

NORTHERN IRELAND AUDIT OFFICE

EQUALITY SCHEME

**Northern Ireland Audit Office
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Foreword

Under the Northern Ireland Act 1998 (Designation of Public Authorities) Order 2003, the Northern Ireland Audit Office has been designated as a public authority for the purposes of Section 75 of the Northern Ireland Act 1998.

Section 75 of the Northern Ireland Act 1998 requires public authorities, in carrying out their functions, powers and duties, to promote equality of opportunity and good relations among a range of groups. Public Authorities, as defined by the legislation, are required to send an Equality Scheme to the Equality Commission, showing how they intend to carry out their new duties.

As Comptroller and Auditor General for Northern Ireland and on behalf of the Senior Management Group and staff in the Northern Ireland Audit Office, I am pleased to support this Equality Scheme which arises out of the implementation of Section 75 of the Northern Ireland Act 1998.

Commitments made in the Equality Scheme refer to how the Northern Ireland Audit Office carries out all its functions, powers and duties relating to Northern Ireland. The Northern Ireland Audit Office is committed to ensuring that all necessary resources (in terms of people, time and finance) are made available to support the effective promotion of equality of opportunity and good relations in all its policies and practices. This also includes making sure there are effective internal arrangements in place to ensure that the duties are effectively complied with and for monitoring and reviewing progress.

The Northern Ireland Audit Office will actively seek to develop a programme of communication and training with the aim of ensuring all staff are made aware of and understand the new equality obligations as they relate to our functions affecting Northern Ireland.

J M Dowdall CB
Comptroller and Auditor General

11 November 2003

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Section 1: Introduction

- 1.1 Section 75 of the Northern Ireland Act 1998 ('the Act') requires the Northern Ireland Audit Office ('the NIAO') in carrying out all its functions, powers and duties 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;
 - between men and women generally;
 - between persons with a disability and persons without; and
 - between persons with dependants and persons without.
- 1.2 In addition, without prejudice to its obligation above, the NIAO is also required, in carrying out its functions, power and duties relating to Northern Ireland to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.
- 1.3 Schedule 9 to the Act requires the NIAO to set out in an Equality Scheme how it proposes to fulfil the duties imposed by Section 75. This Scheme has been developed to satisfy that statutory requirement.

Section 2: Duties and Responsibilities of the Northern Ireland Audit Office

Background

2.1 The NIAO was established on 1 April 1987 under the provisions of the Audit (Northern Ireland) Order 1987. It is headed by the Comptroller and Auditor General for Northern Ireland ('the C&AG'), who has two main functions:

(1) As Comptroller, he is responsible for:

- authorising the issue of money from the Northern Ireland Consolidated Fund to enable Northern Ireland Departments to meet their necessary expenditure; and
- ensuring that there are adequate arrangements for the collection of revenue.

(2) As Auditor General:

- he is required to examine and certify the accounts of the Northern Ireland Departments and the majority of public bodies, including Non-Departmental Public Bodies and Health Service Bodies (Financial Audit); and
- under the Audit (Northern Ireland) Order 1987, he may carry out and report on examinations of economy, efficiency and effectiveness in the use of resources by those bodies he audits or to which he has rights of access (Value for Money Audit).

2.2 The NIAO currently has a staff complement of around 145 and a net annual budget of £6.7 million. Human resource costs (mainly salaries) comprise over 80 per cent of total costs. The NIAO assists the C&AG in the delivery of his functions. It also provides staff for appointment by the Department of the Environment as local government auditors for the audit of the accounts of District Councils.

2.3 The vision of the Northern Ireland Audit Office is to promote accountability and the best use of public money. To achieve this, its mission is to:

- provide objective assurance, information and advice on the use of public funds; and
- encourage:
 - beneficial change in the provision of public services;
 - the highest standards in financial management and reporting; and
 - propriety in the conduct of public business.

2.4 The vision and mission are underpinned by a set of core values, which are:

- adaptability;
- equality;
- integrity;
- making a difference;
- professionalism;
- valuing individuals; and
- working together.

A full description of the equality value is:

“We will treat each member of staff equally, fairly and justly. We will be unbiased in our audit work and in our dealings with suppliers of goods and services.”

Legislation

2.5 The status, functions and main duties of the C&AG and the NIAO are set down in the following legislation:

- *The Audit (NI) Order 1987* established the NIAO as an organisation independent of government and provides the C&AG with statutory authority to examine and report on the use of resources by those public sector bodies to which he has access (value for money examinations). He may investigate any area of expenditure in these bodies but may not question the merits of government policy objectives;
- *The Northern Ireland Act 1998* reaffirmed the independence of the C&AG by providing for his appointment by the Crown on the nomination of the Assembly and that he can be removed from office only by a vote supported by at least two-thirds of the Assembly (during the suspension of devolved government in Northern Ireland his appointment by the Crown is exercisable on an address presented by the House of Commons). The Act makes it clear that he is totally independent in the exercise of his functions and cannot be subject to direction or control by any Minister or the Assembly.
- *The Government Resources and Accounts Act (NI) 2001* made provision for the C&AG to examine and certify the accounts of all Northern Ireland departments, including executive agencies. It also provided the C&AG with powers of access to bodies which exercise functions of a public nature or which are entirely or substantially funded from public money;
- *The Audit and Accountability (NI) Order 2003:*
 - further widened the C&AG's access rights. In addition to his existing statutory powers (including access to documents held by the bodies he audits or in pursuance of arrangements made by these bodies for the compiling or handling of any of their financial records), he was provided

with a right of access to documents held by certain third parties. Third parties from whom information can be sought include not only grant recipients, contractors and sub-contractors but also those in receipt of loans and guarantees from public bodies, or financial assistance by the taking of an interest in any property. The Order took into account possible human rights concerns over the use of the C&AG's access powers to third parties and requires that the exercise of these is subject to a test of necessity and reasonableness;

- increased the number of Non-Departmental Public Bodies (NDPBs) to be audited by the C&AG. Prior to this legislation the C&AG audited the majority of NDPBs in Northern Ireland. The Order specified a further 13 to be brought within his remit;
- provided for the C&AG to be the auditor of all Health Service bodies in Northern Ireland (HSS Boards, HSS Trusts and other agencies). Audit staff previously involved in this work in the Department of Health, Social Services and Public Safety were transferred to the NIAO; and
- provided for the Department of the Environment to designate staff of the NIAO to audit Local Government bodies. Staff formerly employed by the Department of the Environment for this function were transferred to the NIAO.

2.6 The principal legislative authority for the responsibilities of local government auditors is contained in the Local Government Act (Northern Ireland) 1972.

Reporting

2.7 The results of the C&AG's work are reported to the Northern Ireland Assembly and published as Assembly documents. The Assembly's Public Accounts Committee takes evidence from senior officials on all reports and, following consideration of evidence, reports its findings and recommendations to the Assembly. The Executive is required to respond to the Committee's recommendations, specifying the action the audited body intends to take in response. The NIAO monitors the action taken.

2.8 During suspension of the devolved administration, reports by the C&AG prescribed in the Northern Ireland Act 2000 (Prescribed Documents) Order 2002 are laid before both Houses of Parliament in accordance with paragraph 12 of the Schedule to the Northern Ireland Act 2000.

2.9 The results of work undertaken by staff in the NIAO engaged in local government audit are reported to the Department of the Environment. These reports are copied to the District Councils and are available for inspection by the public.

Senior Management

2.10 Senior Executives of the NIAO are members of the Senior Management Group by virtue of their executive positions. The Group is chaired by the C&AG and

comprises four Assistant Auditors General and six Directors. The role of the group is to advise the C&AG on the discharge of his statutory duties. One Assistant Auditor General has been appointed by the C&AG as the Principal Finance Officer whose responsibilities are the same as those set out in 'Government Accounting Northern Ireland' for the Principal Finance Officers of Northern Ireland Departments.

2.11 The Group members as at 1 April 2003 were:

Comptroller and Auditor General	J M Dowdall
Assistant Auditors General	T R Jones J H Savage (Principal Finance Officer) C J Moore J S Buchanan
Directors	B J Edgar K J Donnelly R L Hutcheson M A L Mason (Mrs) J M Sides (Mrs) T G Woodhouse

Functional Responsibilities

2.12 NIAO has four Divisions, three responsible for operational audits (financial audit, value for money (VFM) audit and Local Government audit) and one for providing support, including resources, equipment, supplies and services. Each Division is headed by an Assistant Auditor General who reports to the Comptroller and Auditor General. An organisation chart is set out in Annex 1.

Financial Audit

2.13 The key objectives of financial audit are to:

- provide reasonable assurance that the financial statements audited by the Office give a true and fair view, have been prepared in accordance with the relevant accounting and other requirements and are in accordance with the authorities that govern them;
- identify, assess and examine risks to regularity, propriety and financial control in audited bodies and report on significant weaknesses; and
- provide audited bodies with constructive advice that will help them improve their corporate governance, financial management, control and reporting.

Financial audit is conducted in accordance with United Kingdom Auditing Standards issued by the Auditing Practices Board.

VFM Audit

- 2.14 In carrying out value for money audit, the NIAO seeks to promote better value for money by examining and reporting on whether public bodies spend public money economically, efficiently and effectively. NIAO also suggests ways in which public bodies can achieve their aims and objectives more cost-effectively, using accepted audit methodologies. A structured approach is adopted in selecting topics for examination, based on factors including an assessment of risk, the potential for improving value for money and public interest.
- 2.15 Draft reports are cleared with the audited body and, where appropriate, relevant third parties.
- 2.16 The NIAO receives a number of enquiries from members of the public on a range of financial management and value for money issues. It cannot undertake investigations on behalf of individuals as its responsibility is to report to the Assembly. However, in determining its programme of work, the Office takes into account concerns and issues raised.
- 2.17 The Department of the Environment has power to commission a local government auditor to undertake VFM studies in relation to the provision of services by District Councils.

Public Interest Disclosure (Northern Ireland) Order 1998

- 2.18 The C&AG has been prescribed as a person to whom protected disclosures can be made under the Public Interest Disclosure (NI) Order 1998. He is prescribed as having a role in relation to the proper conduct of public business, value for money, fraud and corruption in relation to the provision of centrally funded public services.
- 2.19 Local Government Auditors (who are appointed from the staff of the NIAO) have also been prescribed for the purposes of the Public Interest Disclosure (NI) Order 1998. Their role is in relation to the proper conduct public business, value for money, fraud and corruption in local government bodies.
- 2.20 Prescribed persons are responsible for investigating allegations that fall under their jurisdiction, and for protecting the whistleblower and their interests while conducting an investigation.

Examination of Equality Obligations

- 2.21 The NIAO's examination of its equality obligations grouped its policies and practices into the following categories:
- its role and responsibility for public sector audit in Northern Ireland and the services it provides in this regard;

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- its personnel management policies and practices and how, in exercising them, it meets its equality obligations to current and prospective employees and to the wider population;
 - its procurement processes and the responsibility of ensuring that equality of opportunity is promoted.

Section 3: Arrangements for Assessing Compliance with Section 75 Duties

3.1 The NIAO is committed to the fulfilment of its Section 75 obligations in all parts of its work. Responsibility for the effective implementation of the Scheme lies with the C&AG and the Senior Management Group.

3.2 The member of NIAO staff responsible for driving forward implementation of the Equality Scheme and acting as the main point of contact within the NIAO will be:

Title *Janet Sides, Director*
Address *Northern Ireland Audit Office*
106 University Street
BELFAST
BT7 1EU
Tel No *028 90 251118*
Fax No *028 90 251051 or 028 90 251106*
E Mail *janet.sides@niauditoffice.gov.uk*

3.3 This person will report regularly to the NIAO's Senior Management Group and respond to any queries for all those affected by the statutory duties.

3.4 Objectives and targets relating to the statutory equality duties will be integrated into the NIAO's corporate and operational plans. Progress on meeting objectives will be monitored and reported to NIAO's Senior Management Group on a quarterly basis.

3.5 The personal objectives of those directly engaged in this work will include implementation of the statutory duties and will be subject to appraisal in the annual performance review. In addition, a commitment to the statutory duties will be included in all job descriptions.

3.6 The NIAO will conduct an annual Review of Progress in relation to the implementation of the Equality Scheme, in complying with the statutory duties, and will forward a report of this Review to the Equality Commission. Progress will also be reported in NIAO's Corporate Plan.

3.7 Moreover, the NIAO will liaise closely with the Equality Commission to build a close working relationship so that progress on the implementation of the Scheme is maintained.

Section 4: Consultation

General

- 4.1 The NIAO is committed to full and meaningful consultation on its Equality Scheme, equality impact assessments and monitoring arrangements. Details of this commitment are set out in the following sections.
- 4.2 The NIAO recognises the importance of consultation in all aspects of the implementation of its statutory equality duties. It affirms that all consultation will be carried out in accordance with the guiding principles set out in the Equality Commission's 'Guide to the Statutory Duties'. In particular, it will conduct all consultations in a timely, open and inclusive way in accordance with the Equality Commission's guidance.
- 4.3 The NIAO will consult as widely as possible to ensure that any organisation or group which has a legitimate, particular interest in its work and /or the likely impact of its policies on the promotion of equality of opportunity and good relations will be included in the process of engagement.

Consultees

- 4.4 A list of those being consulted on matters relevant to the NIAO's equality duties, including screening and equality impact assessments and the Scheme itself, is in Annex 2. The list is not exhaustive and may be amended and reviewed throughout the lifetime of the Scheme to promote inclusive consultation. The NIAO welcomes enquiries from any organisation wishing to be added to the list of consultees and they should contact the person in paragraph 3.2 in order to have their interest noted.
- 4.5 The NIAO will include the Equality Commission, the Community Relations Council, voluntary, community and Trade Union groups, other public authorities and organisations representing the various categories included in Section 75 in any consultation carried out.

Timescale for Consultation

- 4.6 In order to facilitate meaningful consultation, the NIAO will ensure that consultation with groups and individuals will begin as early as possible.
- 4.7 The NIAO is conscious that some groups will need sufficient time in order that their contributions to any consultation may be informed. All consultations will allow a period of at least eight weeks except in emergencies. Such situations will include:
- ◆ policies which have to be implemented urgently to protect health and safety; and
 - ◆ policies which have to be implemented urgently to comply with court judgements.

4.8 The NIAO wishes to minimise the number of exceptions to good practice guidelines on the timescale for consultation. When exceptions do occur, the NIAO will report such instances. Exceptions to the normal eight week consultation period will be monitored, kept under review, clearly justified and reported by the NIAO in its annual Review of Progress to the Equality Commission.

Procedures for Ensuring Inclusive Consultation

4.9 In consulting on any matter to which this Scheme relates, the NIAO will work with representative groups and individuals of the Section 75 categories in order to identify the most appropriate way to obtain their views. This may involve face to face meetings, small-group meetings, discussion papers with the opportunity to comment in writing, questionnaires, Internet discussions and other innovative ways of consulting as there will be different means of consultation for different groups and it will be important to establish the basis for dialogue and engagement during the life of the Scheme.

4.10 It is intended that barriers to proper consultation will be removed by ensuring that language is as clear as possible.

4.11 To ensure the highest level of inclusivity in any policy decision-making, information will be made available in consultation with groups affected by Section 75. Systems will be in place to ensure that timely information can be made available, on request, in accessible formats such as Braille, large print, on disk, on audio cassette and in minority languages to meet the needs of those who are not fluent in English. Specific consideration will be given to how to best communicate information to young people and those with learning disabilities.

4.12 The NIAO believes it is especially important that sufficient, timely and appropriate information is provided to enable all affected groups and individuals to consider the full implications of proposals, and it will take steps to ensure this. This will include quantitative and qualitative data that the NIAO holds or has collated, and other documents such as consultants' reports. This will apply to all consultations.

4.13 Specific training will be arranged for NIAO staff undertaking consultation exercises to ensure they have the necessary skills to communicate effectively.

4.14 Arrangements will be made to ensure full participation in any consultation meetings that are held. The NIAO will consider the time of day, the suitability of the venue, whether it can be accessed by those with disabilities, how the meeting is to be run, the use of languages other than English, whether a signer is needed and childcare arrangements.

Equality Scheme

4.15 Details of the responses submitted to the NIAO on the consultation draft of the Equality Scheme are set out in Annex 3.

Section 5: Assessing the Impact of Policies on the Promotion of Equality of Opportunity

- 5.1 The NIAO is committed to carrying out a systematic review of all its existing and proposed policies to determine whether there are any equality of opportunity implications.
- 5.2 The definition of a 'policy' within the guidance issued by the Equality Commission has a wide remit and includes policies, both written and unwritten, relating to all functions and activities. The NIAO will monitor the implementation of any policy that it operates on behalf of another public authority, and will work in partnership with other bodies where such a policy is subject to an equality impact assessment.

Screening Process

- 5.3 The NIAO will consider the impact of each current and proposed policy on equality of opportunity in terms of the nine categories listed in Section 75 of the Act (see Annex 4) to determine whether any policies should be subject to an equality impact assessment. This will involve reaching a decision on whether individual or groups of policies should be 'screened in' or 'screened out' of the process. The following criteria will be applied to policies:
- ◆ is there any evidence of higher or lower participation or uptake by different groups?
 - ◆ is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy?
 - ◆ is there an opportunity to better promote equality of opportunity or better community relations by altering the policy or working with others in government or the community at large?
 - ◆ have consultations with relevant groups, organisations or individuals within groups indicated that particular policies create problems that are specific to them?

If the answer to any of these is positive, consideration will be given to whether to subject the policies identified to the equality impact assessment procedure. Those policies which have a significant impact on equality of opportunity will be prioritised for equality impact assessment. Proposed factors for use in prioritising the policies to undergo impact assessment will include social need, effect on peoples' daily lives and effect on economic, social or human rights.

Existing Policies

- 5.4 NIAO commenced consideration of its existing policies when preparing the draft Equality Scheme. The policies reviewed, together with the results of the exercise, are set out at Annex 5. These were included in the consultation draft of the

Equality Scheme. Responses raised a number of issues, as shown in Annex 3. NIAO will further review its existing policies, in consultation with the Equality Commission and affected groups. The outcome of this review process will be formally reported to the Equality Commission and Annexes 5, 6 and 7 of the Scheme revised, as necessary. The Report to the Commission, included in the Annual Review of Progress sent to the Commission, will include details of: (1) those policies which will be subject to equality impact assessment; (2) those policies proposed by consultees as appropriate for impact assessment, but not subsequently included – giving an explanation for this course of action; (3) the factors for prioritising impact assessments; and (4) a timetable for carrying out these impact assessments.

Proposed Policies

- 5.5 Proposed policies over the life of the Scheme will be subject to screening and those identified as having significant implications for equality of opportunity will be subject to full impact assessment. The same criteria and factors outlined above will be applied.

Section 6: Conduct of Equality Impact Assessments

General

- 6.1 All equality impact assessments carried out will be conducted in accordance with the procedures set out in the Equality Commission's documents 'Guide to the Statutory Duties' and 'Practical Guidance on Equality Impact Assessments'. The impact assessment process aims to confirm whether, in respect of each relevant Section 75(1) category, the policy under consideration creates differential impacts between relevant persons or has the potential to enhance equality of opportunity between groups, in terms of outcomes. The process will contribute to recommendations on action to amend the policy either to remove such differential impact or to provide the mechanism for the enhancement of equality of opportunity. The process also aims to promote good relations.
- 6.2 In common with other aspects of the statutory equality duties, the NIAO will ensure that any equality impact assessment will be subject to effective consultation.

Monitoring Adverse Impact

- 6.3 A system will be established to monitor the impact of policies in order to identify their effects on the relevant groups. This system will involve:
- ◆ the collection and collation of existing relevant primary quantitative and qualitative data;
 - ◆ the collection and collation of existing relevant secondary sources of quantitative and qualitative data;
 - ◆ identifying where more detailed data is needed in order to have the necessary information on which to base decisions; and
 - ◆ undertaking or commissioning new data if necessary.
- 6.4 If 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, the NIAO will ensure that the policy is revised.
- 6.5 This system will be reviewed on an annual basis and the results will be published as part of the NIAO's annual Review of Progress to the Equality Commission.
- 6.6 In all cases relating to the holding of monitoring information or the collection of data, the NIAO will act sensitively in accordance with Equality Commission guidance and the wishes of representatives from Section 75 organisations.
- 6.7 The NIAO will develop an audit of monitoring information to enable it to undertake ongoing monitoring of adverse impact in the future.

Publication of Equality Impact Assessments and Monitoring

- 6.8 The NIAO will make publicly available the outcome of any equality impact assessments and of any monitoring undertaken to measure the adverse impact of policies. Arrangements will be put in place to provide, on request, impact assessments in accessible formats (eg, Braille, large print, on disk, on audio cassette and in minority languages) and in a timely manner from the contact noted in paragraph 3.2.
- 6.9 The NIAO will inform the general public about the availability of these materials by advertising in the media. It will directly inform interested organisations and groups from Annex 2 when these materials are available.
- 6.10 All published information will comply with the requirements in the Equality Commission's 'Guide to the Statutory Duties'. The NIAO will publish information on equality impact assessments that:
- ◆ includes the aims of the policy to which the assessment relates;
 - ◆ details any consideration given to mitigating adverse impact of the policy on the grounds of equality of opportunity; and
 - ◆ details any consideration given to the consideration of alternative policies which might better achieve the promotion of equality of opportunity.

Any information published will be available in a range of accessible formats in a timely way.

Policy Making and Equality Impact Assessments

- 6.11 In making any decision on a current or proposed policy, the NIAO will take into account any relevant equality impact assessment and the outcome of associated consultation.

Public Access to Information and Services

- 6.12 The NIAO is committed to ensuring that the information it disseminates is made accessible to ensure equality of opportunity. It is aware that some groups will not have the same access to information as others. These include:
- ◆ people with sensory and learning disabilities that may have difficulties with information in print; and
 - ◆ members of ethnic minority groups, whose first language is not English and who may have difficulties with information provided only in English.

Consideration will be given on how to provide accessible information in a timely manner to all groups.

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- 6.14 The NIAO will monitor its arrangements for providing information in Braille, large print, on disk, on audio cassette and in minority language formats, and make any necessary improvements to ensure better public access to information.
- 6.15 In disseminating information through the media, the NIAO will advertise in the press. This arrangement will be kept under review, in terms of promoting wide access throughout the implementation of statutory equality duties. The NIAO intends that all of its services are fully accessible to all parts of the community in Northern Ireland.
- 6.16 The NIAO will ensure that no section of the community is deterred from visiting its premises and a welcoming and harmonious environment will be maintained. The NIAO will also adhere to relevant provisions of the Disability Discrimination Act 1995.

Section 7: Training and Communication

- 7.1 The NIAO will ensure that an effective communication and training programme is developed for all staff. Targets for the implementation of the commitment to training and communication are outlined in the Equality Scheme Action Plan section of this document (Annex 7).
- 7.2 In order to share resources and expertise, the NIAO will work closely with other organisations as appropriate in the development and delivery of training.

Training

- 7.3 The NIAO will draw up a detailed training plan for all its staff over the 5 year period to which this Scheme refers which will aim to achieve the following objectives:
- ◆ to raise awareness of current anti-discrimination legislation, including the provisions of Sections 75 and 76 of the Northern Ireland Act 1998. This will include an explanation of the duties and their implications for all employees;
 - ◆ to provide those employees involved in screening of policies with the necessary skills and knowledge to do this work effectively;
 - ◆ to provide employees involved in the equality impact assessment of policies with the necessary skills and knowledge to do this work effectively;
 - ◆ to provide employees who deal with complaints in relation to the implementation of the NIAO's Scheme with the necessary skills and knowledge to investigate and monitor complaints effectively;
 - ◆ to provide employees involved in consultation processes with the necessary skills and knowledge to do this work effectively;
 - ◆ to provide employees involved in the implementation and monitoring of the effective implementation of the NIAO's Scheme to do this work effectively; and
 - ◆ to evaluate the extent to which all participants in this training programme have acquired the necessary skills and knowledge to achieve each of these objectives.
- 7.4 The extent to which training objectives have been met will be reported on as part of the annual Review of Progress sent to the Equality Commission.
- 7.5 All staff in the NIAO will receive training within one year of the Scheme's approval and training will also be included as part of the induction process for new staff. Focused training will also be provided for staff within the NIAO involved in specialised tasks such as consultation.

7.6 Training will be developed in association with the appropriate Section 75 groups.

Communication

7.7 The Comptroller and Auditor General wishes to communicate the positive commitment of the NIAO to the implementation of the statutory duties arising from Section 75 of the Northern Ireland Act 1998 (both internally and externally). The NIAO will:

- ◆ develop a summary of the Scheme and make it available to all staff;
- ◆ provide access to copies of the full Scheme for all staff;
- ◆ ensure that its commitment to the statutory duties are made clear in relevant NIAO publications; and
- ◆ ensure that any queries or questions of clarification from staff are addressed effectively.

7.8 The NIAO will keep staff informed of progress on the implementation of the Scheme on an ongoing basis.

Section 8: Implementing the Scheme

Publication of the Scheme

- 8.1 Following submission to and approval by the Equality Commission, this Scheme will be available free in print form and other accessible formats.
- 8.2 The following arrangements will be made for the publication of the Scheme and to ensure equality of access:
- ◆ the Scheme will be available, on request, in formats such as Braille, large print, on disk, on audio cassette and in minority languages to meet the needs of those not fluent in English;
 - ◆ systems will be in place to ensure that requests for the Scheme in accessible formats will be dealt with in a timely manner;
 - ◆ the NIAO will develop a plain English summary of the Scheme;
 - ◆ the NIAO will advertise in the media when the Scheme has been approved by the Equality Commission;
 - ◆ a copy of the Scheme will be posted on the NIAO's website;
 - ◆ all those consulted on the Scheme will be sent a copy of the Scheme and others will receive it on request.

Complaints

- 8.3 When a complaint is made on the grounds that the NIAO has failed to comply with the Scheme, the person to contact will be:

Title	Janet Sides, Director
Address	Northern Ireland Audit Office 106 University Street BELFAST BT7 1EU
Tel No	028 90 251118
Fax No	028 90 251051 or 028 90 251106
E Mail	janet.sides@niauditoffice.gov.uk

- 8.4 This person will carry out an internal investigation of the complaint and respond to the complainant within one month. During this process, the complainant will be kept fully informed of the procedures for dealing with the complaint under Schedule 9 of the Northern Ireland Act. The NIAO will also undertake to provide assistance to any complainant who requires information in a format that ensures

equality of opportunity. In this context, 'the complainant' may include a representative group, either on behalf of an individual or in its own right.

- 8.5 In any subsequent investigation by the Equality Commission, the NIAO will co-operate fully, providing access to any relevant documentation that may be required. Similarly, the NIAO will co-operate fully with any investigation by the Equality Commission under Schedule 9, sub-paragraph (11) (1) (b) to the Northern Ireland Act 1998.

Review of the Scheme

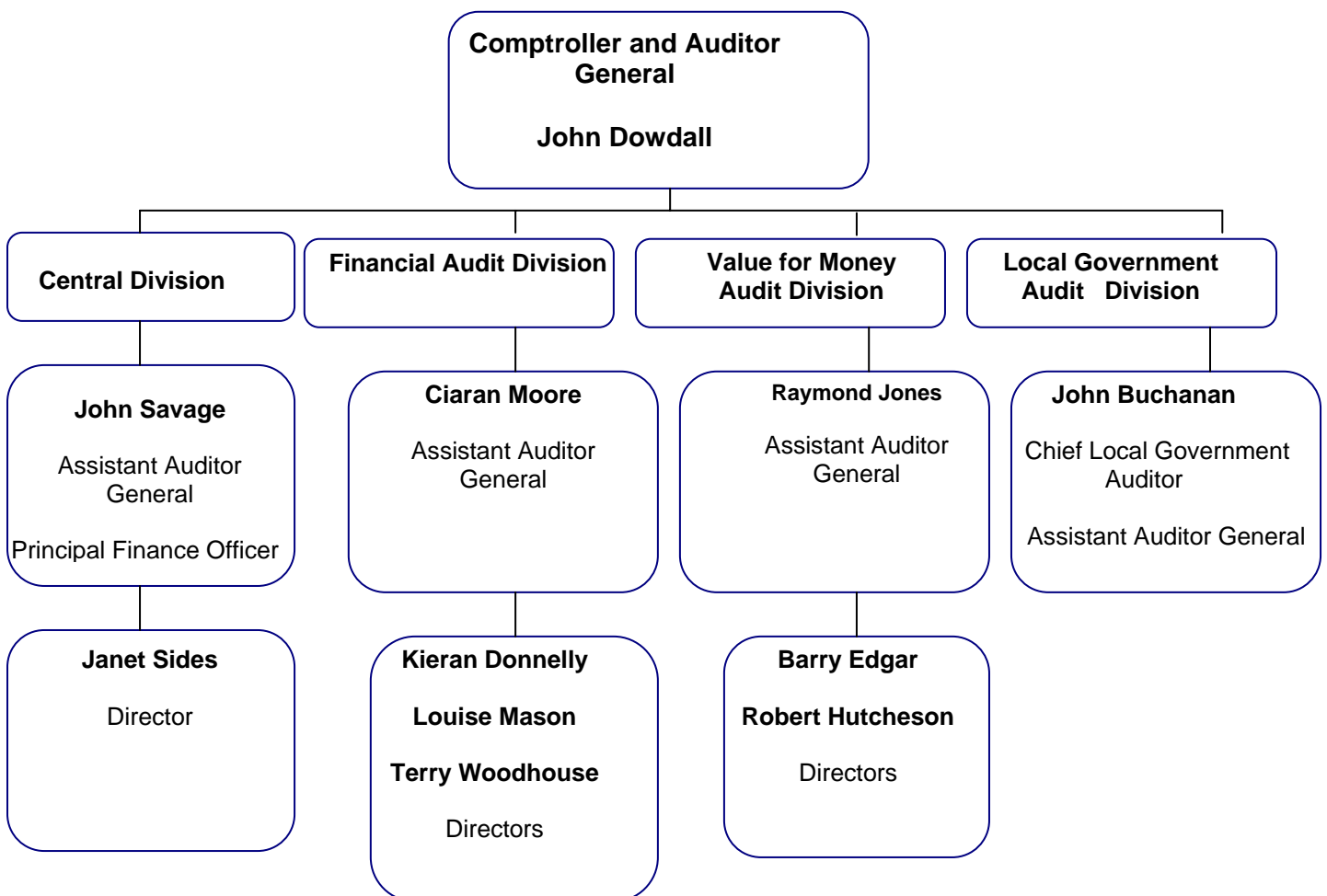
- 8.6 The NIAO will conduct a thorough review of the Scheme within five years of its original submission to the Equality Commission. This review will evaluate the effectiveness of the NIAO in meeting its Section 75 obligations and a copy will be sent to the Equality Commission and also made available to the public.

Timetable for Implementing the Scheme

- 8.7 Annex 7 outlines an Action Plan for implementing the Scheme including date milestones and performance indicators for each task.

Annex 1

NIAO Organisation Chart



Consultee Organisations

Age Concern
British Deaf Association (NI)
Carers National Association Northern Ireland
Child Care Northern Ireland
Church of Ireland
Coalition on Sexual Orientation
Committee on the Administration of Justice
Community Relations Council
Department of Agriculture and Rural Development
Department of Culture, Arts and Leisure
Department of Education
Department for Employment and Learning
Department of Enterprise, Trade and Investment
Department of the Environment
Department of Finance and Personnel
Department of Health, Social Services and Public Safety
Department for Regional Development
Department for Social Development
Disability Action
East Belfast Community Development Agency
Equality Commission for Northern Ireland
First Division Association
Gingerbread
Help the Aged
Local Government Staff Commission for Northern Ireland
MENCAP
Methodist Church
Multi-Cultural Resource Centre
Northern Ireland Committee, Irish Congress of Trade Unions
Northern Ireland Council for Ethnic Minorities
Northern Ireland Council for Voluntary Action
Northern Ireland Human Rights Commission
Northern Ireland Political Parties

Northern Ireland Womens' Aid Federation
Northern Ireland Public Service Alliance
Office of the First Minister and Deputy First Minister
Presbyterian Church in Ireland
Roman Catholic Church
Royal National Institute for the Blind (Northern Ireland)
Rural Community Network
The Blind Centre Northern Ireland
Traveller Movement Northern Ireland
West Belfast Economic Forum
Youth Council for Northern Ireland

Comments Received from Consultees and NIAO Responses

This Annex lists the main points/recommendations raised by consultees

Organisation	Summary of Comments Received	NIAO Response
NI Council for Ethnic Minorities (NICEM)	<p>1. NIAO, through its Auditing role, can play a crucial part in the promotion of equality under Section 75 of the Northern Ireland Act 1998; it can also greatly contribute to the mainstreaming of equality into the governance of Northern Ireland. Consideration should be given to tailoring the Equality Scheme to the organisation in such a way.</p>	<p>NIAO has considered the equality implications of its audit work and concluded that Section 75 of the Northern Ireland Act 1998 does not confer a new audit function on the Office nor require a change in scope of its financial and VFM audits. However, through its work the Office does examine the effect of government policies, and the bodies it examines are subject to Section 75. The NIAO will be alert to issues of equality when considering specific topics as part of its programme of work.</p> <p>As detailed in response to Point 7 below, the Office intends to engage in further consultation on its policies, which will include consideration of this issue.</p>

<p>NICEM, cont'd</p>	<ol style="list-style-type: none"> 2. The NIAO equality core value should be amended to include proactive promotion of equality, as well as the necessary commitment to being unbiased. 3. Section 3 should name the individual to be contacted. 4. NIAO should consider ways in which those directly affected by the statutory duties can assist in assessing compliance and progress made in implementing Section 75. 5. NIAO should go beyond the eight week minimum set in the Guide to the Statutory Duties for consultation, and set the standard of at least 12 weeks. 6. Issues raised on consultation, including omission of details on methods that will be used for consultation. 	<p>Noted for consideration.</p> <p>Name inserted.</p> <p>Noted. NIAO will discuss with Equality Commission and consultees.</p> <p>The eight week minimum period has been retained but, for each consultation exercise, consideration will be given to the adequacy of this. It will be extended if necessary.</p> <p>The Scheme states that NIAO will work with representative groups and individuals in order to identify the most appropriate way to obtain their views. Paragraph 4.9 has been expanded to include examples of ways in which the Office will consult with different groups.</p>
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<p>NICEM cont'd</p>	<p>7. Issues raised on NIAO's screening process, including absence of information on data used to screen policies, the thoroughness of the screening process and the screening out of all policies. NICEM stated those policies it considered should be subject to an Equality Impact Assessment (EQIA).</p> <p>8. Consideration should be given to how to best communicate with different Section 75 groups, in particular moving beyond the mainstream press to alternative methods such as advertising in voluntary sector publications.</p> <p>9. The Equality Scheme should state that the NIAO will provide interpreters and translated information, to enable access to services, and to consider outreach measures to raise awareness of the role and functions of the NIAO amongst black and minority ethnic communities.</p> <p>10. It is good practice to involve affected groups in the design and delivery of training under Section 75.</p> <p>11. NIAO should indicate that it is willing to accept complaints from a representative group, either on behalf of an individual or in its own right.</p>	<p>NIAO has revised Section 5 of the Draft Equality Scheme to provide clarity on the screening process. The Office plans to engage further with consultees on its policies to determine whether any should be subject to an equality impact assessment. A detailed report on the outcome of this exercise will be included in the Annual Review of Progress submitted to the Equality Commission.</p> <p>To be considered in consultation with the Equality Commission and consultees.</p> <p>A new paragraph (4.14) has been inserted. NIAO will consider outreach measures, in consultation with the Equality Commission and consultees.</p> <p>Agreed. A new paragraph has been inserted (7.6).</p> <p>Agreed. Paragraph 8.4 amended.</p>
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<p>NICEM cont'd</p>	<p>12. 'Refugees and Asylum Seekers' should be specified as sub-categories of 'race' within Annex 4.</p> <p>13. The definition used for policies in the Guide to the Statutory Duties, particularly with reference to informal or unwritten policies, should be considered.</p>	<p>Annex 4 has been revised to align with an appendix contained in the Equality Commission's Guide on Equality Impact Assessment. It is not intended to be exhaustive or definitive.</p> <p>Paragraph 5.2 amended to include 'written and unwritten' policies.</p>
<p>Disability Action</p>	<p>14. A named individual contact point should be provided at Paragraphs 3.2 and 8.3.</p> <p>15. Contact details should include a textphone number to enable deaf people the same access as those with hearing.</p> <p>16. A detailed outline of how objectives and targets to be incorporated into corporate and operational plans relating to the Statutory Duties will be accomplished, providing expected outcomes and a timeframe, should be included in the revised Equality Scheme to enable informed comment to be made.</p>	<p>Name inserted.</p> <p>This facility was provided for consultation on the draft Equality Scheme. Consideration will be given to its further use, particularly in future consultations.</p> <p>NIAO is satisfied with the level of detail provided in the main text of the Scheme. Annex 7 provides an Action Plan for implementing the Scheme.</p>

<p>Disability Action, cont'd</p>	<p>17. Concerns raised over the comprehensiveness of the list of consultees and the adequacy of inviting organisations to contact NIAO if they wished to be added to the list. The revised Equality Scheme requires information as to what outreach programme the NIAO has in place to contact the affected groups not listed in Annex 2.</p> <p>18. Issues were raised in relation to the screening process, including whether all functions/policies had been included in the screening process. It was recommended that certain policies should be included for full Equality Impact Assessment.</p> <p>19. More detailed information on training should be provided in the Scheme, for instance how the NIAO will train its staff on equality issues and in awareness of the issues specific to each of the 9 categories listed under Section 75.</p>	<p>NIAO gave careful consideration to the composition of the list at Annex 2 to ensure that any organisation or group with a legitimate, particular interest in its work and/or the likely impact of its policies on the promotion of equality of opportunity and good relations would be included in the process of engagement. As stated in the Scheme, the list is not exhaustive and other consultee groups will be included on request. As noted in response to Point 9 above, NIAO intends to discuss outreach with the Equality Commission and consultees.</p> <p>See response to Point 7.</p> <p>NIAO will ensure that an effective communication and training programme is developed for all staff. Paragraph 7.6 has been added to state that training will be developed in association with appropriate Section 75 groups.</p>
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Disability Action, cont'd	20. General comments provided on the monitoring of adverse impact (Paragraph 6.4) and the operation of the complaints procedure (Paragraph 8.4).	Noted.
Northern Ireland Public Service Alliance Branch 75 (NIAO Branch)	<p>21. In relation to Section 3 of the Scheme, NIPSA should be kept informed of progress on meeting objectives and copied reports submitted to SMG.</p> <p>22. The Scheme should clearly state the Office's commitment to communication and consultation with Trade Union Side (TUS) with respect to NIAO's Equality Scheme, EQIAs and monitoring arrangements.</p> <p>23. NIPSA should be kept informed of arrangements for assessing compliance with Section 75 duties.</p> <p>24. Recommendations made regarding policies for screening.</p>	<p>Accepted. The Office is committed to keeping all staff informed of progress on the implementation of the Scheme and has inserted a paragraph to this effect (7.8).</p> <p>NIAO confirms that it will communicate and consult fully with TUS. It is content that the wording in the Scheme is comprehensive and does not require further adjustment, other than an insertion (Paragraph 4.5) to clarify that NIAO will consult with Trade Union and other bodies.</p> <p>Agreed.</p> <p>See response to Point 7.</p>

Irish Congress of Trade Unions	<p>25. Clarity requested on timescale for consultation.</p> <p>26. Consultation methods used should be expanded in the text of NIAO's Scheme.</p> <p>27. Within its 'policy' definition, NIAO should highlight the inclusion of written <i>and</i> unwritten policies.</p> <p>28. Issues raised on screening.</p> <p>29. 'Mixed ethnic group and others' should be included as a main group under the 'Racial Group' category in Annex 4.</p>	<p>In each consultation exercise, all consultees will be required to respond within the same time period. This will be extended beyond the minimum 8 weeks where justified. See response to Point 5.</p> <p>See response to Point 6.</p> <p>See response to Point 13.</p> <p>See response to Point 7.</p> <p>See response to Point 12.</p>
NIAO Staff	30. Presentational issue raised on the matrix at Annex 5.	Considered and adjusted.
Rural Community Network (NI)	<p>31. The Scheme should be responsive to the rural community needs.</p> <p>32. General comments on consultation, encouraging a participative and inclusive approach.</p>	<p>Noted.</p> <p>Noted.</p>

<p>West Belfast Economic Forum</p>	<p>West Belfast Economic Forum provided a wide range of comments for consideration to secure equality of opportunity and to encourage good community relations. Many were of a general nature and not specific to NIAO's Scheme. Main points included:</p> <p>33. the Equality Scheme should be made available in Irish as well as English. Relevant consultation documentation and information needs to be made available to the Irish speaking community.</p> <p>34. points raised on consultation, including that voluntary and community sector representatives should be appropriately involved at all stages of the consultation process as active participants.</p> <p>35. procurement issues were highlighted.</p> <p>36. Equality Impact Assessments and monitoring results should be published in newspapers and magazines targeting the named categories.</p> <p>37. Equality training for staff should include input from trainers representing the named categories in Section 75 of the Northern Ireland Act.</p>	<p>Comments noted.</p> <p>See responses to Points on consultation above.</p> <p>Procurement policy is subject to screening. See response to Point 7.</p> <p>NIAO will consider, in consultation. See response to Point 8.</p> <p>Accepted and incorporated in Section 7.</p>
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Annex 4

Examples of Groups by Equality Categories

Category	Main Groups
<i>Religious belief</i>	Protestant; Catholic; Hindu; Jewish; Islam/Muslim; Sikh; Buddhist; other religion; people of no religious belief.
<i>Political opinion</i>	Unionists generally; Nationalists generally; members/supporters of any political party; other.
<i>Racial group</i>	Chinese; Irish Traveller; Indian; Pakistani; Bangladeshi; Black African; Black Caribbean; White; mixed ethnic group; any other ethnic group; nationality.
<i>Men and women generally</i>	Men (including boys); women (including girls), transgendered people, transsexual people.
<i>Marital status</i>	Married people; unmarried people; divorced or separated people; widowed people.
<i>Age</i>	For most purposes, the main categories are: those under 18; people aged between 18 and 65; and people over 65. However, the definition of age groups will need to be sensitive to the policy under consideration.
<i>Persons with a disability</i>	Persons with a disability as defined in Sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995.
<i>Persons with dependants</i>	Persons with primary responsibility for the care of a child; persons with personal responsibility for the care of a person with a disability; persons with primary responsibility for the care of a dependant elderly person.
<i>Sexual orientation</i>	Gay, lesbian, bisexual; heterosexual.

Source: Section 75 of the Northern Ireland Act 1998: Practical Guidance on Equality Impact Assessment - Equality Commission for Northern Ireland

Results of the Policy Screening Exercise

The screening process had not been completed prior to the submission of the Scheme to the Equality Commission.

This Annex sets out the results of the screening exercise NIAO undertook when preparing the draft Equality Scheme. These were included in the consultation draft of the Scheme. As noted in paragraph 5.4, NIAO will be liaising further with the Equality Commission and affected groups on its policies and will formally report the outcome of the review process.

Policies 'Screened In' for Equality Impact Assessment

No policies screened in.

Policies 'Screened Out'

Functional Responsibility:

Financial Audit

- (1) **Audit of Financial Statements of Public Sector Bodies** – the aim of the policy is to provide reasonable assurance that the financial statements of central government bodies give a true and fair view, or that the Statement of Accounts of a District Council presents fairly the financial position and transactions; have been properly prepared in accordance with relevant accounting and other requirements and are in accordance with the authorities which govern them. It also aims to provide audited bodies with constructive advice that will help them improve their corporate governance, financial management, control and reporting.
- (2) **Contracting out of Financial Audit Work** – this policy aims to maintain flexibility in resourcing audits, gaining experience of private sector methods and monitoring the price competitiveness of NIAO work.
- (3) **Risk (Investigative) and Inspection Audit** – this policy aims to identify, assess and examine risks to regularity, propriety and financial control in central government bodies and to report on significant weaknesses to the Assembly/Parliament. It also aims to provide audited bodies with constructive advice that will help them improve their corporate governance, financial management, control and reporting.

Value for Money Audit

- (4) **Value for Money Audit** – audit activities are aimed at providing the Assembly / Parliament / the Department of the Environment (regarding local government studies) with independent information, assurance and advice about the economy, efficiency and effectiveness with which a Department or public body has used its resources.
- (5) **Use of Advisors, Reference Partners, VFM Panel** – this policy aims to enhance the quality of audit and reporting by taking advice from experts on NIAO’s audit approach and the material included in published reports.
- (6) **Use of Consultants** – the aim of this policy is to provide additional staff resources or expertise to carry out, or assist with, a Value for Money study.
- (7) **Handling Correspondence and Enquiries from MLAs, other Elected Representatives and Members of the Public** – this policy aims to assess the implications of information provided and to determine the audit response.

Human Resources

- (8) **NIAO Recruitment and Promotion** – this policy aims to appoint people with the required skills, aptitudes, qualifications and potential to fill vacancies in accordance with business needs either by way of recruitment or internal promotion in accordance with relevant legislation (including equality legislation) and best practice (including the merit principle).
- (9) **NIAO Terms and Conditions of Employment** – this policy aims to establish and communicate the terms and conditions which apply to the contracts of employment between NIAO and its staff and to ensure that NIAO complies with all statutory requirements in relation to employment law.
- (10) **Training and Development of NIAO Staff** – the aim of this policy is to develop staff to their maximum potential.

Procurement

- (11) **NIAO Procurement** – the acquisition of goods and services and works in the most cost effective manner, consistent with legal requirements and quality of product.

In relation to the screening of policies (1) to (7) and (10), the answer was negative to the four criteria set out on page 15, paragraph 5.3. For policies

(8), (9) and (11), the answers to one or more of the criteria were positive, but it was concluded that any identified impact was not likely to be significant. The results of the screening of policies (8), (9) and (11) are detailed more fully on page 39.

Matrix showing the results from Policy areas screened to establish any requirement for Equality Impact Assessment

Screening Criteria:

- (i) Is there any evidence of higher or lower participation or uptake by different groups within any of the nine categories specified in Section 75 of the Northern Ireland Act 1998?
- (ii) Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy or policy area?
- (iii) Is there an opportunity to better promote equality of opportunity or good relations by altering the policy or working with others in Government or the community at large?
- (iv) Have consultations in the past with relevant groups, organisations or individuals within groups indicated that particular policies create problems that are specific to them?

Categories: 1=Religious Belief 2=Political Opinion 3=Racial Group 4=Age 5=Marital Status 6=Sexual Orientation 7=Gender 8=Disability 9=Dependants

Policies	Criteria				Category									Is any identified impact likely to be significant?	
	(i)	(ii)	(iii)	(iv)	1	2	3	4	5	6	7	8	9		
NIAO Recruitment and Promotion	No	Yes	Yes	No	No Yes - No	No No - No	No Yes - No	No No - No	No No - No	No No - No	No No - No	No No - No	No Yes - No	No Yes - No	No
NIAO Terms and Conditions of Employment of Staff	No	Yes	Yes	No	No Yes - No	No No - No	No No - No	No No - No	No No - No	No No - No	No No - No	No No - No	No Yes - No	No Yes - No	No
NIAO Procurement	No	Yes	No	No	No No - No	No No - No	No Yes - No	No No - No	No No - No	No No - No	No No - No	No No - No	No Yes - No	No No - No	No

**Proposed Equality Impact Assessment
Timetable**

Details will be inserted when the review of policies has been completed (see paragraph 5.4).

Action Plan for Implementing NIAO's Equality Scheme

(subject to change)

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Organisational Arrangements	<ul style="list-style-type: none"> • Integration of equality objectives into NIAO's corporate and strategic plans • Integration of equality objectives into staff objective setting process • Commitment to statutory duties to be included in job descriptions. 	<ul style="list-style-type: none"> • Senior Management Group (SMG) agrees equality objectives • Objectives included in staff objective setting process • Amended job descriptions 	<ul style="list-style-type: none"> • annually • ongoing • during 2003-04 	Central Division Directorate

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
<i>Progress Reporting</i>	<ul style="list-style-type: none"> • Regular reports to NIAO's SMG • Review of Progress on the Scheme • Review of the entire Equality Scheme 	<ul style="list-style-type: none"> • Key points from reports disseminated to staff via an established cascading process • Review of Progress submitted to the Equality Commission and details incorporated, as appropriate, into the NIAO's Corporate Plan • Conduct a Review, to be published and forwarded to the Equality Commission 	<ul style="list-style-type: none"> • ongoing • annually • within 5 years of the Scheme's approval 	Central Division - Directorate
<i>Consultation</i>	<ul style="list-style-type: none"> • Results of Consultation on the Screening Exercise, including decisions regarding Equality Impact Assessments • Consultation on Equality Impact Assessments 	<ul style="list-style-type: none"> • Results incorporated in the Annual Review of Progress sent to the Equality Commission • In accordance with the Equality Impact Assessment Timetable 	<ul style="list-style-type: none"> • 2004 	Central Division Directorate

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Training	<ul style="list-style-type: none"> • Training provision • Awareness training • Specialised training 	<ul style="list-style-type: none"> • Training provision to be agreed by SMG • For all staff by mid-2004 • All new staff to receive equality awareness training within 1 year of joining • Continuing specialised training for key staff, eg on conducting equality impact assessments 	<ul style="list-style-type: none"> • ongoing • 06/04 • ongoing • ongoing 	Central Division Directorate
Equality Impact Assessments (EQIAs)	<ul style="list-style-type: none"> • Carrying out EQIAs 	<ul style="list-style-type: none"> • SMG agrees plan for EQIAs as required • Begin EQIAs 	<ul style="list-style-type: none"> • On completion of review of policies • Following agreement 	Central Division Directorate

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Communication	<ul style="list-style-type: none"> • Publication of Equality Scheme • Dissemination to key stakeholders 	<ul style="list-style-type: none"> • Scheme to be published after approval from the Equality Commission • Summary of Scheme to be developed and made available • Scheme to be made available in accessible formats on request • Scheme to be published on NIAO's website • Copy of Scheme to be made available to all staff • Copy of Scheme to be sent to all those consulted on the Scheme, and to others on request • Press Release and advertising in the media to publicise the publication of the approved Scheme 	<ul style="list-style-type: none"> • Within one month of approval of Scheme • Within one month of approval of Scheme 	Central Directorate Division
Access	<ul style="list-style-type: none"> • Review of Access to Information and Services 	<ul style="list-style-type: none"> • To monitor arrangements for providing information in alternative formats and make any necessary improvements to ensure better public access to information. 	<ul style="list-style-type: none"> • ongoing 	Central Directorate Division
Complaints	<ul style="list-style-type: none"> • Complaints procedure 	<ul style="list-style-type: none"> • To respond to any complaints of non-compliance within one month of the complaint being made • To report on complaints made on an annual basis to the Equality Commission as part of an annual Review of Progress by NIAO 	<ul style="list-style-type: none"> • ongoing • annually 	Central Directorate Division