

Consultation responses to the Council's Equality Scheme and Disability Action Plan 2015-2017

Comments on the Council's Equality Scheme

Organisation	Consultation Response	Council Response
<p>Equality Coalition Regional Consultation Event and written response</p>	<p>Make sure that the consultation documents are easy to find on the Council website (put a link on the home page)</p> <p>Consultation over holiday periods is very difficult.</p> <p>Complaints procedure – make it clear whether response times refer to working days or calendar days.</p> <p>Try to include deadline for turn around for accessible formats (though we appreciate that this can be difficult)</p> <p>Include a different definition of good relations which has been suggested by the Committee for the Administration of Justice (CAJ). It suggests adopting the following definition which exists in GB;</p> <p><i>'good relations'</i> means, in particular, having regard to the desirability of (a) tackling prejudice and (b) promoting understanding</p>	<p>The Council will ensure that there is a link on the homepage to the consultation documents</p> <p>Where possible the Council will extend the timeframe for consultations when it is during a holiday period</p> <p>Where the Complaints Procedure refers to months, it will be converted into working days.</p> <p>The Council has provided a timeframe within its Equality Scheme.</p> <p>The Equality Commission has advised that there is a definition of good relations in the Commission's model equality scheme, based on the Good Relations Guide 2007. The Commission, in the context of Together Building a United Community (TOBUC), is recommending a definition in legislation. It has further advised that it is up to the Council to decide if it wishes to change the definition of good relations in the current context or</p>

	<p>It would recommend that the current good relations impact questions are removed from the screening and equality impact assessment exercises. It suggests that any consideration of good relations in the context of policy appraisal is limited to measures to tackle prejudice and promote understanding. It also recommends including additional questions which are provided under the Disability Discrimination Act.</p> <p>Is there an opportunity to better promote positive attitudes towards people with disabilities by altering the policy or working with others in government or the wider community? Yes/No</p> <p>Is there an opportunity to encourage people with disabilities to participate in public life by altering the policy or working with others in government or the wider community? Yes/No</p>	<p>await legislative definition if this is brought forward by TOBUC. In light of this advice the Council will adhere to the current definition which is provided in the Commission's model Equality Scheme.</p> <p>The Equality Commission has advised that its position remains the same as per the model screening and EQIA guidance. However, should a public authority decide to present alternative arrangements the Commission will review these arrangements and determine if they are sufficiently equivalent to meet the requirements of the Section 75 duties.</p> <p>The interdependence of the duties needs to be remembered and it may be cumbersome to decouple and introduce alternative good relations arrangements. However, it is up to the Council how it wishes to proceed in this regard. In light of this advice the Council will not alter the screening questions.</p> <p>The Council has included two disability questions in its policy screening form.</p>
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	<p>The Equality Coalition would also recommend that the new equality schemes also contain commitments to: publish Council screening templates online and take reasonable steps to inform consultees of same.</p> <p>The Equality Coalition would also recommend that Audits of Inequalities are consulted on and published.</p>	<p>The Council has already made this commitment in its Equality Scheme</p> <p>The Council will consult on its Audit of Inequalities and publish it.</p>
<p>Equality Commission Regional Consultation Event and written response</p>	<p>We acknowledge and welcome the fact that the approach taken by Armagh, Banbridge and Craigavon DC (ABCDC) in producing a revised equality scheme is one which is consistent with the Commission’s model equality scheme. In addition the Commission welcomes that ABCDC appears to have amended and added to the model scheme in order to make it relevant to ABCDC’s functions.</p> <p>As per the Commission’s recommendations in previous correspondence, I am pleased to note that ABCDC has committed to the production and publication of an action plan based on an audit of inequalities by December 2015. It will be important that the audit of inequalities and action plan address both regional and local issues. The Commission intends to send all Councils a list of and links to relevant Commission policy and research papers, which you should find useful for your audit of inequalities and action plan, by December 2014.</p> <p><u>Consultation</u></p> <p>It would be helpful if the Council, at para 3.2.3, could include a commitment to ensuring that consultees who request</p>	<p>The Council will make every effort to ensure that information is provided in an alternative</p>

	<p>information in alternative formats will have equal time to respond.</p> <p><u>Screening Reports</u> Paragraphs 4.15 and 4.20 screening reports will be published 'biannually' The Commission recommends that screening reports are issued to consultees on a quarterly basis, this would ensure that the results of screening exercises are made available to consultees in a timely manner and would provide them with the opportunity to respond if necessary. The Commission recommends that the Council considers issuing screening reports quarterly.</p> <p><u>Staff training</u> Para 5.3 states that 'the Council will provide training for its staff'. We recommend that the Council includes a commitment to 'drawing up a detailed training plan for its staff', (Though we note that the Council includes a commitment in its Timetable of Measures to developing to developing an overall training programme within 6 months of the new Council being established.)</p>	<p>format in a timely manner. However, as stated in the Equality Scheme it is difficult to be prescriptive in terms of exact timescale as the Council outsources this service. Where possible the Council will extend the consultation period for those who have requested an alternative format, however it cannot guarantee that it will always allow equal time to respond.</p> <p>The Council will amend the Equality Scheme to ensure that screening reports are issued to consultees on a quarterly basis.</p> <p>The Council will amend the Equality Scheme to include a commitment to 'drawing up a detailed training plan for its staff.'</p>
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	<p><u>Screening and EQIA timetables</u> The Commission notes that in establishing the new Council and bringing together three different sets of policies, there will be a lot of work in developing new and revised policies and mainstreaming the Section 75 duties through screening and EQIA. We would advise therefore that the Council includes in its equality scheme (in the Timetable of Measures section) a timetable for screening and a timetable for EQIAs.</p> <p><u>Review of Monitoring Information</u> We welcome the fact that ABCDC has followed the Commission's recommendations in relation to monitoring, in particular we welcome the commitment to monitor more broadly to identify opportunities to better promote equality of opportunity and good relations.</p> <p>Monitoring information is an important source of information which is essential for any public authority's capacity to adhere to its section 75 obligations. Therefore, the Commission recommends that the Council includes a commitment to reviewing monitoring information (other than EQIA information)'annually' rather than 'on an ongoing basis as required.' (paragraph 4.31).</p>	<p>The Council is currently developing and revising its policies but is not yet in a position to list them all or identify which will require EQIA. When the list has been finalised the Council will publish this list separately.</p> <p>The Council will make an amendment to state that where possible other monitoring information will be reviewed annually.</p>
<p>The Disabled Children and Young Persons Participation Project (DCYPPP) Rosemary Murray and Laura Fagan Meeting</p>	<p><u>Document Accessibility</u> It was recommended that the Council produces the documents in Easy Read. A summary scheme would also be helpful.</p> <p><u>Consultation</u> They were generally of the view that it was important to</p>	<p>The Council will produce a summary version of its Equality Scheme and an Easy Read version of its Disability Action Plan.</p> <p>The Council will make every effort to ensure</p>

	<p>involve consultees at the development stage of a project/policy/strategy.</p> <p>The group also recommended that the Council adopts a Participation Policy</p>	<p>that where appropriate consultees will be involved in the development stage of a project/policy/strategy.</p> <p>The Council will consider developing a Participation Policy</p>
<p>NIACRO Written response</p>	<p>NIACRO has provided the Council with information in relation to people with a police record and section 75 groupings, people with conflict related convictions, disclosure and checks. It recommends that the Council considers the additional barriers faced by people with a police record before submitting its Final Equality Scheme.</p>	<p>The correspondence will be forwarded to the Council's Human Resources Department for consideration.</p>

Comments on the Council's Disability Action Plan

<p>Disability Action Regional Event and written response</p>	<p>Disability Action believes that Disability Action Plans must include a commitment to actively involve people with disabilities in their drafting, implementation and monitoring.</p> <p>It is absolutely essential that the new Councils identify what has or hasn't worked to date and develop SMART actions. Paramount to this is including a specific action to effectively engage, from the beginning, with people with disabilities in the drafting, implementation and monitoring of the DAP.</p> <p>It is happy with the Council's anticipated approach of trying to</p>	<p>The Council will add a measure in relation to the drafting, implementation and monitoring of the plan.</p> <p>The Council's Plan includes outstanding measures which have been taken from the Armagh, Banbridge and Craigavon Council plans and these will be reviewed after one year.</p> <p>The Community Planning Team will be</p>
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	<p>link the equality and disability activity into “community planning” in the coming period. It sees this approach as having many opportunities locally.</p> <p>As per the Section 49A of the Disability Discrimination Act 1995 (as amended by the Disability Discrimination (NI) Order 2006), equality screening should integrate questions relating to promoting positive attitudes towards disabled people and encouraging participation of disabled people in public life. These should be included within the equality screening templates and reports.</p>	<p>advised of these comments</p> <p>The Council has included disability questions in its policy screening form.</p>
<p>Guide Dogs (June Best) Regional Event</p>	<p>Need to speak to local people with disabilities about how to improve their access to services rather than just the representative groups (charities are often advocacy groups with no real first-hand experience).</p> <p>It is important that there is joined up thinking and there is an important role for the Council in community planning with regard to transport issues, the public realm and general accessibility.</p> <p>It is important that we don't just think about people falling within the 9 section 75 categories. Individuals cross many groups and we need to think of them as customers.</p> <p>Service provision for people with disabilities will also benefit other users eg. sloped kerbs help people with prams and buggies as well as wheelchair users.</p> <p>As a result of demographic change, there is an ageing</p>	<p>The Council welcomes the comments provided.</p>

	<p>population so there are more people with vision and hearing degeneration.</p> <p>Problems with services being affected by boundaries eg. there have been difficulties using DART rural transport service because it is restricted by boundaries. Leads to isolation of people in rural communities.</p>	
<p>British Deaf Association Regional Event</p>	<p>For many deaf people sign is their first language and English their second</p> <p>Councils can help by keeping in regular contact with BDA staff</p> <p>When advertising events advise deaf people whether a signer will be available or can be requested.</p> <p>Have sign provision on websites – access to websites is a key priority.</p> <p>Have regular meetings with local deaf community –BDA can facilitate if required.</p>	<p>The BDA is included on the Council’s statutory consultation list so it will be kept informed of all policy developments.</p> <p>The Council will make every effort to ensure that signers will be made available on request as appropriate at Council events and deaf people will be advised of this.</p> <p>The Council will investigate sign provision on its website.</p> <p>The Council will seek advice from the BDA on how best to contact local members of the deaf community.</p>

	<p>Provide deaf awareness training.</p> <p>It is important for the deaf community to be informed of the forthcoming changes and what the effect will be.</p> <p>Contact details should include a Textphone and SMS number</p> <p>Websites should be AAA</p>	<p>The Council where it considers it appropriate will offer deaf awareness training to its staff.</p> <p>The BDA is included on the Council's consultation list and the Council will investigate ways of contacting the deaf community</p> <p>The Council will ensure that it includes a textphone number on all correspondence and will investigate the possibility of having a Council SMS number.</p> <p>The Council will aim to achieve Triple A accessibility on all its websites</p>
<p>Equality Commission Regional Consultation Event and written response</p>	<p>With regard to the Disability Action Plan for the new Council, covering the period 2015-2017, we note that there are relatively few action measures included in the DAP. We acknowledge that this may be due to the fact that the Councils are in a transition period and that you may not feel that you are in a position as yet to outline more specific action measures for the new Council. We would suggest that the Council considers developing a DAP which covers a shorter time period- for example one year- and/or that it commits to reviewing this DAP at the end of one year.</p> <p>We also note that both Armagh and Craigavon District Councils have DAPs in place for 2014-2015. We would suggest that you</p>	<p>The Council will review the plan after one year and at this point will scope out issues relating to the new functional areas to decide what additional action measures could potentially be included in the Council's DAP. At this point it will also review any outstanding measures in the three legacy Council's DAP's</p>

	<p>consider developing action measures for the new Council's DAP by reviewing any outstanding/continuing actions contained in these DAPs and Banbridge's DAP, and that you also scope out issues relating to the new functional areas of the Councils to decide what additional action measures could potentially be included in the new Council's DAP.</p> <p><u>Staff Training</u> The Commission acknowledges the commitments contained in the DAP relating to staff training, including training on the DAP and disability legislation for all Council staff. This demonstrates the Council's commitment to the disability duties and it will ensure that staff are aware of the duties and the Disability Action Plan. It would be helpful if the Council could clarify in the DAP whether elected members will also receive training on the DAP and disability legislation. This type of focussed training is an example of an action which both promotes positive attitudes towards disabled people and, by removing attitudinal barriers to appointing disabled people, can encourage participation in public life.</p> <p><u>Employment- related actions</u> Under Section 75 and the DDA Part ii, Councils should already be proactively considering steps to encourage disabled participants to apply for employment opportunities, and to increase the proportion of disabled employees at all levels within their organisations. There is a link, however, between the recruitment of disabled employees and the disability duties, in that employment can provide disabled employees</p>	<p>The Council will amend the Disability Action Plan to include a commitment to train elected members on the DAP and disability legislation</p> <p>The Council will work towards the development of a work placement policy/strategy.</p>
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	<p>with the skills and knowledge to effectively participate in public life. Also, employment opportunities can bring together disabled and non-disabled employees, challenge negative stereotypes about the abilities of disabled employees and promote positive attitudes. Certain types of employment could fall within the scope of 'public life positions' eg. public facing positions which have a real public identity, though not all posts.</p> <p>Although employment measures can contribute to the disability duties, public authorities should not lose sight of the main policy aim of the legislation and the need to address a wide range of public life positions outlined in the Commission's guide which are mainly occupied by office holders and volunteers.</p> <p>Councils employ a significant number of staff across Northern Ireland and should be in a position to effect change in the area. The Council should consider including an employment target in its Disability Action Plan, for example, to achieve a certain number of work placements for disabled people over the duration of the Disability Action Plan.</p>	
<p>The Disabled Children and Young Persons Participation (DCYPPP) Rosemary Murray and Laura Fagan Meeting</p>	<p><u>Disability Training</u> It was their view that the best people to provide disability training were people with disabilities.</p> <p><u>Voluntary Work</u> It was important for the young people to get involved in voluntary work and they were of the view that the Council</p>	<p>The Council where appropriate will offer to its staff disability training which is provided by the disability sector.</p> <p>The Council will work towards the development of a work placement</p>

	<p>could facilitate by providing placements.</p> <p><u>Leisure Centres</u> They believed there was a great opportunity to make the hydro pool at the OLC available to the public in the evening.</p> <p>In relation to the Changing Bench in the OLC, it was suggested that it would be best to have a hoist in this facility. If a carer is required, they generally need more space.</p> <p><u>Accessibility in Armagh City Centre</u> They said there were difficulties with parking on Thomas Street. The dropped kerbs require you to go diagonally across the street when in a wheelchair. The footpath has a slippery surface.</p> <p><u>Access Audits</u> The group was able to conduct access audits and would be available to assist in future.</p> <p><u>Transport</u> It was also explained that transport can be extremely expensive for wheelchair users. There were only two companies in Armagh City that could accommodate wheelchair users. Those living in rural areas are even more isolated. If a wheelchair user wants to travel from Armagh on a Translink bus they must give Translink 48 hours notice.</p>	<p>policy/strategy</p> <p>These comments will be forwarded to the Leisure Centre staff.</p>
<p>Action on Hearing Loss Written response</p>	<p><u>Communication</u> It recommends that we engage the services of a sign language interpreting agency to supply registered interpreters to</p>	<p>The Council will engage the services of a sign language interpreter where appropriate.</p>

	<p>provide communication support. It is important that any sign language interpreters used are registered with the National Register of Communication Professionals (NRCPD)</p> <p><u>Training</u> All staff in the organisation and particularly frontline staff should be provided with deaf awareness training, which includes an introduction to sign language and communication tips, and etiquette in dealing with deaf people. This training should be provided at induction and on a rolling basis. It is recommended that this training is provided by a deaf person.</p> <p><u>Information</u> Information provided to the public by your organisation should be in plain English, avoid jargon, and where practicable, be translated into sign language, for example, the introductory section or key aspects of your website could feature a BSL and subtitled video.</p> <p><u>Access</u> Your premises and services should be fully accessible to people with a hearing loss. You should ensure your organisation can be contacted by email, that staff are trained in the use of Typetalk, the national telephone relay service, (www.typetalk.co.uk), and that you consider the use of SMS.</p> <p>You should also ensure that public areas are fitted with an induction loop or infrared loop system, that these systems are regularly tested, that the public are made aware of these facilities and staff know how to use them.</p>	<p>The Council where it considers it appropriate will offer deaf awareness training to its staff.</p> <p>The Council will ensure that all Council communications are jargon free and where appropriate will consider the use of BSL and subtitled video.</p> <p>Relevant staff members will be trained in the use of appropriate methods of communications.</p> <p>The Council uses induction loop systems and will ensure that staff members are made aware of them and staff know how to use them.</p>
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	<p><u>Hearing loss in the workplace</u> People with hearing loss face more difficulty in accessing employment than others. They, and, you, may require guidance and support to ensure that the recruitment process is equitable and accessible. You may also have a number of staff in your workplace whose hearing is deteriorating, and they will require additional help to enable them to continue to carry out their role effectively.</p> <p>The Action on Hearing Loss Employability Service can help your organisation, and any employees with hearing loss, to create an accessible and supportive working environment. Contact elws@hearingloss.org.uk</p>	
<p>Craigavon Sport and Leisure Users Group (SLUG) ABC Community Network Written response</p>	<p>The following comments were made in response to the following question</p> <p>What barriers do you feel your organisation experiences in relation to participating in sport and leisure activities and physical access in public spaces?</p> <p>Staff: There is a need for disability awareness training for staff and volunteers. In particular this includes:</p> <ul style="list-style-type: none"> • Sign language • Communicating with blind and partially sighted; • Familiarisation with induction loop technology and other technical equipment 	<p>The Council where appropriate will offer to its staff disability training which is provided by the disability sector.</p>

	<p>Transport: Transport issues continue to limit opportunities. Issues include;</p> <ul style="list-style-type: none"> • Availability of accessible transport for evening, weekend and non-local journeys • Lack of vehicles for group travel • Rural transport – availability is a big issue • Support from family member/carer often required – often are charged as being a user rather than seen as being a necessity. • Parking – some disabled ramps are currently inappropriate <p>Leisure Centres:</p> <ul style="list-style-type: none"> • Changing facilities are sometimes not satisfactory – need more ‘changing places’ facilities similar to Brownlow Hub • Issue with double doors/fire doors. Doors are too heavy, eg. automatic opening is necessary at Brownlow Hub • Drop kerb location often not close to entrance • Lift at Brownlow Leisure Centre – small, slow or not always working • Point of access in buildings – often the place where the disabled person wants to take place in an activity is the furthest place away from the entrance! <p>Information</p> <ul style="list-style-type: none"> • Not enough information is made available to people with disabilities about what is available with regard to sport and leisure activities. 	<p>These comments will be forwarded to the appropriate staff members</p> <p>These comments will be forwarded to the appropriate staff members</p>
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