

Mr Steve Gray  
Policy and Development Division  
The Equality Commission for Northern Ireland  
Equality House  
7 -9 Shaftesbury Square  
Belfast  
BT2 7DP

3 November 2008

Dear Mr Gray

**RE: Revision of the Guide to Section 75 Statutory Duties**

Northern Ireland Rural Women's Network (NIRWN) is a regional network established to articulate the voices of women in rural areas. It is jointly funded by Department of Agricultural and Rural Development (DARD) and Department for Social Development (DSD) under the EU BSP Programme.

NIRWN has four key objectives:

- developing weak community infrastructure in areas where little or no community based rural women's groups exist,
- increasing rural women's capacity and opportunities to influence decision-making and policy formulation,
- running Northern Ireland wide communication campaigns with a local focus, highlighting the value of rural women's contribution,
- offering a training and capacity building programme to rural women across the region.

NIRWN welcomes the opportunity to respond to the Revision of the Guide to Section 75 Statutory Duties. The structure and format of the document make it an accessible, easy to read document. We believe that the proposed adoptions will ensure more robust arrangements, with an increase in the obligations arising out of screening/filtering and equality impact assessments.

We particularly welcome the following points:

- The interdependence of equality and good relations.

- Consideration must be given to how best to communicate the equality scheme to children, young people, people with a learning disability and ethnic minority communities.
- Section 75 means that's public authorities are bound to have regard to the need for affirmative action when considering their duty.
- A minimum period of twelve weeks must be allowed for consultations on Equality Impact Assessments.
- Care should be taken to ensure that local issues and demographics in relation to Section 75 categories are also reflected when assessing impact.
- Public authorities must include in their Equality Scheme an action plan. In developing the action plan public authorities must consider the effect or likely effect of its functions and policies across the nine equality categories (as regards promotion of equality of opportunity) and across three categories (as regards the promotion of good relations).
- To inform the action plan, a public authority should also consider the need to undertake an audit of inequalities within it's geographic boundaries and prioritise those that can best be addressed by the particular functions of the public authority, maximising strategic impact.

There are some points within the consultation that require further clarification:

- Information is required on the content of a filtering report, and how it is different from an equality impact assessment.
- The filtering process proposed is very prescriptive, which may hinder the process of mainstreaming equality. Within the proposed actions, only those with specialist knowledge would be able to carry out the function, therefore restricting the process to particular personnel. This contradicts with the ethos of equality mainstreaming.
- Will the 2 questions outlined on page 47, replace the current 4 questions used in screening?
- With reference to demographics in relation to Section 75, consideration should also be given to cross referencing section 75 groups ie women from travelling communities, women with disabilities, women from ethnic communities. The added isolation, exclusion and discrimination of rural women who are lesbian, disabled, non-national, older, from the travelling community, face a number of inequalities.

- We are disappointed that research commissioned as part of the review will not lead to the extension of the legislation to consider socio-economic status and the distinction between urban and rural areas. Rural women straddle two sectors, gender and location. There are a number of inequalities in health, employment, education, public representation, housing, health and social care that rural women face. We strongly advocate for the need to include rural and urban considerations in equality legislation.

If you have any queries, or require further clarification on any of the points, please do not hesitate to contact me.

Yours sincerely

Nora Smith  
Policy Officer