



Invest 
Northern
Ireland
Building Locally
Competing Globally

Equality Impact Assessment (EQIA) on Invest Northern Ireland's Communications and Access Policy

August 2011

Section 75 and Schedule 9
The Northern Ireland Act 1998

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1. PREFACE

Further to the statutory duties contained within Section 75 and Schedule 9 of the Northern Ireland Act 1998, within its Equality Scheme Invest NI has made a commitment to carrying out an Equality Impact Assessment (EQIA) on each policy where screening indicated that there may be significant implications in relation to one or more of the nine Section 75 equality categories: i.e. religious belief, political opinion, racial group, age, marital status, sexual orientation, gender, disability and dependants.

This report presents the results of an Equality Impact Assessment (EQIA) on Invest Northern Ireland's Draft Communications and Access Policy and follows the Draft Report that was issued for public consultation in May 2011. This work consolidates earlier EQIAs involving policies under the themes of: "Recruitment and Selection" (September 2004) 'Accelerating Entrepreneurship'(July 2005), 'Business Development Programmes'(June 2007), and the 'Corporate Plan 2008 - 2011'(August 2008). In combination these EQIAs have already subjected all significant areas of Invest NI business and programmes to detailed scrutiny; the current EQIA deliberately complements this earlier work by adopting a broader perspective with regard to access and communication across all our business areas, both internal and external.

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.

We believe that the proposed actions in this EQIA will promote equality of opportunity between all Section 75 groups and we would like to thank Disability Action for their contribution to this EQIA. We are therefore pleased to present this final report.

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:

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2. SUMMARY

This EQIA forms part of Invest NI's equality commitments under Section 75 of the Northern Ireland Act 1998. Its purpose is to consider, from a Section 75 perspective, how the organisation both interacts externally with its clients and the Northern Ireland business base, as well as internally with its staff.

The main objective of the report is to ensure that Invest NI assesses and records the likely equality impact of its communication methods, on the nine Section 75 grounds, from both an internal and an external perspective.

The EQIA will continue to demonstrate Invest NI's ongoing commitment to anticipating the consequences of its policies on the nine Section 75 grounds and making sure that, as far as possible, any negative consequences are minimised and that opportunities for promoting equality of opportunity are maximised.

This final report has been written following consultation which was carried out in line with Equality Commission Guidance and has taken full account of consultee responses. Invest NI will now monitor the impact of the policies to identify any further adverse differential impacts.



Alastair Hamilton
CHIEF EXECUTIVE



Stephen Kingon
CHAIRMAN

3. INTRODUCING INVEST NORTHERN IRELAND

Invest Northern Ireland (Invest NI) was established as a body corporate under the Industrial Development Act (Northern Ireland) 2002, to work in partnership with the Department of Enterprise, Trade and Investment (DETI) so as to stimulate and encourage economic development in Northern Ireland¹.

Our main task is to deliver the Government's economic development strategies cost effectively while our aim is to strengthen the economy and help it grow by supporting business development, increasing the level of exports, attracting high quality inward investment, and stimulating a culture of entrepreneurship and innovation.

Our Northern Ireland headquarters is located at:

- Bedford Square, Bedford Street, Belfast BT2 7ES

We also operate through five regional offices:

- **North Eastern:** Thomas House, 32 Thomas Street, Ballymena, BT43 6AU:
- **North Western:** 5th Floor, Timber Quay, 100-114 Strand Road, Londonderry BT48 7NR;
- **Southern:** Drumalane Mill, The Quays, Newry BT35 8QF; Oracle Conference Centre, Upper Bann Institute, 36 Lurgan Road, Portadown BT63 5BL
- **Western:** Kevlin Buildings, 47 Kevlin Avenue, Omagh BT78 1ER; INTEC Centre, 36 East Bridge Street, Enniskillen BT74 7BT
- **Eastern:** Bedford Square, Bedford Street, Belfast BT2 7ES

And a number of international offices which are based around three international centres:

- *Europe* – London, Dublin, Brussels, Dusseldorf
- *North America* – Boston, New York, San Jose
- *Asia/Pacific* - Seoul, Tokyo, Taipei, Shanghai
- Dubai, Mumbai

¹ Further details of founding legislation, roles, powers and responsibilities can be found in Invest NI's Management Statement and Financial Memorandum, issued by DETI (April, 2002) and available on request from the Equality Unit.

4. INVEST NI and SECTION 75

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

- 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 dependants and persons without.

In addition, and without prejudice to these obligations, in carrying out our functions relating to Northern Ireland we are also committed to having due regard to the desirability of promoting 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 November 19th 2003 and was further updated in 2006. The current scheme sets out arrangements as to how we propose to fulfil our obligatory duties as determined through Section 75 legislation and its implementation. The Equality Scheme also acknowledged the commitment to carry out Equality Impact Assessments (EQIAs) and policy reviews on existing policies and to develop new policies as required.

Invest NI has carried out screening of all its policies so as to assess which policies may potentially impact on equality of opportunity and/or good relations obligations. Each policy was considered using the following criteria:

- (a) Is there any evidence of higher or lower participation or uptake of different groups?
- (b) Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy?

- (c) Have consultations with relevant groups, organisations or individuals indicated that particular policies create problems, which are specific to them?
- (d) 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 the screening process, a number of Invest NI business areas were identified and have undergone Equality Impact Assessments (EQIA) to date, namely:

Recruitment and Selection Policies (R&S, 2004)

Accelerating Entrepreneurship Strategy (AES, 2005)

Business Development Solutions Programmes (BDS, 2007)

Invest NI Corporate Plan (2008-2011, 2008)

To complement these EQIAs, under the lifespan of the current Equality Scheme, Invest NI's 'Communications and Access' policy is the last area to undergo Equality Impact Assessment and is concerned with how Invest NI communicates, both internally and externally, and how it offers and makes accessible its services to customers.

While these areas of business may already have been considered in the context of past EQIAs it was felt that by focusing attention directly on access and communication across all business areas, both internal and external, then there could be absolute surety that any potential adverse impacts could be identified and mitigated.

5. COMMUNICATIONS AND ACCESS–Aims of the policy

The policy area under scrutiny in this EQIA is how Invest NI communicates at a corporate level, both internally and externally, with customers, staff and stakeholders and how these groups access Invest NI's services.

The Aim of the Invest NI Access and Communications policy is:

“As far as is reasonably practicable and within available resources, to provide access to, and communications with, its business, services and staff in a fair, transparent and inclusive manner, mindful of corporate objectives and best value principles.”

Invest NI's core business depends on accessing and communicating efficiently and effectively with all our clients, companies, individuals and/or organisations with an interest in the Northern Ireland economy and its labour market.

For the purposes of this EQIA, the policy relates not only to the ways in which external client companies and individuals access and communicate with Invest NI but also internal access and communications systems operating within Invest NI. The policy is deliberately broad in scope in order to complement earlier Section 75 work and in particular the four EQIAs which Invest NI has already completed.

Who originated and/or defined the policy?

The Corporate Services Group in Invest NI is responsible for core corporate business including HR, Financial and Corporate Governance, Strategic Management, Planning and Policy Co-ordination, Investment Appraisal Services, and Corporate Communications. The group works to ensure that the organisation has adequate resources, both human and financial, for the effective delivery of its services and the achievement of its strategic aims and targets. Responsibilities also include developing and implementing corporate governance policies and procedures in line with best practice and which allow Invest NI to be responsive to its customers while ensuring that the basic principles of public accountability are observed. As an integral

part of this remit Corporate Services manages Invest NI's communications, both internally and externally, and has the responsibility for ensuring that key information is relayed to customers, stakeholders and staff in a timely and effective manner.

Who implements the policy?

The policy area encompasses access and communication issues across all corporate business and is managed and coordinated, in the first instance, by the Corporate Communications Unit. This work is then cascaded down through all of the business units and areas in Invest NI.

Who delivers the policy?

Ultimately all those who are employed by Invest NI, and including its staff and agents, are responsible for delivery on this policy. This includes all of the business units and divisions within Invest NI, from those who interact directly with clients to those who are internally focused. The policy also extends to third parties who deliver goods and services on behalf of Invest NI. Engagement of consultants or Third Party Organisations (TPOs) is procured through the Central Procurement Directorate (CPD) of the Department of Finance and Personnel, following best practice procedures as laid out by CPD.

6. BACKGROUND TO INVEST NI

Invest NI is sponsored by the Department of Enterprise, Trade and Investment (DETI); its primary role is to deliver significant aspects of the Government's economic development strategies, effectively and efficiently. Invest NI operates under the management of an independent Board, which is appointed by the Minister responsible for DETI. The Chief Executive reports to the Board and is responsible for the daily management of the agency. A Senior Management Team deals with the ongoing delivery of programmes and services.

Invest NI's overarching goal is to help create wealth for the benefit of the whole community by strengthening the economy and helping it grow. It achieves this by supporting business development, helping to increase business export levels, attracting high quality inward investment, and stimulating a culture of entrepreneurship and innovation. Specifically Invest NI has been tasked under the NI Executive's Programme for Government to increase business productivity and boost Northern Ireland's Gross Value Added (GVA) per employee which is around 20 per cent lower than the UK average. GVA is the contribution each employee makes to the economy, and increasing it helps to generate wealth for the benefit of the whole community.

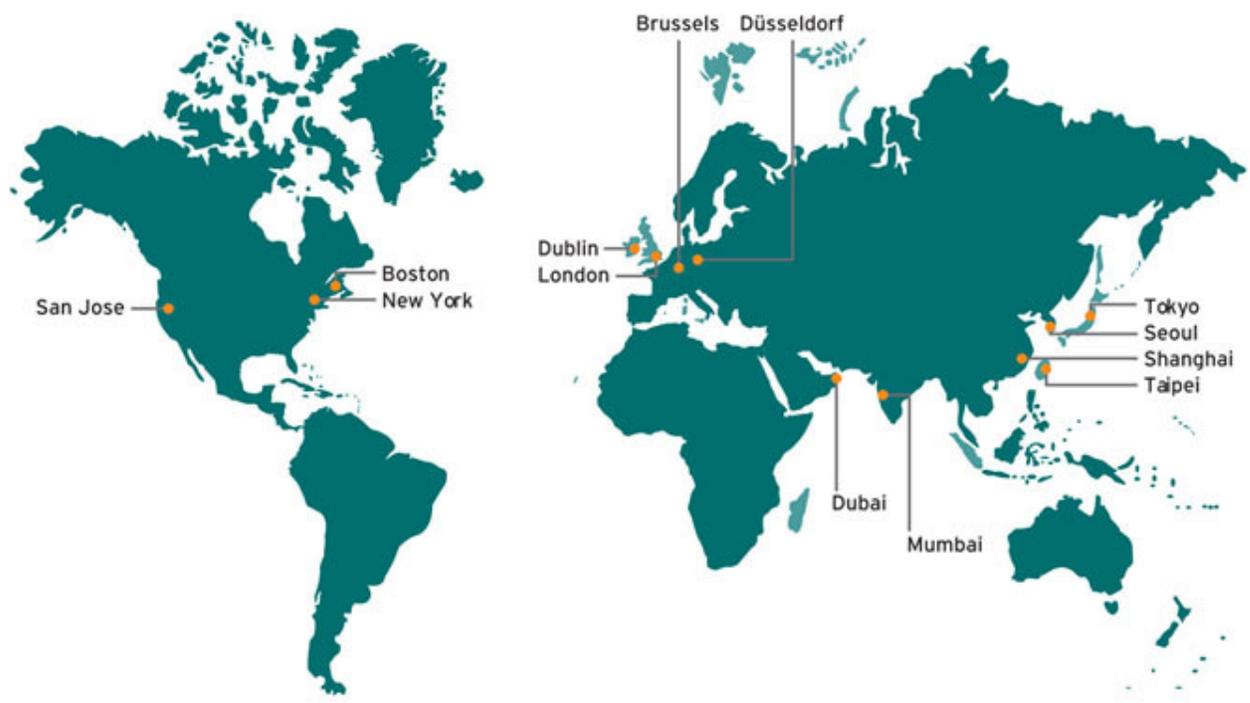
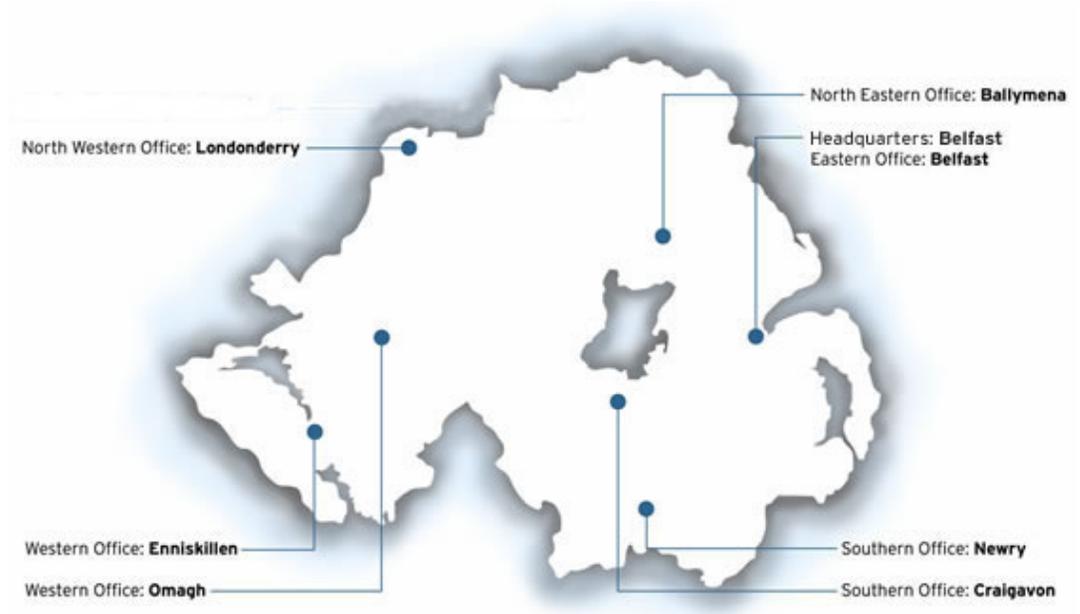
Invest NI therefore provides businesses with a single organisation or 'one stop shop' offering high-quality services, programmes, support and expert advice. While some advice and support is available to businesses in general, clients are predominantly within the manufacturing and tradable services sectors.

Invest NI Structure

Invest NI is a global organisation committed to improving the international competitiveness of Northern Ireland's businesses. Invest NI Headquarters is situated in Bedford Square, Belfast, although services are also delivered locally through a wider network of eight offices across Northern Ireland and 13 offices worldwide. The location of these offices is detailed in the two maps below.

The local office network aims to ensure that indigenous businesses, particularly those with an export focus, can easily access advice, assistance and support. Through

these contact points Invest NI also works with local economic development partners, stakeholders and business service providers to support the growth of regional business communities and infrastructures.



The distribution of offices ensures that there is a local presence right across Northern Ireland. Through its worldwide network of offices, Invest NI also helps attract internationally mobile investors to locate and develop businesses in Northern Ireland and helps local companies to access business opportunities in these important markets.

Corporate Communications and Marketing Unit (CCMU)

Invest NI's Corporate Communications and Marketing Unit (CCMU) is responsible for developing and implementing an integrated marketing and communications strategy for the organisation. The central purpose of CCMU is to provide high levels of customer service in respect of the delivery of a wide range of added value marketing and promotional services. More specifically, the unit provides professional handling and advice in respect of:

- Promotional literature (Corporate & Programme) – creative, copy control & print
- Magazine and e-zine design management
- Open events and closed event management (closed events are based on an invitation being issued typically to Invest NI clients, stakeholders and the wider business community)
- Advertising – tactical & campaign including creative, media planning & monitoring
- Web publishing/marketing – including copy control and imaging
- Invest NI brand control
- Sponsorship management
- Database/tele/direct mail marketing
- Promotional Items

Invest NI Press Office

The objective of the Press Office is to promote Invest NI through the Northern Ireland media, thereby helping the organisation achieve its objectives and to position it as a key player in the development of the Northern Ireland economy.

The Press Office deals with two types of media relations, the first being proactive, concerned with promoting the organisation, and the second being reactive, mainly concerned with responding to issues as and when they arise. The Press Office deals with all Invest NI activity relating to broadcast and print media in Northern Ireland and abroad. Overseas enquiries are either dealt with in-market or referred to Invest NI's International Sales and Marketing Division where staff responds directly.

Within this remit the Press Office provides the following functions:

- Press releases
- Articles (for business/trade magazines or newspapers)
- Photography (for use in media outlets)
- Copy (to support business/trade or newspaper advertising)
- PR management (support and planning)
- Cuttings (via intranet)
- Media enquiry service (journalists' enquiries, interview bids etc)
- Media management at events
- Strategic PR advice

Invest NI's Communications and Marketing Strategy

As part of this strategy Invest NI has set up a detailed website at www.investni.com. This provides information on all of Invest NI's products and services and offers links to other related sites relevant to those interested in setting up, developing or re-locating a business.

The website complies with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) up to level A. The website has already been assessed by an independent consultancy and Invest NI is committed to ongoing improvement in this area.

If customers have problems accessing content on the website, Invest NI can also provide information and documents, if appropriate, in alternative formats. This includes, but is not limited to, the following: braille; disk; audio cassette; and minority languages. If there is a requirement for information that is published on the website in

an alternative format, the site webmaster can be contacted by telephone (028 9069 8069) or via textphone (028 9069 8585).

In cases where customers have no computer or website access, they are able to contact Invest NI directly by phone or can arrange to visit their nearest office. In cases where this is not possible Invest NI will arrange for staff to go out to meet potential clients.

Invest NI Client Support and Selection Criteria

Invest NI's support is both (a) financial and (b) advisory.

Financial assistance

As we work within tight financial constraints we have to focus our financial assistance on projects that have the greatest potential to generate economic growth and prosperity. Financial resources are focused on clients that are generally businesses operating in the manufacturing and tradable services sectors. Normally they are selling, or have the potential to sell, into markets outside Northern Ireland. To be eligible for financial assistance, a project must be viable, show a need for Invest NI support, and generate a positive return to the economy.

Advisory support

We also offer our clients advice and guidance. They can access help with everything from strategic planning through to technical advice, property advice and in-market support regarding exporting. Our aim is to increase the capability of companies, as this will ultimately increase their productivity and competitiveness. It should be noted that while Invest NI provides targeted support as detailed above, it also offers a range of programmes and information services that are open to all businesses, including those that do not currently qualify as Invest NI clients.

Selection criteria

Generally for a business to become an Invest NI client a number of criteria have to be met, namely that the business now, or over the next three years, will have:

- total sales of over £100,000 per year; and
- sales outside Northern Ireland greater than 25 per cent of turnover, or greater than £250,000 a year.

Companies in the tradable services sector (i.e. with the potential to sell their services internationally) must also have the potential to sustain salaries above the Northern Ireland private sector median or demonstrate a minimum gross margin of 20%.

7. CONSIDERATION OF AVAILABLE DATA AND RESEARCH

In developing this EQIA a wide range of information has been drawn upon. These include the following in-house data sources:

- Invest NI Website (including NIBUSINESSINFO.CO.UK)
- Invest NI policies, programmes and initiatives
- Client Executives
- Programme literature and publications
- Invest NI Events and Press Releases
- Third Party Organisations/ Local Enterprise Agencies
- Client and Staff Surveys
- Staff Contact /Focus Groups
- FOI Requests
- Business Information Services & European Information Centre
- Invest NI Business Intelligence website

Alongside in-house information, the EQIA has also been informed by relevant statistics relating to the Northern Ireland economy as derived from numerous external sources and including in particular:

- 2008 Monitoring Report No. 19: A Profile of the Northern Ireland Workforce. Equality Commission for Northern Ireland.
- Labour Market Bulletins 13 – 22 (June 2009). Department of Employment and Learning.
<http://www.delni.gov.uk/index/publications/pubs-stats/labour-market-bulletin.htm>
- National Statistics Local Area Labour Force Surveys 2000 - 2010.

The main focus of this section is to look at two specific areas namely how Invest NI communicates **externally** with its customers regarding its products and services, and also how it communicates **internally** with staff.

As an integral part of the external analysis section, we will also provide information on the geographic distribution of Invest NI's support to its client businesses, demonstrating the organisation's commitment to ensuring accessibility and uptake of products and services on a Northern Ireland wide basis.

EXTERNAL COMMUNICATION

Access to Invest NI Products and Services

Contact enquiries normally fall under one of the following three main themes:

Starting a Business - Invest NI has a range of programmes and a network of dedicated enterprise partners that can offer people advice, information and support to turn business ideas into reality. The priority start-up programmes are offered through our Enterprise Development Programme (EDP) and incorporate the “Go for It Programme”, the “Export Start” and the “Global Start” Programmes. We also offer the “Propel Programme” aimed at those entrepreneurs who have the greatest potential to scale up and reach significant export growth from start up. Other targeted forms of support are also available for starting an export or globally focused business and further assistance is available to help female, young, rural and social entrepreneurs start-up an enterprise.

Growing a Business – Programmes at this stage are aimed at energising growth at every level of business performance. They include, for example, helping businesses develop in the areas of innovation, exporting, marketing, licensing, operating efficiencies and strategy development.

Locating a Business– Invest NI offers a wide range of services to companies that are interested in investing and setting up businesses in Northern Ireland.

Direct Contact Methods

Through its communications strategy, Invest NI has set up a number of routes by which individuals and businesses can make contact for signposting, advice and support. The main communication methods are as follows:

- Accessing the Invest NI website at www.investni.com;
- Contacting by phone or calling at Invest NI Headquarters, Bedford Square, Bedford Street, Belfast, BT2 7EH;
- Calling the widely advertised freephone “Go For It” helpline contact number on 0800 027 0639;
- Contacting by phone or calling directly to Invest NI’s own Local Office Network at the various locations shown in the Northern Ireland map above;
- Accessing the Invest NI sponsored NIBUSINESSINFO.CO.UK website;
- Contacting Enterprise Northern Ireland directly on 028 7776 3555 or the province-wide network of 32 Local Enterprise Agencies (LEAs)
- Calling at or contacting the appropriate overseas offices;

Invest NI also has a text phone number available (028 9069 8585).

By way of example, a summary is provided below, of all Invest NI contacts by entry point over the period 2009-2010:

Entry point	Numbers per annum
www.investni.com	252,483 visits 186,834 visitors
www.nibususinessinfo.com	314,079 visits
HQ Main telephone number	39,523 calls
Regional offices	12,250 calls
Business Information Centre	4287 calls
Business Information Centre	1611 visitors
Number of Invest NI events	78
Number of Invest NI publications	160
Invest NI Textphone	4

*N.B. visitors refers to the number of unique individuals who visited a site
visits refers to the number of times these individuals were on the site*

Invest NI therefore communicates extensively and through a wide range of media. While the websites remain the most popular way of accessing information, the number of phone calls and personal contacts via events and meetings is still considerable.

Client Executive Contact

Along with many of the direct methods listed above, Invest NI works closely with its client businesses through providing business specialists including Client Executives, Business Advisors and Programme Managers.

When a business first becomes a client we assign a Client Executive. This person then becomes the company's main point of contact and works in partnership with the client business, drawing on his/her wide ranging expertise to assess the business needs and to direct effective client specific support. Client Executives have access to a considerable network of contacts that are there to help individuals and businesses with their development needs. Evaluation systems are in place to assess whether our programmes provide value for money and the extent to which customers and clients are satisfied with all aspects of support provided for them.

Client Feedback

Invest NI gathers feedback from clients/customers through various sources, including for example, *client surveys and consultations*.

Client Surveys: In order to assess client satisfaction the organisation undertakes quarterly and annual satisfaction surveys. The quarterly satisfaction surveys are carried out on Invest NI's behalf by an independent service provider, and take the form of a telephone conversation with clients who have accepted a 'Letter of Offer' in the previous two months. This research attempts to gauge client satisfaction with Invest NI's processes, identify any adverse issues, and create a culture of ongoing improvement.

The Annual Client Satisfaction Survey is an effective way of gathering client feedback at a more substantial level to ensure that we continue to provide value for money and appropriate support to our client base. A number of our annual client satisfaction surveys are available to view at www.investni.com. Survey recommendations have led to an ongoing process being developed in order to improve both the internal systems and the overall management of client and customer relationships.

Consultations: Invest NI consults with its customers in a variety of ways. With respect to the Equality agenda, Invest NI has produced four EQIAs and consulted on them through public, community, voluntary and business organisations.

ACCESS FOR THOSE WITH DISABILITIES

Invest NI is not only bound by Section 75 of the Northern Ireland Act 1998 but also by the Disability Discrimination Act (DDA) 1995 and the Disability Discrimination Order 2006. These statutes require Invest NI to ensure that the organisation has due regard, when carrying out its everyday operations, to the need to promote positive attitudes towards people with disabilities and to encourage participation by disabled people in public life.

Disability Action Plan

In line with these disability duties we have produced an outcome-oriented Disability Action Plan. To inform the action planning process, the Invest NI Equality team has worked with a number of organisations in the disability arena over the last number of years, including the Equality Commission, Disability Action, Employers for Disability, Mencap, Royal National Institute for Deaf people (RNID) and the Royal National Institute for Blind People (RNIB).

Invest NI's Disability Action Plan 2008 runs in conjunction with the 2008-2011 Corporate Plan and demonstrates the organisation's ongoing commitment to ensuring that access to services and buildings are compliant with the disability regulations. Indeed the Invest NI Headquarters building in Bedford Street was designed, built and now operates to best practice DDA guidelines.

Invest NI's Headquarters Facilities Team carry out regular audits of the Headquarters building and the local office network to assess level of compliance. They are currently assessing a number of the local offices to identify any areas for improvement around physical access. If any areas of adverse impact are identified then these will be addressed within the action plan. All Invest NI staff, both full-time and part-time, have been fully trained in the legislative requirements associated with both the equality and disability regulations. They are also aware of the necessity, when booking events outside Invest NI, to channel these through Invest NI's Corporate Communications and Marketing Unit. This ensures that all events organised on Invest NI's behalf are arranged at venues compliant with DDA regulations.

The latest Invest NI Disability Action Plan (2008-2011) can be accessed, as before, at the Invest NI website. While web - based systems continue to provide an efficient means of communication, it is important to note that, when required, we can also respond and provide information to those less able to access computers and information technology.

There is therefore a myriad of ways in which Invest NI accesses and communicates with both its existing clients and new potential customers. In order to provide ongoing improvements in our communication and access levels, we rely heavily on regular feedback from our customers to ensure that the services we provide continue to be freely available to all and do not have an adverse impact on any of the nine Section 75 categories.

ACCESS FEEDBACK

If any client has a comment or issue around the quality of the Invest NI service which they receive, full details of the client feedback procedure can be located on the website or alternatively they can contact:

Customer Service Manager
Invest NI
Bedford Square
Bedford Street
Belfast BT2 7ES:

Tel: 028 9069 8148
Fax: 028 9043 6536
E-mail: customerservicemgr@investni.com

GEOGRAPHICAL ANALYSIS OF INVEST NI INTERVENTIONS (2004/2005 to 2008/2009)

For the purposes of this EQIA, it is useful to demonstrate, by geographical means, Invest NI's commitment to ensuring full communication of, accessibility to and uptake of its services on a Northern Ireland wide basis. Throughout this section we provide an overall comparison of Invest NI assistance and activity between sub-regional geographic areas.

In the figures and graphs outlined in this section we have demonstrated our assistance both by **District Council Area (DCA)** and by **Invest NI Regional Office Area**. It should also be noted that total assistance offered by adult population is presented as an "amount per head figure" and we have shown assistance over a five-year period to March 31st 2009. This period has been used in order to provide a substantial picture of assistance levels and is in line with the way in which statistics are presented in previous Invest NI Performance Information Reports.

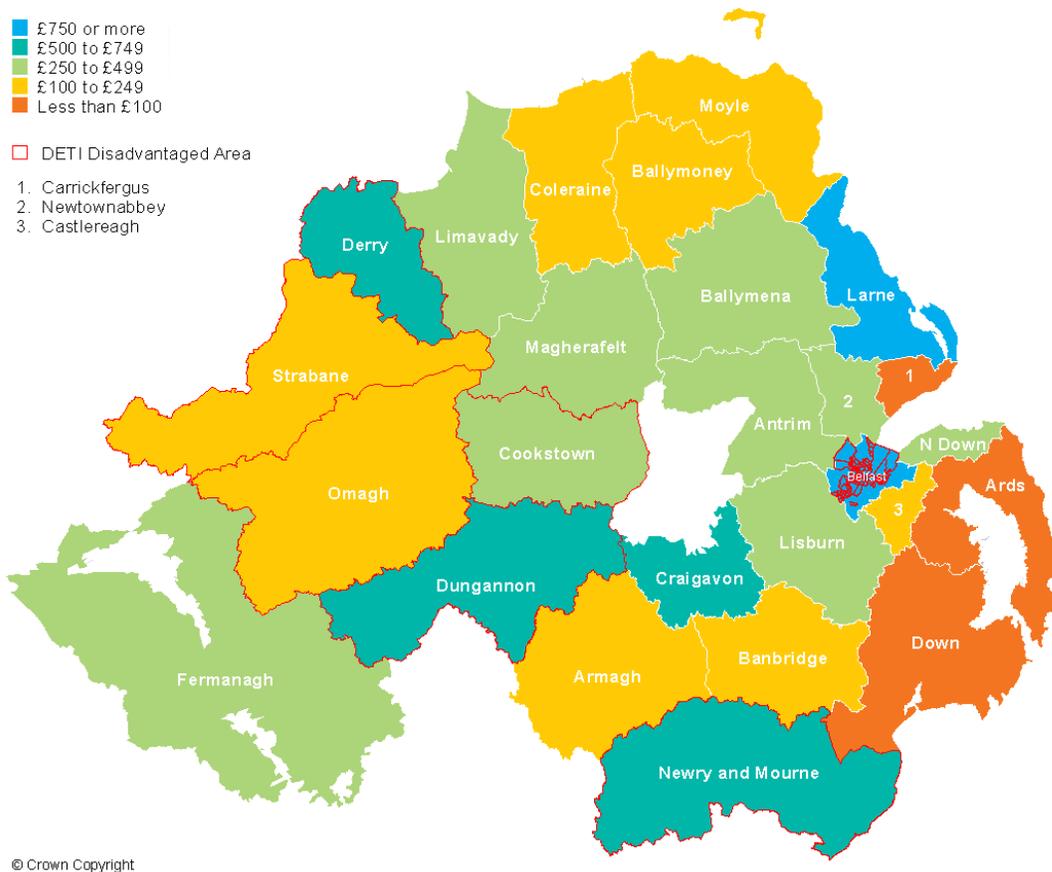
Regarding Invest NI's ability to influence the location decisions of new internationally-mobile projects, it is worth noting that the decision regarding a specific location remains with the business itself. Indeed assistance patterns continue to be largely demand-led by businesses wishing to improve their competitiveness and gain a larger share of international markets. The fact that geographically Northern Ireland is a relatively small area should not be forgotten, with evidence showing that many people travel to work across local administrative boundaries. For example, the NI data confirms that 55% of those who work in Belfast DCA reside in other areas. It should also be remembered that the benefits associated with business development are not constrained by local boundaries such as District Council Areas (DCAs) which are not self-contained labour markets.

Invest NI's work provides assistance for businesses to improve their competitive position, which in turn may lead to employment creation. Since much of the mobile foreign investment which Invest NI targets and wins is in the tradeable services

sector, the main differentiator is access to skilled workers. Therefore, metropolitan areas such as Belfast are likely to have an advantage, in that they provide both access to a critical mass of population and opportunities for those who can commute relatively short distances. In the case of established businesses, reinvestment patterns will mostly be determined by the existing location of the business. The following analysis considers how these factors come together in the determination of patterns of support across Northern Ireland.

INVEST NI ASSISTANCE BY DISTRICT COUNCIL AREA (DCA) and REGIONAL OFFICE AREA

Fig. 1 Invest NI Assistance per Head of Adult Population by District Council Area (DCA)



During this five year period Invest NI offered almost £611m of assistance (that can be analysed geographically) to 4,590 businesses across the Northern Ireland. This equates to £443 per head of adult population². Figure 1 above illustrates the levels of assistance offered per head of adult population across the 26 District Council Areas (DCAs). Of the areas designated by OFM/DFM as ‘disadvantaged’³, Derry

² Population based on 2007 mid-year population estimates.

³ OFM/DFM Lifetime Opportunities³ (November 2006) - Anti-Poverty and Social Inclusion Strategy for Northern Ireland - identifies ‘disadvantaged’ areas based on their relative levels of deprivation according to 25 indices – see Appendix 2.

<http://www.ofmdfmi.go.uk/antipovertynov06.pdf>

(£683 per head), Newry & Mourne (£525), Dungannon (£571) and Cookstown (£471) were higher than the Northern Ireland rate, while Omagh (£226) and Strabane (£152) were lower. Belfast City Council (£981), which includes a number of 'disadvantaged' areas, had the highest rate of assistance per head of all 26 DCAs.

It should be noted, however that the results for Belfast have been significantly influenced by the offer of £21m of assistance (£520m investment) to the Bombardier C series Project, although benefits from this project will be distributed across a much wider area. This point is relevant for all references to the Belfast/East Belfast figures in the remainder of this section.

Additionally, superior road and rail networks and the location of Belfast City Airport, coupled with the proximity to the city centre, continue to make Belfast an attractive area for businesses to locate. Furthermore Queen's University is located near to the city centre providing easy access to a diversity of skills, technology, suppliers and customers. The University also received substantial funding (£10m innovation assistance) towards a range of research-based, high technology projects. The benefits arising from such investments will not, however, be restricted to those who reside in South Belfast since around 75% of those working in the constituency travel there from other areas across Northern Ireland.

Fig. 2 Inward Investment per Head of Population by District Council Area

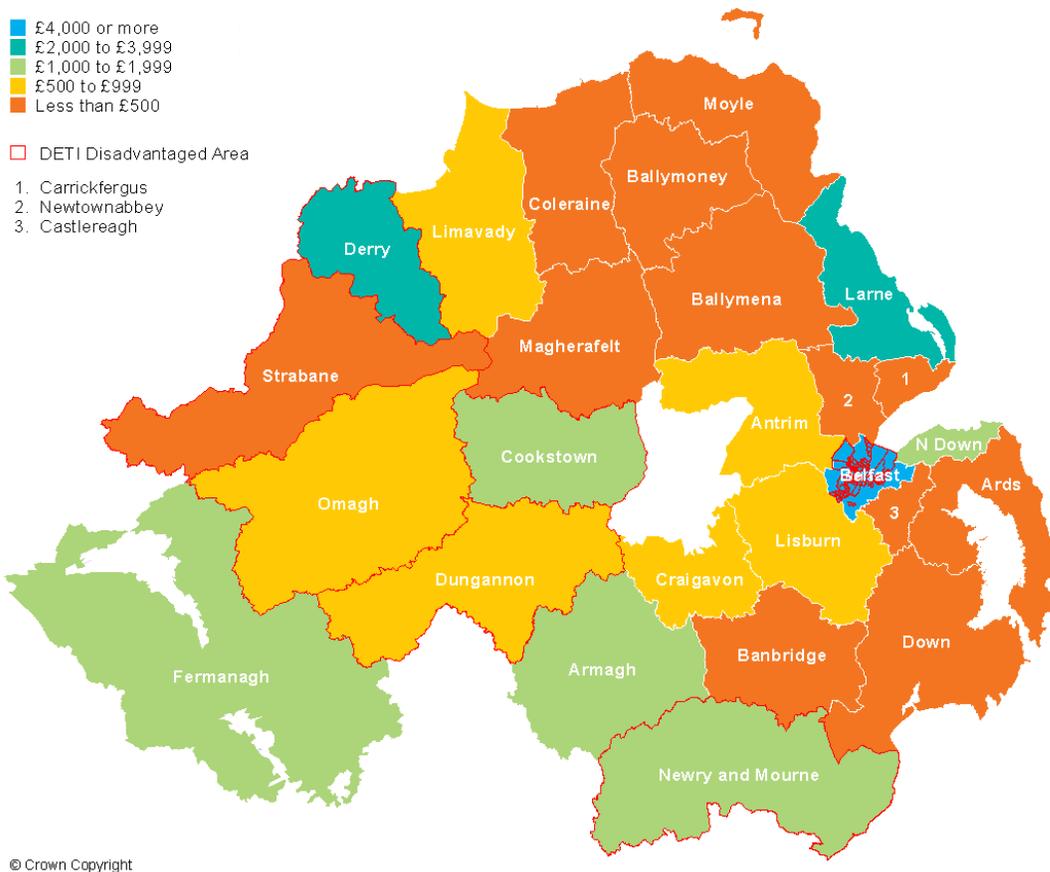
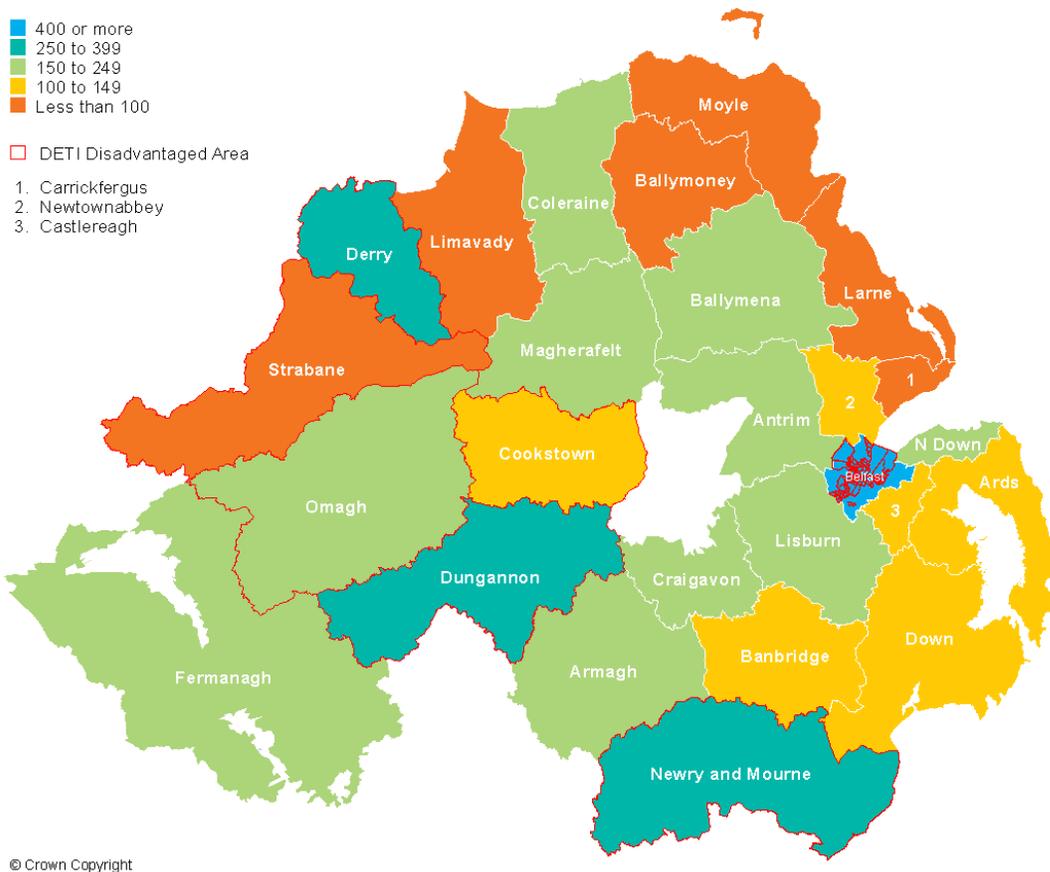


Fig. 2 shows the levels of inward investment per head of adult population by DCA. During the 5 year period, Invest NI made 1,057 offers of assistance totalling almost £312m to externally owned businesses that planned to invest almost £2.1bn in the local economy. Four 'disadvantaged' areas were in the top 10 DCAs in terms of rates of inward investment per head across Northern Ireland - Derry ranked 3 (£2,416), Newry & Mourne at 4 (£1,490), Cookstown at 7 (£1,096) and Omagh at 8 (£950). Belfast, which contains some 'disadvantaged' areas, had the highest rate of inward investment per head at £5,361 compared to £1,502 for Northern Ireland as a whole, but again the Belfast figure is inflated due to the Bombardier project referred to earlier. As previously mentioned, whilst being able to present the merits of certain areas, Invest NI cannot direct inward investment projects to specific locations.

Fig. 3 Number of Businesses Assisted by Invest NI by DCA



During the 5 year period, Invest NI directly assisted 4,590 businesses (with growth potential in external markets) spread across all areas of Northern Ireland. Fig. 3 shows the concentration of these businesses at District Council level. The area containing the highest number of assisted businesses was Belfast (679), followed by Derry (297). However, outside these areas there was a healthy balance in the spread of businesses supported across the 26 DCAs. After Belfast and Derry the highest concentration was in Newry & Mourne (276) and Dungannon (251).

Fig. 4 Number of Indigenous Start-Up Businesses per 10,000 Adult Population by DCA



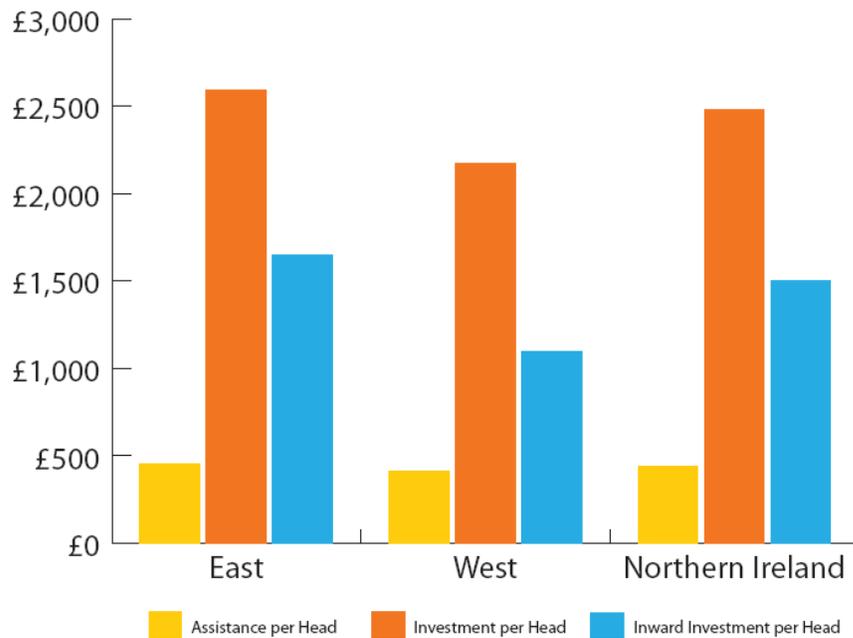
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In addition to assisting the existing businesses as detailed in Fig. 3, Invest NI also supports, through the delivery agent Enterprise Northern Ireland, a large number of business start-ups. Fig. 4 presents an analysis of the volume of assisted indigenous business start-ups and how they were distributed by District Council Area. During the five years, 16,379 businesses were assisted in total, 15,844 of these through the Start A Business Programme (now the Enterprise Development Programme) delivered in conjunction with Enterprise Northern Ireland. The start-up business rate per 10,000 adults was 119 for Northern Ireland as a whole. Across the 'disadvantaged' areas, those in the West had higher start-up rates than the East, with Cookstown (173), Dungannon (160), Omagh (158), Derry (157), and Strabane (132) being well above the Northern Ireland rate, while Belfast was below with 87.

Regional Comparison

Having examined assistance patterns by smaller sub-geographic areas such as DCA it might be also meaningful to look at patterns based on larger geographic areas as they are more likely to contain a higher proportion of people who both live and work in that area. To achieve this, assistance and investment data has been compared for areas defined as the 'East' and 'West' of Northern Ireland⁴, a summary of which is presented in Fig. 5, and for the five Invest NI Regional Office Areas in Fig. 6.

Fig. 5 Assistance, Investment and Inward Investment in the East & West of Northern Ireland



The level of financial assistance offered per head of adult population was marginally higher in the East (£455) as compared to the West (£411). Both the amount of investment per head and the amount of inward investment per head supported by Invest NI was higher in the East than the West (driven up by the Bombardier project).

⁴ The composition of these areas is as follows: East DCAs - Armagh, Antrim, Ards, Ballymena, Ballymoney, Banbridge, Belfast, Carrickfergus, Castlereagh, Craigavon, Down, Larne, Lisburn, Moyle, Newry & Mourne, Newtownabbey, North Down. West DCAs - Coleraine, Cookstown, Derry, Dungannon, Fermanagh, Limavady, Magherafelt, Omagh, Strabane.

Fig. 6 Invest NI Assistance per Head of Population by Regional Office Area

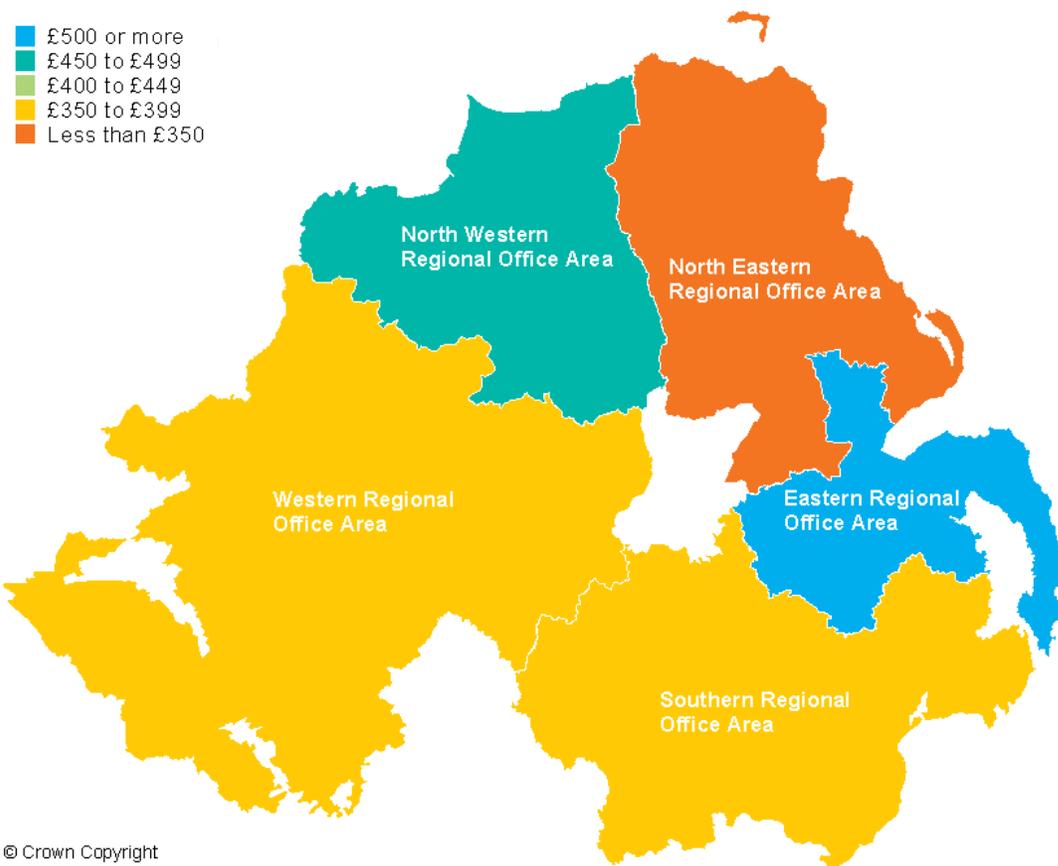
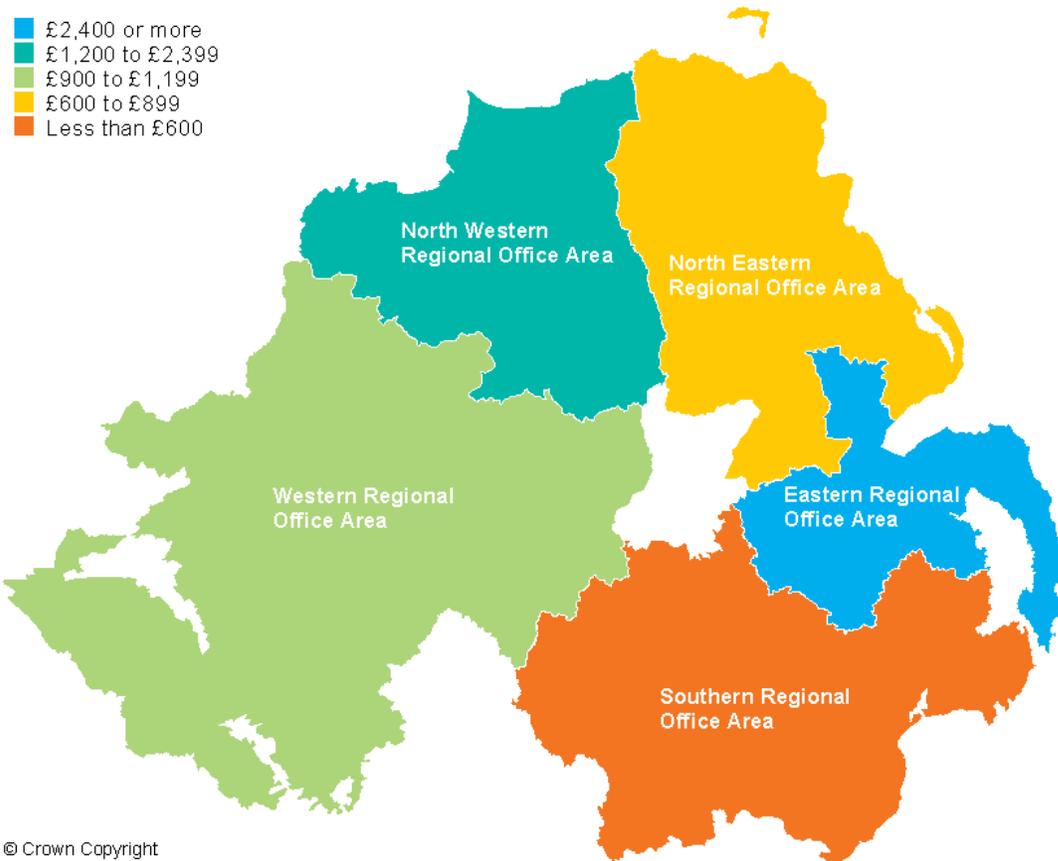


Fig. 6 illustrates the levels of Invest NI assistance offered per head of adult population across the five Invest NI Regional Office areas⁵. The rate for Northern Ireland as a whole was £443. Of the five areas, the Eastern (£536 per head) and North Western areas (£472 per head) were offered the highest amounts of assistance per head; however, these areas contain the principal cities of Belfast and Londonderry and would be expected to attract higher levels of investment for the reasons explained earlier. There was a significant amount of parity in assistance per head across the other three areas with the Southern area having a rate of £367 per head, the Western at £350 per head and North Eastern at £344 per head.

⁵ Areas reflect boundaries in place as at April 2010

Fig. 7 Inward Investment per Head of Population by Regional Office Area



Levels of inward investment per head of adult population across the Regional Office areas can be seen in Fig. 7. The rate for Northern Ireland as a whole was £1,502 per head. Again the highest rate per head was in the Eastern (£2,478) and North Western (£1,292) regions, presumably reflecting the proximity of Northern Ireland's main cities. The other rates were £905 in the Western region, £780 in the North Eastern and £595 in the Southern region. Similar to District Council areas, Invest NI has limited scope for directing inward investors to a particular area, perhaps helping explain this distribution pattern.

Fig. 8 Number of Businesses Assisted by Invest NI by Regional Office Area

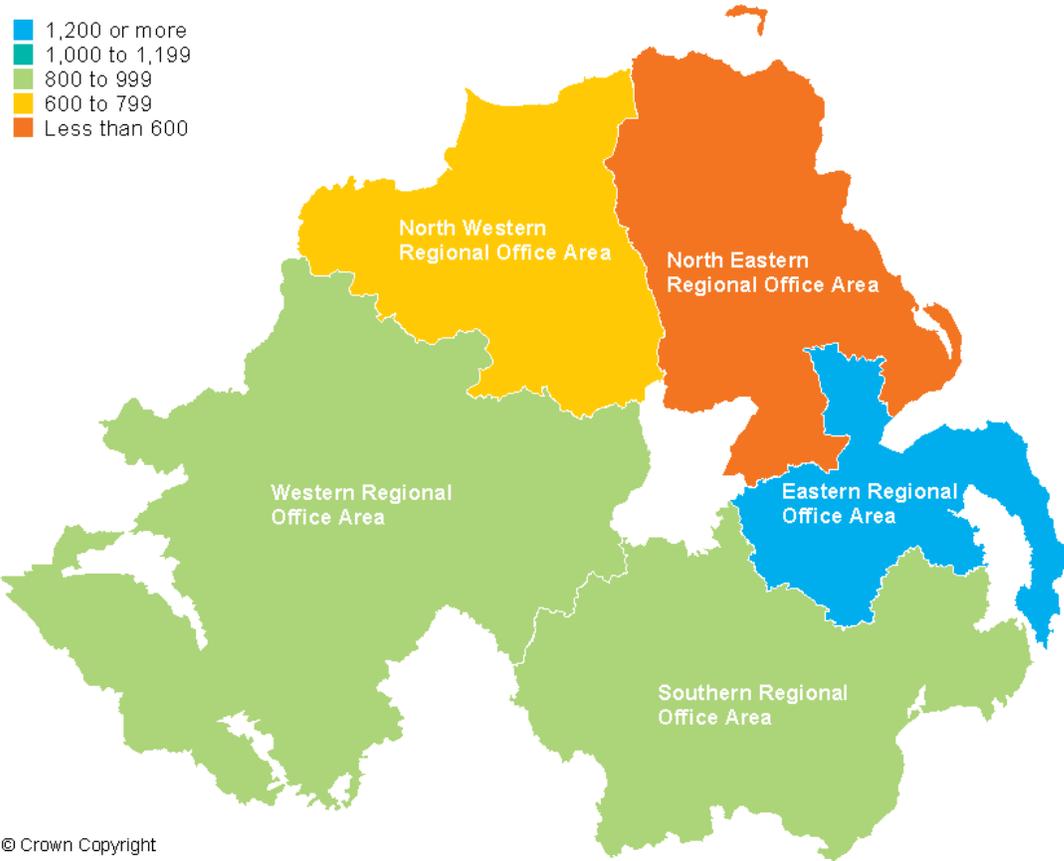


Fig.8 again demonstrates the wide-ranging distribution of businesses assisted by Invest NI across all Regional Office areas. The largest concentration of supported companies was in the Eastern region (1,439). The next highest area was the Southern region with 945, closely followed by the Western region with 869. The North Western region contained 761 assisted businesses and the North Eastern office had 575. These results broadly reflect the adult population in each area and support Invest NI's commitment to assist businesses in every region of Northern Ireland.

Fig. 9 Number of Indigenous Start-Up Businesses per 10,000 Adult Population by Regional Office Area

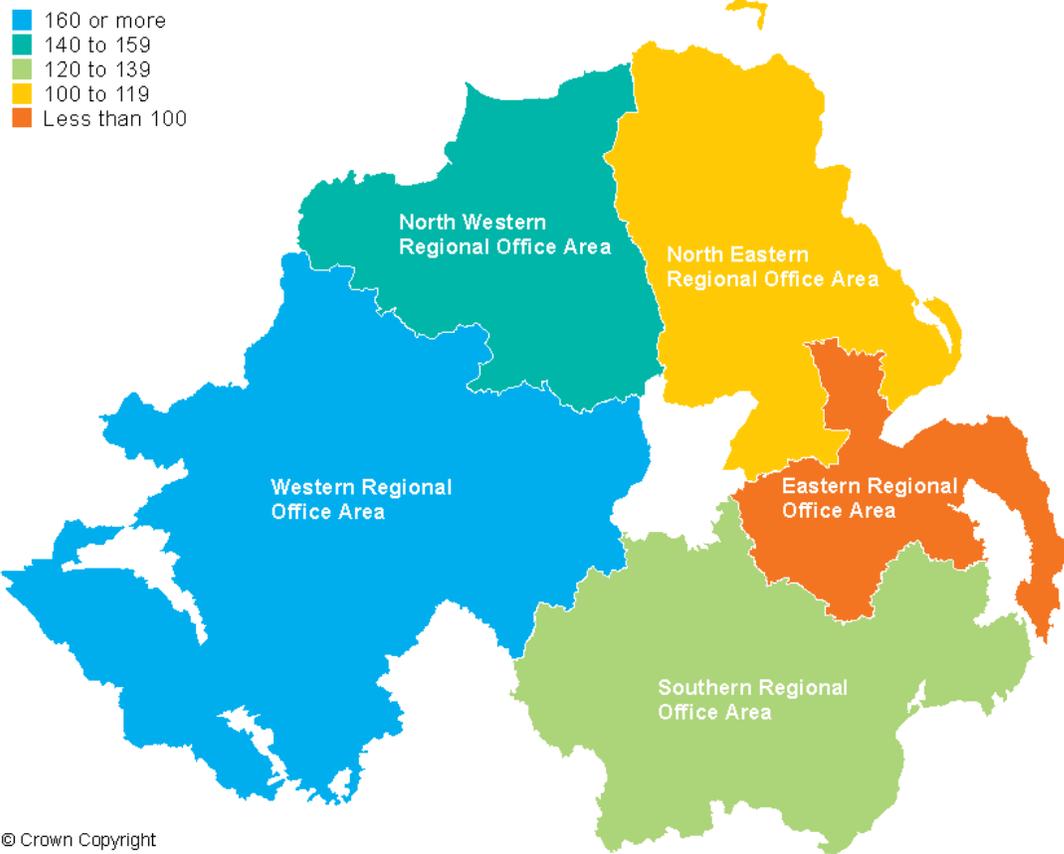


Fig. 9 presents an analysis of assisted indigenous business start-up activity, and its distribution across Northern Ireland by Invest NI Regional Office. The rate of start-up activity per 10,000 adult population was highest in the more rural Western (172) and North Western areas (155) and lowest in the Eastern area (87). Reasons for this may include limited access to other opportunities and the relatively large number of agricultural businesses in these areas.

Assistance by Region and Employees' Community Background

Using both the Equality Commission's latest monitoring information (Monitoring Report 19, 2008; the next Monitoring Report will not be carried until end December 2010) we have presented below a comparison between the Invest NI client group of businesses and the broader NI business base. Employees in Client companies were profiled by community background and location, with companies assigned a geographical location based on the position of their Headquarters. The wider business base as provided by the Equality Commission is a list of those private sector businesses (employing 26+ people) that have provided employment monitoring returns to the Equality Commission, and includes the 409 Invest NI client companies. The total usable sample of businesses from the Equality Commission was 1572 but as 140 of these had HQ addresses listed in GB these could not be included in this analysis leaving a sample of 1432.

Table 2a: Invest NI Client Companies by Region and Community Background of Employees

Regional Office	Invest NI Client Group					Equality Commission				
	No. of Clients	Employees	% Employees			No. of Companies	Employees	% All Employees		
			P	C	ND			P	C	ND
East	153	37,652	62	32	6	740	141,888	57	37	6
North East	55	15,825	66	25	9	152	25,116	65	27	8
North West	61	10,031	38	57	5	175	23,076	43	51	6
Southern	86	15,378	49	43	8	216	30,358	45	48	7
Western	54	9,201	37	54	9	149	16,612	39	54	7
Grand Total	409	88,087	55	38	7	1432	237,050	54	40	6

P (Protestant); C(Catholic); ND (Non Determined)

Table 2b: Invest NI Client Companies by East / West and Community

Background of Employees

Region	Invest NI Client Group					Equality Commission				
	No. of Clients	Employees	% Employees			No. of Companies	Employees	%All Employees		
			P	C	N D			P	C	ND
East	294	68,855	60	33	7	1108	197,362	56	37	7
West	115	19,232	38	55	7	324	39,688	41	53	6
Grand Total	409	88,087	55	38	7	1432	237,050	54	40	6

These tables indicate that the community background of employees working for companies supported by Invest NI does not differ significantly from the wider working population by region, with no percentage figure varying by more than 5% from the baseline Equality Commission figure and no consistent trend for either over or under representation of Protestants or Catholics. This indicates a fair distribution of resources by community background.

Summary of Analysis of Assistance

While the above analysis of support programmes is not intended to be exhaustive, it does provides a clear indication that Invest NI continues to attract support from across the region, and its presence, while reflecting on a range of historical, demographic and socio-economic variables, allows for representation from all sections of the community across Northern Ireland. It is also useful to note that during the past five years 55% of the assistance offered by Invest NI was to projects located in the designated disadvantaged areas, which contain 30% of the Northern Ireland population. This demonstrates a skewing of resources to areas which are most economically disadvantaged and increasing access to new employment opportunities by those living in them.

INVEST NI CLIENT EQUALITY MONITORING

Within this external communication section it is important to refer to the equality monitoring efforts of Invest NI. Since Invest NI's resources are constrained we must ensure that they are focused on those businesses which have the greatest potential to contribute towards the growth of the Northern Ireland Economy. Whilst some of our services, such as the provision of information and guidance, are accessible to all businesses, the financial support which is provided through Invest NI is directed at those with the potential for growth through the development of markets outside Northern Ireland. These, as a whole, constitute what we refer to as our "client portfolio".

In line with our obligations under the equality legislation Invest NI, from 2008, has put in place a systematic equality monitoring strategy to gather information on the profile of both individual clients and companies who engage with the organisation. So far we have obtained equality monitoring data on a small number of Invest NI's programmes targeted at individuals. However because the Invest NI budget is predominantly targeted at businesses as opposed to individuals, these monitoring results would not be sufficient to provide a true equality picture. We are currently carrying out equality monitoring of our interventions available to companies, but as yet this has not been finalised. Once the company monitoring is complete we will be able to produce a more representative picture of the collated equality information.

INTERNAL COMMUNICATION WITHIN INVEST NI

Invest NI communicates with its staff on a regular basis through a wide range of information channels, with some of the more widely used methods shown below:

Staff e-mail, memos and telephone calls

Newsweekly Bulletins (e-zine)

Team and Divisional meetings

Staff Training

Invest NI Intranet

Project /Working Groups

Notification of Jobs

Staff Magazine

Business Intelligence Website

Meet the Chief Events

Staff Focus Groups

Staff Surveys

Staff Conferences

Staff Focus Group

For the purposes of the current EQIA, a staff focus group was established to access opinion from a wide range of employees across the organisation. As well as helping to scope the EQIA, the focus group meeting was designed to help prioritise themes within the EQIA. In an open discussion of emerging issues, key points that were highlighted by participants included the following:

- There is a need to focus on how we approach our customers, both existing and new;
- Initial contact points should be a matter of priority, including Invest NI reception areas, Local Enterprise Agencies, Third Party Organisations, Client facing staff, media and the website;

- We must ensure that we work with a range of businesses for our invitee events including trade missions, seminars and programmes, ensure that all geographical areas of NI are included;
- We must ensure that our customers have a clear and accurate understanding of the sectors in which we intervene;
- We should make sure that newly promoted initiatives or schemes arising due to the current economic situation are understood by customers and are promoted to all;
- In many cases how Invest NI deals with clients needs to be more consistent across the business;
- Issues around staff promotion should be addressed – there is a need to work more closely with Human Resources Team to ensure better communication in this area in terms of the filling of vacancies as they arise and the advertising of internal job opportunities;
- We must encourage working with corporate marketing division so as to ensure consistency of approach and highlight our overall communications policy;
- Our communications policy should ensure that we interact in a positive manner with all of the Section 75 groups.

These issues will be addressed through the Invest NI current “Transform Programme” which has been implemented as a result of the recent Independent Review into Economic Policy, as commissioned in December 2008. This programme will build on the success of the organisation to date and focus on a change management process designed to increase the overall impact of Invest NI activities.

INVEST NI STAFF PROFILING

To help inform the EQIA, a breakdown of Invest NI staff by age, gender, disability and community background was undertaken. The monitoring statistics tabulated below have been compiled by Invest NI's Human Resources Division as at January 2010. At present Invest NI monitors on the above categories but is currently exploring the possibility of monitoring on all nine of the Section 75 categories.

Gender

GRADES	GENDER					
	M		F		Total	
ANCILLARY, AA & AO	22	30%	51	70%	73	12%
EO2	34	27%	92	73%	126	20%
EO1	11	33%	22	67%	33	5%
SO	41	39%	64	61%	105	17%
DP	101	56%	78	44%	179	29%
GRADE 7	58	66%	30	34%	88	15%
GRADE 6 & ABOVE	17	74%	6	26%	23	3%
TOTALS	284	45%	343	55%	627	

At the present time, 45% of employees are male and 55% female. Women continue to be over-represented in grades up to and including Staff Officer (68%). However, this trend is reversed after DP grade. At grade 7 and above, men comprise 68% of staff. Across the public sector in Northern Ireland, 63.3% of the workforce are female (Equality Commission Monitoring Report No.19, 2008) although within the Civil Service this figure falls to 49.7%. Hence, the gender profile of Invest NI does not appear to be exceptional.

Community Background

GRADES	RELIGION					
	P		RC		ND	
ANCILLARY, AA & AO	32	44%	41	56%	0	0%
EO2	68	54%	58	46%	0	0%
EO1	19	58%	13	39%	1	3%
SO	59	56%	46	44%	0	0%
DP	95	53%	82	46%	2	1%
GRADE 7	45	51%	42	48%	1	1%
GRADE 6 & ABOVE	16	70%	6	26%	1	4%
TOTALS	334	53%	288	46%	5	1%

53% of the current workforce is Protestant, 46% is Roman Catholic and 1% is non-determined. This is broadly in line with the Equality Commission's most recent Monitoring Report (No. 19) of 2008. This indicated that of the total Northern Ireland monitored workforce, 50.8% were Protestant and 42.0% were Roman Catholic, with 7.2% non-determined (i.e. 55% Protestant, 45% Roman Catholic excluding non-determined).

Within the NI public sector, the composition stands at 51.7% Protestant, 43.0% Roman Catholic and 5.2% non-determined (55% Protestant, 45% Roman Catholic, excluding non-determined). The relative proportion of each religion at each grade within Invest NI appears to mirror general labour market trends, with the exceptions of the Ancillary, AA and AO grade where Roman Catholics make up the majority of employees (56%) and at Grade 6 and above where 16 of 23 managers (69%) are Protestant.

Age

GRADES	AGE											
	18-21		22-30		31-40		41-50		51-60		61-65	
ANCILLARY, AA & AO	2	3%	34	46%	19	26%	10	14%	8	11%	0	0%
EO2	0	0%	40	32%	57	45%	22	17%	7	6%	0	0%
EO1	0	0%	4	12%	8	24%	10	30%	11	33%	0	0%
SO	0	0%	12	11%	54	51%	27	26%	9	9%	3	3%
DP	0	0%	4	2%	60	34%	78	44%	32	18%	5	3%
GRADE 7	0	0%	0	0%	23	26%	41	47%	20	23%	4	5%
GRADE 6 & ABOVE	0	0%	0	0%	0	0%	15	65%	8	35%	0	0%
TOTALS	2	0.3%	94	15%	221	35%	203	32%	95	15%	12	2%

The profile of Invest NI staff by age would continue to indicate that a younger age profile characterises more junior grades while more senior staff are on average older. There are no staff under 40 at grade 5 or above and only 4 aged under 30 at Deputy Principal grade or above, while the relative numbers of staff aged over 50 at Grade EO2 or below remains low. These figures are not seen to be exceptional but are likely to mirror career development and progression across time.

Disability

GRADES	DISABLED	
ANCILLARY, AA & AO	3	4%
EO2	1	0.7%
EO1	0	0%
SO	2	2%
DP	2	1%
GRADE 7	0	0%
GRADE 6 & ABOVE	0	0%
TOTALS	8	1%

Of the total Invest NI workforce, 8 (1.2%) have self-declared as having a difficulty in relation to mobility, access or disability.

Other Section 75 Categories

Invest NI monitors all applicants and records the information provided by the applicants on the following areas through to appointment – age, religion, ethnicity, gender and disability. We monitor and report on applicants and employees as per our legal requirements. Invest NI is currently considering the introduction of a monitoring process to cover all nine Section 75 categories.

8. CONSIDERATION OF ADVERSE IMPACT

Invest NI continues to engage with a labour market that is segregated in many ways and including some of those associated with Section 75 grounds. While many of these economic inequalities lie outside the scope of Invest NI's work, we remain committed to furthering equality of opportunity across the Northern Ireland labour market by widening access to our services through various means of communication.

Our previous EQIAs in relation to the Accelerating Entrepreneurship Strategy (2005), Recruitment and Selection (2006), Business Development Solutions (2007) and the Corporate Plan 2008-2011(2008) all included positive steps that have already been taken to widen access and improve communications.

The present EQIA has built on existing work by considering ways in which access and communications both externally and internally can be enhanced so as to further promote equality of opportunity and good relations.

A preliminary review of the available data would not suggest that Invest NI's Access and Communications policies and procedures are likely to have a significant adverse impact on any group attaching to the nine Section 75 grounds but instead significant steps have already been taken to promote equality of opportunity through targeted positive action measures. At the same time, the report and associated background research has highlighted or drawn attention to the following issues relating to access and communications and the nine Section 75 grounds.

Religious Belief: Taking into account all economic and demographic variables that impact on businesses in Northern Ireland, the distribution and availability of Invest NI support across Northern Ireland does not appear to have an adverse impact on any one community. The profile of Invest NI staff continues to be representative of the wider community. All events and functions continue to be offered in a way that encourages representation from all sections of the community, irrespective of religious belief and/or political opinion. The profile of participants attending Invest NI programmes by community background would suggest some imbalance but this may

reflect wider social trends and in particular patterns of graduate migration from Northern Ireland.

Political Opinion: Taking into account all economic and demographic variables that impact on businesses in Northern Ireland, the distribution and availability of Invest NI support across Northern Ireland does not appear to have an adverse impact on any one community. The profile of Invest NI staff continues to be representative of the wider community. All events and functions continue to be offered in a way that encourages representation from all sections of the community, irrespective of religious belief and/or political opinion.

Gender: Invest NI continues to work in a labour market that is segregated on grounds of gender. Through targeted positive action measures (that are lawful under existing sex discrimination legislation), Invest NI has helped to reduce historical inequalities. The breakdown of Invest NI staff by gender also reflects wider social trends while the monitoring profile of those individuals on Invest NI programmes suggests lower female participation and this is a matter worthy of further consideration. In general terms however, no adverse impact was noted with regard to how services and premises are accessed by either gender.

Disability: Invest NI remains aware of the under-representation of those with a disability within the labour market and is committed to working with strategic partners to redress this imbalance. All facilities, events and services have been subject to scrutiny, including the website, regarding accessibility and no adverse impact has been identified.

Race / Ethnic origin: The overwhelming majority of clients accessing Invest NI services appear to be white European, and representation of ethnic minorities remains low. In the absence of up-to-date population statistics it is not possible to determine whether this profile is imbalanced but there is no evidence to suggest that existing policies with regard to access and communications will have an adverse effect on minority ethnic individuals or communities.

Age: Through both formal and informal feedback the impact of the 'digital divide' on accessibility of Invest NI services and support was noted, along with potential adverse impact on older people. While computer-based systems are likely to continue to be the primary medium of communication, the EQIA has revealed that alternative means of communication remain in place and will continue for the foreseeable future. The age profile of Invest NI staff is not atypical.

Marital Status: No adverse impact was identified.

Dependancy: No adverse impact was identified.

Sexual Orientation: No adverse impact was identified.

Overall, the data available on businesses, clients and staff alike suggest that existing access and communications policies are not having a significant adverse impact on any of the nine grounds. However, largely reflecting the history of Northern Ireland business and industry, it would appear that our client base remains predominantly white and European and this may be a matter worthy of further consideration given the increasing ethnic diversity of the region. Furthermore Invest NI continues to be conscious of, and responsive to, longstanding issues attaching to community background, gender, disability and age that operate within the Northern Ireland economy and labour market.

9 MEASURES TO MITIGATE / ALTERNATIVE POLICIES (Preliminary Recommendations)

Invest NI remains fully committed to making a contribution to stimulate economic growth, improve productivity and create wealth in all parts of Northern Ireland, and including areas of relative deprivation, so as to help narrow the gap on key indicators such as economic inactivity. This work will continue with due acknowledgment that there are many deep-rooted social and economic issues that continue to conspire to create and sustain inequalities. To remedy these inequalities will require the co-ordinated efforts from all parts of government with support from the private sector.

Having considered available data and research and considered any adverse impact which may arise, and recognising that no Section 75 ground presents immediate cause for concern, it is proposed that Invest NI will build on its existing EQIAs in taking the following actions in respect of widening access yet further and improving communication, both internally and externally⁶:

1. Invest NI will work increasingly closely with DETI, other departments and the private, voluntary and community sectors, to contribute towards addressing any existing and emerging inequalities in the Northern Ireland labour market.
2. Invest NI will continue to adopt an appropriate methodology for monitoring its clients and support services with regard to appropriate Section 75 grounds. It will also remain responsive to emerging equality of opportunity issues associated with the labour market. Projects have addressed or are currently addressing the needs of, for example, women entrepreneurs and those with dependants (e.g. promotion of childcare voucher schemes).
3. In line with the Equality Commission's Guide to Promoting Good Relations, Invest NI will refine its Good Relations Strategy and will consider appropriate

⁶ These measures deliberately overlap with, and complement, those found in existing Invest NI EQIAs (see p.8) in order to help consolidate an integrated Section 75 strategy that will inform the forthcoming Action Plan and revised Equality Scheme.

positive action measures to support this strategy. This work will follow on from any new guidance on good relations emerging from the Executive and government departments, including OFMDFM, over coming months.

4. Ongoing training of all staff in relation to equality of opportunity and Section 75 responsibilities will remain a corporate priority. Where external agents or consultants work alongside Invest NI then their contractual responsibilities to meet Invest NI's Section 75 obligations will continue to be made clear through the Central Procurement Directorate's (CPD) contract.
5. The selection criteria which apply to any scheme, programme or support mechanism operated by Invest NI will continue to promote 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 and, as appropriate, mitigated.
6. 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.
7. For those who are not fluent in English, we will continue to ensure that appropriate translation services are made available during early stages of support. However, such support will be on the clear understanding that the operation of an effective and efficient business in the medium to longer term is likely to require fluency in English among senior management and key staff.
8. We will continue to take forward our Disability Action Plan through informed interventions and appropriate consultations with representative bodies.
9. Working with appropriate representative groups, we will continue to ensure all our premises, facilities and venues are fully accessible to those with a disability. This will include ensuring, for example, that textphone numbers are added to staff and office contact details.

10. While web-based systems continue to provide an efficient means of communication, both internally and externally, mindful of the 'digital divide' we will continue to be responsive to the needs of those who may be less able to access computers and information technology (IT).
11. Reflecting on the Transform Programme (the current Invest NI internal change programme) currently underway, Invest NI is likely to undergo substantial changes over the coming period. This strategic change programme, which is seeking to accelerate the impact of Invest NI's support to Northern Ireland businesses, will evaluate the potential for us to improve productivity by engaging with and supporting a wider customer base than is currently the case.

This programme is likely to affect NI businesses that are VAT registered (excluding agriculture) and who have the potential to grow sales outside of Northern Ireland. Transform aims to improve the performance and impact of Invest NI's interactions; embed a customer-led service culture at all levels; enhance the customer experience of Invest NI and bring clarity to product/service offerings through streamlined and simplified services. All stages of implementation will be subject to scrutiny under Section 75 and including screening and EQIAs as appropriate.

These measures, when implemented, should further promote equality of opportunity generally, in compliance with Invest NI's obligations under Section 75 of the Northern Ireland Act 1998. As previously stated in our Equality Scheme, the amended policies will be regularly monitored to ensure that no adverse impact occurs.

10. FORMAL CONSULTATION

The EQIA report was published in May 2011, 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:

- 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 intranet.
- Invest NI put in place systems to ensure that the EQIA was available in accessible formats, and in a timely fashion.

Invest NI received two written requests for copies of the draft EQIA and one written response from Disability Action was received.

11. SUMMARY OF COMMITMENTS AND AGREED ACTIONS

Comments and Responses to the EQIA of Invest NI's Draft Communications and Access Policy.

Respondent	Comment Received	Invest Northern Ireland Response
Disability Action	Regarding website accessibility the minimum recommendations is for level AA. Disability Action would ask what action plan/timescale is in place to improve access for people with disabilities. The Disability Action Plan states May 2011, has this been achieved?	We are re-purposing our website to reflect the new 21 solutions approach for Invest NI. This means a new site style and copy on the existing Content Management System (CMS). The website was designed to be AA compliant for release. We have not yet engaged a 3 rd party to verify accessibility but we will be doing this in the coming months.
	Disability Action recommends that Invest NI include large print in the range of alternative formats available	This is currently available and will continue to be made available.
	Additionally, Disability Action seeks information on the current number of requests for information in other formats. This information could have been used to inform this EQIA and if external communications are currently effective.	We have had one request for information in alternative formats, (Braille) during 2010 – 2011 and no requests to date during 2011.
	Disability Action welcomes the current equality monitoring of Invest NI interventions available to companies however seeks clarity on whether this monitoring covers all 9 categories listed under Section 75. (Invest NI Client Equality Monitoring)	Individuals participating in our programmes are asked to complete monitoring in relation to age, gender, community background, disability and racial group. Companies are asked to provide information relating to community background, racial group, disability and gender. We are dependent on both goodwill on the part of the companies submitting these forms, and on whether they themselves already collate this information from their employees. This informs what Invest NI feels it is currently appropriate to collect.
	Given the low percentage of staff who have self declared as having a disability, Disability Action requires information on Invest NI's plans to encourage more staff to volunteer this information. (Disability)	Invest NI would welcome continued dialogue with Disability Action given this is a longstanding and unresolved problem. However, our Human Resources department plan to introduce an annual staff questionnaire to allow internal monitoring under the S75 categories, including disability, in the hope that staff will disclose this information.
	Disability Action would advise that ensuring physical access to all facilities, events and services, whilst laudable, does not ensure that communication to disabled people is also accessible. (Disability)	Noted but please also be aware of steps that are taken to communicate in alternative formats.
	Disability Action believes that projects must address equality of opportunity for disabled people in the labour market. (Item 2, Measures to Mitigate)	Noted.

12. DECISION BY THE PUBLIC AUTHORITY

Following the formal consultation period and consideration of the findings from this EQIA, the subsequent outcomes will inform the Invest NI Communications and Access Policy.

13. PUBLICATION OF RESULTS OF EQUALITY IMPACT ASSESSMENT

The outcomes of this EQIA will be posted on Invest NI's website. It will be made available in different formats on request where appropriate.

14. MONITORING FOR ADVERSE IMPACT IN THE FUTURE AND PUBLICATION OF THE RESULTS OF SUCH MONITORING

Invest NI has established a system to annually monitor the impact of the policy in the future on relevant groups. This is reviewed on an annual basis. If this monitoring / evaluation shows that the revised policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, Invest NI will ensure the policy is revised.

APPENDIX 1: Examples of Groups by Section 75 Categories

'Age'

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. For example, (i) in relation to employment policies the middle aged are often a vulnerable group, pensionable age is different for men and women and legal ages for working and voting vary; (ii) in relation to policies concerning young people then narrower age bands are likely to be more appropriate.

'Marital status'

Married people; unmarried people; divorced or separated people; widowed people.

'Men and women generally'

Men (including boys); women (including girls); transgender people; transsexual people.

'Persons with a disability'

Persons with a disability as defined in Sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995.

'Persons with dependants'

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.

'Political opinion'

Unionists generally; Nationalists generally; members/supporters of any political party; other.

'Racial group'

Chinese; Irish Traveller; Indian; Pakistani; Bangladeshi; Black African; Black Caribbean; White; mixed ethnic group; any other ethnic group; nationality.

'Religious belief'

Protestant; Catholic; Hindu; Jewish; Islam / Muslim; Sikh; Buddhist; other religion; people of no religious belief.

'Sexual orientation'

Gay; lesbian; bisexual; heterosexual.

(This list is not exclusive but may be amended as appropriate)

APPENDIX 2: Poverty/Deprivation Indicators

Income & Spending

1. Receipt of welfare benefits % of working age on means-tested benefit (OFMDFM Report); Longterm recipients (JSA or IS >2 yrs - OFMDFM Report)
2. Low income % below 60% of median income (EU measure); Persistent low income (at least 2 yrs out of last 3 - EU 60% measure)

Employment & Unemployment

3. Unemployment % rate (ILO definition – OFMDFM Report); Longterm unemployment % rate (>1 yr, ILO definition – EU measure); % living in workless households (EU measure)
4. Participation in labour market Working-age people in employment as % of working age population (OFMDFM Report)

Health and Social well-being

5. Mortality rates/life expectancy Life expectancy at birth (EU measure)
6. General health Self-defined health status (WHO definition – EU measure)
7. long-term illness/disability % of population receiving disability benefits (Noble measure)
8. Specific illnesses Comparisons of main causes of premature deaths (age < 60 yrs)
9. Dental health of children % of 12 - 17 yr olds with extractions (Noble measure)
10. Teenage pregnancies/conceptions Conception rates for under 18s (DSS measure)
11. Suicides Death rates from suicide and undetermined injury (DSS measure)
12. Low birth weight babies Per 1,000 births (OFMDFM Report)
13. Mental health % scoring 3+ on General Health Questionnaire (GHQ12 - OFMDFM Report)

Education & Training

14. Educational attainment % achieving level 4 at Key Stage 2 in literacy and numeracy (DSS measure); % of 19 yr olds with at least a level 2 qualification (DSS measure); % adults over 25 at ISCED level 2 or less (EU measure)
15. Participation in education and training % of 16 - 18 yr olds not in education or training (DSS measure); 18 - 24 yr olds (at ISCED level 2 or less) not in education or training (EU measure)
16. Truancy and exclusion % truanancies and exclusions (DSS measure)

Access

17. Geographical access Transport services in rural areas (ROI measure)
18. Help with living at home % of adult dependent population receiving help to live independently (extended DSS measure)

Social environment

19. Fear of crime % of population whose lives are affected by fear of crime (extended DSS measure)
20. Recorded crime rates by area and victim group (extended Scottish Executive measure)
21. Drugs Use of heroin and cocaine (DSS measure)

22. Housing/Accommodation

Housing conditions Poor Housing Index (OFMDFM Report)

23. Lack of amenities Houses without central heating (Noble measure)

24. People sleeping rough/homelessness Number of people sleeping rough (DSS measure)
25. Access to public sector rented accommodation Access to public sector housing (ROI measure)

(Source: Northern Ireland Assembly Research Paper 42/02, 27 June 2002, Measuring Poverty And Social Exclusion In Northern Ireland)



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