

**Disability Action Plan**

**2016 - 2019**

**Response to Consultation**

 **March 2016**

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**Section 1- Summary**

1. In October 2015, the Northern Ireland Office (NIO) published a consultation paper on its new Disability Action Plan. The consultation invited comments on the contents and commitments contained in the draft Disability Action Plan. The consultation closed on 18 December 2015.
2. The Department’s position in relation to the feedback received is detailed in Section 4 of this document. After detailed consideration of all the views and comments received, a number of amendments were made to the draft Disability Action Plan. A revised Plan was considered by the NIO Board and subsequently approved by Ministers in March 2016. A copy of the revised plan can be found at **Annex A**.
3. This document is available on the NIO Website: [www.nio.gov.uk](http://www.nio.gov.uk) under *Public Consultation*. Printed copies of this response may also be obtained free of charge from:

Corporate Governance Team

Northern Ireland Office

Stormont House

Stormont Estate

Belfast

BT4 3SH

Email: equality.scheme@nio.gov.uk

Tel: 028 9076 5497

1. You may make additional copies of this response without seeking permission. This document can also be made available on request in different formats for individuals with particular needs.
2. The NIO would like to thank all those who participated in the consultation process for taking time to make their views known.

Section 2 - Introduction

1. The Northern Ireland Office supports the Secretary of State for Northern Ireland in promoting the best interests of Northern Ireland within a stronger United Kingdom. It ensures Northern Ireland interests are fully and effectively represented at Westminster and the heart of Government, and the Government’s responsibilities are fully and effectively represented in Northern Ireland.
2. Our key purpose is to make politics work by working alongside the Northern Ireland Executive to help improve the effectiveness and delivery of the devolved institutions; to ensure a more secure Northern Ireland; deliver a growing economy including rebalancing the economy; and ensure a stronger society by supporting initiatives designed to build better community relations and a genuinely shared future.
3. The UK Government is delivering a stronger Northern Ireland within a stronger United Kingdom across a wide range of areas. In support of the Government’s commitments, our objectives are:

• Making politics work

• A more secure Northern Ireland

• A growing economy

• A stronger society

1. Under Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), The NIO is required when carrying out its functions to have due regard to the need to:
* promote positive attitudes towards disabled people; and
* encourage participation by disabled people in public life (‘the disability duties’).
1. Section 75 of the Northern Ireland Act 1998 also requires public authorities to have due regard to the need to promote equality of opportunity, including between persons with a disability and persons without. Furthermore, as a Whitehall Department, the NIO is also bound by the statutory requirements set out in the Equality Act 2010, which provides protection on the basis of protected characteristics, including disability.
2. Under Section 49B of the DDA 1995, The NIO is required to submit to the Equality Commission a disability action planshowing how it proposes to fulfill these duties in relation to its functions.
3. We have recently updated our Disability Action Plan to articulate our vision, priorities and plans for the period 2016- 2019. The draft plan sets out how we will work to achieve these goals. The plan makes a clear statement of our commitment to implementing our equality duties in relation to disability.
4. In line with our Equality Scheme we have carried out a proportionate consultation exercise to seek the views of those who may have a direct interest in our Disability Action Plan. Further details on the consultation process are provided in Section 3 of this document.

Section 3 – Consultation Process

1. The consultation document on the draft Disability Action Plan was issued to a range of consultees on 23 October 2015 and made available on the NIO website. The consultation period ran for 8 weeks until 18 December 2015.
2. The consultation invited comments with regard to the contents and commitments outlined in the Disability Action Plan.
3. In total, five organisations contributed by submitting written responses; one organisation indicated that they were fully content with the draft Plan. A list of those organisations that provided comments is attached at **Annex B**.
4. The Department considered all comments received by the deadline of 18 December. A summary of the key views presented and the NIO’s response is provided at Section 4.

Section 4- Key Comments and Response

1. This section sets out the NIO’s consideration of the key responses received and summarises their response and, as appropriate, the subsequent changes which were made to the draft Disability Action Plan as a result of the consultation process.
2. Where a number of organisations have raised either the same or similar comments these have been grouped together.

View Expressed

1. One respondent indicated that they agreed with the action measures; however, they also recommended that the new measures should take into consideration how people are treated when they attend medical reviews for benefits and blue badge allocation.

Response

1. The Department welcomes this input; however, the concerns raised sit outside the scope of our Disability Action Plan and are devolved matters for the Northern Ireland Executive.

View Expressed

1. Comments were received from several consultees regarding website accessibility and the availability of alternative formats for displaying guidance on the intranet along with contact details in the consultation documents. It was recommended the intranet site is accessible to people with visual impairments and additionally the contact details in this consultation document and action plan should be clearly advertised and include a textphone or dedicated SMS number to enable deaf people the same access as those who have hearing.

Response

1. The Department welcomes the comments from consultees. The NIO’s internal and external sites are hosted on **GOV.UK** which is the central government platform operated by the Government Digital Service. **GOV.UK** has been designed to ensure accessibility for all users and is compatible with a number of screen readers including Jaws, ZoomText, NVDA, VoiceOver, Window Eyes, Supernova screen readers and MAGic. In addition, it is also compatible with speech recognition software and operating system speech packages. In common with other central government departments, the NIO no longer provides a textphone service; however, a dedicated email address is made available and we intend to provide greater access through the use of social media.

View Expressed

1. Several consultees acknowledged the list of public life positions the NIO is responsible for; however, they requested information held in relation to diversity and the number of people with disabilities represented within the 8 bodies.

Response

1. A single transparent source of top-level data, including disability information, on all non-departmental public bodies, executive agencies and non-ministerial departments, including public life positions held within NIO sponsored bodies is published on an annual basis. The most up to date information can be found at <https://www.gov.uk/government/publications/public-bodies-2015>. This includes top level disability data.

View Expressed

1. One respondent asked the NIO to outline measures to promote public life opportunities which are not confined simply to the public appointment process. Furthermore, it was suggested that the NIO should highlight measures for which it has responsibility within its action plan or at the very least identify those public life opportunities that it may influence to increase the number of people with disabilities in public life

Response

1. The Department welcomes the comments. The NIO is a Whitehall Department and recruitment policies are set by Cabinet Office. All recruitment is underpinned by the principles of appointment on merit following fair and open selection. Further information on the steps that are being taken to increase diversity in the Civil Service can be found at:

<https://www.gov.uk/government/organisations/civil-service/about/equality-and-diversity> or information on increasing diversity in public appointments can be found at: <https://publicappointments.cabinetoffice.gov.uk/about-appointments/>

View Expressed

1. Although one respondent welcomed the guaranteed interview scheme, they commented that they found no other evidence of actions to encourage people with disabilities in public life. They asked how many people with disabilities have been successful in securing employment to enable them to make an informed comment.

Response

1. As highlighted in section 4.10, the NIO is committed, and has a responsibility, to ensure all recruitment processes are operated in a fair, open and transparent manner. Information on diversity within the Civil Service is available at: <https://www.gov.uk/government/organisations/civil-service/about/equality-and-diversit>y and information on public appointment diversity is published on an annual basis. The most up to date information can be found at <https://www.gov.uk/government/publications/public-bodies-2015>.

View Expressed

1. In relation to the action measures outlined in the plan, one respondent commented that the inclusion of reasonable adjustments in the staff induction checklist (action 2) is a duplication of the DDA 1995 obligation and should not be included. Additionally, comments were received that providing an annual progress report to the Board is a compliance issue and the annual progress report should be published on the Departments website.

Response

1. The Department welcomes the comments. The inclusion of a reasonable adjustment’s question within the staff induction process enables the NIO to take a pro-active approach and provides employees with an early opportunity to declare a disability and request reasonable adjustments are made. The NIO Board is committed to promoting and ensuring equality and valuing diversity within the workplace. Whilst these may be perceived to be compliance issues the inclusion of these measures in the action plan demonstrates the commitment of the NIO to meet its obligations and promote positive attitudes across the Departmental family towards people with a disability. We believe that including these measures will strengthen the oversight arrangements and ensure greater transparency. All future annual progress reports will be published on the Department’s website.

View Expressed

1. One respondent commented that they found it difficult to identify what is actually new or carried over from the previous action plan. If carried over, have these actions been monitored and evaluated and what have been the successes to date.

Response

1. The structure and role of the NIO has changed significantly in recent years, especially since the devolution of policing and justice functions to the Department of Justice. Given the NIO has reduced its staff numbers from approximately 3000 to less than 150 and it no longer provides any front line services to the public in Northern Ireland it was not possible to either carry over previous action measures or evaluate their effectiveness. The new Disability Action Plan has been developed to reflect the current NIO structure and functions.

View Expressed

1. One respondent commented the performance indicators within the action plan would be more beneficial if the measures were specific, measurable, achievable, realistic and time-bound (SMART). In relation to the timetable they also commented there are no actions scheduled from the second quarter of 2016 to 2018.

Response

1. The Department welcomes the comments. We have reviewed the draft plan and made a number of changes to the measures and actions.

View Expressed

1. One respondent commented that they found no evidence of a specific action detailing how the NIO intends to involve people with disabilities in the implementation, monitoring and review of the action plan 2016-19.

Response

1. The Department welcomes the comment and has updated the action plan. The NIO is fully committed to staff inclusion and involvement in the delivery, monitoring and review of the action plan. We will put arrangements in place that will allow all staff, including those with disabilities, to be involved in all aspects of the implementation, evaluation and review of the action plan.

Section 5 – Assessment of Responses

1. The NIO is committed to upholding the Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006). The structure and role of the Department has changed significantly following the devolution of policing and justice functions to the Department of Justice (NI) on 12 April 2010. The new Disability Action Plan replaces any previous plan and is intended to take account of this new structure and role and seeks to reflect best practice guidance.
2. Following consultation, the Department has reviewed its draft Disability Action Plan and made a number of changes to incorporate the comments provided by consultees. A revised copy of the action plan can be found at **Annex A**.
3. The amended Disability Action Plan was submitted to Ministers and approved in March 2016.
4. The document is available in the publications section of the NIO Website: [www.nio.gov.uk](http://www.nio.gov.uk). Printed copies of this response may also be obtained free of charge from:

Corporate Governance Team

Northern Ireland Office

Stormont House

Stormont Estate

Belfast

BT4 3SH

Email: equality.scheme@nio.gov.uk

Tel: 028 9076 5497

**Northern Ireland Office**

**March 2016**

**Annex A**



**DISABILITY ACTION PLAN**

 **Disability Action Plan**

 **2016-2019**

March 2016

Northern Ireland Office

**Introduction**

**1.1** Under Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), The Northern Ireland Office is required when carrying out its functions to have due regard to the need to:

* promote positive attitudes towards disabled people; and
* encourage participation by disabled people in public life (‘the

disability duties’).

Section 75 of the Northern Ireland Act 1998 also requires public authorities to have due regard to the need to promote equality of opportunity, including between persons with a disability and persons without. Furthermore, as a Whitehall Department, the NIO is also bound by the statutory requirements set out in the Equality Act 2010 which provides protection on the basis of protected characteristics, including disability.

Under Section 49B of the DDA 1995, The Northern Ireland Office is required to submit to the Equality Commission a **disability action plan** showing how it proposes to fulfill these duties in relation to its functions.

**1.2** As Parliamentary Under-Secretary of State for Northern Ireland and Permanent Secretary of the Northern Ireland Office, we are committed to implementing effectively the disability duties and this disability action plan. We will allocate all necessary resources (in terms of people, time and money) in order to implement effectively this plan and where appropriate, build objectives and targets relating to the disability duties into corporate and annual operating plans.

We will also put appropriate internal arrangements in place to ensure that the disability duties are complied with and this disability action plan effectively implemented. We will ensure the effective communication of the plan to staff and to providing all necessary training and guidance for staff on the disability duties and the implementation of the plan.

We confirm our commitment to submitting an annual report to the Equality Commission on the implementation of this plan as well as carrying out a five yearly review of this plan. We also confirm our commitment to consult with disabled people when implementing and reviewing our plans.

Responsibility for implementing, reviewing and evaluating this disability action plan and the point of contact within The Northern Ireland Office will be:

**Name: Richard Steven**

**Title: Head of Corporate Governance**

**Address: Stormont House, Belfast, BT4 3SH**

**Telephone number: 028 90 765 497**

**Email: Equality.scheme@nio.gov.uk**

If you require this plan in an alternative format (such as in large print, in Braille, on audio cassette, easy read or on computer disc) and/or language, please contact the above person to discuss your requirements.

**1.3** We confirm our commitment to submitting an annual progress report on the implementation of this plan to the Equality Commission and carrying out a five year review of this plan, or plans submitted to the Equality Commission over the five year review period.

A copy of this plan, our annual progress to the Equality Commission and our five year review of this plan will be made available on our website:

<https://www.gov.uk/government/organisations/northern-ireland-office>

**1.4** **Functions**

The Northern Ireland Office supports the Secretary of State for Northern Ireland in promoting the best interests of Northern Ireland within a stronger United Kingdom. It ensures Northern Ireland interests are fully and effectively represented at Westminster and the heart of Government, and the Government’s responsibilities are fully and effectively represented in Northern Ireland.

Our key purpose is to make politics work by working alongside the Northern Ireland Executive to help improve the effectiveness and delivery of the devolved institutions; to ensure a more secure Northern Ireland; deliver a growing economy including rebalancing the economy; and ensure a stronger society by supporting initiatives designed to build better community relations and a genuinely shared future.

The UK Government is delivering a stronger Northern Ireland within a stronger United Kingdom across a wide range of areas.

Further information on the NIO can be found on our website:

<https://www.gov.uk/government/organisations/northern-ireland-office>

**1.5** **Public Life Positions**

The range of public life positions over which The Northern Ireland Office has responsibility for, are public appointments to the following bodies:

* The core department of the Northern Ireland Office
* The Boundary Commission for Northern Ireland
* The Chief Electoral Officer for Northern Ireland
* The Civil Service Commissioners for Northern Ireland
* The Equality Commission for Northern Ireland
* The Northern Ireland Human Rights Commission
* The Parades Commission for Northern Ireland
* The Sentence Review Commissioners for Northern Ireland

***2.*****Previous Measures**

Outlined below are the key measures which The Northern Ireland Officehas already taken to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life.

**Promoting positive attitudes towards disabled people**

* The NIO has engaged with the Commissioner for Public Appointments and Cabinet Office’s reporting mechanisms to monitor the diversity of public appointments providing transparent reporting data on the number of public appointments held by persons with a disability.
* The NIO has sign-posted staff to and maintained an “Equality” section on the departmental intranet site.
* The NIO has appointed a dedicated Equality Officer and Board Diversity Champions to promote equality and diversity within the Department. The Equality Officer also provides guidance to staff and resolves any internal or external issues or queries in relation to equality matters.
* The NIO’s external website is fully accessible and in a suitable format for persons with a disability.

**Encourage the participation of disabled people in public life**

* The NIO has a process in place to provide all public documentation in suitable formats for persons with a disability.
* The NIO has incorporated the “Guaranteed Interview” scheme for all vacancies and public appointments.
* The NIO accepts applications from disabled people in accessible formats.
* The NIO advertises and promotes public appointments on numerous public authority websites.
* The NIO is committed to providing constructive feedback to unsuccessful applicants.

***3.* Action Measures**

Outlined below are the measures which we propose to take over the period 2016-2019of this disability action plan, together with performance indicators or targets.

**Measures to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life**

|  |  |  |
| --- | --- | --- |
| **Measures** | **Timescale** | **Performance** |
| Implementation Date | Review/Report Date(s) |
| 1. A disability section will be included in the staff induction checklist to ensure a proactive approach for any new employees to declare a disability and/or request for any reasonable adjustments.
2. A dedicated Disability section will be created on the Department’s Intranet site to provide guidance and signposting to staff in relation to disability duties.

 1. The HR manager will continue their membership of the Civil Service Workplace Adjustment Team (CSWAT) as a means of supporting staff with disabilities. Membership will be renewed on an annual basis.
2. News stories and blog posts will be published on the intranet site to promote diversity seminars and specific areas of focus in line with the annual diversity calendar.
3. The Equality Officer will register as a member of the MOJ Disability Network. Membership will be renewed on an annual basis.
4. All staff at management level and above will complete the online “Diversity, Equality & Disability Awareness” training on the Civil Service Learning site.
5. The Equality Officer will provide an annual progress report to the NIO Board in respect of disability & equality; this will be reported in tandem with the Section 75 annual progress report.
6. The Department will explore options for improving access to information using social media.
 | April 2016 September 2016October 2016November 2016January 2017April 2017June 2017June 2017 | October 2016April 2017October 2017April 2018October 2018April 2019March 2017September 2017March 2018September 2018March 2019June 2017June 2018June 2019As and when in line with the Annual Diversity CalendarJanuary 2018January 2019April 2018April 2019June 2018June 2019June 2017 | Deputy Directors will be asked to confirm all new staff have undergone an induction process during the mid-year and end of year stewardship process.The intranet site will be refreshed on a six-monthly basis to ensure the most up to date guidance and information is made readily available to staff. A short online survey will also be included on the site for staff to provide feedback.Updates from each meeting will be published on the disability section of the intranet site. A record will be maintained of all blog and news items added to the intranet site and figures provided in the annual progress report.The Equality Officer will promote this network and provide any updates on the disability webpages at regular intervals.Training will be mandatory for all staff at management level and above. Deputy Directors will be asked to confirm all relevant staff have undergone this training during end of year stewardship process.Annual Report will be a standing agenda item on the July Board meetings.A record of the implementation date will be provided in the annual progress report. |

Signed by:

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**Parliamentary Under-Secretary of State Permanent Secretary**

**Annex B**

**LIST OF THOSE WHO PROVIDED A RESPONSE TO THE CONSULTATION**

* Disability Action
* Royal National Institute for the Blind (RNIB NI)
* NI Action Health and Wellbeing (NIAMH)
* Association of School and College Leaders (ACSL)
* Patient and Client Council