” in their authority. In another authority it was felt that the EAP that had been drafted following an extensive restructuring was “basic” and “interim” and represented a significant “scaling back” of what the equality officer would have liked.

In some authorities the usefulness of collaborative working, “working beyond the silo”, between authorities with similar functions was noted. In these cases the sharing of best practice, “co-design” and sharing the load in relation to information gathering was valued. One equality officer felt that the loss of co-ordination and equality support from the professional association in their sector had impacted on the equality role since several small authorities were now having to duplicate work.

4.2 The Structure and Content of Action Plans

The purpose of this section is to meet requirements in Objectives 1 and 2 of the research by assessing how far our sample of 17 authorities had implemented the Commission’s guidance and to identify differences in approaches to developing EAPs. In their 2010 guidance *Section 75 of the Northern Ireland Act 1998: A Guide for Public Authorities* the Commission lay out their recommendations for developing and reporting on EAPs. Unlike the statutory requirement to complete DAPs, the Commission do not require a specific structure for EAPs but do provide guidance on what EAPs should include and how they should be developed. In summary, the guidance (pgs 46-50) recommends EAPS should:

- be informed by an analysis of the inequalities that exist for those s.75 categories affected by the functions of the public authority.
- link to the corporate planning cycle and mainstreamed at a strategic level into the business of the public authority.
- include action measures that are be specific, measurable, linked to achievable outcomes, realistic and timely and include performance indicators and timescales for their achievement.
- focus on impact and outcomes rather than simply outputs.
- consult on their action plans prior to submission to the Commission.
- be submitted along with equality schemes to demonstrate commitment to implementing equality schemes.
- be monitored for progress on the delivery of action measures.

Unsurprisingly, since the Commission has not issued specific requirements for the structure of EAPs, there was quite a wide variation in the formats used in the case study authorities. However, most had utilised a tabular format and adopted similar criteria to those recommended by the Commission for the DAP, providing a description of the measure, a timescale for its completion and performance indicators. As noted in section 4.1, although most of the case study authorities stated that their EAP was based on an AoI, just under half had published their AoI. It was therefore not possible in these cases to track this as a basis for action measures.

Most of the EAPs used a thematic structure to group action measures, usually based on those identified in the AoI and often based on corporate or business plan priorities. In many of the EAPs corporate strategy and business model had become the driver of the EAP. What was striking, given the Commission guidance, was that few of the EAPs systematically covered the 9 categories identified in s.75, although most did refer to some of the categories. When this was raised at interview with one of the public authorities who had opted not to use s.75 category groups to develop their EAP, it was explained that the chosen format better reflected the organisational structure of the authority. One authority who had previously used the s.75 categories in the EAP had decided to move away from this structure in their new EAP for similar reasons. The equality officer in this authority felt that a focus on protected groups was too rigid and that tackling deprivation could not always be achieved by focussing on the legally defined categories. There was a widespread, but not universal, view amongst the equality officers interviewed that general good practice would lead to good equality outcomes.

In the majority of authorities there tended to be uneven coverage of the equality categories. Disability featured to the greatest extent with marital status and persons with or without dependents featuring very little. In some cases there was an unequal coverage between service delivery/service users and employees in the focus of action measures, with a small number having little or no inclusion of employees in the EAP. In one interview an equality officer related the move to align equality to a business agenda had translated into being about “the customers”.

The larger public authorities tended to have more developed EAPs but there were some examples of EAPs that did have potentially measurable outcomes in both large and small authorities. A few random examples are given below:

- Better health outcomes in mental health for BME service users.
- Increased uptake and inclusion in youth services for marginalised and disadvantaged groups of young people at risk of underachievement.
- Increase the numbers of women, people with a disability and people from ethnic minority backgrounds applying for public appointments.

However, most action measures contained in EAPs involved process related actions such as collecting data, monitoring data, training staff, developing frameworks and policies. These action measures and performance indicators did not refer to an identifiable or measurable impact on an equality group. In most cases the outcome was the delivery of the process rather than a positive impact on an equality group. During interviews some equality officers felt that developing a meaningful EAP with measurable actions was the most difficult aspect of their s.75 work. One equality officer felt that measuring successful changes in behaviour was difficult. Others felt that, because the function of their authority was 'back office' and not directly customer facing, it was difficult for them to measure success since the impact of their actions would be felt 'downstream'. Some officers felt that, because the actions in the EAP were mainstreamed, it was difficult to collect information back on the success of measures. Following a discussion with one equality officer about how some of the impacts of the actions contained in their EAP might be measured by data collected by HR and relevant service delivery areas, the officer offered to collect and send on the data. The officer sent the data after a few weeks, which did show clear improvement trends in some cases but not in others. The equality officer did, however, indicate that it had been difficult to locate and extract the data from the relevant sources.

There were quite a few examples where action measures were rather generalist and not clearly related to the nine s.75 categories, even where these were used. For example, the development of employee wellbeing initiatives, employee assistance plans and dignity at work policies featured as action measures in some EAPs. Whilst it is possible that these policies are used to a greater extent by some equality groups and it would be useful to show how these policies are used by them, this was not clearly identified or justified as the reason for including them as action measures in an EAP. The assumption seemed to be that simply having these policies in place would benefit equality groups. Some EAPs included action measures that related to processes required for compliance with s.75 such as screening, EQIA and reporting on EAPs, which seemed somewhat tautological. The inclusion of generalist measures might be related to a view held by some equality officers that equality is simply good practice. However, in a couple of cases, examples of good practice provided in documentation were insensitive to some groups.

4.3 Reporting Progress on Action Plans

The APR was our first source of information for analysing how our case study authorities reported progress on completing or working towards their EAP action measures. Six (35%) of our case studies had not published their latest APR on their website. In most cases the APR was signed off by an equality officer, often the one interviewed for this research. In 4 cases the APR had been signed off at a higher level in the authority.

Analysing examples of outcomes and impacts of action measures should have been relatively straightforward since section 2 of the APR template asks authorities to:

“Please provide examples of outcomes and/or the impact of equality action plans/ measures in [year] (or append the plan with progress/examples identified).”

Notwithstanding this clear instruction, the documentary analysis of reporting progress on EAPs elicited the greatest variation between the case study authorities. Firstly, 6 (35%) of our case studies had not published their latest APR on their website. Authorities that had published APRs displayed a great deal of variation in the length and detail of what was reported. In relation section 2, the entries tended to be the shortest with most referring to the EAP or an updated version of the EAP. In some cases this was appended to the APR, in some cases it was missing and in some cases the EAP had not been updated with progress on actions.

Authorities had made greater use of Part A section 1 of the template:

“In [year], please provide examples of key policy/service delivery developments made by the public authority in this reporting period to better promote equality of opportunity and good relations; and the outcomes and improvements achieved. Please relate these to the implementation of your statutory equality and good relations duties and Equality Scheme where appropriate.”

Some of the entries of this part of the APR were long and detailed accounts of the main outreach activities of the authority during the year. In some cases these examples were equality related and offered useful insights of where authorities had engaged with members of the public from some of the 9 categories. Some of these examples were related to the EAP and Equality Scheme, but most were not. Often the accounts related to general outreach activities not specifically related to s.75 duties, again perhaps reflecting a move to a ‘good practice’ approach. It was therefore difficult to trace progress on the outcome of action measures in EAPs in many cases. Even where authorities produced clearly measurable actions, the impact was not always measured and reported in the APR. For example, of the three random measurable actions identified on page 19, outcomes for only one of these was partially reported on. Where it was possible to trace progress, the focus on process of most of the action measures contained in EAPs meant that identifying a direct impact on s.75 categories as published in EAPs was not possible. In many cases the outcome of action measures was reported as ‘on going’. Since very few authorities held public archives of previous APRs or EAPs it was not possible to see how far ‘on-going’ actions dated back making it difficult to track progress.

Interviews with equality officers identified the APR as the greatest source of dissatisfaction with their s.75 duties. The template has recently been updated and some equality officers felt unhappy with the ‘tick box’ approach they felt it had become. In 2 cases equality

officers felt that the new template did cut down on work, although this was qualified. One of the officers interviewed felt that, although it made the jobs easier, the tick box approach meant that “we are not thinking so hard about what we put into it”.

Several officers felt that the APR was a difficult report for them to bring together because mainstreaming meant that they were not directly involved with implementing the action measures. It was felt that the ‘customer facing’ work went on in other departments and by staff members who were not driven by the EAP and often did not have a clear equality focus. Therefore, collecting evidence of outcomes for EAPs was sometimes difficult. One equality officer did however report that there had been a keener interest in taking on equality related public engagement roles by senior managers since it had been included in their promotion criteria.

There was a strong view that EAPs tended to be a “static”, “high level” “snapshot” of what was important and adequately resourced at the time at which they were drafted. By comparison the APR worked at a different level, reflecting the more dynamic, mainstreamed and opportunistic approach to equality that most authorities are faced with on a day-to-day basis. However, one officer commented that what went in to the APR often reflected an approach to equality that was not planned and was “information after the fact”. In some cases equality officers felt that action measures that required statistical measurement on employment would be reported on in the Article 55 review rather than the APR. One of the equality officers felt that annual reporting should be replaced by a “joint consultative forum” with the Commission to provide regular dialogue rather than in an “ad hoc” written document on which there was no feedback.

Some equality officers felt that the long time scale usually covered by the EAP was incompatible with a yearly requirement to report since, when an EAP was newly drafted, there would be little to report and, when it was nearing the end of its coverage, actions may have been completed and again, therefore, little new activity to report. The Commission (2010) guidance does say that EAPs “should review and update action plans over the life time of their equality scheme to ensure that they remain effective and relevant to their functions and work” (p.50), but only one authority had added identifiably new action measures to their EAP.

Some of the equality officers in smaller authorities felt that the APR had become a competitive process where large and well-resourced authorities could include numerous “chapter and verse” examples of what had been undertaken in their authorities that year. This raised an interesting question about who the audience for the APR was meant to be, since the documents sometimes resembled marketing brochures with a ‘shop front’ approach. However, one equality officer felt their role was to make sure that “the equality agenda isn’t used for spin”. Another equality officer felt that targets and measurable

outcomes were avoided by authorities “because it looks really bad if you fail to achieve them”.

4.4 Disability Action Plans

The requirement to complete a Disability Action Plan (DAP) is not part of the s.75 duties but stems from section 49A and 49B of the Disability Discrimination Act 1995 (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006). The general duty (49A) requires public authorities to have due regard to the need to:

- promote positive attitudes towards disabled people; and
- encourage participation by disabled people in public life.

Section 49B requires public authorities to draw up and submit to the Commission a DAP. DAPs are therefore statutory requirements, unlike the voluntary commitment made by authorities to complete EAPs. The structure of DAPs is prescribed by the Commission in Chapter 4 of their 2007 statutory guidance *Promoting Positive Attitudes to Disabled People and Encouraging the Participation of Disabled People in Public Life*, for which a template for a DAP is provided. In section 4.5. of the guidance (pg. 39) the Commission summarises the key elements:

4.5 The disability action plan (or revised plan) **must** include the following key elements:

1. An **introductory statement** as per the requirements set out in paragraph 4.7).
2. An outline of appropriate and effective **action measures** showing how it proposes to promote positive attitudes towards disabled people and encourage their participation in public life (see Chapter 5). An outline of measures to provide training and guidance to employees and office holders on the disability equality legislation and disability awareness, **must** be included (see paragraphs 5.7 – 5.16).
3. An outline of the **timescale** for the implementation of those action measures (see paragraph 4.22).
4. Meaningful outcome focused **performance indicators or targets** (see paragraph 4.24).
5. Details of how the disability action plan will be **published** (see paragraph 4.26).

4.4.1 Content of DAPs

The focussed approach of the general duties on promoting positive attitudes and encouraging participation in public life, coupled with the statutory guidance provided by the Commission means there is less scope for public authorities to vary the content and structure of DAPs. Accordingly, in our documentary analysis we did find more homogeneity amongst our case study authorities in relation to their DAPs. In one case we could not trace a DAP on the authority's web site and in 2 cases the published DAP was out-of-date. In 3 cases, where the DAP was published and current, the authority had not included performance indicators or targets.

Most of the action measures contained in the DAPs were process focussed or related to training. In many cases key performance indicators more closely resembled action measures or aspirational statements and numerical targets were rarely set. However, there were some good examples of action measures that included measurable targets that would impact directly on disabled people. An example of this, utilised by several authorities, was the provision of work experience to specified number of disabled people. Most authorities also included an action measure on producing information in accessible formats, where numbers of requests could be monitored, although this was rarely used as the performance indicator. Consultation with disabled groups was included in most DAPs. Disability measures relating to employment were more evident in DAPs than in EAPs and in one case the DAP related entirely to staff.

4.4.2 Reporting on Progress of DAPs

Part B of the APR template asks authorities to report on the progress on action measures contained in the DAP. The template requires authorities to answer in a structure that is different from their DAP and therefore the reporting of progress on action measures does not always correspond with the content of the DAP, making it difficult to track outcomes for some action measures. Like the EAP, this could be a result in the time lag between a DAP that often covers a five year period and annual reporting where measures that have been achieved are no longer reported on.

Some authorities that had included work experience as an action measure in their DAP reported on the number of disabled people who had been engaged. At interview, equality officers were asked if the measure was followed up by tracking whether the work experience led to employment. In most cases it was reported that this may have been tracked by the HR team in a work placement evaluation scheme, but was not reported back to equality officers, echoing the HR/equality team divide identified in section 4.1. In one case the equality officer felt that it was rare that work experience led to employment. In another case the equality officer felt that the benefits of offering work experience were not always related to gaining employment but may be more diffuse, such as gaining in confidence and likely benefits to carers who gained respite during work experience. Another equality officer felt that having disabled people on work experience also promoted

positive attitudes amongst employees of the authority because they gained positive experience of working alongside people with disabilities. Another felt that the work experience scheme in their authority was a “runaway success”.

There were some good examples of disability action measures that were reported on in the APR and during interviews with equality officers that were not action measures in the DAP. For example, one authority had invested heavily in innovative, award winning, technology to make their website accessible to visually impaired service users. The result had been “website hits in excess of 10,000 rather than in the hundreds”.

The dissatisfaction with the APR template highlighted in section 4.3 often related to the reporting requirements for the DAP with one equality officer describing it as “unwieldy” and “not very user friendly”. Several equality officers felt that there should be just one EAP to include disability and in some authorities there was an integration of the two.

4.5 Reflecting on Equality Actions and s.75

This section reports on the interview data collected towards the end of the interview where equality officers were invited to share their thoughts and experiences of implementing equality actions and s.75 duties. Equality officers were emphatic in their support for s.75 with most feeling the legislation was still relevant and necessary and that there was still strong belief in “the process”. There was some divided opinion on the way forward. There is a feeling amongst some equality officers that a great deal had changed in NI in the 20 years since the Northern Ireland Act was introduced and that the situation had “moved on”. In these cases there was a feeling that NI had once led the way in terms of equality legislation but that was not now the case and the Single Equality Act in Great Britain was more innovative. Alongside this was a use of concepts of best practice, diversity and inclusion rather than legislative concepts of equality and compliance. Other equality officers felt that old tensions remained and that, for example, a great deal of time was still expended on the issue of flags and emblems. There was also an acknowledgement that new tensions relating to immigration had emerged and this was likely to take on greater importance following the EU referendum result and “Brexit”. In some cases equality officers felt that the threat of litigation, adverse media coverage and complaints kept the legislation “up front and central”, but that success was sometimes measured on the basis of no complaints. The importance of consultation as a central factor in the implementation of s.75 was stressed by all the equality officer interviewed. However, in one interview the issue of “consultation overload” and the difficulty of keeping interest in consultation was raised.

All the officers interviewed were committed to their work, however it was clear that the context of implementing s.75 was becoming more difficult. It was felt that restructuring and budget cuts had led to a loss of priority on equality both in terms of resources and

leadership support. There was clearly immense respect from the equality officers interviewed for the work of the Commission and a valued good working relationship, but also a feeling amongst some equality officers that the Commission did not fully appreciate the difficulty of “front line” equality work authorities were experiencing. There was, again, some division amongst equality officers about how this could be resolved. Some equality officers felt that more freedom from “bureaucratic” processes and detailed guidance was necessary because equality was successfully mainstreamed in their authority. Others felt less confident, valued the templates and guidance, and wanted more support and input from the Commission, particularly in relation to how to develop and evidence measurable outcomes and impacts.

4.6 Summary of Qualitative Analysis

The qualitative data confirmed the differences between levels of engagement of public authorities with s.75 identified in the quantitative analysis. Most public authorities were highly committed to the implementation of s.75, whilst a small number seemed disengaged.

Most equality officers commented on the impact of budget cuts and restructuring on their ability to implement action measures, with the equality function being directly affected resulting in a lack of continuity in s.75 implementation in several cases. Although most equality officers felt there was senior level support in their organisations for s.75, there was a feeling that, in times of competition for scarce resources, equality had fallen down the list of priorities. In a minority of authorities equality officers felt that senior level support for s.75 was increasingly absent.

The content of EAPs was quite variable between case study authorities, with some more detailed and complex than others, perhaps reflecting the size of authorities and the resources available to them. However, even in well-developed EAPs, there was a tendency for action measures to be process oriented with performance indicators that could not be easily measured and very few with targets. There was uneven coverage of the 9 s.75 categories in action measures and between employment focussed and service delivery focussed action measures.

There were differences between even committed authorities about the use of action plans, templates and guidance with some preferring more freedom where it was felt that mainstreaming had been successfully embedded in their authority. By comparison some equality officers valued the templates and guidance and wanted greater support on how to develop measurable action measures. There was some disconnect between the content of EAPs and APRs, making it difficult to trace outcomes and impacts of action measures.

DAPs were more homogenous than EAPs, reflecting the greater level of statutory direction required for their development and implementation. However, there were similar issues in relation to measurable performance indicators and lack of targets.

5. Conclusions

Section 75 of the Northern Ireland Act 1998 represents a paradigm of equality legislation that has greatly influenced the development of legislation in Great Britain. There are some developments in relation to anti-discrimination legislation in the Equality Act 2010 that NI could benefit from (ECNI, 2015) but s.75 of the Northern Ireland Act 1998 remains a much more influential piece of legislation than its equivalent (s.149) in the Equality Act 2010. Section 75 is underpinned by concepts of transformation, reflexive and responsive legislation and equality mainstreaming. The concepts have considerable strengths over traditional approaches to anti-discrimination legislation but they also have some identifiable weaknesses that may be increasingly evident in the way that s.75 is being implemented in the current economic and political context. In their seminal work on responsive legislation Nonet and Selznick (1978/2009) argue:

In this perspective law is valued as a resource for criticism and an instrument for change...To be responsive, the system should be open to challenge at many points, should encourage participation and should expect new social interests to make themselves known in troublesome ways. (p.6)

The central thesis is that to be responsive to change, institutions must be open to criticism and able to reflect on information they receive about what they need to do to improve. Implicit in this process is the identification of what is wrong as well as what is right. In terms of s.75, the purpose of the Audit of Inequalities, of consultation and the complaints process is to help authorities to identify what is wrong, whilst the EAP and the DAP are the products of reflection. However, Nonet and Selznick acknowledge that inviting criticism is a 'high-risk' strategy, which requires the confidence of institutions to adequately address the issues it uncovers. Public authorities faced with unprecedented budget cuts and restructuring of services to accommodate them are unlikely to have the confidence to open themselves up to criticism when they do not have the resources to address the issues it raises. This may explain the reluctance for most of the case study authorities to adopt an approach to action measures in EAPs and DAPs that require performance indicators and targets that can be measured and consequently identified as not having been met. One result is that evidence of impact on disadvantaged groups becomes opportunistic, a target met retrospectively, rather than planned in advance. This might explain the preference for authorities to report extensively on yearly activities in the APR rather than expand on progress on action measures in their EAPs.

Mainstreaming is a key aspect of s.75 and whilst in theory it has the ability to transform institutional processes by infusing them with the principles of equality, as a process, it is known to be susceptible to capture i.e. being absorbed by the mainstream rather than transforming it (Verloo, 1999; Beveridge and Nott, 2002; Rees, 2005; Walby, 2005). There is a risk that the approach to equality becomes led by the business agenda rather than the other way around (Bacchi and Eveline, 2010). Therefore, whilst public authorities are

encouraged to link their EAPs to the business plan or strategy, there is a risk that equality becomes indistinguishable from general best practice and ultimately shaped only by what is deemed good for business (Noon, 2007), often meaning that minority voices or critical perspectives can be overlooked. In terms of s.75 this might mean that, where a clear focus on the 9 equality categories is not maintained, authorities will find it harder to demonstrate they have fulfilled their duties.

There are also problems with models of 'top-down' equality mainstreaming in public authorities that are uni-directional (Conley and Page, 2015) and there has been some criticism that the public sector equality duties in GB have focussed on process rather than impact (Hepple, 2011). In our case study authorities this was evident in the difficulty with which information on outcomes could be retrieved from mainstreamed action measures. The result was that the outcome of action measures was the development of processes to mainstream equality rather than the impact the action measure had on disadvantaged groups.

The evidence reviewed in this research is that s.75 continues to influence the behaviour of public authorities and make a difference to the lives of people in NI. It remains the best example of reflexive and responsive legislation and of statutory equality mainstreaming. Equality officers in public authorities continue to work hard to implement the legislation despite unprecedented adverse economic conditions. However, reflexive and responsive legislation and equality mainstreaming rest on political and organisational leadership (Nonet and Selznik, 1978; McCrudden, 1998; Veitch, 2005). There is some evidence that equality had lessened as a priority in some public authorities and is being re-interpreted as general best practice. The challenge for public authorities to maintain the success of s.75 is, in the words of one of the equality officers we interviewed, to "keep it up front and central".

6. Recommendations

- **Leadership:** At a political level it is recommended that there is a reaffirmation of the importance of s.75 to the continued success of the Belfast Agreement. At the level of public authority leadership, it is recommended that senior managers reaffirm their commitment to s.75, prioritise adequate resources for the implementation of s.75 duties and to engage actively with the process of its implementation. One example from this research identified that performance incentives for senior managers encourage this behaviour.
- **Breaking down silos:** Several equality officers noted a division of duties between their work on s.75 and the work of HR teams on compliance with anti-discrimination legislation. Since there may be a useful overlap in the data gathered, for example in Article 55 reports, and measurable objectives for EAPs/DAPs, it is recommended that closer working between HR and equality teams is established in relation to the exchange of data.
- **Availability of documentation:** The research identified that a sizeable proportion of public authorities do not make current equality documents available on their websites, although part of the commitment to develop EAPs and DAPs is that they should be published for the benefit of the communities they serve. Furthermore, the qualitative data indicate that the failure to publish documents on websites signals a weakening of commitment in the authority to implementing s.75. It is therefore recommended that public authorities implement regular monitoring to ensure that the equality documentation on their websites is current and available to all staff and service users.
- **Critical reflection, performance indicators and targets:** The guidance for action plans recommends public authorities to adopt a self-critical approach to developing and reporting on the progress of action measures. It is recommended that, when developing action measures, public authorities consider how they are meant to benefit one or more of the 9 equality categories and develop clearer, measurable performance indicators and numerical targets to demonstrate how this can be achieved over time. It is recommended that public authorities should provide statistical evidence of progress towards action measure targets in each APR.
- **Extending process based action measures:** Public authorities tend to develop process based action measures that are designed to initiate new or enhance existing internal systems (e.g. monitoring data, collecting data, reviewing policy, setting up working parties). Public authorities are recommended to link process based action measures to the impact they are intended to have on one or more of the 9 equality categories. For example, if an action measure is to collect data on one of the 9 groups, public authorities should also identify how it is intended that the data will be used. Once the data is collected and the process action measure has been completed, a replacement action measure on the use of the data should be developed to update the EAP/DAP, providing continuity from process towards impact.

- **Measuring the progress on mainstreamed action measures:** It is recommended that evidence to support the progress on or completion of action measures should be collected by the equality officer responsible for the EAP/DAP and reported on in the APR, even if the action measure is mainstreamed to a different area of the authority.
- **Achieving a balance between service users and employees:** Public authorities are recommended to satisfy themselves that they have considered actions for all relevant functions, in particular for both public service users and employees in their EAPs/DAPs.
- **Reporting Progress:** Section 1 of the APR is often completed in a very detailed way that is not always directly related to s.75, whilst the questions on action plans in Section 2 of the APR is often completed in a perfunctory way, referring the reader to a separate document. Public authorities are recommended to ensure that activities reported in section 1 of the APR are directly related to their equality schemes and that documents referred to in section 2 are appended in the APR provided on their website and relate specifically to action measures in EAPs. The Commission should consider putting a word limit on the sections to indicate the importance that they place on each section.
- **Support for smaller authorities:** Smaller authorities may benefit from joint working with similar authorities on the development and implementation of EAPs/DAPs. It is recommended that a relevant professional body or association, where one exists, would be well placed to co-ordinate support.

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Appendix 1

Interview Schedule

A Review of Action Plans developed by public authorities in relation to their statutory good relations and equality duties in Northern Ireland

Principle Investigator: Professor Hazel Conley, FBL

Participant details:

Name and position in organisation:

Role in relation the authority's s.75 duty

Process of fulfilling statutory duties:

Where does the role fit within the authority's decision making structure?

What was the process for developing the authority's equality scheme and disability action plan for S.75?

What was the process (if any) for developing an equality action plan?

If the authority has decided not to develop an equality action plan, why not?

How were the objectives for the equality scheme/disability action plan/equality action plan decided upon?

Can you give me any examples of where a completed objective for equality schemes/disability action plan/equality action plan has resulted in benefits for a protected group?

How was success measured for completed objectives?

Experience of fulfilling the statutory duties:

Were the guides provided by the ECNI useful? Which parts are useful/not useful? Why?

What have been the barriers (if any) in fulfilling the duty and/or the recommendations made by the ECNI?