



Invest
Northern
Ireland

Building Locally
Competing Globally

Results of an Equality Impact Assessment (EQIA) on Invest Northern Ireland's Corporate Plan 2008 - 2011

AUGUST 2008

Section 75 of the Northern Ireland Act 1998



Executive Summary

This report presents the results of an Equality Impact Assessment (EQIA) on Invest Northern Ireland's Draft Corporate Plan 2008-2011 and follows the Draft Report that was issued for public consultation in March 2008.

The draft report, which is still available from Invest NI or from its website www.investni.com/equality, detailed the information that was reviewed, identified potential adverse impacts and provided preliminary policy recommendations as to how the policy should be modified to lessen adverse impacts.

Seventeen responses to the draft report were received from the voluntary, community and trade union sectors, and verbal feedback from the pre-consultation meeting held in Invest NI on 31 August 2007. Our proposed consultation meeting on 16 April 2008 however gained only one attendee who opted to attend a more generic session and so this engagement generated no feedback. Issues raised were considered alongside existing data in coming to the final decisions as presented in this report. We believe that the proposed actions will promote equality of opportunity between all Section 75 groups and we would like to thank all those who have contributed to this EQIA.

Further copies of the report are available on Invest NI's website at www.investni.com/equality

If you have any queries about this document and/or its availability in alternative formats (including Braille, disk and audio cassette, and in minority languages to meet the needs of those who are not fluent in English) then please contact:

The Equality Unit

Invest NI
3rd Floor
Bedford Square
Bedford Street
Belfast
BT2 7ES

Telephone: 028 9069 8390

Textphone: 028 9069 8585

Fax: 028 9043 6536

E-Mail: equality@investni.com

Introduction

Section 75 (1) of the Northern Ireland Act 1998 requires that Invest NI shall, "in carrying out its function relating to Northern Ireland, have due regard to the need to promote equality of opportunity" between the following nine Section 75 groups:

- 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; and
- Persons with dependents and persons without.

In addition and without prejudice to these obligations, in carrying out its functions, Invest NI is also committed to promote good relations between persons of different religious belief, political opinion or racial group.

Invest NI's Equality Scheme was approved by the Equality Commission for Northern Ireland on 19 November 2003. This scheme sets out how Invest NI proposes to fulfil the obligatory duties determined through Section 75 legislation and its implementation.

It also acknowledges the commitment to carrying out Equality Impact Assessment (EQIA) policy reviews, and to develop new policies as required.

Invest NI has conducted Equality Screening Consultations to screen all policies, written and unwritten, to assess which policies may potentially impact on equality of opportunity and/or good relations obligations. Each policy was considered using the following criteria:

- Is there any evidence of higher or lower participation or uptake of different groups?
- Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy?
- Have consultations with relevant groups, organisations or individuals indicated that particular policies create problems, which are specific to them?
- Is there an opportunity to better promote equality of opportunity or better community relations by altering the policy or working with others in Government Departments/ education or in the larger community?

Following this screening process, it was determined that the Draft Corporate Plan 2008-2011 should be subjected to Equality Impact Assessment.

Invest NI Corporate Plan 2008-2011 Aim

The aim of Invest NI's Corporate Plan 2008-2011 is to:

*“increase business productivity,
the means by which wealth can
be created for the benefit of
the whole community”.*

Invest NI Corporate Plan 2008-2011 Background

Invest NI's Corporate Plan 2008-2011 is set in the context of a new political dispensation for Northern Ireland, a new Programme for Government (PfG) and renewed confidence across the region. In implementing this, our third Corporate Plan, Invest NI will help to steer an economy in transition. While the Northern Ireland economy has performed well in recent years, relative to the UK average, this performance masks a number of underlying structural weaknesses as detailed in our EQIA.

With an average annual programme budget allocation of around £160million, Invest NI will allocate resources to ensure we achieve our delivery targets and attain maximum impact with regard to these economic issues.

In order to raise business productivity, Invest NI, through its third Corporate Plan, will focus on three priority actions for economic growth:

- Realising Client Potential - helping our clients become better at growing profitability.
- Shifting the Sectoral Focus - requiring a shift in the sectoral mix towards higher value-added activities.
- Frontier Technologies - developing businesses at the leading edge of innovation and technology.

To help our clients to accomplish this, we will focus our resources on a number of potential actions, including:

- Simplifying and increasing flexibility of our research, development and innovation programmes;

- Increasing awareness of the benefits of innovation through role models and case studies;
- Appointing a number of innovation advisers;
- Introducing an innovation voucher scheme, jointly managed with Enterprise Ireland;
- Enhancing our design programme and doubling the target for participating companies;
- Offering targeted development programmes aimed at improving productivity and business performance;
- Increasing the relevance and quality of our mentoring and coaching support, particularly in developing leadership skills at the senior level;
- Increasing the number of strategic collaborative networks involving both business and knowledge institutions;
- Working proactively with Department for Employment and Learning (DEL) to help tackle specific skills needs and to align qualifications with market demand;
- Enhancing the role of technology missions in international markets to attract foreign direct investment (FDI) and seek to secure internationally mobile Research & Development (R&D) projects;
- Underpinning the sectoral shift by supporting the development of an R&D infrastructure and by skewing our support towards those projects which offer the most commercial promise from innovation;

- Securing increased commercial outcomes from our research base;
 - Supporting industrial research within companies and in collaboration with knowledge institutions;
 - Introducing new industry-led competence centres; and
 - Ensuring a stream of risk capital for early-stage technology ventures to support indigenous and overseas-based entrepreneurs to locate in Northern Ireland.
- Promote 6,500 new jobs from inward investment, of which:
 - 5,500 will provide salaries above the Northern Ireland Private Sector Median;
 - 2,750 will have salaries at least 25 per cent above the Northern Ireland Private Sector Median.
 - Increase the business expenditure on R&D by Invest NI client companies with 250 employees by an average of eight per cent per annum in real terms;

The targets we will therefore use to measure our progress against our aim are as follows:

- Increase sales outside Northern Ireland per employee of Invest NI manufacturing clients by an average of six per cent per annum in real terms;
- Increase sales outside Northern Ireland per employee of Invest NI tradable services clients by an average of four per cent per annum in real terms;
- Increase by three percentage points sales outside the United Kingdom as a proportion of total sales by Invest NI client companies (excluding the top 25 exporting companies);
- Secure total annual wages and salaries of £345million from inward investment and locally owned clients. This represents an eight per cent increase over the three-year period ended 2006/07;
- Increase the business expenditure on R&D by Invest NI client companies with 250 employees or above by an average of five per cent per annum in real terms;
- Support 45 new start-ups selling outside the United Kingdom;
- Support 300 start-up businesses selling to Great Britain;
- 75 per cent of land acquisition (acres) in areas of economic disadvantage; and
- 70 per cent of new FDI projects secured to locate within ten miles of an area of economic disadvantage.

Consideration of Data and Available Research

Invest NI considered a wide range of data and research when compiling the Draft Corporate Plan 2008-2011 EQIA all of which were summarised and fully covered in the draft consultation report.

Initial Recommendations to Mitigate Adverse Impact

The following actions to prevent potential adverse impact were recommended in the Draft Consultation Report. Consultees were then invited to comment on these, along with the data on which they were based.

1. Invest NI will work increasingly closely with Department of Enterprise, Trade and Investment (DETI) and DEL and the private sector in a responsive manner to contribute towards addressing existing and emerging inequalities in the Northern Ireland labour market, within our remit.
2. Working in conjunction with the Equality Commission for Northern Ireland, Invest NI has established an appropriate methodology for monitoring its clients and support services with regards to appropriate Section 75 grounds. The new Client Monitoring Strategy will be operational by April 2008.
3. Invest NI will remain responsive to emerging equality of opportunity issues associated with the labour market and in particular among its private sector clients. By way of example, projects are already addressing the needs of migrant workers, female entrepreneurs, and raising awareness of childcare voucher schemes among Small and Medium Enterprise (SME) clients.
4. In line with the Equality Commission's newly published Guide to Promoting Good Relations, during 2008 Invest NI will develop a good relations strategy and will consider positive action measures to support this strategy. For example, how best to market Invest NI's programmes and services where relevant among minority communities.
5. Ongoing training of all staff in relation to Section 75 responsibilities will remain a corporate priority. Where external agents or consultants work alongside Invest NI then their contractual responsibilities to meet our obligations under Section 75 will also be made clear.
6. The selection criteria that will continue to apply to any support, scheme or programme operated by Invest NI will continue to encourage equality of opportunity. Where additional criteria are introduced, for example to target an industrial sector or geographical area, then these will be clearly defined and set out, and any potential adverse impacts associated with these criteria will be considered.
7. Each programme will make explicit, in all documentation, that materials can be made available in alternative formats where necessary and on request for those who are not able to access written English.
8. Building on our 2007 Disability Action Plan and subsequent consultation period, we will continue to take forward the Plan through informed interventions.

Formal Consultation

The EQIA report was published in March 2008, making clear that Invest NI was keen to consult as widely as possible on its findings and including preliminary recommendations as to how to mitigate adverse impact. These actions were taken:

- A pre-consultation meeting was made available with representatives of particular interest groups in August 2007.
- The report was issued to all consultees in our Equality Scheme and to any members of the public on request.
- Prominent advertisements were placed in the Belfast Telegraph, Irish News and News Letter, inviting comment on good practice.
- A copy was posted on Invest NI's website and on the internet.
- A further consultation meeting was arranged on 16 April to gather any additional feedback on the draft Corporate Plan and the accompanying Equality Impact Assessment.
- Invest NI put in place systems to ensure that the EQIA was available in accessible formats, and in a timely fashion.

Written and Verbal Submissions

Invest NI received 17 written responses regarding the consultation on the draft Corporate Plan 2008-2011. Six of these responses were simply acknowledgements of receipt. Seven responses were not directly relevant to S75 concerns and hence have not been responded to in this section but have been duly noted and addressed by relevant staff.

Summary of Comments and Agreed Actions

Comments and Responses to the EQIA of Invest NI's Draft Corporate Plan 2008-2011:

Respondent	Comment Received	INI Response
Training For Women Network Limited	The absence of a gender perspective in the Corporate Plan is a serious oversight.	Plan has been amended to reflect this.
	Encouragement of women's entrepreneurship is a major omission from the draft Plan.	Plan has been amended to reflect our responsiveness to structural inequalities in the labour market, particularly in relation to gender, race and disability. Details in relation to encouragement of women's entrepreneurship will be captured in our annual operating plans.
Northern Ireland Rural Women's Network	A gender specific approach should be included in the Invest NI Corporate Plan 2008-2011.	Plan has been amended to reflect our responsiveness to structural inequalities in the labour market, particularly in relation to gender, race and disability.
	Investing in Women Initiative should be continued.	Details in relation to encouragement of women's entrepreneurship will be captured in our annual operating plans.
Women's Support Network	WSN notes that the document is gender neutral in its composition.	Plan has been amended to reflect our responsiveness to structural inequalities in the labour market, particularly in relation to gender, race and disability.
	WSN welcomes the section on Equality of Opportunity, however notes that this is positioned at the end of the document; WSN believes there needs to be more systematic reference to promoting equality of opportunity between men and women throughout the plan.	Invest NI has produced a robust and concise strategic document. We believe the section on Equality of Opportunity sets out our approach to this important aspect of our work in a coherent manner. The section has been amended to reflect our responsiveness to structural inequalities in the labour market, particularly in relation to gender, race and disability. Reference is also made in the Foreword to carrying out our duties in full compliance with our Equality Scheme and Section 75 commitments.

Respondent	Comment Received	INI Response
Women's Support Network (continued)	<p>WSN would request that Invest NI details in the Corporate Plan how they would reduce the levels of women who are economically inactive.</p>	<p>The Corporate Plan 2008-2011 is a high level, strategic document. While responsibility for addressing economic inactivity rests primarily with DEL, we are committed to working closely with them and this aspect of our work will be addressed in our annual operating plans.</p>
	<p>WSN would wish to refer Invest NI to Programme for Government's commitment to the inclusion of all people "...to deliver a peaceful, prosperous and fair society that we all want". This expresses well WSN's contention that the promotion of equality is important to increasing business productivity.</p>	<p>Noted and agreed</p>
	<p>WSN would ask Invest NI to set out in this Corporate Plan how they will work with DEL to challenge gender stereotyping and promote equality of opportunity, thus enabling women to enter employment in internationally tradable services which would currently be perceived as male dominated.</p>	<p>The Corporate Plan 2008-2011 is a high level, strategic document. As indicated in the Plan, we have signed a Memorandum of Understanding with DEL. Further details will be captured in our annual operating plans.</p>
	<p>WSN would therefore ask Invest NI to target companies that promote equality of opportunity between men and women as potential sources of FDI.</p>	<p>Any company which establishes itself in Northern Ireland will be subject to the equality legislation governing indigenous companies.</p>
	<p>WSN would ask Invest NI to detail in the plan what steps they will take to ensure women, especially those with caring/childcare responsibilities, can take advantage of such programmes.</p>	<p>The Corporate Plan 2008-2011 is a high level, strategic document. This aspect of our work will be addressed in our annual operating plans.</p>
	<p>WSN would ask Invest NI to include in their Corporate Plan how they will work with DEL to ensure women have the opportunities to develop skills, especially areas where women are under-represented, for example non-traditional trades, necessary to participate in high level economic activity.</p>	<p>The Corporate Plan 2008-2011 is a high level, strategic document. As indicated in the Plan, we have signed a Memorandum of Understanding with DEL. Further details will be captured in our annual operating plans.</p>

Respondent	Comment Received	INI Response
<p>Women's Support Network (continued)</p>	<p>WSN contends that to qualify as an Invest NI client, a business should also have an explicit equality focus. WSN would ask Invest NI to consider including under client definition that a business must be able to demonstrate good practice as regards equality of opportunity between men and women.</p>	<p>Any company that is attracted into Northern Ireland as a potential source of FDI will be subject to the same legislation as governs all Northern Ireland companies.</p>
	<p>WSN welcomes Invest NI's draft EQIA and particularly welcomes its reference to Section 75 of the Northern Ireland Act 1998. WSN also welcomes Invest NI's consideration of gender statistics in the EQIA.</p>	<p>Noted</p>
	<p>WSN notes that the EQIA states that "while the labour market continues to be segregated in many ways and including those associated with S75 grounds, many of these economic inequalities lie outside the scope of Invest NI's work". However WSN would contend that there are many ways in which the draft Corporate Plan can be amended to better pursue Invest NI's stated commitment of equality of opportunity.</p>	<p>Invest NI has produced a robust and concise strategic document. We believe the section on Equality of Opportunity sets out our approach to this important aspect of our work in a coherent manner. The section has been amended to reflect our responsiveness to structural inequalities in the labour market, particularly in relation to gender, race and disability. Reference is also made in the Foreword to carrying out our duties in full compliance with our Equality Scheme and Section 75 commitments.</p>
	<p>WSN welcomes the measures set out in the EQIA to mitigate adverse impact such as the Pathways to Female Entrepreneurship project and awareness of childcare voucher schemes. WSN notes however that these are not included in the draft Corporate Plan and would contend that it would be beneficial to make reference to these to support Invest NI's stated commitment of Equality of Opportunity.</p>	<p>The Corporate Plan 2008-2011 is a high level, strategic document. This aspect of our work will be addressed in our annual operating plans.</p>
<p>Age Concern</p>	<p>We believe that Action Point 1 needs to be expanded to include the voluntary and community sector (including individuals and groups representing the equality grounds). By working collaboratively, there is perhaps a greater opportunity to address existing and emerging inequalities.</p>	<p>We would more than welcome any feedback from the voluntary and community sector and will change the wording of Action Point 1 to reflect this.</p>

Respondent	Comment Received	INI Response
<p>Age Concern (continued)</p>	<p>Whilst we agree with the flow and direction of Action Point 2, the language used concerns us. We agree that it is right for Invest NI to design an appropriate methodology for monitoring its clients and support services, however we are not sure what is meant by the term “appropriate Section 75 grounds” and we seek clarification on this. This has the potential to suggest that some categories are not “appropriate”.</p>	<p>Noted and we would be happy to change this wording. However we would like to make it clear that our monitoring strategy will at first only be looking at four of the nine Section 75 grounds for monitoring companies and five of the nine Section 75 grounds for monitoring individuals. This will be reviewed each year and categories will be added as the process becomes embedded.</p>
	<p>We welcome the approach suggested through the implementation of Action Point 3 and commend Invest NI for having taken the approach of looking to emerging inequalities and introducing and supporting projects dealing with older workers, migrant workers and female entrepreneurs.</p>	<p>Noted.</p>
	<p>Action Point 4 suggests that Invest NI could bring forward measures such as how best to raise awareness of Invest NI’s programmes. ACNI would like to see that this is not restricted to the categories contained within Section 75 (2). We believe it is important to not restrict best practice or positive action measures to a few categories to the potential detriment of others.</p>	<p>Noted and we will make every effort to raise awareness throughout all of the varying Section 75 groupings.</p>
	<p>Action Point 5 is important and essentially goes to the core of the importance of Section 75 in ensuring an organisation (Invest NI, in this case) fully ensures that all the organisations it is involved with comply with its obligations, this is important as it ensures that the public authority is fully complying with its obligations under various Equality Legislation. We also believe that this measure should go beyond just “external agents or consultants” and should include the provision of resources, financial or otherwise.</p>	<p>Our provision of resources financial or otherwise have all been equality screened and the majority have undergone Equality Impact Assessment to ensure that we are in compliance with the legislation and are not adversely impacting on any of the groupings.</p>

Respondent	Comment Received	INI Response
Disability Action	Disability Action welcomes the location of information on alternative formats and language in a prominent position.	Noted.
	We would welcome information on how Invest NI's website conforms with European guidance on website accessibility for disabled people.	The website is currently accessible according to W3C Guidelines and this is being reviewed in line with our Disability Action Plan.
	The analysis of religious belief/political opinion is clear and informative.	Noted.
	Whilst welcoming the general data provided for all the other Section 75 groups, Disability Action would have appreciated a more detailed application of this information to the direct activities of Invest NI as outlined in its Corporate Plan.	The Corporate Plan 2008-2011 made reference to the implementation of our equality monitoring strategy and this along with all our areas of work will be handled in more detail through our operating plan.
	Disability Action would advise that the dialogue boxes - white writing on a rust background - is not very accessible. We are happy to advise on information accessibility.	Noted.
	Whilst recognising the limitations of the extrapolation of current monitoring data to a per capita basis, Disability Action would point out that mid-Ulster, Tyrone and Fermanagh disability inequality is exacerbated by rural location.	Noted.
	Disability Action commends the outreach work undertaken by Invest NI and in particular the Pathways to Female Entrepreneurship Programme which has successfully attracted a number of disabled women who without such outreach would not have attempted to establish their own businesses.	Noted.
	Disability Action advises that such initiatives should be delivered for a number of years and closely monitored to ensure that their equality successes are highlighted.	We will continue to monitor our initiatives and respond to that monitoring information as appropriate.
	Disability Action believes the Corporate Plan should have contained more significant sections of this full draft Equality Impact Assessment to which we have been pleased to respond.	Noted. However we have worked to produce both the Corporate Plan and the separate EQIA to enable us to work to the agreed guidance.

Decisions on the EQIA

Following the consultation, Invest NI will:

1. Work increasingly closely with DETI and DEL and the private and voluntary and community sector in a responsive manner to contribute towards addressing existing and emerging inequalities in the Northern Ireland labour market, within our remit.
2. Work in conjunction with the Equality Commission for Northern Ireland, to embed an appropriate methodology for monitoring clients and support services with regard to Section 75 grounds. The new Client Monitoring Strategy will be operational by April 2008.
3. Remain responsive to emerging equality of opportunity issues associated with the labour market and in particular among its private sector clients. By way of example, projects are already addressing the needs of migrant workers and their families, older workers, female entrepreneurs, and raising awareness of childcare voucher schemes among SME clients.
4. In line with the Equality Commission's newly published Guide to Promoting Good Relations, develop a good relations strategy during 2008 and will consider positive action measures to support this strategy. For example, how best to market Invest NI's programmes and services, where relevant, among minority communities.
5. Ensure ongoing training of all staff in relation to equality of opportunity and Section 75 responsibilities remains a corporate priority. Where external agents or consultants work alongside Invest NI their contractual responsibilities to meet our obligations under Section 75 will also be made clear.
6. Ensure the selection criteria which apply to any support scheme or programme operated by Invest NI will continue to encourage equality of opportunity. Where additional criteria are introduced, for example to target an industrial sector or geographical area, then these will be clearly defined and set out, and any potential adverse impacts associated with these criteria will be considered.
7. Ensure each programme makes explicit, in all documentation, that materials can be made available in alternative formats where necessary and on request for those who are not able to access written English.
8. Build on our 2007 Disability Action Plan and subsequent consultation period, and continue to take forward the Plan through informed interventions.

Monitoring for Adverse Impact in the Future and Publication of the Results of Such Monitoring

Invest NI is currently establishing a monitoring system for the organisation to allow the impact of the policies on relevant groups by the Section 75 dimensions to be monitored, both within Invest NI and across client companies with whom we engage.

This information will be reviewed annually and the results widely and openly published. Policy will be revised accordingly if this monitoring shows a greater adverse impact than predicted, or if opportunities arise which would allow greater equality of opportunity to be promoted.

Given that this will be the case and that our strategies at the highest level have now been subjected to an EQIA process, our operating plans will not be subject to separate scrutiny at this time, in particular as the EQIAs conducted on the Corporate Plan, Accelerating Entrepreneurship and Business Development Solutions suites of programmes have already addressed both the strategic and operational aspects of our work.

In line with our ongoing commitment both to the letter and spirit of Section 75 we will also look towards carrying out 'follow-up' EQIAs on our suites of programmes within the life-cycle of our 2008-2011 Corporate Plan.

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