

**Northern Ireland Authority for Utility Regulation**



**Public Authority Statutory Equality and Good Relations Duties  
Annual Progress Report 2023-24**

**Contact:**

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Documents published relating to our Equality Scheme can be found at:

<https://www.uregni.gov.uk/equality>

**Signature:**

A rectangular box containing a handwritten signature in cursive script that reads 'Susan Lavery'.

**This report has been prepared using a template circulated by the Equality Commission.**

**It presents our progress in fulfilling our statutory equality and good relations duties, and implementing Equality Scheme commitments and Disability Action Plans.**

**This report reflects progress made between April 2023 and March 2024**

## **PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

### **Section 1: Equality and good relations outcomes, impacts and good practice**

- 1 In 2023-24, please provide **examples** of key policy/service delivery developments made by the public authority in this reporting period to better promote equality of opportunity and good relations; and the outcomes and improvements achieved.

*Please relate these to the implementation of your statutory equality and good relations duties and Equality Scheme where appropriate.*

During the reporting period, we (the Utility Regulator (UR)) continued to build on the work previously carried out to maintain and improve equality of opportunity and good relations as a mainstream element of our corporate goals and values.

A formal review of the current equality scheme and disability action plan took place during 2023/24 and an action plan was agreed for five years from 2024-29. HR monitors the on-going process of improvement in equality awareness and other related policies and procedures, with assistance from managers and both union and non-union staff representatives.

We continued to be represented in forums aimed at tackling fuel poverty in Northern Ireland (NI). We continue to work closely with the Department for Economy (DfE) to consider the future development of energy efficiency provision in NI. We sit on the Fuel Poverty and Just Transition Project Board which has oversight of the development of the new Fuel Poverty Strategy. We are also represented on the NI Home Energy Conservation Authority (HECA) Panel, which seeks to improve the energy efficiency of NI properties, thus also alleviating the impact of fuel poverty.

During the year we helped the UKG to continue to deliver a number of Energy support schemes in Northern Ireland which began in the last reporting period, which included financial support being paid to NI consumers.

The NI Sustainable Energy Programme (NISEP) continued to provide 80% of its funding for energy efficiency measures to be installed in vulnerable households. In 2022-23 £8.3m was spent on schemes providing heating systems and insulation with the aim of reducing energy costs and improving comfort for households at risk of fuel poverty.

NISEP has been extended until March 2027, or until a suitable replacement has been identified in the DfE Energy Strategy and will continue to target 80% of funding into energy efficiency schemes for vulnerable households. Priority schemes approved provide a range of energy efficiency measures including heating systems, loft and cavity wall insulation, draught proofing measures, low energy lighting, shower regulators, radiator panels and smart heating controls.

## Codes of Practice

Electricity and gas suppliers in NI are required to comply with a number of Codes of Practice (CoP) as part of their licence conditions. The CoPs set out requirements that suppliers must follow to protect consumers, in particular those who may require additional protection because of their characteristics or circumstances.

Suppliers are required to comply with the minimum standards set out in the following Codes:

1. Code of Practice on Payment of Bills
2. Code of Practice on Provision of Services for persons who are of Pensionable Age or Disabled or Chronically Sick
3. Code of Practice on Services for Prepayment Meter Customers
4. Code of Practice on Complaints Handling Procedure
5. Code of Practice on the efficient use of electricity and gas

In addition, suppliers are also required to prepare their own versions of each of these Codes which must meet these minimum standards and may go further than them. Energy suppliers must consult with the Consumer Council for Northern Ireland (CCNI) on their CoPs in advance of these being approved by UR. Supplier CoPs are then published on their websites. Once approved by the UR, each supplier must then comply with their Codes in full.

The Code of Practice on Provision of Services for persons who are of Pensionable Age or Disabled or Chronically Sick is being replaced with a new mandatory Code of Practice for Consumers in Vulnerable Circumstances. The new CoP will retain the protections in the existing code and introduce new protections and supports for consumers in vulnerable circumstances. The new CoP will be introduced via licence modifications and will be mandatory across electricity, gas and water for suppliers and network operators. We published our final decisions on the new CoP in March 2024. It is expected that the CoP will become effective during Autumn 2024.

In addition, to the minimum standards CoPs and their own CoPs, suppliers must also comply with the following mandatory codes:

- Marketing Code of Practice (Domestic and Non-Domestic Codes)
- Code of Practice on Energy Bills and Statements (Domestic and Non-Domestic Codes)
- Codes of Practice for Energy Theft

Compliance with all Codes is monitored through the supplier's annual returns (Statement of Licence Compliance). As the CoPs are requirements under supplier licence conditions, they are enforceable. Where non-compliance is identified or reported, UR will investigate and take appropriate action in line with our enforcement policy.

## **Compliance and Enforcement**

In addition to the annual Statement of Licence compliance, which is submitted by energy suppliers, we also conduct annual independent audits to determine how suppliers are complying with certain aspects of their supply licence and/or with relevant Codes of Practice. The audit findings and implementation of audit recommendations ensure that suppliers are complying with their licence and codes of practice, which leads to improved and consistent outcomes for customers.

In order to assess the impact of the Covid-19 pandemic on the energy market the Market Regulation and Monitoring team introduced specific monitoring metrics. This involved the collection of aggregated consumer debt monitoring metrics from electricity and gas suppliers. These metrics cover a range of debt measures and indicators including numbers of customers in debt, value of debt, customer payment behaviour and customer communications regarding problems with topping up keypad meters. Data is also gathered from the network operators on disconnections (due to reasons other than health & safety) and communications. This information has continued to be used to monitor consumer debt in relation to the energy and cost of living crisis during the 2023/2024 reporting period.

### **Retail Energy Market Monitoring (REMM)**

The REMM framework was implemented in 2015 following a comprehensive consultation and industry engagement process. REMM continues to be a robust framework to monitor retail market indicators as well as suppliers' compliance with their electricity and gas supply licences. REMM is a useful tool for informing policy and ensuring the highest levels of consumer protection. We continue to work with all our stakeholders to ensure it is delivered effectively.

REMM was subject to screening at the time of implementation and no negative impacts were highlighted. We use REMM data to establish trend information which we publish in our Quarterly and Annual REMM reports; and it is the primary source of internal information for policy discussion.

During the 2020/2021 reporting period, we enhanced REMM by introducing new metrics to monitor the implementation of the Energy Supplier Codes of Practice which are submitted to the UR quarterly and annually.

### **Consumer Protection Programme**

The Consumer Protection Programme (CPP) is a prioritised programme of projects designed to provide enhanced protections and to have a positive impact on electricity, gas and water consumers. Our new CPP (CPP24) was launched in March 2024 and will be delivered across a five-year period between 2024 and 2029. As an indication of UR's ongoing commitment to protecting all consumers, a renewed focus has now been placed on prioritising consumer protection within the organisation. This commitment is reflected by the inclusion

for the first time of non-domestic consumers as well as domestic, consumers in vulnerable circumstances and 'future' consumers within CPP24.

Within the CPP24 we set out the delivery plan for projects for years one to three, which will take us up to the mid-term review period. In doing so, we have identified three core themes which will represent our approach to CPP24. These are as follows:

1. Research and Leadership – Providing evidence-based thought leadership in delivering the consumer protection policy agenda.
2. Enablement – Creating the frameworks and environment for domestic and non-domestic consumers to engage in a meaningful way with electricity, gas and water services.
3. Protection – Providing appropriate protection for domestic and non-domestic consumers who may need additional support to ensure they avail of the best-in-class electricity, gas and water services in Northern Ireland, both now and in the future.

Projects included within CPP 24 include an energy literacy project (to understand and address the barriers consumers face that may reduce their ability and willingness to engage in the energy market), a bereavement support project and research with private renters.

To ensure that CPP24 is sufficiently agile to adapt to emerging challenges and changes, there will be a mid-term review of the programme which will be conducted at the end of year three. This will allow UR to develop workstreams and projects for the remaining two years that are relevant to consumer needs as they emerge.

### **Best Practice Framework**

The overall aim of the Best Practice Framework (BPF) programme is to establish best practice principles and measures which electricity, gas and water suppliers and distribution network companies in Northern Ireland must implement to better identify, support and protect consumers in vulnerable circumstances.

The two core workstreams for delivery of the BPF are:

- (1) A new mandatory CoP for Consumers in Vulnerable Circumstances that will be applicable across gas, electricity and water. This will be the main delivery mechanism for the BPF programme to better identify, support and protect consumers in vulnerable circumstances and will be implemented via licence modifications.
- (2) Changes to the current customer care register structure with the longer-term aim of implementing a single customer care register for electricity, gas and water.

Following on from extensive engagement with stakeholders through workshops and a consultation on our proposed approach to Best Practice Framework programme in 2022, in June 2023 we published a consultation *Best Practice Framework Proposals: Code of Practice for Consumers in Vulnerable Circumstances*. This consultation closed on 25 September 2023 and our final decisions on the new CoP were published in March 2024.

The CoP will introduce new protections and supports for consumers in vulnerable circumstances. Through the CoP we will also implement a new wider definition of vulnerable which recognises that any consumer could be considered vulnerable given a particular set of circumstances, and that vulnerability is not necessarily a permanent characteristic, but rather a fluid state. The CoP is made up of ten high level principles supported by industry specific measures. Principles span the following core themes:

- Culture, ethos and training
- Identification of vulnerability
- Practical support measures
- Data sharing
- Monitoring, reporting and publication

This mandatory CoP will be delivered through licence modifications for utility suppliers and DNOs which will require the Licensees to comply with the CoP. Through development of a single mandatory CoP for both suppliers and DNOs across electricity, gas and water, we aim to address the gaps and inconsistencies in the regulatory frameworks in Northern Ireland with regard to the support and protections for consumers in vulnerable circumstances. The new mandatory CoP will ensure that the support and protections offered to Northern Ireland consumers are consistent, adequately promoted and reflective of best practice exemplars seen in Great Britain (GB) and across other regulated sectors.

We intend to publish our final licence modification decisions in August 2024 to implement the new licence conditions by October 2024.

The implementation of changes to the customer care register structure will be delivered as a separate workstream.

### **Customer Care Registers**

Customer Care Registers are held by regulated energy and water companies in order to provide certain services to vulnerable consumers or customers with additional needs who choose to be included on those registers. The registers are for consumers who may require special assistance as they are at a greater risk of harm. Consumers likely to avail of these special services typically include those of pensionable age, who are disabled or chronically sick. An animated video with information on customer care registers and additional services offered by energy and water companies has been added to the consumer information page on the [UR's website](https://www.uregni.gov.uk/getting-help-and-support).  
<https://www.uregni.gov.uk/getting-help-and-support>.

Ongoing work in this area has been incorporated into the Best Practice Framework (see above) as the need grows for improved mechanisms for identification of vulnerability, increased awareness of care registers and industry collaboration to protect vulnerable consumers. Within the new mandatory CoP for Consumers in Vulnerable Circumstances, requirements have been introduced to encourage greater identification and sign up of eligible customers to the registers. In addition, any consumer meeting the UR's new vulnerable definition will be eligible to be added to the registers.

A core deliverable of our BPF programme is to implement changes to the customer care register (CCR) structure in Northern Ireland. These changes are as follows:

- i. The development of industry level CCRs with the longer-term aim of implementing a single CCR across electricity, gas and water; and
- ii. The development of a two-tier CCR structure with the top-tier being for medical care and the second being needs-based.

Changes to the CCR structure will be delivered through industry working groups. We are currently engaging with industry in relation to this workstream and will be publishing an information paper over the coming months setting out our expectations on how the new CCR structure will be developed and implemented. This will include a requirement for inclusive design principles to ensure that consumers who will be using the CCR are involved from the start of the design process and throughout all stages of development and testing.

### **Consumer Protection Advisory Group**

The Consumer Protection Advisory Group (CPAG) (Formerly the Consumer Vulnerability Working Group), established in 2018, has continued to meet and provide UR with a consumer representative voice in regard to consumer protection matters. The group provides consumer insight and challenge to UR in relation to wider consumer protection policy developments. The membership of CPAG includes consumer representative bodies and statutory agencies, all at a senior level (manager and director level).

The organisations represented are: (1) Advice NI, (2) Christians Against Poverty, (3) CCNI, (4) Commissioner for Older People, (5) NEA, (6) The Energy Saving Trust, (7) Bryson Energy, (8) Marie Curie and (9) Disability Action. CPAG is chaired by CCNI and is independent of UR.

During 2023/2024, CPAG engaged with UR on a continuous basis. Topics covered at meetings included our Consumer Protection Programme, the Consumer Energy Charter, the domestic tracker survey findings, RP7 Regulatory Price Control for NIE Networks, Energy Supplier Customer Service Levels Consultation and Debt Research. NIEN also attended the CPAG and presented on their Medical Care Register and Winter Preparedness Programme.

### **Protecting all consumers from the impact of high energy bills**

### Energy Bills Support

We worked with local energy suppliers and the UK Government to provide support with energy bills in Northern Ireland during 2023. Five different schemes were implemented, providing support for domestic and business consumers with the final date for cashing in the voucher in June 2023. Whilst we had no role in scheme delivery (our role was in relation to enforcement only), we worked with DESNZ to ensure that the schemes were designed in such a way that they provided appropriate support to NI consumers; in particular we ensured that vulnerable consumers were prioritised in the delivery of the Energy Bills Support Scheme financial assistance. Almost 775,000 payments were made during the schemes with a total value of over £464 million for Northern Ireland consumers.

### Consumer Energy Charter

For the second year, we implemented our Consumer Energy Charter to provide enhanced protections to consumers over the winter period. Commitments for the 2023/24 Consumer Energy Charter were in place from 1 November 2023 to 31 March 2024. The charter is a collaborative project which has been led by the Utility Regulator, in partnership with gas and electricity supply companies, the Consumer Council for Northern Ireland, the Department for Communities and the Department for the Economy. The charter was first launched during winter 2022/23 in response to the cost of living and energy crisis to provide practical and timely support for households, in particular for consumers in debt or vulnerable consumers. The 2022/23 Consumer Energy Charter was successful in winning the Collaboration Award at the UK Collaboration Networks 2023 awards ceremony.

The commitments in the Charter aimed to enhance consumer protection for households during the winter and covered financial support, support for prepayment meter customers, debt support and communications with customers. Suppliers who signed up to the Charter did so voluntarily. The charter was principally designed to help energy consumers in need. While its protections extended to all households, in practice it was expected that customers in debt or vulnerable because of age, disability or chronic illness were more likely to avail of the protections offered.

Within CPP24 we have committed to implementing the Consumer Energy Charter each year. The 2024/25 winter charter will also include protections for non-domestic consumers.

### Removal of the minimum consumption charge

Following numerous complaints and queries from gas customers we engaged with both gas suppliers on the minimum consumption charge. This charge had almost trebled in 2022, as it was based on unit charges driven upwards by the surge in wholesale gas prices. Both the regulated suppliers agreed that this was not sustainable, and the minimum consumption charge has now been removed to ensure that customers using little, or no gas are not being charged unfairly.



### **Consumer data and research**

In protecting consumers, and how they engage with energy markets, we recognise that understanding their preferences, knowledge and experience of the energy market is key. We have been building our data and insights capacity to help us measure and track the experiences of consumers in the energy market over time.

Survey fieldwork was conducted for the fourth Domestic Insight Tracker during October and November 2023. The Domestic Tracker covered the following themes - heating types and current energy supplier, payment, interaction with energy suppliers, complaint handling, switching, payment difficulties, consumer protections and consumer support services. Demographic breakdowns by subgroup were also analysed including for age group, gender, socioeconomic status, disability and vulnerable consumers. Preliminary findings from the research were made available to the UR in advance of publication of the final reports. Given the difficulties facing consumers over recent years with the cost-of-living crisis, this research has become even more important as we use the results to directly inform our regulatory policies and consumer protection work.

### **Energy Supplier Customer Service Levels**

At the end of 2022, we identified that domestic customers were experiencing a range of customer service problems that fell short of the standards expected from suppliers. Specifically, this related to the areas of:

- a) customer contact centre services;
- b) setting fixed direct debits; and
- c) returning customer credit.

The impact of Covid-19, volatile energy prices, the cost-of-living crisis, and delivery of the UK Government Energy Support Schemes placed increased pressure and resource demands on suppliers' customer services.

As a result of a rising number of complaints and concerning reports regarding customer service levels, UR conducted a review of supplier performance in these areas. We found that the performance of the contact centres of some energy suppliers had fallen below what we would consider to be an acceptable standard.

In September 2023 we issued a Guidance Note in advance of a formal consultation process. The Guidance Note represented the minimum expectations we expected from suppliers in delivering efficient and effective customer contact centre services, fixed direct debit offerings for their customers and consistent processes for returning of customer credit that had accrued on the customer account. While this was not mandatory, we encouraged suppliers to put the processes in place to be able to meet these minimum standards and we welcomed where suppliers went beyond this guidance to enhance the customer experience.

We held a series of meetings in October 2023 with all suppliers where we asked them to provide an assessment of their current processes to establish if there were any gaps in their customer service provision across the three areas;

discuss any plans to align with the guidance; and discuss any issues they may have.

In March 2024 we published a Consultation paper on Energy Supplier Customer Service Levels. We were seeking stakeholder views on our proposals to improve energy supplier customer service levels for domestic customers across four areas:

- Consumers in vulnerable circumstances;
- Customer contact centre services (this includes call centres and all mediums of written contact including social media platforms and emails);
- Setting fixed direct debits; and
- Returning of customer credit that has accrued on the customer account.

We are currently assessing the consultation responses in Q2 2024 with the aim of implementing licence modifications and a mandatory code of practice in late 2024 / early 2025.

### **Energy Transition**

In defining the direction for the Consumer Protection Programme, we wanted to highlight that our new programme will explicitly identify how we will seek to include protection of 'future' consumers.

We consulted on continuing to develop our research into the energy transition. This will inform future workstreams to support Just Transition, as well as providing important insight to support development of wider government policy.

### **Arrangements for Provision of Gas to Northern Ireland**

During the reporting year, we have undertaken work in a number of areas of relevance to the provision of gas to consumers in Northern Ireland, including those in section 75 categories. In particular we have consulted in March 2023 on whether to introduce short term exit products into the Northern Ireland postalised gas transmission system. Introducing short term exit products may benefit the gas-fired power generators in Northern Ireland (NI) who may be better able to match their capacity bookings on the gas network with their expected dispatch in the SEM (and so reduce their costs). However, the introduction of short-term exit products could have a number of the potential implications and risks particularly for non-power generation gas users and electricity consumers. Therefore, the impact that these new products could have needs to be carefully considered, including for section 75 categories. Work has been ongoing on the arrangements for off takes in Scotland and the Republic of Ireland respectively from the pipelines built to bring gas into Northern Ireland. The impact of these arrangements on gas costs and security of supply for all natural gas consumers in Northern Ireland, including particularly those of section 75 categories, is an integral part of this workstream.

The new gas-fired power station at Kilroot will increase gas capacity requirements, particularly at peak times. We are working with the gas TSOs to consider options for minimising additional costs for consumers which may be

incurred on peak days. We intend to identify and minimise the potential for increased gas transportation charges for NI gas consumers as a result of increasing electricity exports from NI to RoI.

### Gas Distribution Network Connection Policies

The three Gas Distribution Network Operators (DNOs) in Northern Ireland (Phoenix Energy, Firmus Energy, and Evolve) are required under their licences to put in place, publish and comply with a statement of connection charges and terms for connecting to the network (i.e. a Connection Policy). These Connection Policies provide clarity and transparency to interested parties on the charges and terms for connecting to each gas network, as well for maintaining, repairing, modifying and removing such connections.

The DNOs are also required to periodically review their policies and, where such a revision other than any increase in costs due to an increase in the Consumer Price Index (including Housing), obtain the UR's approval for such a revision.

In January 2024 the UR approved Evolve's updated Connection Policy. An Equality Screening of this policy was conducted, concluding that for each of the Section 75 categories, the policy would have no impact on equality of opportunity for those affected by the policy.

In February 2024 the UR approved Phoenix Energy's updated Connection Policy. An Equality Screening of this policy was conducted, concluding that for each of the Section 75 categories, the policy would have no impact on equality of opportunity for those affected by the policy

### **Lived Experience Research on Energy Hardship**

In July 2024 we published research on energy hardship which looked at the lived experiences of domestic electricity and gas consumers across Northern Ireland struggling to pay for their energy costs. Participants involved in the research had experienced being in debt with their energy supplier, regularly running out of energy on their prepayment meter or had significantly reduced their energy usage to levels below their daily living needs because of difficulties paying for their energy. Interviews took place between November 2023 and January 2024.

The research provides an evidence base to inform our consumer protection work, as we continue to support domestic consumers who are struggling with or at risk of experiencing energy debt. It supports the ongoing quantitative research we carry out on an annual basis and provides a voice to the people behind the statistics.

### **Debt and Affordability**

Following on from our lived experience research with consumers struggling to pay for their energy, we have established a working group to facilitate cross industry collaboration towards a shared goal of increased protection and support for consumers who are experiencing or at risk of experiencing energy debt, self-

disconnection and affordability issues. The first meeting of the working group was held in June 2024.

The purpose of the working group is to facilitate discussion on:

1. How to improve supplier approach and response to debt; and
2. How to best support and educate consumers regarding debt and affordability related issues.

Through the working group and using the outcomes of the lived experience research, we will also explore how to identify self-disconnection as well as the support and education needed for consumers at risk of self-disconnection.

### **Promoting accessible communications to all consumers**

We continue to promote easier access to information and improve the ease of use for all stakeholders. We are also continuing to take steps to improve the accessibility of our website by ensuring the web news blurb is consumer friendly and in plain English.

We also continued to post our consultations on the CitizenSpace online portal for public consultations.

We also met with consumer representative bodies to provide tailored briefings on consultations and to encourage engagement, both individually and through our Consumer Protection Advisory Group. This included briefings on RP7, the Best Practice Framework, Customer Service Levels and the new Consumer Protection Programme. In recognition that smaller organisations, including consumer bodies, may have less resources to complete full consultation responses, we invited other forms of feedback on consultations, including shorter responses by email or one-page responses.

During the last year we also took steps to promote access by all consumers to information about our work. Our social media presence on Facebook, Twitter and LinkedIn helps to communicate relevant consumer information in an accessible format. We continued with the publication of monthly newsletters to further explain our role and our work. We publish the newsletter on our website and promote it on across our social media platforms.

In the new hybrid world, ensuring we have an effective method of communicating and engaging with our staff remains a key focus. As well as weekly all staff meetings, we continued to offer a range of learning opportunities to staff virtually. We have continued to develop and enhance our intranet to ensure information is communicated to all staff in a timely fashion.

### **People and the workplace**

In February 2018, we began our Investors in People (IiP) journey. Following an initial assessment, we received a standard accreditation which recognised that our staff enjoy very good terms and conditions. Following on from this we consulted with staff internally and developed a three-year IiP Action Plan 2018-2021 which was endorsed by the Remuneration Committee (RemCom). This resulted in a Silver Award from IiP in February 2021, we recently attained a

Silver Award re-accreditation in February 2024. Success in our liP journey has been assisted through the engagement of our UR People (URP) group which was set up in 2019 and was reengaged in 2021. The group comprised of a small core group of HR and Communications staff to drive the day-to-day plan delivery, along with a staff team made up of representatives across directorates and grades to take an active role in overseeing and supporting the ongoing delivery of the URP plan.

Taking on board the feedback from the liP report, we completed a process to develop a new URP plan 2021-2024. The three-year action plan was developed through staff engagement via the URP group and feedback from RemCom. Given our previous experience, we have retained the current URP governance model for delivering the plan. With ultimate oversight residing with the Senior Leadership Team (SLT) with regular updates on progress provided to RemCom. During the reporting period in met with our liP assessor for our context meeting on the 18 December 2023. This meeting was in preparation for our liP assessment commencing with the "All Staff Survey", which opened from 01 to 21 December. We had a response rate of 72%.

We undertook our re-assessment in January 2024, with our assessor selecting staff across grades, gender, length of service, directorate, contract status and specialist roles/groups. Feedback from our assessor has been very encouraging, with an improvement in some of the most challenging indicators. For example, the leadership capability rating is showing a 0.8 improvement. Out of 27 themes we have improved in 10. Our assessor recognised that we were approaching re-assessment within a significant change programme but reflected that the restructure was well managed, and communications handled well. She noted that people will naturally feel vulnerable within a restructure, and with any major change that will play out in the results. She also noted that staff were loyal and passionate, and felt UR was a great place to work. People also appreciated the value of hybrid working and the positive difference to work life balance along with the value of anchor days and days together in the office. On diversity, 88% agreed that UR were committed to diversity. The full liP report has been shared with the URP group and was celebrated and shared with staff at the "Staff Away Day" in March.

In the next reporting period, a new plan will be developed with will focus on finding ways to promote and develop effective ways of working together to better engage and motivate staff; developing and reinforcing UR culture that is based on UR values. A new URP group will be constituted to take forward the new plan.

During the previous reporting period significant work was undertaken to make the office ready for a return of staff to hybrid working which took place on 03 October 2022. Staff had been attending the office on average 1 to 2 days per week. Formal feedback on hybrid working practice was undertaken in June/July 2023. 80 staff responded to a survey on the hybrid working model pilot. Overall, there is strong support for hybrid working.

A new draft hybrid working guide was developed through consultation with Trade Union colleagues. Our “Guide to Working” in the Utility Regulator was developed with the intention to move to the new hybrid working model in March 2024. The new guide provides for an average of 40% of everyone’s working hours working face to face with colleagues, either on-site at Queen’s House (QH), or on official business (e.g., attending meetings with colleagues and stakeholders). If staff prefer to be on-site more than that, or not to work in a hybrid way, they can also choose to do that. We have considered a range of factors in deciding on the next phase of our hybrid working model. This has included staff feedback via the staff survey of June 2023, best practice across the public and private sectors, wellbeing, to ensure we are meeting our duty of care towards staff, the need to build strong working relationships within teams and across the organisation, supporting the induction and bedding in of new colleagues, and enhancing project working, including multidisciplinary teams.

Following on from the work undertaken to make the office ready for a return of staff to hybrid working we also provided:

- All staff provided with a laptop, docking station, screen, keyboard, and mouse;
- Hybrid Working “how to” guides uploaded to the intranet and IT/Facilities support staff available to assist;
- All staff training and support sessions delivered on returning to the office in a hybrid working environment to support staff to maintain work life balance, staying connected, managing anxiety, health and safety, practical arrangements and housekeeping;
- Managers provided with training on “How to facilitate hybrid meetings”, and “How to manage hybrid teams effectively”;
- To ensure compliance with legislative requirements for coverage in the office for a return to work, CS staff have worked with the Health and Safety Committee, completing walk rounds and risk assessments. A specific home display screen equipment risk assessment will be completed for all staff wishing to avail of remote working;
- To ensure compliance with legislative requirements for coverage in the office for a return to work, there has been a significant uptake of staff volunteering for first aid, fire warden and evacuation chair training;
- We provided self-defence training for all staff following concerns about returning to the office in the winter months and travelling around the area close to the office; and
- Return to the office training is shared as part of the induction process.

Formal feedback on hybrid working practice will include RemCom, SLT, staff and trade union colleagues which will allow us to review progress.

The most significant change during this reporting period has been the UR restructure. In the previous reporting period, our Board began discussions on options for a new structure and level of staffing resource needed to equip us with the agility and capability to address opportunities and challenges. Our CEO and Board considered the structure and size of the organisation in light of the increased challenges of the Department for the Economy’s (DfE) Energy

Strategy, the Climate Change Act (Northern Ireland) 2022 the Department for Infrastructure's (DfI) Long-Term Water Strategy and external factors linked to energy and the economy. Our Board endorsed the proposed restructuring, which was implemented from 1 December 2022, following a staff consultation process in November 2022. The new structure included plans to increase the current complement from 110 to around 165. This will include additional opportunities for vertical and horizontal progression across the organisation. The previous format of four directorates (Corporate Affairs, Networks, Wholesale and Retail) was reorganised to key function areas of Networks and Energy Futures, Price Controls, Markets and Consumer and Business Protection, with changes to teams and directors within those. The structure also includes scope for a new of "associate analyst" role at officer grade and two students, one of these student positions is a Higher-Level Apprenticeship (HLA) development role. The development of our staff remains a priority, and the restructure has created opportunities for career progression at all grades. A new process of offering lateral moves across the organisation will develop skills cross directorates and provide develop opportunities particularly at officer and analyst grades. Our CEO has set up quarterly meetings and continues to meet with new staff engaging with the groups for feedback and to identify development opportunities.

In early 2023 we set up an implementation working group to oversee implementation of the "Shaping UR For the Future" programme. The programme was intended to primarily to engage and support staff while project managing the various strands of the restructure, including growing the size of our team, and change the structure of the organisation to meet future strategic challenges.

### **Resourcing & Recruitment**

During the reporting period the UR has undertaken significant levels of recruitment and resourcing. In order to deliver the work, set out under the URP programme, restructure plans, plus business-as-usual activities, there was a substantial pressure focussed on the HR team. To help the HR team deliver this a secondee from the Department of Communities with HR and payroll experience, joined to cover a maternity leave gap and we sourced further HR administrative support via agency.

Throughout the year, we have reviewed our recruitment processes, updating packs, widening our advertising including increased use of social media and diversity targeted advertising boards.

In 2023 we undertook 33 recruitment competitions, which included 20 internal promotions and temporary promotions. The recruitment also provided for the maximum flexibility in terms of remote and flexible working in order to open the competition to the widest market of suitable candidates and has resulted in an increase in new staff on flexible working patterns. Two new senior Executive Directors roles were also recruited, using an Executive Search company with a global reach, this project was openly tendered early in 2023.

### **Internal Development Moves**

To promote a culture of cross directorate working during the reporting period 18 staff have completed lateral moves in the new structure, moving to new opportunities at the same grade. Four matrix policy groups have been set up to provide opportunities to work and learn as a collaborative UR team.

### **Turnover**

The turnover rate for 2022-23 is 9.5%. In comparison to the average UK figure of 15% this is considered relatively low. As part of our exit process, staff invited to anonymously complete a voluntary interview, providing feedback on their employee experience. It is worth noting that leavers generally move for increased salary and career development reasons. However, we have a few returners who have feedback that they wished to return for better work life balance, flexibility and the supportive culture in UR.

### **Development**

During the reporting period, we continued delivering on our Learning and Development Plan 2021-24. We noted a 561% increase in the number of individual learning and development activities between 2021 and 2022. In the reporting period some of these activities include:

- Engineering for non-engineers by NIEN with class learning and site visit;
- Florence school of Regulation;
- Jam Card e-learning rolled out for all staff;
- Celebrating Autism provided by the Now Project;
- Dementia Training with the Dementia Friendly East Belfast Campaign;
- Recruitment and Selection Panel Training for all managers on panels;
- Menopause support;
- Various Women in Business events (including UR Career Journeys);
- Effective Writing;
- Tender evaluation;
- Various Regulation training;
- CEF Public Accountability & Governance training for Board Members;
- NI Leadership and Governance;
- Prince 2;
- Having Difficult Conversations;
- Introduction to mindfulness;
- Cornwall Insights Market Overview;
- Diversity Charter training and events;
- Fraud;
- Legal Island Diversity and Inclusion Certificate;
- Various Leadership courses and conferences;
- Institute of Directors;
- NEBOSH;
- Procurement;
- Health and Safety (premises officer; first aid; fire warden, Evac chair);
- Various energy courses and conferences;
- Deaf awareness;
- Hybrid working for managers;
- Various software courses (Power BI, Excel);
- Mental Health First aiders;



- SLT Performance Management; and
- Induction training for new staff.

### **Healthcare and Wellbeing**

During the review period, we continue to promote Kingsbridge Health plan and their new platform and Benenden Healthcare to provide information to staff who might benefit from monthly membership, 20 staff are now members via monthly subscription.

We continue to provide online training and support for staff wellbeing including support from our Mental Health First Aiders, Inspire EAP, training on Neurodiversity and ongoing online yoga and Pilates classes.

In response to an increased level of difficult calls to the office from energy customers related to the rise in energy prices Samaritans training has also been rolled out across the organisation focusing on Dealing with Difficult Conversations, Vulnerable People, Responding to Anger, Resilience and Personal Safety.

We also held a Men's Shed mental health event, hosted a Chest Heart and Stroke talk about the symptoms and signs, plus our annual health checks and Indian Head massages on site. We also held events around Mental Health Week and World Menopause Day.

All of our activities are promoted through our wellbeing calendar.

### **Diversity Chartermark**

In July 2021, we completed our application for Diversity Charter Mark, bronze assessment. We were delighted to retain our bronze accreditation in September 2022 and have made an application for the silver accreditation we are currently working on feedback from our submission and hope to have our new accreditation confirmed in 2024.

During the reporting period we developed a new Equality, Diversity and Inclusion Strategy and met our gender targets. Due to the recent restructure, we have made significant strides in addressing the balance between male and female members of SLT. Previously there were 5 men (56%) and 4 women (44%), we now have 7 men (43%) and 8 women (57%), this is a 14% increase on women in SLT. Again, we have made significant improvements and strides in addressing the balance of female and male managers. In our initial submission in 2021 there was 70% male managers and 30% female managers. Now this figure currently stands at 54% male and 46% female.

We have submitted a new gender target under the silver award requirements which is to support women across all grades to undertake CPD to include activities such as an accreditation related to career development, targeted leadership development, undertaking mentoring or undertake being mentored, or a lateral move within the organisation to a new work area or project to aid their career development.

### **Diversity and Inclusion Group**

The UR People group engaged with staff to form a cross-directorate Diversity and Inclusion (D&I) group representing a mix of age, gender and grade. The D&I group recently delivered a presentation to staff, outlining our commitment to equality, diversity and inclusion; introducing the team and the work of the group and appointing diversity champions in age, culture, gender, LGBTQIA+ and disability. This year we have delivered a number of mental health activities. We have been working with the Royal National Institute of Blind People and been awarded its “Visibly Better Standard Employer” status which aims to increase accessibility for blind and partially sighted people applying for jobs and existing staff who develop sight loss.

At the time of writing, we are planning to engage our Board in our planned programme of events to deliver a new refreshed programme in 2025.

Over the last year, we have built on our Women in Business (WIB) commitment and used our membership to support and encourage women to focus on developing leadership skills. We are continuing to work with Diversity Mark, attending training and events such as the Diversity Mark Industry Peer Event and promoted the Boardroom Apprentice.

A UR WIB panel event took place in March 2023, where UR female leaders, talked about their career journeys with female colleagues. We have included positive statements on our recruitment web page: “Northern Ireland continues to have an under-representation of women across our STEM (Science, Technology, Engineering and Mathematics) industries. The Utility Regulator is an Equal Opportunities and Disability Confident Employer and welcomes women applicants, who are currently underrepresented.”

### **Disability Confident**

We have continued to work on our Disability Confident commitment to develop a more inclusive workplace for disabled people and those with long-term health conditions. This has helped us to support staff with reasonable adjustments including, working with Access to Work to purchase equipment for a staff member with a declared disability; and developing a personal support plan for another employee with a neurodiverse condition, and two staff with adjustments for enhanced home working. We have worked with a number of applicants in recent recruitment to make adjustments and ensure equity. We proudly promote UR as a disability confident employer via recruitment campaigns and website.

### **Best Companies**

In March 2023 we undertook completion of our third Best Companies survey, to enhance the work commenced under URP. We retained our position in the “one to watch” category. The survey results showed an improved rating in the following areas: My Manager; My Team; and Wellbeing. Results have been shared with staff at a high level and suggestions for practical actions to try and improve our future score, address the lowest scoring areas and celebrate what we do well are being picked up under our URP actions. We are due to undertake our annual survey in March 2024.

### **Reward and Recognition**

We continue to promote our benefits through our UR Benefits Guide, we benchmark these benefits, through QCG surveys, which compare UKRN companies. We recently asked staff for their views on whether we should add to our non-salary benefits, through a survey issued to all staff during October 2023. During 2024 we will decide on staff feedback to update our non-salary benefits. We are currently developing a staff recognition scheme.

### **Corporate Social Responsibility**

During the period, we have continued to work with Give As You Earn to provide webinars and promotion to staff have increased the take up of staff now donating through payroll giving achieving our Payroll giving Gold Award.

We have received green level accreditation from the Business in The Community Northern Ireland Environmental Benchmarking Survey for 2023 and we took our first steps towards attaining the Business in the Community Standard for Responsible Business. Working across teams to help consumers we were awarded the UK Collaboration Network Award.

One theme from Best Companies survey was staff's willingness to engage in "giving something back". We recently offered volunteering opportunities in partnership with Business in the Community, with various opportunities such as: Sheil's House; Crosskennan Lane Animal Sanctuary; National Trust - Mount Stewart; Praxis, Simon Community, North Belfast/Dundonald Food Banks

Our corporate charity during the reporting period is the Cancer Fund for Children raising funds via activities such as a Christmas jumper day and donations. We also continue to support the Welcome Organisation, with donations of clothes, food and toiletries.

### **Leadership and Staff Engagement**

Proactive CEO engagement continues, with weekly all staff/CEO meetings, where staff are invited to attend to hear updates from the CEO and across the organisation, with staff from all grades presenting on news and a variety of topics. This "all staff" meeting space has also been used for guest speakers and staff training.

The intranet has been fully utilised, encouraging staff penned blogs on topics such as menopause, retirement, bereavement, positive mental health; age; culture; LGBT+ history; cancer screening; pride events; consumer protection; men's health; volunteering along with promotion of activities such as book club, Pilates/yoga and nights out which have been posted to good feedback.

During the reporting period we have continue to promote internal communications based on richer content through CEO meetings and on the intranet, "5 on Friday" all-staff emails and engagement with staff on the restructure via a dedicated section of the intranet titled "Shaping UR for the Future".

### **Performance Management and Learning and Development**

During the reporting period we have promoted awareness of how we carry out performance management at UR by making sure that all managers are trained on performance management and pushing awareness of the performance management process. We have pro-actively monitored returns and these are reported to our Board with the aim to increase engagement in performance management. Our engagement on performance management has significantly increased in the reporting period from 83% in November 2022 to 98% on End of Year in November 2023 and from 53% to 89% on Mid-Year Reports.

Our skills matrix completed as part of our skills analysis and will be incorporated into our Learning and Development Plan (2024-25) which will also be revised to include further development linked to induction, onboarding and succession planning.

We have also introduced a new senior performance management process. The aim of our senior leadership performance management process is to ensure the highest standards of performance, and that senior leaders, embody the organisation's values and model ethical and inspirational leadership, focusing on Leadership; Delivering results; Strategic thinking; Inclusivity and development.

### **Induction and probation**

During the previous review period, we updated our induction pack to assist in onboarding in remote environment, we continue to review and improve our induction tailoring to our hybrid environment. We have produced a new induction pack. In addition to meeting with HR and IT/Facilities, new staff meet with a nominated representative from each directorate where they are provided with an overview of the work carried out in that particular directorate. This is usually carried out within the first month of the new staff member commencing employment as part of their induction programme. A staff support group continues to meet regularly with new staff meeting to support each other and provide an opportunity for building connections and support structures. The CEO and Executive Director also meet with the new staff group and feedback from the first session was factored into our new pack. HR have provided mandatory training and guidance for line managers, supporting staff through induction, with monthly reminders for managers and regular monthly feedback to HR. We aim to produce a full induction and training programme to support the onboarding of the new staff in 2024/25.

### **“Grow Your Own”**

The new structure has provided for additional new “associate analyst” posts. We have developed a new specification of these roles which includes a career path to analyst grade. These staff will be supported with opportunities for analyst grade line managers and mentors and development of a mentoring programme is underway. We have recently appointed our first two associate analysts with a recruitment drive in partnership with the Universities planned in early spring 2024. Our annual placement student vacancies have also been included permanently in the new structure and we recently appointed our first 3–4-year Higher Level Apprenticeship for a fintech student through Southern Regional College.

## UR Values

UR values have become a key component in the URP action plan. Significant work progressed on values (including plans to brand values around the building), promoting and reinforcing the link to performance, recruitment and D&I. At our recent all staff event in September 2023 we engaged staff to bring to life aspects of how to effectively reinforce an organisational culture underpinned by our values. Staff lead the discussion on the review of new values for our new organisation, with new values due to be in place early in 2024.

- 2 Please provide **examples** of outcomes and/or the impact of **equality action plans/** measures in 2022-23 (*or append the plan with progress/examples identified*).

The Forward Work Programme is an established plan which has been consulted upon extensively with people and organisations listed in our Equality Scheme.

The Gas (Individual Standards of Performance) Regulations (Northern Ireland) 2014 came into force on 1 April 2014 following extensive consultation. The Regulations afford protection to all consumers including those falling within Section 75 categories. The Regulations set out a level of service required in a number of service areas including;

- Response to complaints
- Making and keeping appointments
- Reconnecting gas supply after an incident
- Resolving meter disputes

Where the supply or distribution company fails to meet a prescribed standard, they must make a payment to the customer. The Regulations encourage companies to offer a high level of service to customers or to compensate them accordingly.

During 2023/2024 we continued to work with the Consumer Council for Northern Ireland (CCNI), gas supplier and distribution companies to consider how vulnerable customers are treated in the event of a disconnection. In this case, vulnerable customers refer to those who are of pensionable age, disabled or chronically sick. We will continue to work with CCNI as to ensure vulnerable customers are adequately protected.

In August 2023 we consulted on changes to the electricity Guaranteed Standards of Service (GSS) which set out prescribed service levels which individual consumers can expect from electricity companies, including compensatory payment requirements when the company fails to adhere to the standards (subject to certain exemptions). As part of the development of this consultation, we conducted an equality screening exercise. The conclusion was that the introduction of the proposed GSS would not have a negative impact on any Section 75 individuals. The GSS will provide enhanced levels of consumer protection for consumers in Northern Ireland. The screening exercise also indicated that the proposed GSS would have a beneficial impact for older

consumers and those with disabilities in particular, as it sets standards for electricity suppliers around better engagement with consumers and proposed automatic compensatory payments to be made to consumers (eliminating the need for consumers to initiate a claim process themselves).

NISEP continued to provide grant funding for energy efficiency schemes for domestic and non-domestic properties. 80% of the funding available each year is ring-fenced for schemes that target vulnerable households. In 2022-2023, over £7.1m was divided between 17 different schemes providing a mixture of heating systems, loft and cavity wall insulation and other energy efficiency measures to vulnerable households. Each scheme defined its own vulnerability criteria, but the main criterion used to assess eligibility for the schemes was low-income. Whilst not specifically focusing on Section 75 groups, the schemes benefit all groups within the population at risk of fuel poverty.

As part of the NISEP review, an equality screening exercise took place in September 2019. The screening exercise highlighted that NISEP has a positive impact on specific section 75 groups, including older people, children, people from BAME backgrounds and people living with disabilities. NISEP uses a vulnerability matrix, designed to assist Primary Bidders with scoring vulnerable customers which can help ensure funding is provided to those most in need. The vulnerability matrix can be used whereby schemes are oversubscribed and the Primary Bidder has a waiting list. Organisations specialising in dealing with vulnerable customers can assist Primary Bidders assess vulnerable customers, via the matrix.

Licence modifications, required to implement the customer protection requirements of the EU Third Energy Package (IME3), came into effect during 2014-20105. Since then, we have worked closely with licensees to ensure compliance and continued to monitor their policies, procedures, and practices to ensure ongoing compliance (for example approved new Codes of Practice for all suppliers). Annual monitoring of all supplier licence conditions, including the documents pursuant to the licence conditions, is done through the annual REMM framework (Statement of Licence Compliance).

Electricity, as well as gas supply and distribution licences, contain a condition regarding services that must be provided for specific customer groups including customers who are of pensionable age, disabled or chronically sick and customers who are blind, partially sighted, deaf or hearing impaired. Such services include a password scheme to identify company staff, the provision of bills and information in accessible formats, repositioning of pre-payment meters free of charge, providing bills to a nominated carer and making arrangements to avoid deprivation of adequate heating and cooking facilities where the conveyance of gas has been disconnected. We oversee compliance with licence conditions on an ongoing basis.

Our major network price controls continue to build on widely appreciated consumer research which has underpinned price controls for NI Water. The collaborative partnership model we have developed locally continues to deliver for the consumer, especially where expertise is pooled across companies, this

office, CCNI and associated government departments. Such collaborative partnership continued during the reporting year unabated by either Covid-19 or the increased frequency of a changing membership across our working groups.

For water, our collaborative group remains the Consumer Engagement Oversight Group (CEOG). This is supported by a consumer measures and satisfaction working group (CM/SAT) which considers opportunities to introduce consumer measures focused on 'actionable data' to help target improvements for the customer experience.

A number of new consumer satisfaction and vulnerable consumer measures formed part of PC21, that is, NI Water's Price Control. CM/SAT has continued to monitor and report on these measures. A number of these measures focus on vulnerable customers in particular with the aim of helping to drive company behaviour to focus on this category of customer. This has led to NI Water seeking to obtain an accreditation for Inclusive Service Provision (BS 18477 / ISO 22458) which helps companies provide a service that is available and accessible to all consumers equally, including a JAM card accreditation for supporting customers with hidden disabilities. As part of the PC21 Mid-term Review we have started discussions on the appropriateness of the measures and targets as well as examining ways in which to increase awareness of the Customer Care Register to try to ensure that those customers who need additional help are identified and adequately supported.

The outputs, objectives and targets included in our PC21 final determination published on 13 May 2021 reflected the outcome of engagement undertaken with stakeholder groups, business customers and the broader domestic customer base through direct engagement and consultation undertaken as part of the price control process. In 2023-24 we undertook a mid-term review of PC21 which resulted in the adjustment of some of the planned deliverables. This included changes to the consumer targets in place for NIW including:

- Unwanted contacts
- Domestic Net Promotor Score (NPS)

There has also been progress on the development of measures that are to be introduced in the PC27 period including:

- Developer Services metric
- Non-Domestic NPS
- Consumer Vulnerability

The RP7 Price Control Business Plan submitted by NIE Networks has been underpinned by consumer research and engagement, commissioned by the Consumer Engagement Advisory Panel (CEAP). In January 2024 the CEAP began the process of undertaking a procurement activity for new consumer engagement to take place during the new price control period. New consumer

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measures have also been developed which will come into effect in the new price control period which were deliberated on by the CEAP. This includes adoption of the BS ISO 22458 on Consumer Vulnerability.



- 3** Has the **application of the Equality Scheme** commitments resulted in any **changes** to policy, practice, procedures and/or service delivery areas during the 2023-24 reporting period? *(tick one box only)*
- Yes       No (go to Q.4)       Not applicable (go to Q.4)
- Please provide any details and examples:

- 3a** With regard to the change(s) made to policies, practices or procedures and/or service delivery areas, what **difference was made, or will be made, for individuals**, i.e. the impact on those according to Section 75 category?

Please provide any details and examples:

- 3b** What aspect of the Equality Scheme prompted or led to the change(s)? *(tick all that apply)*
- As a result of the organisation's screening of a policy *(please give details):*

As a result of what was identified through the EQIA and consultation exercise *(please give details):*

- As a result of analysis from monitoring the impact *(please give details):*

- As a result of changes to access to information and services *(please specify and give details):*

- Other *(please specify and give details):*

## **Section 2: Progress on Equality Scheme commitments and action plans/measures**

### **Arrangements for assessing compliance (Model Equality Scheme Chapter 2)**

- 4** Were the Section 75 statutory duties integrated within job descriptions during the 2023-2024 reporting period? *(tick one box only)*
- Yes, organisation wide  
 Yes, some departments/jobs  
 No, this is not an Equality Scheme commitment  
 No, this is scheduled for later in the Equality Scheme, or has already been done  
 Not applicable

Please provide any details and examples:

Employee's job descriptions and personal performance plans reflect their contributions to the discharge of the Section 75 statutory duties and

implementation of the equality scheme where relevant. The personal performance plans are subject to appraisal in the annual and mid-year performance review. UR values are included in the criteria for person specifications in all recruitment exercises.

- 5 Were the Section 75 statutory duties integrated within performance plans during the 2023-24 reporting period? *(tick one box only)*
- Yes, organisation wide
  - Yes, some departments/jobs
  - No, this is not an Equality Scheme commitment
  - No, this is scheduled for later in the Equality Scheme, or has already been done
  - Not applicable

Please provide any details and examples:

The personal performance plans are subject to appraisal in the annual and mid-year performance review. Where Section 75 statutory duties are related to jobs this is reflected in individual performance plans. In 2021 a review of the performance management documentation took place, resulting in new elements developed to include new “corporate” objectives aligned to UR values; an employee “self-assessment” linked to personal development and focusing on UR values and statutory obligations, such as section 75. This format was used for performance review in April 2021 onwards. A further review is planned in 2024.

In the 2023-24 reporting period were **objectives/ targets/ performance measures** relating to the Section 75 statutory duties **integrated** into corporate plans, strategic planning and/or operational business plans? *(tick all that apply)*

- Yes, through the work to prepare or develop the new corporate plan
- Yes, through organisation wide annual business planning
- Yes, in some departments/jobs
- No, these are already mainstreamed through the organisation’s ongoing corporate plan
- No, the organisation’s planning cycle does not coincide with this 2015-16 report
- Not applicable

Please provide any details and examples:

Our Corporate Strategy 2019-2024 places consumers at the centre of our work and includes an overarching purpose to protect and empower all consumers. The strategy includes a strategic objective: “promoting markets that deliver effective competition, informed choice and fair outcomes”. A key aspect of this is to protect vulnerable consumers, such as through our Consumer Protection Programme. We are also committed to engaging with consumers more as part of our work. Our Corporate Strategy identifies key success measures related to customer satisfaction.

Specific objectives and measurements relating to Section 75 statutory duties URP Plan 2021-2024 focusing strongly on equality, diversity and inclusion and UR values which include “To be a best practice regulator, transparent, consistent,

proportionate, accountable, and targeted, which includes the fulfilment of UR's duties under Section 75 and ensuring that equality underpins, and is mainstreamed through, all our work. HR worked closely with staff and SMT to develop and refresh the UR Mission, Vision and Values and Behaviours (MVVB). From this a set of UR behaviours were developed of which best practice and equitable behaviour was key. During 2024 we plan to carry out a review of our Values as part of our Shaping UR For the Future work.

During 2023/2024 we also consulted on our Forward Work Programme for 2023/2024. As well as considering all written responses, we held an online stakeholder workshop to ensure the programme took into account the priorities and key issues of our stakeholders.

During 2014 an equal pay review was carried out independently by the NI Statistics and Research Agency (NISRA) on behalf of UR to identify whether there is a significant difference between males and females and between Protestants and Catholics in terms of basic salary. Following on from the work carried out on the equal pay review, and in accordance with advice received from the Departmental Solicitor's Office (DSO), NISRA completed a modelling exercise to develop a revised pay system. We worked closely with the Northern Ireland Public Service Alliance (NIPSA) and non-union staff representatives to develop options and agree the introduction of a system of pay progression with the intention to remove the inequalities identified in the pay review in 2014.

To establish the extent to which the revised pay system was successful in removing inequalities, further comparative analysis was carried out by NISRA in February 2017 which revealed that the number and extent of pay disparities has decreased. A commitment was given for NISRA to re-run the age analysis in 2018/2019 to assess the extent to which age-related gaps have been closed. This analysis was undertaken and shared with NIPSA colleagues in August 2019, again no inequalities were identified, and any gaps could be explained by starting salary or length of service.

During the previous reporting period UR engaged NISRA to complete an equal pay review which was presented to management and TUS colleagues at the Joint Negotiations and Consultation Committee (JNCC) in February 2022. This formed the basis for the start the consultation process for our April 2022 pay award. An increase of 3.5% was agreed and backdated in June 2023. An equal pay review and benchmarking survey was undertaken using data from Office of National Statistics, QCG and Willis Towers Watson, and was the basis of an agreement between management and TUS for a 2023 pay award of 4.7% which compared favourably with NICS. The 2022 pay deal also included adaptation of two weeks full pay for paternity leave and the 2023 deal included a reduction in lowest pay grades of officer/admin scales from five to three points.

During the reporting year we also introduced new pay scales for senior leaders. The new five-point scales commence with an anchor point but to achieve progression beyond that requires performance to be assessed as "outstanding". This is a higher bar than for our main staff groups whose movement up those scales are dependent on "satisfactory" performance. We want our leaders to

perform at the highest level, and the new performance related pay scheme encourages and supports our leaders to achieve outstanding performance.

**Equality action plans/measures**

7 Within the 2022-2023 reporting period, please indicate the **number** of:  
 Actions completed:  Actions ongoing:  Actions to commence:

Please provide any details and examples (*in addition to question 2*):

Continuing to Develop as an Organisation: during 2018 a review of our Corporate Strategy was complete and our new corporate strategy for 2019-2024 was published at the end of March 2019. This will continue to be an on ongoing action.

8 Please give details of changes or amendments made to the equality action plan/measures during the 2021-2022 reporting period (*points not identified in an appended plan*):

Please see updated action plan 2024-2029.

9 In reviewing progress on the equality action plan/action measures during the 2023-2024 reporting period, the following have been identified: (*tick all that apply*)

- Continuing action(s), to progress the next stage addressing the known inequality
- Action(s) to address the known inequality in a different way
- Action(s) to address newly identified inequalities/recently prioritised inequalities
- Measures to address a prioritised inequality have been completed

**Arrangements for consulting (Model Equality Scheme Chapter 3)**

10 Following the initial notification of consultations, a targeted approach was taken – and consultation with those for whom the issue was of particular relevance: (*tick one box only*)

- All the time
- Sometimes
- Never

11 Please provide any **details and examples of good practice** in consultation during the 2023-2024 reporting period, on matters relevant (e.g. the development of a policy that has been screened in) to the need to promote equality of opportunity and/or the desirability of promoting good relations:

As part of our commitment to good practice in consultation, we proactively engage with CCNI in respect of the most appropriate ways of engaging with consumers. We seek appropriate and proportionate approaches to impact assessments in our consultation documentation and seek to reflect this in our template document. We also review the operation of our approach to consultation against our consultation guide.

We continue to develop relationships and consult with other organisations including the Equality Commission, the Commissioner for Older People, Christians Against Poverty, National Energy Action, AgeNI, Bryson and mainstream political parties.

Our consultations are intended to seek the views of those directly affected by the subject matter or policy, regulated utilities, the Equality Commission, representative groups of Section 75 categories, other public authorities, voluntary and community groups, our staff and recognised trade union (NIPSA) and such other groups who have a legitimate interest whether they have a direct economic or personal interest.

Initially all consultees within the UR Equality Scheme, as a matter of course, will be notified (by email or post) of the matter or policy being consulted upon to ensure they are aware of all consultations. Thereafter, to ensure the most effective use of our and our consultee's resources, we will take a targeted approach to consultation for those consultees that may have a particular interest in the matter or policy being consulted on and to whom the matter or policy is of particular relevance. This may include, for example, regional or local consultations, sectoral or thematic consultation etc.

We consider the accessibility and format of every method of consultation we use in order to remove barriers to the consultation process.

Following the redevelopment of our website in 2016/2017, we continue to promote easier access to information and improve the ease of use for all stakeholders. We have introduced the use of more infographics to increase the accessibility of our information. We are also continuing to take steps to improve the accessibility of our website by ensuring the web news blurbs are consumer friendly and are in plain English.

Within the website, there is a dedicated section for equality where we continue to publish all of our Section 75 information and reports.

Specific consideration was given as to how best to communicate with children and young people, people with disabilities (in particular people with learning disabilities) and minority ethnic communities.

Information can be made available, on request, in alternative formats, in a timely manner. This message is displayed on our website news items. Requests for alternative formats will be responded to usually within three working days and we will ensure that such consultees have equal time to respond.

Specific training is provided to those facilitating consultations to ensure that they have the necessary skills to communicate effectively with consultees.

Following the May 2016 Assembly elections, and as stipulated under the Fresh Start Agreement (FSA) of 20 November 2015, a maximum eight-week consultation period took effect for ongoing consultations.

In addition, the FSA included 'Eight Steps to Good Practice in Public Consultation-Engagement'. The FSA's call for "early and continuous engagement", "consider[ation] of the timing, duration and cost", "manage[ment] of stakeholders' expectations" and "share[d] best practice" add further support to UR's expectation

for regulated utilities, especially the network monopolies, to continuously engage with consumers and stakeholders. Such informed conversations should not be limited to each price control published by us every five years or more. Furthermore, our collaborative partnership model of consumer research with consumer engagement working groups which pool resources across government/regulator, consumer representative, public and private sectors ensure we share best practice, to help deliver valuable research and insight into consumer priorities.

Where, under the exceptional circumstances beyond our control, we must implement a policy immediately we may consult after implementation of the policy in order to ensure that any impacts are still considered.

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

We are conscious of the fact that affected individuals and representative groups may have different needs. We take appropriate measures to ensure full participation in any meetings that are held. We consider, for example, the time of day, appropriateness of venue and in particular whether or not it can be accessed by those with disabilities, how the meeting is to be conducted, the use of appropriate language, whether a signer and/or interpreter is necessary, and whether the provision of childcare and support for other carers is required.

We continue to engage representative bodies of the Section 75 categories through official publications, website, press releases and reports and when consulting on business projects. We endeavour to keep consultation lists up to date with personnel or organisational changes. We do this via regular news updates and our CEO and/or directors regularly carry out briefings with stakeholders on key issues and use of workshops, question and answer sessions and consultations.

Directorates continue to consult and engage with stakeholders by including representatives of vulnerable groups including Section75 groups, to workshops or meetings on specific social action issues as appropriate.

Our Chief Executive continues to meet with key consumer, political and business stakeholders. Stakeholders have the opportunity to discuss how our work impacts on all consumers with a focus on the most vulnerable. There is representation at a senior level from CCNI, National Energy Action, Advice NI, Commissioner for Older People NI and Christians Against Poverty.

In the context of consulting internally, we use team meetings, staff working groups, all staff meetings, all staff emails, notice boards, URP updates and the intranet to provide information for internal consultation. The URP group continues to meet to oversee and support the ongoing delivery of the URP, including practical involvement in the delivery of key URP actions and providing a sounding board for URP plan activities, as well as acting as an advocate/champion for the URP plan within their directorate and being a channel of communication on the activities to and from directorates.

12 In the 2023-2024 reporting period, given the consultation methods offered, which consultation methods were **most frequently used by consultees**: (*tick all that apply*)

- Face to face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email with an opportunity to opt in/out of the consultation
- Internet discussions
- Telephone consultations
- Other (*please specify*): Workshops

Please provide any details or examples of the uptake of these methods of consultation in relation to the consultees' membership of particular Section 75 categories:

This list is not exhaustive, and we may develop other additional methods of consultation more appropriate to key stakeholders and the matter being consulted upon. Consultation with all relevant stakeholders will begin as early as possible. We will engage with affected individuals and representative groups to identify how best to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these.

13 Were any awareness-raising activities for consultees undertaken, on the commitments in the Equality Scheme, during the 2022-2023 reporting period? (*tick one box only*)

- Yes                       No                       Not applicable

Please provide any details and examples:  
See 12 above.

14 Was the consultation list reviewed during the 2022-23 reporting period? (*tick one box only*)

- Yes                       No                       Not applicable – no commitment to review

**Arrangements for assessing and consulting on the likely impact of policies (Model Equality Scheme Chapter 4)**

During the review period we have updated the technical specification of our website to meet accessibility requirements. Our website has also been audited and an accessibility statement has been published which sets out our intention to further enhance the website's accessibility over the next year. Screening templates, our Equality Scheme and framework is uploaded to the equality section and this archive is regularly maintained.

15 Please provide the **number** of policies screened during the year (*as recorded in screening reports*):

5
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**16** Please provide the **number of assessments** that were consulted upon during 2023-2024:

0	Policy consultations conducted with <b>screening</b> assessment presented.
0	Policy consultations conducted <b>with an equality impact assessment</b> (EQIA) presented.
0	Consultations for an <b>EQIA</b> alone.

**17** Please provide details of the **main consultations** conducted on an assessment (as described above) or other matters relevant to the Section 75 duties:

Some vulnerable customers rely on electricity more than others (for example the elderly and those with a disability). However, the price control process does not seek to positively advantage or disadvantage any particular group. The premise is that the same level of service, including any planned improvements, would apply across the entire customer base and to all groups. Specific operational arrangements exist to try to ensure that vulnerable customers continue to receive the service they need when normal provision is impacted by specific unforeseen events.

Feedback on RP7 is facilitated through the consultations on the approach document, draft determination and proposed licence modifications. The approach document was consulted upon in a previous reporting year while the draft determination consultation period opened on 28 November 2023 and ending on 22 March 2024. The consultation on the licence modification will fall in the next reporting year i.e. 2024/25.

Details of other consultations are listed at Q11 above.

**18** Were any screening decisions (or equivalent initial assessments of relevance) reviewed following concerns raised by consultees? *(tick one box only)*

Yes
  No concerns were raised
  No
  Not applicable

Please provide any details and examples:

**Arrangements for publishing the results of assessments (Model Equality Scheme Chapter 4)**

**19** Following decisions on a policy, were the results of any EQIAs published during the 2022-2023 reporting period? *(tick one box only)*

Yes
  No
  Not applicable

Please provide any details and examples:



**Arrangements for monitoring and publishing the results of monitoring (Model Equality Scheme Chapter 4)**

- 20** From the Equality Scheme monitoring arrangements, was there an audit of existing information systems during the 2023-2024 reporting period? (*tick one box only*)
- Yes  No, already taken place  
 No, scheduled to take place at a later date  Not applicable

Please provide any details:

An informal review of the Equality Scheme, including monitoring arrangements, takes place in June/July each year, a formal review of the Disability Action Plan (DAP) took place in 2023 with Equality Scheme and DAP in place for 2024-2029.

- 21** In analysing monitoring information gathered, was any action taken to change/review any policies? (*tick one box only*)
- Yes  No  Not applicable

Please provide any details and examples:

- 22** Please provide any details or examples of where the monitoring of policies, during the 2023-24 reporting period, has shown changes to differential/adverse impacts previously assessed:
- N/A

- 23** Please provide any details or examples of monitoring that has contributed to the availability of equality and good relations information/data for service delivery planning or policy development:
- N/A

**Staff Training (Model Equality Scheme Chapter 5)**

- 24** Please report on the activities from the training plan/programme (section 5.4 of the Model Equality Scheme) undertaken during 2023-2024, and the extent to which they met the training objectives in the Equality Scheme.

Staff have received ongoing training in corporate and individual responsibility to ensure compliance with Section 75 issues with a training session being delivered in advance of any recruitment exercise for new panel members. This training covers persons of different religious belief; persons of different political opinion; persons of different racial groups; persons of different age; persons with different marital status; persons of different sexual orientation; men and women generally; persons with and without disability; and persons with and without dependants. Training also covers equality, diversity, and unconscious bias.

During the previous reporting period we developed our new Learning and Development plan 2021-2024 and published this in September 2021, to support and develop our staff to perform at their best. This was a three-year plan to deliver training programmes and provide suggestions to further support UR staff continuing professional development while underpinning our UR values and competencies. The plan sets out a mixture of mandatory training and suggested

training that can be completed in UR time around operational commitments at staff's own pace, this includes eLearning, remote working, and wellbeing support. A new plan is being developed for 2024-27 and will be published following the start of year performance submissions for personal development plans.

We undertake an annual individual review of all employees, where the key aspects of their performance and effectiveness are assessed. In addition to goals and objectives being established for the forthcoming year, training needs are reviewed and form part of the annual learning and development plan. Directorates also undertake regular reviews of performance against targets where variances are highlighted, which are then addressed.

A skills and training needs analysis was undertaken in a previous reporting period and from the aa comprehensive skills matrix was produced. This analysis has fed into the new learning and development plans from April 2024, allowing us to identify the level of demand for training across the organisation, business priorities and support succession planning. A number of recommendations following an internal audit review in this area, is reported to Audit and Risk Committee/Board level throughout the year.

More specific training of staff, in how they contribute to the values and responsibilities required under Section 75 carried out during the year, was as follows:

- Employment Law updates – throughout the year;
- Equality Commission training - throughout the year;
- Equal Opportunities/Dignity at Work Policy included in induction for new staff;
- Members of the Consumer Protection branch attended seminars and workshops throughout the year in relation to fuel poverty and energy efficiency issues;
- Induction and ongoing staff training in equality legislation for all staff;
- Equality, diversity and selection training for staff and board members sitting on recruitment and selection panels;
- Ongoing Senior and Wider Leadership Development training was delivered;
- Equality and Section 75 training is provided to all staff via online training from NICS Centre of Applied Learning (CAL);
- Mandatory training for staff who would sit on evaluation panels for Central Procurement Directorate (CPD) administered tenders;
- Mandatory training for all staff on procurement, GDPR and Data Protection;
- Various resilience at work and mental health training is ongoing via Inspire, Action Mental Health and a selection of online courses from (CAL);
- A selection of mandatory CAL e-Learning modules has been identified in our URP Learning and Development Plan 2021-2024 and set the foundation for essential training. Staff have been auto enrolled and a schedule has been timetabled to help keep learning on track with reminders to refresh learning annually or every two years;
- Engineering for non-engineers by NIEN with class learning and site visit;
- Florence school of Regulation;

- Jam Card e-learning rolled out for all staff;
- Celebrating Autism provided by the Now Project;
- Interactive Dementia Training with the Dementia Friendly East Belfast Campaign;
- Recruitment and Selection Panel Training for all managers on panels;
- Menopause support;
- Various Women in Business events (including UR Career Journeys);
- Effective Writing;
- Tender evaluation;
- Various Regulation training;
- CEF Public Accountability & Governance training for Board Members;
- NI Leadership and Governance;
- Prince 2;
- Having Difficult Conversations;
- Introduction to mindfulness;
- Cornwall Insights Market Overview;
- Diversity Charter training and events;
- Fraud;
- Legal Island Diversity and Inclusion Certificate;
- Various Leadership courses and conferences;
- Institute of Directors;
- NEBOSH;
- Procurement
- Health and Safety courses (premises officer; first aid; fire warden, Evac chair):
- Various energy courses and conferences;
- Deaf awareness;
- Hybrid working for managers;
- Various software courses (Power BI, Excel);
- Mental Health First aiders;
- SLT Performance Management; and
- Induction training for new staff.

**25** Please provide any examples of relevant training shown to have worked well, in that participants have achieved the necessary skills and knowledge to achieve the stated objectives:

General awareness training is provided for all staff and board members on Section 75 and disability issues including, anti-discrimination legislation, Section 75 background and responsibilities and details on disability action plans commences at induction. All staff are trained and aware of the provisions of Section 75, UR's equality scheme commitments, the issues likely to affect people across the range of categories and understand their role in implementing the scheme.

Equality screening training was arranged for key staff to ensure all staff are adequately trained and competent in the screening process outlined in UR's Equality Scheme. Paul Oaks from the Equality Commission delivered refresher

Section 75 and screening training in December 2020. Section 75 CAL training is mandatory and is ongoing and the Equality Commission video is included in all inductions. Key staff are confident to, and competent in, the screening process in line with UR's Equality Scheme.

Board members are trained as new recruitment panel members and have successfully recruited a number of UR staff. Refresher training and training for all managers is planned to coincide with onboarding our new staff in September 2024. Probationary performance management training took place for managers in summer 2022 and will be delivered again to all new line managers as part of our line manager training planned for September 2024 to coincide with a major onboarding and induction programme for new staff.

Staff sitting on tender evaluation panels receive in house and, as appropriate, CAL tender evaluation training and understand the importance of assessing each tender submission in an equitable, open, and transparent manner using the published specification and award criteria and attend regular procurement training. A short CAL course is now also used by staff as a refresher on the EtendersNI process.

On an ongoing basis members of the Consumer Protection Branch attend fuel poverty/energy efficiency seminars and workshops, giving them better understanding of the issues and barriers encountered by related Section 75 groups.

#### **Public Access to Information and Services (Model Equality Scheme Chapter 6)**

**26** Please list **any examples** of where monitoring during 2023-2024, across all functions, has resulted in action and improvement in relation **to access to information and services**:

Section 75 continues to be annual agenda item for our Audit and Risk Committee. The Board also receives reports on performance against section 75 objectives through approval of this progress report. During the reporting period we continued to explain our duties and responsibilities and consulted with groups representing those with disabilities in the course of Section 75 processes. Going forward in the reporting year 2024-25 it is intended that this report will be presented to September RemCom for oversight and October Board for approval.

We fully comply with the requirements of the Disability Discrimination Act and the associated Codes of Practice within our offices. We ensure access requirements are met for members of the public with disabilities to take part in public consultation through provision of documents in alternative formats on request.

The redevelopment of our website included looking at how we consult and was aimed at improving the accessibility of our documents and information. The website is consumer-facing and promotes access to information and improves the ease of use for all stakeholders. This includes an equality section detailing the new equality scheme, revised Disability Action Plan, and equality progress reports. Accessibility to all is a priority for us and is clearly demonstrated by the website having been assessed against, and as compliant with, the W3C 'AA' standard. We can also provide alternative formats for all our publications on request.

Equality consultation has been incorporated within the development of our business approach with particular focus on employment matters, procurement, communications, and social and environmental issues.

Employment opportunities in the office are based on experience rather than minimum academic qualifications and all application forms and interviews are competency based and applicants with disabilities are invited to tell us about reasonable adjustments they require.

A staff member with hearing loss assisted in production of a deaf awareness brief for inclusion in staff induction which includes practical guidance on deaf awareness and communicating effectively. We continue to include this in our induction for new staff.

**Complaints (Model Equality Scheme Chapter 8)**

**27** How many complaints **in relation to the Equality Scheme** have been received during 2023-2024?

Insert number here:

0
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Please provide any details of each complaint raised and outcome:

**Section 3: Looking Forward**

**28** Please indicate when the Equality Scheme is due for review:

A review was carried out by the HR Manager each summer and a formal five-year review is carried out every five years. The updated Disability Action Plan (DAP) 2024-2029 was opened to an eight week consultation during the reporting period before approval by Risk and Audit Committee in and is available on the UR website.

**29** Are there areas of the Equality Scheme arrangements (screening/consultation/training) your organisation anticipates will be focused upon in the next reporting period? (*please provide details*)  
None.

**30** In relation to the advice and services that the Commission offers, what **equality and good relations priorities** are anticipated over the next (2022-2023) reporting period? (*please tick any that apply*)

- Employment
- Goods, facilities and services
- Legislative changes
- Organisational changes/ new functions
- Nothing specific, more of the same
- Other (please state):

**PART B - Section 49A of the Disability Discrimination Act 1995 (as amended) and Disability Action Plans**

**1. Number of action measures for this reporting period that have been:**

**9**

Fully achieved (and ongoing)

**0**

Partially achieved

**0**

Not achieved

**2. Please outline below details on all actions that have been fully achieved in the reporting period.**

2 (a) Please highlight what **public life measures** have been achieved to encourage disabled people to participate in public life at National, Regional and Local levels:

Level	Public Life Action Measures	Outputs <sup>i</sup>	Outcomes / Impact <sup>ii</sup>
National <sup>iii</sup>			
Regional <sup>iv</sup>			
Local <sup>v</sup>	We will continue to develop staff and specifically board awareness workshops and training on equality and disability legislation, particularly for recruitment panels and staff dealing with consultation papers.	Promoting positive attitudes amongst staff and board members towards disabled people.	Improvement in attitude, more effective communication.

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2(b) What **training action measures** were achieved in this reporting period?

	Training Action Measures	Outputs	Outcome / Impact
1	Equality, diversity and selection training for staff sitting on recruitment and selection panels.	Training sessions being delivered in advance of any recruitment exercise for new panel members, including new staff panel members in equality, diversity and selection and training. Refresher training and training for all managers.	Panel members are adequately trained and competent in the equality and recruitment process outlined in UR's Recruitment Policy and in line with equality legislation and best practice.
2	All staff trained equality and diversity.	HR and new key staff attended Equality Commission training. Equality awareness is included in the induction for new staff. Section 75 and policy screening training was complete with all key staff in February 2016, and refresher training was carried out by Equality Commission in 2020. All staff training on Equality, Diversity, and Inclusion (Transgender Policy) was carried out in 2020 and Equality and Section 75 Screening training is provided via NICs CAL.	All staff are aware of the provisions of Section 75, UR's equality scheme commitments, diversity in the work place and the issues likely to affect people across the range of categories and understand their role in promoting equality.

2(c) What Positive attitudes **action measures** in the area of **Communications** were achieved in this reporting period?

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	Communications Action Measures	Outputs	Outcome / Impact
1	HR regularly reviews policies and discusses issues relating to Section 75 and disability discrimination as they arise with union representatives and communicated to staff.	Communicating and updating staff. A new Menopause Policy was developed through the URP, Diversity, and Inclusion group, and TUS consultation.	Forum to discuss with staff relevant issues on a timely basis.
2	Commissioning consultation documents to representative groups.	Developing relationships for feedback. Ongoing.	Consideration of applying feedback.
3	Developing relationships with other public authorities, voluntary and community sector groups and mainstream political parties.	Promoting good relations and positive attitudes. Ongoing.	Change of attitude and consideration of moving towards all-inclusive policies and procedures.
4	Review of accessibility of communications.	Promoting good relations and positive attitudes. Introduction of Twitter in 2018 promoted greater access to our information. We have now added LinkedIn and Facebook to our social media platforms. We have introduced the use of videos to wider the appeal of our work.	Change of attitude and consideration of moving towards all-inclusive policies and procedures. Improved accessibility.



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<p>5</p>	<p>Produce accessible corporate documents.</p>	<p>Promoting clarity in communication and provision of the clearest possible information. Ensuring documentation and web uploads such as the web news blurb is consumer friendly and is in plain English.</p>	<p>More engaging information for all consumers.</p>
<p>6</p>	<p>Website and intranet improvements plans to improve accessibility.</p>	<p>Both our website and intranet have been updated to promote ease of access and better engagement. During the review period we have updated the technical specification of our website to meet accessibility requirements. Our website has also been audited and an accessibility statement has been published which sets out our intention to further enhance the website's accessibility over the next year.</p>	<p>Inclusive approach from staff in relation to accessibility of information.</p>
<p>7</p>	<p>Ongoing website and intranet development and maintenance</p>	<p>Screening templates, our equality scheme and framework were uploaded to the equality section and this archive is regularly maintained. During the review period we have updated the</p>	<p>More engaging information for all consumers.</p>

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		technical specification of our intranet to meet accessibility requirements, and this is currently in development.	
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2 (d) What action measures were achieved to ‘**encourage others**’ to promote the two duties:

	Encourage others Action Measures	Outputs	Outcome / Impact
1			
2			

2 (e) Please outline **any additional action measures** that were fully achieved other than those listed in the tables above:

	Action Measures fully implemented (other than Training and specific public life measures)	Outputs	Outcomes / Impact
1			
2			

3. Please outline what action measures have been **partly achieved** as follows:

	Action Measures partly achieved	Milestonesvi / Outputs	Outcomes/Impacts	Reasons not fully achieved

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4. Please outline what action measures **have not been achieved** and the reasons why.

	Action Measures not met	Reasons
1		
2		

5. What **monitoring tools** have been put in place to evaluate the degree to which actions have been effective / develop new opportunities for action?

(a) Qualitative

Evaluation of training provided

(b) Quantitative

Receipt of Monitoring Questionnaires for directly employed staff

6. As a result of monitoring progress against actions has your organisation either:

- made any **revisions** to your plan during the reporting period or

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- taken any **additional steps** to meet the disability duties which were **not outlined in your original** disability action plan / any other changes?

Please select No

If yes please outline below:

	Revised/Additional Action Measures	Performance Indicator	Timescale
1			
2			
3			
4			
5			

7. Do you intend to make any further **revisions to your plan** in light of your organisation's annual review of the plan? If so, please outline proposed changes?

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<sup>i</sup> **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

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- ii **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.
- iii **National** : Situations where people can influence policy at a high impact level e.g. Public Appointments
- iv **Regional**: Situations where people can influence policy decision making at a middle impact level
- v **Local** : Situations where people can influence policy decision making at lower impact level e.g. one off consultations, local fora.
- vi **Milestones** – Please outline what part progress has been made towards the particular measures; even if full output or outcomes/ impact have not been achieved.