



**BSO & associated health organisations  
Equality & Disability Action Plan Consultations  
ECNI feedback  
7<sup>th</sup> July 2023**

The Commission welcomes BSO and the associated health organisations' consultations on their revised Equality Action Plans and Disability Action Plans. We would just like to offer some signposts to advice and guidance which you may find useful when reviewing and finalising your EAPs and DAPs following consultation.

We welcome that BSO and the Health organisations have reviewed progress from their previous DAPs and EAPs and have developed key learning points from this.

We are pleased to note that easy read, Audio and large print versions of the DAPs/EAPs have been provided for consultation, and that other formats including translations to other languages are available on request.

### **Disability Action Plans**

The Disability Duties were introduced within the legislative framework of the Disability Discrimination (NI) Order 2006 as part of a series of changes to the DDA. The DDA is primarily focused on eliminating discrimination against disabled people in the fields of employment, the provision of goods, facilities and services, education and transport. The 'disability duties' are positive mainstreaming duties which focus on proactive implementation of a range of measures which contribute to improving the way in which public authorities work in order to:

- better promote positive attitudes towards disabled people and
- improve the level of disabled peoples' participation in public life.

Your disability action plans (DAP) should focus specifically on these two duties, and not on disability issues generally. It is also important that BSO and the health organisations, while working together and collaborating to develop DAPs, consider the specific functions and services of their organisations and develop action measures specific to all these functions and services. Organisations should also

consider if there are actions they can take to encourage other organisations within their sphere of influence to promote positive attitudes / encourage disabled people's participation in public life. E.g. RQIA in relation to their work within the care sector.

We welcome the action measures in the DAPs including: the disability staff network Tapestry; reserved contracts for organisations whose main aim is to integrate disabled people; the disability work placement scheme with permanent paid employment prospects; the involvement of disabled people in the design and delivery of training and in the review and development of policies, programmes and services,

The Equality Commission recently issued guidance which provides a range of examples of action measures to promote positive attitudes towards disabled people and to encourage disabled people's participation in public life [Disability Action Plan Example Action Measures](#). You may find it useful to review these example action measures and include some in your DAP if appropriate given the range of functions and services your organisation provides.

You may also find our recent guidance on encouraging the participation of disabled people in public life useful [Encouraging the participation of disabled people in public life](#)

Some recommendations that the Commission would ask BSO and the health organisations to consider in relation to their DAPs are:

- –Many of the measures are internally/staff focused, organisations could perhaps consider some more externally focused action measures where appropriate.
- while collaboration with BSO and other health organisation is good, in terms of pooling expertise, learning and resources, ensure health organisations are considering measures relating to the specific functions and services of their individual organisation.
- Ensure as much as possible that **performance indicators** are clear and measurable and demonstrate how actions and intended outcomes are relevant to the disability duties.
- It is important that individual **actions are clearly defined in order that monitoring** can effectively measure the impact that individual actions have and enable adjustments to be made where necessary. Clear targets can encourage staff at all organisational levels within a public authority to take ownership and allocate resources appropriately.

- The Commission recommends that the health organisations ***provide more detail on the training which they intend to deliver*** over the course of the disability action plan and consider in more detail how monitoring and evaluation could measure the impact of training on both the duties. Page 11 and 12 of the Commission's guide 'Disability Action Plan Example Action Measures' (link provided above) outlines the Commission's recommendations in relation to training that should be included in a disability action plan.

## Equality Action Plans

### Audit of inequalities

The BSO and health organisations' EAPs should be based on an audit of inequalities, the audit of inequalities for an organisation identify inequalities which are relevant to a public authority's functions. The Commission has some advice on how to approach an audit of inequalities [Public Authorities Audit of Inequalities](#). The aim of the audit of inequalities is to produce a strategic picture of the inequalities that a public authority may be in a position to influence, depending on its functions and remit. The public authority can then use this audit information to develop an action plan to address inequalities relative to its functions.

In carrying out an audit, the Commission recommends that public authorities consider the following key functional areas of their organisations:

- employment;
- service delivery and exercise of public functions;
- procurement;
- promoting good relations and tackling prejudice;
- participation in public life.

The Equality Commission has a number of useful publications which BSO and the other health organisations should/could consider when carrying out its audit of inequalities, including:

- [ECNI Programme for Government Paper](#)
- [Equal access to all at work 2023 briefing paper](#)
- <https://www.equalityni.org/SexualOrientation> including 2013 position paper
- <https://www.equalityni.org/Disability>
- [ECNI - Delivering Race Equality in Northern Ireland \(equalityni.org\)](#)
- [ECNI - Delivering Gender Equality in Northern Ireland \(equalityni.org\)](#)
- [ECNI - Delivering Age Equality in Northern Ireland \(equalityni.org\)](#)

BSO and the health organisations should consider the advice contained in the Equality Commission's response to the Department of Health's Budget EQIA [ECNI consultation response: Department of Health Budget 2023-24 Equality Impact Assessment \(equalityni.org\)](https://equalityni.org)

We would recommend that before finalising EAP action measures, BSO & the health organisations consider the impact of the cost of living increases and budget cuts on existing inequalities experienced by Section 75 categories.

#### Section 75 EAP Action measures

We note the BSO/health orgs action measures included in the Section 75 action plan.

In addition to those actions proposed and in order to measure/assess inequalities more effectively, BSO and the health organisations should consider what steps you can take to: gather and improve quantitative and qualitative **S75 data** and improve equality monitoring and data coordination across all business areas.

In addition, we advise that EAP action measures should be SMART i.e. specific, measurable, linked to achievable outcomes, realistic and timely. They should include performance indicators which focus on **outcomes** rather than outputs, as this makes for more effective monitoring of progress on the delivery of the measures and their impact on S75 categories.

If you have any queries regarding this feedback, please do not hesitate to get in touch.

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Equality Commission for NI

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