

Equality Commission

FOR NORTHERN IRELAND

11 March 2021

Dr Ashleigh Perry
Democratic Unionist Party

Dear Ashleigh,

Promoting Excellence: Improving Boys' educational achievement in NI

The Commission welcomes the opportunity to provide feedback to the Democratic Unionist Party's Policy Consultation paper *Promoting Excellence: Improving Boys' Educational Achievement in Northern Ireland*.

While noting the paper's title, we recognise that the application of many of the interventions would be of universal benefit to children and young people, particularly those experiencing social disadvantage and across the Section 75 equality grounds.

We welcome that a number of the areas within the paper align with the priorities which we identified via a detailed process of research and stakeholder engagement in our Key Inequalities in Education work. You can find out more about the research work here: [Key Inequalities in Education](#). Our policy priorities align with your own identified issues including childcare and early years, and family and community involvement. Our age work also recommended action to reduce the proportion of young people who are NEET.

I have not answered the questions enclosed with the consultation paper, but instead highlight on the next page a number of our policy recommendations. These are highly relevant to the questions posed. I attach full versions of our policy recommendations.

I found our meeting very interesting, and will send on a copy of our family / community engagement – learning from the pandemic publication when it is finalised next week. I wish you well as you progress your policy paper, and please let me know if I can be of any assistance,

Yours sincerely



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Enc.

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Provide, and monitor uptake of, appropriate, accessible and affordable childcare and early-years provision more generally to meet the diverse needs of all children.

- 1.1 We reiterate our 2013 policy position on Childcare¹, which calls for appropriate, accessible and affordable childcare provision to meet the diverse needs of all children, including children with disabilities, those from BME communities and new residents.
- 1.2 The Department of Education has recognised the importance of early-years' provision². We recommend the monitoring of uptake by those equality groups experiencing educational underachievement, with action taken to address any shortfalls.

Supporting rationale

- 1.3 Research in Northern Ireland has found that children who did not attend pre-school showed poorer cognitive and behaviour outcomes than their peers who attended pre-school³. European Commission research also found that children who attended high quality provision had better performance in school, and better economic and social outcomes in later life.⁴
- 1.4 The Department of Education has recognised the importance of early-years provision, with the Minister stating⁵ in February 2016:
- “It is widely recognised that the early-years of a child’s life are some of the most important in terms of their development. Intervention during these early-years of education can have a significant, positive and lasting impact on raising educational standards and narrowing gaps that prevail in achievement later in life. Evidence shows that the greatest impact and most significant difference can be made for children from areas of disadvantage. During these times of severe budgetary constraints, it is critical that we focus resources in areas where we can ensure the best possible outcomes for our children.”*
- 1.5 Save the Children⁶ has argued that given the gap in children’s development by the age of three, the highest priority should be given to the development of a fit-for-purpose early childhood education and care model. It recommends that the Executive appoints a panel to consider the structure and funding of the model and to progress the early-years and childcare strategies as well as expanding Sure Start.

¹ ECNI (2013) Childcare: Maximising the Economic participation of women

² DENI (2016) Press release O'Dowd launches pathway fund for early years education

³ Sylva, Melhuish, Sammons et al (2010) Early Childhood Matters: evidence from the effective pre-school and primary education project, cited in Northern Ireland Assembly Research Paper (2013) Early Years Provision, NIAR 68-13

⁴ EU High Level Group of Experts on Literacy (2012) Final Report

⁵ DENI (2016) Press release O'Dowd launches pathway fund for early years education

⁶ Save the Children (2013) Too Young to Fail, Closing the educational achievement gap in NI p.3

- 1.6 Echoing the 2011 'Call to Action' report⁷, the 2015 PUP 'Firm Foundations' report⁸ highlighted that early interventions are more effective and less complex than later remedial action. It also argued that while Sure Start has done excellent work there are many more children who would benefit but are not referred, are ineligible or are referred late. It also cited the impact of a lack of attention to early development from antenatal care through to early language therapy interventions on those entitled to free school meals, particularly Protestant working class boys.

Promote collaborative approaches to drive attainment, involving engagement with parents / families / carers and the wider communities of key equality groups.

- 1.7 The Chief Inspector's Report 2012-2014⁹ highlighted the benefits of broader family / community involvement in education noting: *"It is clear that schools alone cannot break the cycle of low outcomes; there is a need for greater coherence and connection between the learners, their families, their communities, their schools and the wide range of agencies and health support service providers that play a significant part in their lives."* These linkages were also among the common factors identified in the Executive Office's 2017 ILiAD¹⁰ research as contributing to the enhancement of educational achievement across the seven wards included in the study. Lack of parental engagement has also been linked to poorer educational outcomes for those entitled to free school meals, particularly boys, including Protestant working class boys¹¹.
- 1.8 Feedback¹² on the progress of two local partnership programmes involving children, parents, teachers and the wider community has been very positive with successful outcomes such as improved attendance and attainment recorded. The programmes highlighted appear to be effective in addressing attainment and broader educational issues by involving those outside the immediate school¹³. It is recommended that consideration of how those, such as BME groups and children with disabilities who may not live within socially deprived areas, could access such schemes, should they become more widespread.

⁷ Purvis, D., (2011) Educational disadvantage and the Protestant Working Class, A Call to Action, p 7

⁸ PUP (2015) Firm Foundations, Educational Underachievement and the Protestant Working Class Education: Getting it right for every child

⁹ The Education and Training Inspectorate (2013) An Evaluation of Extended Schools - Chief Inspector's Report 2012-2014, p26

¹⁰ TEO (2017) [Investigating Links in Achievement and Deprivation \(ILiAD\)](#)

¹¹ PUP (2015) Firm Foundations, Educational Underachievement and the Protestant Working Class Education: Getting it right for every child

¹² McMahon (2015) Full Service Extended Schools (FSES) and; Full Service Community Network (FSCN) Tackling barriers to Learning: the Policy Forum for Northern Ireland conference on Education in Northern Ireland: raising standards, school accountability and leadership

¹³ Report by the five ELBs (2015) Extended Schools Annual Report 2013-14

Supporting rationale

- 1.9 A number of Extended Schools programmes exist across Northern Ireland. The 2017 Investigation Links and Achieving Deprivation (ILiAD) report cited Extended schools provision among the most important school level drivers of attainment¹⁴.
- 1.10 The Full Service Extended Schools programme (FSES) and the Full Service Community Network (FSCN) are located in predominately Protestant and Catholic areas in Belfast including some of the most deprived electoral wards in Northern Ireland. These programmes are designed to address the barriers to learning that children and young people from these disadvantaged areas experience by providing additional support. In the FSCN programme the focus is on early intervention with the parents of children of pre-school and primary school age whereas the focus of the FSES is on supporting learners and their families as they transfer from primary to post primary.

The Education Authority should put in place a system for learning from successful interventions, and disseminate and share these lessons with other schools.

- 1.11 Currently, there does not appear to be any formal mechanism or procedure in place for schools to share their learning, both positive and negative, from different interventions or initiatives undertaken to raise attainment. The Commission has sought to highlight successful interventions through a number of video case studies¹⁵.
- 1.12 JRF¹⁶ recommends developing a 'what works' centre to compile and promote high-quality evidence of ways schools can improve attainment for low income pupils and evaluate how successful these are. This type of approach could be extended to include pupils from the different equality groups with organisations such as the IES feeding in.
- 1.13 The Education Authority, through its regional role, has the potential to provide and oversee a formal mechanism to make possible the sharing, across schools in Northern Ireland, of successful interventions.

Supporting rationale

- 1.14 Research¹⁷ carried out for the Great Britain Department of Education and Skills in 2005 acknowledged from the outset that: *policy makers, academics and practitioners tend to agree that spreading good practice from one school to another is important in improving the quality of teaching and learning across the school system.* However, the research also recognised the barriers that exist - such as identifying what

¹⁴ TEO (2017) [Investigating Links in Achievement and Deprivation \(ILiAD\)](#)

¹⁵ ECNI (2017) [Equality Commission case studies - Key Inequalities in Education](#)

¹⁶ Joseph Rowntree Foundation (2016) A prosperous, poverty free Northern Ireland

¹⁷ DERA (2005) Factors influencing the Transfer of Good Practice

constitutes good practice; the time and resource involved; and the potential for resistance to it.

- 1.15 In England, the Education Endowment Foundation and Sutton Trust are jointly designated by government as the 'What Works Centre for Education'¹⁸. A 2018 review¹⁹ found that: 'they have helped transform our understanding of the effectiveness of widely used but until now poorly evidenced practices'.
- 1.16 In Scotland, guidance²⁰ was produced in 2009 for the education sector, based on the principle 'that when teachers learn from and with each other this can lead to better outcomes from learners'. In 2017, the Scottish government published a research strategy for Scottish education²¹ which provided a framework to 'effectively share lessons of international evidence, to identify effective interventions, establish 'what works' in the Scottish context and continuously learn from the data that is gathered.'

The Department of Education should develop a system of post-primary transfer that enables all pupils to maximise their potential.

- 1.17 In 2009²² the Commission again noted its concern about the use of academic selection at eleven years old as a method for determining transfer to post-primary education. A 2016 JRF briefing on poverty in Northern Ireland²³ reported '*strong evidence that selective systems of education, using examination methods such as the Transfer Test, have a negative impact upon the attainment of children from low-income backgrounds*'.
- 1.18 Aligned to this, data demonstrates that a number of Section 75 groups are over-represented within free school meal entitlement. Language and awareness barriers have also been identified for Newcomer children.
- 1.19 In 2017, the Department of Education's Strategic and Policy Development Forum²⁴ highlighted negative impacts of academic selection, including evidence that it led to some primary school children becoming uninterested in learning in Year 6. This finding is echoed in the Executive Office's ILIAD (Investigating Links in Achievement and Deprivation) report²⁵. This has implications for the Department's ability to close the performance gap and increase access and equality²⁶.

¹⁸ Others were established for policing, local economic growth and health and social care

¹⁹ What Works Network (2018) [What Works Network, Five Years On](#)

²⁰ HM Inspectorate of Education (2009) Learning together: improving teaching, improving learning, the role of CPD, collegiality and chartered teachers in implementing curriculum for excellence

²¹ Scottish Government (2017) [Research Strategy for Scottish Education](#)

²² ECNI (2009) [Response to the Department of Education – Transfer 2010](#)

²³ JRF (2016) A Prosperous, poverty-free Northern Ireland, p. 9

²⁴ DE (2017) Report of the Strategic Forum Working Group on Inclusion and Prosperity

²⁵ TEO (2017) [Investigating Links in Achievement and Deprivation](#)

²⁶ RAISE (2016) Academic Selection, a brief overview, Northern Ireland

1.20 We continue to raise concern about the use of academic selection at eleven years old as a method for determining transfer to post-primary education. In this context we reiterate our overarching call to the Department to develop a system of post-primary transfer that enables all pupils to maximise their potential.

1.21 We also reiterate our wider concerns regarding the current unregulated transfer process. While we understand from media reports²⁷ that the organisations that currently provide the different tests are seeking to agree a single test / set of tests, it is still the case that pupils may undertake up to four tests, with some children also required to pay to participate²⁸.

Supporting rationale

1.22 Burns et al²⁹ highlighted that the type of school attended (i.e. grammar or non-grammar) was a strong predictor of attainment.

1.23 In 2016/17 44.9% of post primary pupils attended grammar schools³⁰. However, Department of Education statistics³¹ demonstrate that grammar schools have a lower proportion of their intake of FSME pupils, newcomer pupils and children with disabilities.

1.24 In broad terms, data shows that: those entitled to FSM are less likely to attend a grammar school³²; that a significant proportion of those within some Section 75 groups are entitled to FSM³³; and that those entitled to FSM are less likely to achieve 5 GCSEs (A*-C including English and Maths)³⁴.

Deliver a shared curriculum in shared classes to support improved attainment across equality groups.

1.25 Sharing can allow pupils to access the full range of the curriculum and may be encouraged to study those wider subjects at a further or higher education college. Pairing more effective schools with less effective

²⁷ BBC News Online (26 June 2018) Academic selection: Plans for common transfer test agreed. Accessed 14 August 2018

²⁸ An assessment fee of £50 is payable to sit the AQE test unless evidence of FSME is provided. The GL test is free

²⁹ Burns, S., Leitch, R., Hughes, J., (2015) [Education Inequalities in Northern Ireland](#)

³⁰ DENI (2017) [Enrolments in schools and at funded pre-schools in Northern Ireland 2016/17](#). This compares to 37.2% in 1986/87.

³¹ Equality data is generally not collected beyond gender, nor is it published by the two providers of the current unregulated transfer tests. Therefore Department of Education enrolment, attainment and FSME data, where it exists, regarding grammar and non-grammar schools has been considered as regards the impact of selection on Section 75 groups.

³² DENI (2016) [2015/16 Statistical Bulletin](#) – FSM entitled pupils make up 39.9% of non grammar compared to 13.9% of grammar school enrolments.

³³ DENI (2016) [Key Statistics – free school meals](#), and DENI (2016) [2015/16 Statistical Bulletin](#) all – 28.2%; Travellers – 80%; Roma 74.1%; children with Statements 48.4%

³⁴ DENI (2016) [Qualifications and Destinations Data](#) FSM entitled – 41.3%; not FSM entitled – 73.7%

schools may also offer the potential to close achievement gaps by improving standards and outcomes for all learners.

- 1.26 The Commission considers that the sharing in education has the potential to improve educational access and attainment for pupils from a diverse range of backgrounds and abilities³⁵. We reiterate our recommendations in relation to sharing in education, as set out further above.
- 1.27 The DE Sharing Works policy³⁶ lists among the benefits of shared education, *the education case - improving access for learners to a wider choice of subjects encompassing the full range of the curriculum; increasing access to specialist teaching and to modern facilities; and facilitating the sharing of ideas and good practice between education providers*. Such actions could, for example, be targeted to encourage boys, which research has highlighted may feel they have fallen behind and could not catch up³⁷.

Supporting rationale

- 1.28 The Commission has highlighted³⁸ the educational, economic and societal benefits of sharing in education – including that sharing can offer opportunities to improve standards and outcomes for all learners.
- 1.29 Sharing can allow pupils to access the full range of the curriculum and may be encouraged to study those wider subjects at a further or higher education college. Such access is seen as ‘vital in areas where deprivation is more prevalent and is an important driver in breaking the cycle’³⁹. Pairing more effective schools with less effective schools may also offer the potential to close achievement gaps by improving standards and outcomes for all learners⁴⁰.
- 1.30 Such actions have the potential to also tackle low educational aspiration and achievement ingrained in disadvantaged communities, affecting those entitled to free school meals, particularly boys, including Protestant working class boys⁴¹ and contribute to addressing a legacy of working class sons having followed their fathers into jobs leading to a perception that qualifications are not needed⁴².

³⁵ ECNI (2015) Summary policy position on sharing in education

³⁶ at page 8

³⁷ DOJ/ DENI (2012) Taking Boys Seriously – a longitudinal study of adolescent male school life experiences in Northern Ireland

³⁸ ECNI (2015) Summary policy position on sharing in education

³⁹ Oxford Economic (2010) Developing the case for shared education, page 12

⁴⁰ Borooah and Knox (2012) Delivering Shared Education: Knowledge Exchange seminar

⁴¹ Barnardos (2010) Response to Purvis consultation on educational disadvantage and the Protestant Working Class

⁴² Purvis, D (2011) Educational disadvantage and the Protestant Working Class, A Call to Action, page 3

- 1.31 Cross-sectoral sharing of facilities and teaching can also act as a means of ensuring that all young people have access to a wider range of sporting and cultural resources as well as community-based activities.

Establish robust, reliable education information systems to address existing equality data gaps and provide more disaggregated data.

- 1.32 There remain^{43 44} significant and specific equality data gaps across a number of themes in education in relation to gender identity, religious belief, political opinion, minority ethnic group and sexual orientation. Where data exists, there is also a lack of disaggregation in relation to: ethnicity, disability status, dependency status and marital status.
- 1.33 Data gaps and lack of disaggregation in relation to Section 75 groups present a barrier to the assessment of the extent of particular groups within the school population. They limit the accurate and robust measurement of educational attainment, experiences and progression for those with particular equality characteristics. This in turn limits the scope for more effectively meeting the needs which specific groups may have, and prevents a detailed assessment of the effectiveness of measures aimed at benefitting such pupils / students across Section 75 groups.
- 1.34 We recognise that there are some limitations to data disaggregation. However, where robust to do so, disaggregation would provide greater information to inform the better targeting of policy interventions – for example on how young carers, or children and young people with particular disabilities progress through school.

Supporting rationale

- 1.35 We recognise that classifying pupils from black and minority ethnic (BME) communities can be difficult. The Executive Office has provided guidance⁴⁵ to public bodies on monitoring racial equality, which may be of assistance to the Department and education providers in this regard.
- 1.36 In relation to disability and SEN, increased data on the nature of disability would allow for better analysis of how children and young people with particular disabilities progress through school.
- 1.37 Also there is currently no official monitoring of carers in school - particularly young mothers. We welcome the ‘Supporting Young Carers in School’⁴⁶ guidance produced⁴⁷ by the Education Authority and the Health and Social Care Board. The guidance includes good practice in

⁴³ ECNI (2017) Statement of Key Inequalities in Education

⁴⁴ Burns, S., Leitch, R., Hughes, J., (2015) [Education Inequalities in Northern Ireland](#)

⁴⁵ OFMDFM (2011) [Guidance for Monitoring Racial Equality \(under review\)](#)

⁴⁶ Education Authority and Health and Social Care Board (2017) [Supporting Young Carers in School: An Introduction for Primary and Secondary School Staff](#)

⁴⁷ The Children and Young People’s Strategic Partnership Young Carers Group comprising the Health and Social Care Board produced the guidance in partnership with the Education Authority; Action for Children NI; Barnardo’s NI; Gingerbread NI and Carers Trust NI.

identifying young carers. We recommend monitoring and reviewing the mainstreaming of this guidance in schools.

- 1.38 Some examples of the specific gaps in educational data identified by Burns et al (2015)⁴⁸ included sexual orientation, where limited quantitative data led to reliance on research from small samples or qualitative data from small-scale surveys.
- 1.39 Similarly, a lack of data prevents a comprehensive understanding of the race related issues and inequalities – for example relating to the educational experience and outcomes of asylum seekers and refugees.
- 1.40 The school census classification for 2015/16 has 15 categories, with some of the largest ethnic minority groups in Northern Ireland falling within the white category. This includes non-Newcomer Eastern European migrants. We note that the school census categories include 'first language' and 'Newcomer', which may provide some data, but will not produce robust information on those BME groups within the 'white' category.
- 1.41 School age parents or those with dependents / caring responsibilities are often hidden in official statistics, making it difficult to measure their needs and provide the necessary support. A 2013 report⁴⁹ for England and Wales found that many young adults do not realise they are carers or do not want to be identified as carers, so the limited data that is collected is likely to be an underestimation of the real number of young carers.
- 1.42 Although quantitative data is collected on the marital status of students participating in education beyond post primary school, there has been little research in this area to explain the trends that are observed.
- 1.43 Section 75 of the Northern Ireland Act provides the legislative framework for public authorities to mainstream equality of opportunity for nine specific groups⁵⁰. It requires all public authorities in Northern Ireland to have due regard to the need to promote equality of opportunity between the nine equality categories and have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group⁵¹. The collection of equality data is an integral part of this process.
- 1.44 The Commission's monitoring guidance⁵² provides practical assistance and advice to public authorities on developing monitoring arrangements. It outlines the different data collection methods with some pointers on the choice of method depending on the context. It recognises that the collection of monitoring data in respect of children presents particular

⁴⁸ Burns, S., Leitch, R., Hughes, J., (2015) [Education Inequalities in Northern Ireland](#)

⁴⁹ NIACE (2013) Access and Inclusion: young adult carers and education and training

⁵⁰ Nine groups include persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; men and women generally; persons with a disability and persons without; and persons with dependents and persons without

⁵¹ ECNI (2010) Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities. (p11)

⁵² ECNI (2007) Monitoring Guidance for use by Public Authorities

difficulties raising both ethical and consent issues as well as covering sensitive data categories⁵³. It calls on Public Authorities to give due consideration to the various factors involved in deciding on a data collection methodology.

Address any negative equality impacts arising from the shift to home-based learning.

1.45 Action should be taken, in collaboration with learners, their families, and the broader community, to identify and address key equality issues, including any associated with differences in the effectiveness of the home learning environment, including:

- access to appropriate space to learn and study;
- access to educational or curriculum support materials;
- the accessibility of digital materials – either due to access to IT equipment or broadband, or the accessibility standards of the materials themselves;
- the circumstances and abilities of parents, carers or siblings to support learning – including in the context of wider family, caring and/or work commitments;
- access to related specialist support and equipment – in particular for those children with disabilities or special educational needs; and those in need of language or wider support – including Traveller, Roma and Newcomer children.

Supporting rationale

1.46 The home environment, including space to study and the circumstances and abilities of parents, carers or siblings to support learning affects home-based learning. Juggling work or care (inside or outside the home), or education / learning support for wider dependents or siblings, will have an impact.

1.47 Similarly, limited or differential access to educational materials and expert teaching support will reduce the effectiveness of home-based learning. Access to related equipment, including specialist teaching / support equipment may also be more restricted.

1.48 The reduction in social interaction with peers and teaching professionals may be a further particular issue, including for those requiring language support.

1.49 A June 2020 report⁵⁴ by the National Foundation for Educational Research, based on research in English state schools, found that teachers surveyed reported that just over half (55%) of their pupils'

⁵³ ECNI (2007) Monitoring Guidance for use by Public Authorities p.103 Appendix E paragraph 18

⁵⁴ National Foundation for Educational Research (June 2020) [Schools' responses to COVID-19. Pupil Engagement in Remote Learning](#)

parents were engaged in their children's home learning. Additional support for families and children is therefore required now and upon the return to school.

- 1.50 The research⁵⁵ also reported that teachers were most concerned about low engagement from pupils with limited access to IT or those who lacked space to study.
- 1.51 A shift to digital based teaching and digital curriculum support materials has a range of potential impacts. Differential access to home computing and/or internet access⁵⁶, which even if available in the home may need to be shared with parents / carers or siblings (due to their work or learning needs), might limit access to teaching / curriculum support materials, and/or opportunities to engage in virtual learning or discussions.
- 1.52 We acknowledge the Minister of Education's confirmation⁵⁷ of a scheme to loan digital devices to those 'who may be considered vulnerable and those in examination year groups'. We note an initial focus⁵⁸ on those children in key transition years 11, 13, 6 and 3 (in that order) who are entitled to free school meals and are also within particular priority groups including Newcomer (including Roma) children and children with Special Educational Needs (SEN). We however note that the scheme as announced does not include, in the initial priority groups, Traveller or Roma children (who are not Newcomers) or those children with disabilities not categorised as SEN. Nor does it cover the provision of internet access until later in the rollout of the scheme⁵⁹, thereby limiting the benefit of some IT equipment for those in homes without sufficient internet access.
- 1.53 There might also be differential impacts arising from access to, or the accessibility of, curriculum support materials, be they in digital formats or otherwise. Such impacts might vary with different types of learners or learning needs - for example for those with special educational needs or disabilities; and those in need of language or wider support – including Traveller, Roma and Newcomer children.

⁵⁵ National Foundation for Educational Research (June 2020) [Schools' responses to COVID-19, Pupil Engagement in Remote Learning](#)

⁵⁶ An estimated one million children in the UK do not have access to a device or mobile connectivity at home. IPPR (2020) [Children of the Pandemic](#)

⁵⁷ DENI (21 May 2020) [Statement from the Education Minister to the Ad hoc Committee](#)

⁵⁸ We note that the scheme then extends include all pupils who are eligible for Free School Meals in these year groups but do not meet the other criteria; and then, subject to availability, to pupils who are eligible for Free School Meals in other year groups.

⁵⁹ DENI (1 June 2020) Section 75 screening – Criteria to be used in the lending of digital devices to pupils during the COVID-19

1.54 In 2017, the UK Independent Mechanism⁶⁰ report⁶¹ to the UN Committee on the Rights of Persons with Disabilities on compliance with the Convention noted that 'Disabled people continue to experience barriers in accessing information and are more likely never to have used the internet. There are also issues with digital accessibility and the inaccessibility of some government websites'⁶². The UNCRPD Committee subsequently⁶³ noted with concern '*The lack of accessible information from public services and authorities and obligatory standards for making websites accessible and monitoring of ICT accessibility*'⁶⁴.

⁶⁰ The Equality Commission and the NI Human Rights Commission, together with the Equality and Human Rights Commission and the Scottish Human Rights Commission form part the United Kingdom Independent Mechanism under the UNCRPD.

⁶¹ UKIM (2017), [Disability rights in the UK: UK Independent Mechanism: Updated submission to the UN Committee on the Rights of Persons with Disabilities in advance of the public examination of the UK's implementation of the UNCRPD](#)

⁶² Paragraph 40, page 40.

⁶³ UNCRPD (2017) [Committee on the Rights of Persons with Disabilities: Concluding observations on the initial report of the United Kingdom of Great Britain and Northern Ireland](#)

⁶⁴ Paragraph 46, page 10.