



# Belfast Harbour

## EQUALITY SCHEME FOR BELFAST HARBOUR COMMISSIONERS

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

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- Paper Copy
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# EQUALITY SCHEME FOR BELFAST HARBOUR COMMISSIONERS

## Foreword

We are honoured to present the new Equality Scheme of Belfast Harbour Commissioners (BHC), which sets out how we intend to fulfil our statutory duties under Section 75 of the Northern Ireland Act 1998.

Section 75 mandates public authorities and other named bodies to consider the implications of their actions in promoting equality of opportunity and good relations across various categories stipulated in the Act. We take these duties seriously and have, therefore, dedicated the necessary resources, including personnel, time, and finances, to ensure our complete compliance with Section 75 statutory duties and the effective implementation of our equality scheme.

In addition to dedicating resources, we are committed to establishing robust internal structures to ensure our adherence to the Section 75 statutory duties and to assess our progress. As part of this commitment, we will develop and implement comprehensive communication and training programmes to ensure that all our staff and board members are fully aware of our equality scheme and its responsibilities and obligations. Furthermore, we will create an awareness-raising programme for our consultees on the Section 75 statutory duties and our commitments within our equality scheme.

The Chair and Chief Executive of Belfast Harbour Commissioners wholeheartedly support the effective fulfilment of our Section 75 statutory duties across all our functions, including service provision, employment, and procurement, through the diligent implementation of our equality scheme.

We acknowledge the pivotal role that the community, voluntary sector, and the general public play in ensuring the effective implementation of the Section 75 statutory duties. Our equality scheme underscores our determination to provide opportunities for those impacted by our work to positively influence how we carry out our functions in alignment with our Section 75 statutory duties (see Section 1.1 of our Equality Scheme). The scheme also provides a mechanism for individuals directly affected by what they perceive as a failure on our part to comply with our equality scheme to lodge complaints.

In conclusion, on behalf of the Belfast Harbour Commissioners and our staff, we are proud to support and endorse this equality scheme, developed in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998 and the guidelines of the Equality Commission.

Together, we can work towards a more inclusive and equal society for all.

**Chair**



**Dr. Theresa Donaldson**

**Chief Executive**



**Joe O'Neill**

Section 75 of the Northern Ireland Act 1998 (the Act) requires Belfast Harbour Commissioners to comply with two statutory duties:

### **Section 75 (1)**

In carrying out our functions relating to Northern Ireland we are required to have due regard to the need to promote equality of opportunity between:

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

### **Section 75 (2)**

In addition, without prejudice to the obligations above, in carrying out our functions in relation to Northern Ireland we are required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

“Functions” include the “powers and duties” of a public authority. This includes our employment and procurement functions. Please see below under section 1.2 for a detailed explanation of our functions.

## **1.1 How we propose to fulfil the Section 75 duties**

Schedule 9 4. (1) of the Act requires Belfast Harbour Commissioners as a designated public authority to set out in an equality scheme how it proposes to fulfil the duties imposed by Section 75 in relation to its relevant functions. This equality scheme is intended to fulfil that statutory requirement. It is both a statement of our arrangements for fulfilling the Section 75 statutory duties and our plan for their implementation.

Belfast Harbour Commissioners are committed to the discharge of our Section 75 obligations in all parts of our organisation, and we will commit the necessary resources in terms of people, time, and money to ensure that the Section 75 statutory duties are complied with and that our equality scheme can be implemented effectively.

## **1.2 Belfast Harbour Commissioners Functions**

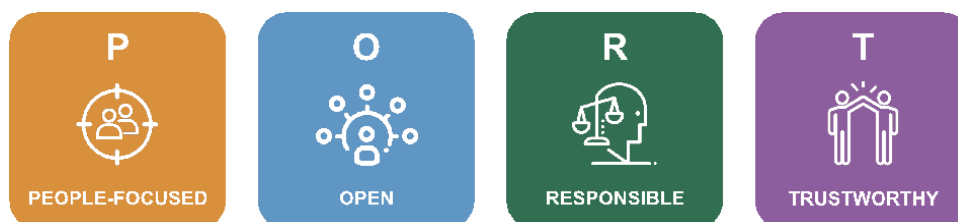
Belfast Harbour is a Trust Port; as such its operational remit is governed by Statute and it operates on a commercial basis. BHC’s purpose outlined in its Corporate Plan [www.belfastharbour.co.uk](http://www.belfastharbour.co.uk) is to support and develop the regional economy by the operation of the Port, growth of Port capacity and development of the Harbour Estate.

As outlined in the Corporate Plan, our Vision is to be a world-class Port offering leading-edge marine and estate facilities, thereby enabling the economic development of Northern Ireland.

We recognise that the values held by the organisation guide the decision-making process at all levels. The values stated below, therefore, are employed to validate behaviours and decisions throughout the business.

Strategic Themes	
<b>A World Leading Regional Port</b>	A best-in-class and customer-focused Port, with modern and resilient infrastructure and an exemplary Health & Safety offering at its core.
<b>Green Port</b>	Sustainability and decarbonisation that underpins the World's Best Regional Port and an Iconic Waterfront for the City.
<b>A Key Economic Hub</b>	An engine for economic growth for the region, leveraging the Trust Port model, creating jobs and talent pipelines, underpinning the Port, Property, and industrial asset base.
<b>A Smart Port</b>	Addressing the innovation and digital aspects that underpin the World's Best Regional Port and an Iconic Waterfront for the City.
<b>Iconic Waterfront</b>	Transforming the infrastructure and landscape of Belfast's waterfront through integrated Placemaking, community and civic engagement.

Our values are the heart of Belfast Harbour's Culture:



**People Focused** – We put our people at the centre of our business and work collaboratively to achieve the best outcome for all. We provide an inclusive workplace where all can achieve their full potential.

**Open** – We are innovative in our approach and open to new or better ways of doing things. As an agile business, we adapt and react quickly when required.

**Responsible** – We put the safety and well-being of our employees and customers above everything else. As a Green Port, we are committed to environmentally friendly and sustainable practices.

**Trustworthy** – As a Trust Port we always act in the best interest of our customers and stakeholders. We act with integrity and do the right thing. We respect our partners, building trust with our stakeholders.

Our functions are as follows:

- Commercial
- Business Development
- Port Engineering
- Property and Place
  - Estate Tenants

- Property development
- City Quays
- Urban Regeneration
- Marketing
- Operations Engineering
- Harbour Master's Dept
- Harbour Police
- Support Services
- Infrastructure and Sustainability
- Port Health & Safety
- Compliance
- People Team
- Finance
- Financial Management
- Corporate Services

**Procurement-** BHC has undertaken an EQIA of its procurement policy and carries out its procurement activities in accordance with the good practice in procurement recommended by the Equality Commission and the CPD.

**Staff-** On 1<sup>st</sup> August 2023, BHC employed a total of 196 people. BHC is committed to honouring its equality obligations across all aspects of its employment functions.

An organisational chart is included in Appendix 1.

## Chapter 2 Assessing Compliance with Section 75 Duties

Some of our arrangements for assessing our compliance with the Section 75 statutory duties are outlined in other relevant parts of this equality scheme, for example, monitoring arrangements (Section 4), assessment of impact of policies arrangements (Section 4), consultation (Section 3), publication (Section 4), complaints (Section 8).

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

### 2.1 Responsibilities and Reporting

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

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

If you have any questions or comments regarding our equality scheme, please contact our People Team in the first instance, at the address given on page 2.

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

Employees' job descriptions and performance plans reflect their contributions to the Section 75 statutory duties and implementation of the equality scheme, where relevant.

The personal performance plans are subject to appraisal in the annual performance review.

BHC prepares an annual report on the progress we have made on implementing the arrangements set out in this equality scheme to discharge our Section 75 statutory duties (read our Annual Equality Progress Reports).

BHC's Section 75 Annual Progress Report will be sent to the Equality Commission by 31 August each year and will follow any guidance on annual reporting issued by the Equality Commission.

Progress on the delivery of Section 75 statutory duties will also be included in our (organisational) annual report. The latest Section 75 annual progress report is available on our website see link below or by contacting us. [www.belfast-harbour.co.uk](http://www.belfast-harbour.co.uk)

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: [peopleteam@belfast-harbour.co.uk](mailto:peopleteam@belfast-harbour.co.uk)

BHC liaises closely with the Equality Commission to ensure that progress on the implementation of our equality scheme is maintained.

Due to the nature of BHC's business model, there are limitations in terms of how the organisation can enhance the promotion of equality and good relations. However, notwithstanding the nature of the functions undertaken by BHC, equality and good relations obligations are mainstreamed across the organisation through the implementation of the corporate values and objectives. Through the development and implementation of the Corporate Social Responsibility Strategy BHC has taken a proactive and innovative approach

to promoting equality and good relations in their internal and external functions. BHC has integrated the promotion of Statutory Duties into their arrangements for Governance and the Commissioners have a strategic role in monitoring the performance of the organisation in this regard.

All Directors and senior managers have been trained in Section 75 and are responsible for ensuring that the Section 75 statutory duties are taken fully into account in developing, reviewing, and implementing policy decisions across their business remit.

Day-to-day responsibility for overseeing the Equality Agenda and monitoring compliance across BHC lies with the People Team Function.

## **2.2 Action Plan Measures**

BHC has developed an action plan to promote equality of opportunity and good relations. This action plan is set out in the appendices of this equality scheme.

The action measures that make up our action plan are relevant to our functions. They have been developed and prioritised on the basis of the audit of inequalities. The audit of inequalities collates and analyses information across the Section 75 categories to identify the inequalities that exist for our service users and those affected by our policies.

Action measures will be specific, measurable, linked to achievable outcomes, realistic and time-bound. Action measures will include performance indicators and timescales for their achievement.

We will develop any action plans for a period of between one and five years in order to align them with our corporate and business planning cycles. Implementation of the action measures will be incorporated into our business planning process.

We will seek input from our stakeholders and consult on our action plan before we send it to the Equality Commission and thereafter when reviewing the plan as per below.

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

BHC will inform the Commission of any changes or amendments to our action plan and will also include this information in our Section 75 annual progress report to the Commission.

Once finalised, our action plan will be available: On the BHC website, <https://www.belfast-harbour.co.uk> or by contacting us:

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: [peopleteam@belfast-harbour.co.uk](mailto:peopleteam@belfast-harbour.co.uk)

We will also bring it to the attention of all our consultees.

Our progress on our Audit of Inequalities Action Plan targets will be reported in our Section 75 Annual Progress Report to the Equality Commission.



## Chapter 3 Consultation

We recognise the importance of consultation in all aspects of the implementation of our statutory equality duties. We will consult on our equality scheme, action measures, equality impact assessments and other matters relevant to the Section 75 statutory duties. We will also consult on our Audit of Inequalities and its accompanying Action Plan.

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

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

BHC will monitor its approach to consultation, to ensure that it is open and encourages participation; and that it continues to reach out to representative groups and to those individuals directly affected by the matter/policy.

Initially, consultees (see Appendix 3), will as a matter of course, be notified (by email or post) of the matter/policy being consulted upon to ensure they are aware of up-and-coming consultations. However, we realise that many of our consultees may / may not wish to be contacted about all of BHC's upcoming consultation exercises. Thereafter, to ensure the most effective use of our and our consultee's resources, we will take a targeted approach to consultation for those consultees that may have a particular interest in the matter/policy being consulted upon and to whom the matter/policy is of particular relevance. This may include for example regional or local consultations, sectoral or thematic consultations etc.

Consultation with all stakeholders will begin as early as possible. We will engage with affected individuals and representative groups to identify how best to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will consider these. Methods of consultation could include:

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

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

We will consider the accessibility and format of every method of consultation we use to remove barriers to the consultation process. Specific consideration will be given as to how best to communicate with children and young people, people with disabilities (in particular people with learning disabilities) and minority ethnic communities.

BHC is committed to achieving effective communication with its customers and with the public. We will ensure that we provide a wide range of accessible communication channels to

suit the needs of our customers, and we will also take action to promote the availability of our accessible services too. Where it is requested, we will make our information services accessible through a range of different formats where it is required and will seek feedback from our customers and as appropriate, review and enhance our service provision. Particular care will be taken to ensure that we take account of the specific communication needs of people with disabilities, older people, and children and young people.

Information will be made available, in a timely fashion, (normally within 28 days) and in accessible formats in consultation with the affected groups.

Training will be given to staff engaged in consultation exercises to ensure they have the necessary skills to communicate effectively with those being consulted.

To ensure effective consultation with consultees on Section 75 matters, we will develop a programme of awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by undertaking the following:

- Meeting on a face-to-face or telephone basis with consultees
- Attending events organised by consultees to respond to section 75 matters
- Facilitating any requests received for meetings

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

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

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

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

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

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

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

A list of our consultees is included in this equality scheme at Appendix 3. It can also be obtained by contacting:

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: [peopleteam@belfast-harbour.co.uk](mailto:peopleteam@belfast-harbour.co.uk)

Our consultation list is not exhaustive and is reviewed on an annual basis to ensure it remains relevant to our functions and policies. We welcome enquiries from any person/s or organisations wishing to be added to the list of consultees.

Please contact [peopleteam@belfast-harbour.co.uk](mailto:peopleteam@belfast-harbour.co.uk) to provide your contact details and have your areas of interest noted or have your name/details removed or amended. Please also inform us at this stage if you would like information sent to you in a particular format or language.

## Chapter 4 Assessing, Monitoring and Publishing the Impact of Policies

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

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

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

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

### 4.1 Screening

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

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

The lead role in the screening of a policy is taken by the policy decision maker who has the authority to make changes to that policy. However, screening will also involve other relevant team members, for example, equality specialists, those who implement the policy and staff members from other relevant work areas. Where possible we will include key stakeholders in the screening process.

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

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

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

Completion of screening, taking into account our consideration of the answers to all four screening questions set out in 4.1 above, will lead to one of the following three outcomes:

- 1) the policy has been 'screened in' for equality impact assessment
- 2) the policy has been 'screened out' with mitigation or an alternative policy proposed to be adopted
- 3) the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

If our screening concludes that the likely impact of a policy is 'minor' in respect of one, or more, of the equality of opportunity and/or good relations categories, we may on occasion decide to proceed with an equality impact assessment, depending on the policy. If an EQIA is not to be conducted, we will nonetheless consider measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations. Where we mitigate, we will outline in our screening template the reasons to support this decision together with the proposed changes, amendments, or alternative policy. This screening decision will be 'signed off' by the appropriate policy lead within BHC.

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

If our screening concludes that the likely impact of a policy is 'none', in respect of all the equality of opportunity and/or good relations categories, we may decide to screen the policy out.

If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, we will give details of the reasons for the decision taken. This screening decision will be 'signed off' by the appropriate policy lead within BHC.

As soon as possible following the completion of the screening process, the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on request by contacting:

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: [peopleteam@belfast-harbour.co.uk](mailto:peopleteam@belfast-harbour.co.uk)

If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, we will review the screening decision. Our screening reports are published quarterly.

## **4.2 Equality Impact Assessment**

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

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

Any equality impact assessment will be subject to consultation at the appropriate stage(s). (For details see Section 3 above).

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

### **4.3 What We Publish**

These are published quarterly on the BHC website. Our screening reports will include:

- Details of policies screened by BHC over the three-month period
- A short statement about the aim(s) of each of the specific policy/policies which have been screened
- Details of the consideration given to measures which might mitigate any adverse impact
- Details of the consideration given to alternative policies which might better achieve the promotion of equality of opportunity;
- Details about each screening assessment made, i.e.:
  - whether the policy has been 'screened in' for equality impact assessment
  - whether the policy has been 'screened out' with mitigation or an alternative policy proposed to be adopted
  - whether the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.
- Where applicable, a timetable for conducting equality impact assessments
- A weblink to each of the completed screening form(s).

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

- A statement of the aim of the policy assessed
- Information and data collected
- Details of the assessment of impact(s)
- Consideration given to measures which might mitigate any adverse impact
- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity
- Consultation responses
- The decision taken
- Future monitoring plans

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

The results of our assessments (screening reports and completed templates, the results of equality impact assessments) are available by contacting:

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: [peopleteam@belfast-harbour.co.uk](mailto:peopleteam@belfast-harbour.co.uk)

In addition to the above, our screening reports (which set out details about the policies we have screened over a 3-month period) are sent out by email link to our consultees on a quarterly basis. Hard copies of our screening reports can also be made available, on request.

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

### **4.4 Arrangements for Monitoring Adverse Impact of Policies**

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

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

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

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

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

We review our EQIA monitoring information on an annual basis.

- Human Resources staff and where necessary external specialist assistance are used to provide guidance to business areas on the completion of equality impact assessments and arrangements to undertake appropriate equality monitoring;
- Our Section 75 Annual Progress Report to the Equality Commission includes an update on the equality monitoring actions we have undertaken and the outcomes from these actions;
- Section 75 complaints are regularly monitored to ensure satisfaction with services is maintained and that any issues raised by stakeholders are addressed promptly and satisfactorily.

## **4.5 Publishing the Monitoring Results**

Schedule 9 4. requires us to publish the results of the monitoring of adverse impacts of policies we have adopted. However, we are committed to monitoring more broadly and the results of our policy monitoring are published as follows:

- EQIA monitoring information is published as part of our Section 75 annual progress report.
- Our consultees will be advised by email when our Annual Progress report is published. Hard copies can be made available on request.
- All information published is accessible and can be made available in alternative formats on request.

## **Chapter 5 Staff Training**

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

Our Chief Executive wishes to positively communicate the commitment of the BHC to the Section 75 statutory duties, both internally and externally. To this end, we have introduced an effective communication and training programme for all staff and will ensure that our commitment to the Section 75 statutory duties is made clear in all relevant publications.

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

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

### **5.1 Training Arrangements**

The following arrangements are in place to ensure all our staff and the Commissioners are aware of and understand our equality obligations.

- We will develop a summary of this equality scheme and make it available to all staff.
- We will provide access to copies of the full equality scheme for all staff; and ensure that any queries or questions of clarification from staff are addressed effectively.
- Staff in BHC will receive a briefing on this equality scheme within three months after the approval of the Scheme.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within the BHC who are directly engaged in taking forward the implementation of our equality scheme commitments (for example those involved in research and data collection, policy development, service design, conducting equality impact assessments, consultation, monitoring, and evaluation).
- Where appropriate, training will be provided to ensure staff are aware of the issues experienced by the range of Section 75 groups.
- When appropriate and on an ongoing basis, arrangements will be made to ensure staff are kept up to date with Section 75 developments.
- Management has received training on Diversity Awareness.
- The frontline employees and BHC Police have received training on Disability Equality. The training on Disability Equality has also been provided for contractors used by BHC. The further roll-out of this training is also planned.



- Dignity at work and Diversity Awareness training have been provided for the BHC Police.
- All managers in BHC have been briefed on the New Guidance in relation to Section 75 of the Northern Ireland Act and information is to be provided for the Commissioners at appropriate intervals.
- Management has been briefed on the new arrangements in relation to screening.

To share resources and expertise, BHC will, where possible, work closely with other bodies and agencies in the development and delivery of training.

## **5.2 Monitoring and Evaluation**

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

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

The following arrangements are in place to ensure all our staff and the Commissioners are aware of and understand our equality obligations.

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

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

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

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

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

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

- We will respond to requests for information in alternative formats in a timely manner.

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

### **6.1 Access to Services**

BHC are committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories. BHC's purpose is to operate and maintain the Port, develop Port capacity and the Harbour Estate and supporting the development of the regional economy.

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

BHC monitors annually across all its functions, in relation to access to information and services, to ensure equality of opportunity and good relations are promoted.

BHC monitors progress on several key areas including any Section 75 complaints and issues raised in relation to access to BHC information and services.

Accessibility of our information and services is also reviewed periodically through feedback and monitoring arrangements.

## **Chapter 7 Timetable for Measures Proposed**

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

This timetable is different from and in addition to our commitment to developing action plans/action measures to specifically address inequalities and further promote equality of opportunity and good relations. We have included in our equality scheme a commitment to develop an action plan. Accordingly, this commitment is listed in the timetable of measures in Appendix 4.

## **Chapter 8 Complaints Procedure**

BHC are responsive to the views of members of the public. We will endeavour to resolve all complaints made to us.

Schedule 9 paragraph 10 of the Act refers to complaints. A person can make a complaint to a public authority if the complainant believes he or she may have been directly affected by an alleged failure of the authority to comply with its approved equality scheme. If the complaint has not been resolved within a reasonable timescale, the complaint can be brought to the Equality Commission.

A person wishing to make a complaint that BHC has failed to comply with its approved equality scheme should contact:

Telephone Number: 02890 554422

Textphone Number: 02890 322013

Email address: [peopleteam@belfast-harbour.co.uk](mailto:peopleteam@belfast-harbour.co.uk)

A complaint perceived to be of a minor nature will be dealt with and a response given within five working days. A complaint perceived to be of a more serious nature will be acknowledged within five working days and if the investigation is likely to be protracted an intended response date will be given. This will not normally be more than two months.

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

In any subsequent investigation by the Equality Commission, the BHC will cooperate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

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

BHC will make all efforts to implement promptly and in full any recommendations arising out of any Commission investigation.

## **Chapter 9 Publication of Our Equality Scheme**

BHC equality scheme is available free of charge in print form and alternative formats. Please see page 2 for contact details.

Our equality scheme is also available on our website at: <https://www.belfast-harbour.co.uk>

The following arrangements are in place for the publication in a timely manner of our equality scheme to ensure equality of access:

- We will communicate widely about the publication and content of our equality scheme. This may include press releases, advertisements in the press, the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a weblink to all Section 75 consultees on our consultation list letting them know about the publication of our approved Equality Scheme, and how to access it on the BHC website. Other consultees who prefer written communication or do not have an e-mail address will be notified by letter that our Equality Scheme is available on request.
- Our equality scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats (CD, mp3, DAISY) and in minority languages to meet the needs of those not fluent in English.
- A summary of our Equality Scheme will be prepared and circulated for distribution to organisations representing the groups under Section 75.
- For a list of our consultees please see Appendix 3 of the equality scheme.

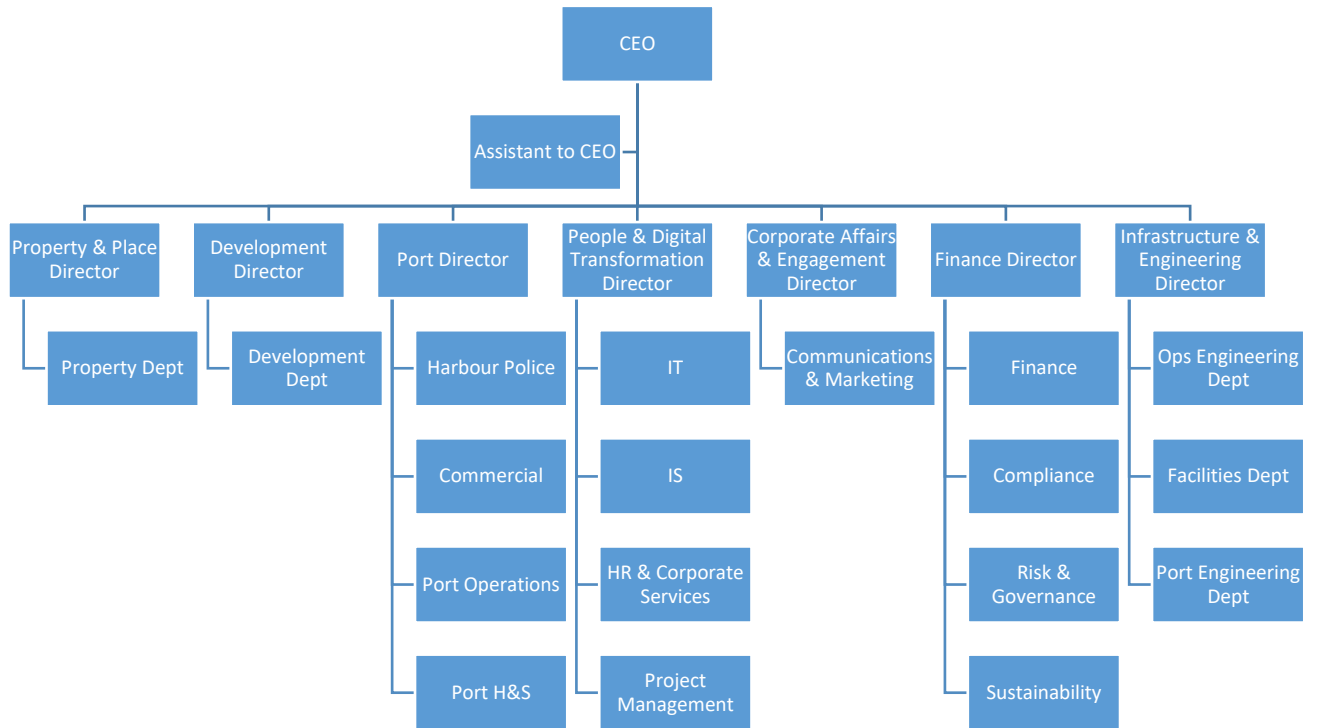
## **Chapter 10      Review of our Equality Scheme**

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

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

In undertaking this review we will follow any guidance issued by the Equality Commission. A report of this review will be made public on the BHC website, with consultees notified by email and a report sent to the Equality Commission

**Appendix 1) Organisational Chart**



## Appendix 2) Example groups relevant to the Section 75 Categories

Category	Example groups
Religious belief	<p>Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths.</p> <p>For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment &amp; Treatment (NI) Order</i><sup>9</sup>. Therefore, “religious belief” also includes any <i>perceived</i> religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “<i>similar philosophical belief</i>”.</p>
Political opinion <sup>10</sup>	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people.
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls).
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.

Please note this list is for illustration purposes, it is not exhaustive.

### **Appendix 3) List of Consultees**

- 1) D.O.E Planning Services
- 2) Belfast Trust
- 3) Belfast City Council
- 4) Housing Executive
- 5) DRD
- 6) OFMDFM
- 7) Belfast Education and Library Board
- 8) CCMS
- 9) Department of Finance and Personnel
- 10) Port Welfare Committee
- 11) Mission to Seafarers
- 12) Unite the Union
- 13) NIPSA
- 14) UCATT
- 15) GMB
- 16) Londonderry Port
- 17) Warrenpoint Port
- 18) Green Part
- 19) Sinn Fein
- 20) DUP
- 21) PUP
- 22) Alliance
- 23) SDLP
- 24) UUP
- 25) The Workers Party
- 26) Aware Defeat Depression
- 27) British Deaf Association
- 28) Employers Forum on Disability
- 29) RNIB (Royal National Institute of Blind)
- 30) Down's Syndrome Association
- 31) Chinese Welfare Association
- 32) NICEM
- 33) Indian Community Centre
- 34) Belfast Travellers Education & Development Group/ An Munia Tober
- 35) Polish Association
- 36) Belfast Metropolitan College
- 37) Methodist Church
- 38) Church of Ireland Board for Social Responsibility
- 39) Presbyterian Church
- 40) Catholic Church
- 41) Belfast Islamic Centre
- 42) Belfast Hebrew Congregation
- 43) Baha'i Faith Baptist Union of Ireland
- 44) Women's Aid NI
- 45) Training for Women's Network
- 46) Queerspace
- 47) Carafriend
- 48) The Rainbow Project
- 49) Carers National Association NI
- 50) Age Concern NI
- 51) Community Relations Council NI
- 52) Disability Action
- 53) Equality Commission NI

- 54) MENCAP
- 55) NIACRO
- 56) NSPCC
- 57) Irish Traveller Movement
- 58) Youth Council for NI
- 59) MS Society
- 60) Northern Ireland Commissioner for Children and Young People
- 61) Northern Ireland Association for Mental Health
- 62) Advice NI

#### Appendix 4) Timetable for Measures Proposed

Measure	Responsibility	Timetable
Reflect the actions and targets in Corporate Business Plan	Leadership Team and Senior Management Team CEO	Annually each January
Section 75 Progress Report	People and Corporate Services Director CEO	Annually 31 <sup>st</sup> August
Update to the Commissioners	People and Corporate Services Director CEO	Annually between February & June
Action Plan:		
Consultation on draft action plan	People Team	June- September 2023
Arrangements for monitoring progress in place	People Team	December 2023
Finalised action plan published	People & Corporate Services Director & People Team	Depending on date of approval by Equality Commission
Consultation list reviewed and updated	People Team	June / July Annually
Awareness raising of New Equality Scheme	People Team	Within 3 months of the publication of the scheme.
Screening timetable	People Team	To begin March 2024
Quarterly screening of policies		
Monitoring	People Team	December 2023
Review of the monitoring information		
Training		
Development of overall Section 75 training program	People Team	Within 3 months of approval of the scheme
Focused training	People Team	Ongoing
Update training	People Team	Ongoing
Evaluation of training	People Team	After each training block



Assessing access to information and services	Communications and Marketing Manager	Annually
Communication of Equality Scheme	People Team	Ongoing
Notification of consultees	People Team	Ongoing
Review of Equality Scheme	People & Corporate Services Director & People Team	Every 5 years, August 2028

## Belfast Harbour Commissioners Audit of Inequalities and Action Plan 2023-2028

<b>Company Analysis and Reporting</b>					
<b>Action</b>	<b>Aims &amp; Objectives</b>	<b>Impacted Section 75 Group</b>	<b>Department</b>	<b>Measurable Outcomes</b>	<b>Timescale</b>
Conduct a Company Article 55 review every 3 years	To review our workforce composition and employment practices affecting recruitment, promotion and training by community background every 3 years, as required Under Article 55 of the Fair Employment and Treatment (NI) Order 1998.	Community Background	People Team	<p>Conduct Article 55 Review every 3 years.</p> <p>Develop an action plan to address objectives and agreed positive action measures.</p> <p>Report progress to the Equality Commission every year, following internal approval.</p> <p>Publish Review and Action Plan on website.</p>	Timescales detailed in the Article 55 Action Plan
Continue to implement our Company Disability Action Plan 2023-2028.	To ensure Belfast Harbour continues to have due regard for the need to update and implement how we intend to promote positive attitudes towards disabled people and encourage participation by disabled people in public life.	Disability	People Team	<p>Review progress annually.</p> <p>Develop Company actions annually.</p> <p>Review and report progress to the Equality Commission every year, following internal approval.</p>	<p>Timescales are detailed in the Disability Action Plan</p> <p>August 2024 (And annually thereafter)</p>
Report Company progress to the Equality Commission for Northern Ireland (Section 75 Annual Progress Report).	To fulfil our statutory reporting responsibility designated for the purposes of Section 75 of the Northern Ireland Act 1998.	All 9 protected characteristics	People Team	<p>Submissions for relevant Section 75 progress requested and received from relevant directorates.</p> <p>Report progress to the Equality Commission every year, following internal approval.</p>	August 2024 (And annually thereafter)
Review and analyse (staff) Equality Monitoring data and submit Fair	To understand the breakdown of job applicants and Belfast Harbour staff by community	Community Background,	People Team	Monitor, analyse and report our Equality Monitoring data.	May 2024 (And annually thereafter)

Employment Return to the Equality Commission for Northern Ireland.	background, gender, and disability, submitting return to the Equality Commission for Northern Ireland and develop actions to address underrepresentation	Gender, Disability		Develop action plan to address identified underrepresentation's.  Report progress to the Equality Commission, following internal approval	
Conduct a Company wide Equal Pay Audit every 3 years.	To analyse and report on the pay of male and female staff doing equal work, to identify equal pay gaps and develop appropriate actions to close gaps that cannot be satisfactorily explained on grounds other than sex	Gender, Disability, Ethnicity	People Team	Analyse and report Equal Pay Audit every 3 years.  Develop institutional Equal Pay Action plan to address identified gaps and positive outcome measures for implementation across the university.  Report progress to the Equality Commission following internal approval and publish.	Report for period 2023 –2028

## Outreach, Engagement and Public Life Activities

Action	Aims & Objectives	Impacted Section 75 Group	Department	Measurable Outcomes	Timescale
Promote and deliver a wide range of gender equality activity.	To enhance the participation and visibility of women in all aspects of Belfast Harbour life, share best practice and support women at Belfast Harbour.	Gender, Race, Disability, Age, Sexual Orientation, Dependents	People Team		Aligned with submission/renewal deadlines
Develop a new programme of institution wide activity to support staff with their Mental Health.	To support a nurturing and supportive environment that empowers our employees to be mentally well.	All 9 protected characteristics	People Team	Develop Staff Health and Wellbeing Action Plan  Develop and implement a comprehensive annual	Ongoing

	Support the creation of an organisational culture that enhances the health, wellbeing and sustainability of its community and empowers our employees to be mentally well			<p>program of Mental Health training and support for all staff including a dedicated programme for managers.</p> <p>Implement Stress Management Policy and Procedure for staff.</p> <p>Consider feasibility of developing Mental Health First Aiders.</p> <p>Continue to promote Employee Assistance Programme.</p> <p>Explore the potential provision of Cognitive Behavioural Therapy (CBT) interventions.</p>	
Support and develop Belfast Harbour staff networks.	To provide welcoming, inclusive opportunities for staff.	Dependants, Gender, Sexual orientation, Disability, Race and Ethnicity.	People Team	<p>Programme of annual events and activities in collaboration with the networks on key dates e.g., Black History Month, IDAHOBIT, Belfast Pride, Carers Week</p> <p>Benchmarking on Staff Network composition and arrangements.</p> <p>Review the support and governance of staff networks and committee membership.</p> <p>Consultation with staff networks on key issues.</p>	Ongoing
Continue to partner with local organisations to promote diversity, inclusion and understanding at Belfast Harbour.	All protected characteristics.	All protected characteristics	People Team & Communications & Marketing Department	<p>Develop and support volunteering opportunities for employees.</p> <p>Review existing staff volunteering partnership arrangements.</p> <p>Develop further partnerships with</p>	2023-2028

				local organisations to promote understanding of diversity and inclusion.	
Continue to improve and promote physical access at Belfast Harbour.	To help employees and visitors to access our sites and buildings more easily by providing detailed information regarding physical accessibility.	Disability	People Team, Compliance Department, H&S Department	Continuously review and update physical access at Belfast Harbour to reduce barriers.	Ongoing
Develop and promote assistive technology available for employees.	To ensure that all employees have access to a range of assistive technology software which can assist them with their day-to-day work.  Provide access to a Disability Support Fund which allows Belfast Harbour employees to apply for funding to purchase various pieces of equipment to assist them when carrying out their work.	Disability	People Team, IS Department, IT Department	Review current provision for accessible software.	2023-2028
Review web accessibility for all BHC webpages.	To ensure Belfast Harbour's webpages and online content is accessible and usable to everyone.	Disability	People Team, IT Department, Communications & Marketing Department	Scope Belfast Harbour's website accessibility.  Implementation of web accessibility software for digital inclusion.	2023-2028
Ensure that marketing, communication and engagement content and activity reflect the diversity of our employees; and are accessible.	To reflect diversity of our employees; to demonstrate the diverse and inclusive nature of Belfast Harbour and the surrounding area.	All 9 protected characteristics	Communications & Marketing Department	Communications and engagement activities and content, including guides, websites, policies, and procedures are accessible.	Ongoing
Ensure our social media activity is inclusive and diverse and promotes good	To ensure social media content reflects the diversity of our employees relating to topics, news, and events	All 9 protected characteristics	Communications & Marketing Department	Company compliance with the Social Media Policy.	Ongoing

relations between people of different protected characteristics.					
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<b>Policy, Process and Practices</b>					
<b>Action</b>	<b>Aims &amp; Objectives</b>	<b>Impacted Section 75 Group</b>	<b>Department</b>	<b>Measurable Outcomes</b>	<b>Timescale</b>
Develop Accessibility Guidelines / Compliance for institutional events and promote good relations between people of different protected characteristics	To ensure equality of opportunity and participation for all attendees at University events (online and on campus)	All 9 protected characteristics	Corporate Services, Compliance Department	Develop an Inclusive Events Checklist.  Publish and promote checklist to employees as part of any event planning.  Where relevant, develop Easy Read version of questionnaires/documents.	August 2024
Review and update relevant People and Culture policies and practices.	To ensure all People and Culture policies are inclusive and reflect legislative change and best practice.  To ensure Belfast Harbour provides modern, inclusive, and user-friendly employment policies and processes and ensure that equality screening is central to all policy development and review.	All 9 protected characteristics	People Team	Develop framework for review of People and Culture workplace policies and processes, to identify and reduce any negative and adverse impact of existing practices.  Future policy development to include development of: <ul style="list-style-type: none"> <li>• Pregnancy Loss</li> <li>• Domestic Abuse</li> <li>• Support leave / Kinship or Miscellaneous leave provision</li> </ul> Review sexual harassment policy position and training.	Ongoing

				Review recruitment process for staff  Review Reasonable Adjustments process for applicants and current staff.  Develop enhanced Menopause Support for staff and line managers.	
Review recruitment practices to support and encourage those from underrepresented groups and protected characteristics to work at Belfast Harbour.	To ensure equality of opportunity and participation, and support and encourage those from underrepresented groups and characteristics to work at Belfast Harbour.	All 9 protected characteristics	People Team	Targeted advertising of posts and partnerships with organisations to encourage applicants and provide support for those from underrepresented groups.	2024 - 2025
Integrate equality screening guidance for policy leads and ensure / develop mechanism for internal Equality screening compliance.	To ensure employees understand the Company's responsibility to equality screening new /reviewed policies for potential impact on employees with protected characteristics; introducing mitigation or undertaking EQIAs where appropriate	All 9 protected characteristics	People Team	Develop process to ensure compliance with equality screening requirement prior to Company approval of key decisions, policies etc. Continue to review and update a dedicated library of screened policies, frequently asked questions etc.  Continue to deliver equality screening training	Annually

## Training and Development

Action	Aims & Objectives	Impacted Section 75 Group	Department	Measurable Outcomes	Timescale
Ensure Members of the Board and Leadership Team receive	To ensure compliance with Equality and Diversity	All 9 protected characteristics	People Team	All new members of the Board or Leadership Team to complete EDI training as part of their induction.	As required.

appropriate level of Equality, Diversity and Inclusion training.					
Deliver EDI / Bullying & Harassment Training for staff.	To ensure staff are trained in Belfast Harbours Policies and procedures; ensure staff are equipped to effectively respond to formal and/or informal allegations of bullying/harassment; to ensure all complaints are dealt with in a professional, effective and timely manner.	All 9 protected characteristics	People Team	Deliver EDI and Bullying and Harassment sessions for all employees.	2024
Deliver Section 75 training for all employees.	To ensure all our staff and the Commissioners are aware of and understand our equality obligations.	All 9 protected characteristics	People Team	Deliver Section 75 training sessions for all employees.	2024