

**Measuring Equality in Northern Ireland
Monitoring framework**

**Consultation Report Findings
May 2022**

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1. Introduction

- 1.1. The Equality Commission for Northern Ireland (the Commission) has developed a formal monitoring framework for Measuring Equality in Northern Ireland. This framework will enable the Commission to identify emerging inequalities and track improvements over time, in relation to persistent and deep-rooted inequalities in the lives of people in Northern Ireland. The Commission plans to periodically produce a succinct statement from the framework, covering particular outcome areas.
- 1.2. The Framework identifies six broad areas of life in Northern Ireland to be covered, with nine equality outcome areas described. Each of those outcome areas have associated specific priority areas with potential population indicators and sources of evidence. We will use these sources of evidence to track and measure change over time.
- 1.3. The sources of evidence and the measures for the framework, are drawn from current and available data sources. Also, we have gaps in our measures; there are a number of priority areas which we have identified where there appears to be no current sources of evidence, or where data development may be needed.

2. Summary of consultation process undertaken

- 2.1. As part of the process of developing the monitoring framework for Measuring Equality in Northern Ireland, we undertook a consultation process during a twelve-week period. We engaged with individuals and stakeholder organisations that are producers and/or users of equality data. We asked about their specific views on the outcome areas, the key priority areas, the population indicator(s), and sources of evidence proposed, to assist us in developing this framework.
- 2.2. The consultation process involved a number of mechanisms for the engagement with stakeholders and for the dissemination of the framework. These included: the creation of a website and social media channels, an online form, along with an accessible Word document of the same form. Focus groups were organised through Eventbrite, and meetings with organisations were scheduled upon request. Responses and comments by email and social media were also recorded.
- 2.3. The contributions and recommendations gathered from our stakeholders, data users and producers are recorded in this report and have been considered by the Commission.

3. Consultation findings

- 3.1. The Commission received a total of 45 responses, of which 15 were online responses, 8 were forwarded by email and/or using the word form. The focus groups conducted on the 24th and 25th of March were attended by 15 people, and four meetings with stakeholder organisations took place during the consultation period. In addition, three comments were recorded in social media.
- 3.2. Of the total 45 responses, 21 came from data user organisations, 6 from data producers organisations and 10 from individuals. Some participants from the focus groups and meetings also submitted an extended response focusing on key issues of interest for their organisation.
- 3.3. Consultees were given the choice to provide responses to all sections of the consultation framework or the option to contribute and comment only on sections of interest for their organisation. All the responses were analysed, summarised, and recorded in the full consultation report, which is available upon request.
- 3.4. The following organisations engaged in the consultation exercise:

Law Centre NI, Rainbow Project, Northern Ireland Council for Integrated Education (NICIE), CLEAR Project, Belfast Trust, Mid Ulster MEGA, Angel Eyes, Here NI, Families Involved NI (FINI), Officer of the Commissioner for Public Appointments NI (OCPANI), Equality Coalition, British Medical Association (BMA), Collaborative Centre for Housing Evidence (CaCHE), Homeless Connect, Northern Ireland Women's Budget Group (NIWBG), Transgender NI, Northwest Forum of People with Disabilities, Integrated Education Fund (IEF), Arts Council of Northern Ireland, Centre for the Administration of Justice (CAJ), PDQ solutions, TEO/ Ethnic Equality Monitoring working group, Higher Education Statistics Agency (HESA), Department for Economy (DfE), Northern Ireland Housing Executive (NIHE), Public Health Information & Research Branch - Department of Health (DoH), and Department of Education.
- 3.5. In general, participants of this consultation acknowledged the value of the Measuring Equality Framework to identify and raise awareness of data gaps to public authorities, and the importance of collecting this data towards addressing inequalities. It was also suggested that the Commission should use the framework to work with government bodies to improve data collection and disaggregation for all Section 75 grounds.
- 3.6. Consultees also commented that the Commission should encourage public bodies to use the framework for the development of evidence-based policy making, as well as to monitor and evaluate the impact of their policies on Section 75 grounds.
- 3.7. Overall, the consultation exercise provided a variety of views from organisations on the key priority areas, population indicators and data sources. Comments were focused on: the formulation of the outcome and key priority areas and statements and the suitability of indicators and sources of evidence.

- 3.8. In terms of the outcomes areas, overall the responses indicated the need to refine some statements considered to be unspecific, and that these should be more explicit from the outset in stating what is meant to be achieved in terms of equality outcomes.
- 3.9. It was noted that, while the nine outcome areas appear as discrete mission statements rather than hard measurable outcomes, they were considered to be reflective of society as a whole. However, some of these are more sector specific and tend to lean towards broader impacts than outcomes that can be measured.
- 3.10. In relation to the key priority areas and the associated population indicators, comments suggested that a proportional number of indicators should be included in all key priority areas. Currently, some key priority areas have more than one indicator and sources of evidence, while others have only one or none. It was acknowledged, however, that the availability of data might be the determining factor to be able to identify indicators and sources of evidence. This was also contested in some comments, noting that indicators should be informed by the need to gather data to measure equality, rather than by the current availability of data.
- 3.11. A significant number of participants in this exercise suggested additional or alternative sources of evidence collected by non-government organisations and the independent sector. The importance of not relying on survey data, which collects perceptions that might differ from facts, or on government data, was also mentioned. It was further pointed out that while official statistics and data sources of government and public bodies are important, these are also limited in the data they collect and the representativeness of this data of the whole population.
- 3.12. With regards to the availability of data, in general participants acknowledged that there are challenges in accessing data that is regularly collected and disaggregated on all the Section 75 equality categories. Significant data gaps were also mentioned by organisations working with LGBTQI+ groups, people with disabilities, ethnic minorities, and the homeless.
- 3.13. It was suggested that the Commission should follow their own guidance in terms of disaggregation when collecting and recording data on complaints by individuals and when conducting surveys. These data sources could also be used for the framework.
- 3.14. In general terms it was widely understood that the purpose of the framework is about measuring equality outcomes across the priority areas, identifying existing or emerging inequalities and data gaps. Although many contributions and comments recorded were about policy issues concerning public services and programme delivery and their development, which are outside the scope of this project, these have been acknowledged here as valuable factors that can affect equality outcomes.

4. Analysis and identification of key themes

Education.

Outcome areas. The two outcome areas proposed in the framework “*There is equality of opportunity in education*” and “*The places we learn are welcoming and inclusive*” were considered by the majority of the consultees as appropriate to cover key areas to measure equality in education.

- 4.1. In the Education section, overall consultees agreed that the four key priority areas: ‘Attainment in Education’, ‘Access to Curriculum and Career Paths’, ‘Education Support’, and ‘Access to Education’; reasonably represent areas for measuring the outcome area “*There is equality of opportunity in education*”.
- 4.2. While the statement attached to Attainment in Education was not contested, in general the population indicators were considered insufficient to measure the complexities of this area. A number of consultees suggested that the measures should include other educational pathways, different from those achieved through GCSE’s, A-levels, and BTEC. While important, these exclude the skills framework that measures the trajectory in education for children and young people with disabilities.
- 4.3. Consultees were also concerned that while the statement on Access to Curriculum and Career Paths is reflective of the outcome, the population indicator proposed was not adequate in capturing and identifying potential inequalities for this key priority area. In addition to the percentage of children choosing STEM and non-STEM subjects in secondary and third level education, other measures on career paths, such as apprenticeships and non-vocational subjects, were proposed. Disaggregated data on the destination of school leavers, including those students entitled to free school meals (FSM), was recommended as a more appropriate measure for this priority area, and the Graduate Outcomes Survey could provide some data for this purpose.
- 4.4. In terms of the key priority concerning Access to Education, and in the absence of a specific measure for this area, access to the Entitlement Framework, which sets out the minimum number and range of courses any school should offer at Key Stage 4 and Post-16, and data on access to six form courses, were proposed as potential measures. Data is available to monitor these areas. These measures could provide a more accurate picture in terms of equality of opportunity in access to education and training. Some consultees also mentioned that this key area overlaps with access to curriculum and career paths; measures such as access to six form and school leavers destinations might be interlinked.
- 4.5. The majority of comments about the key priority area of Education Support, and its statement ‘Everyone has equality of opportunity to access the support they require to achieve their full potential’, focused on the impact of this key area on children and young adults with disabilities and with Special Educational Needs

(SEN) statements. While there was not a specific population indicator proposed for this area during the consultation exercise, some participants were of the opinion that data on access to support services, and type of services provided to children with disabilities by the Education Authority, could potentially provide a measure to identify inequalities in this area.

- 4.6. The responses collected on the outcome area *“The places we learn are welcoming and inclusive”* and the associated key priority areas of ‘Sharing in Education’ and ‘Bullying and Stereotyping’ were seen as appropriate and no specific comments received.
- 4.7. As there is not a specific measure included in the framework for Sharing in Education, some participants were unclear as to how this key area was defined. It was pointed out, by one of the consultees working in the field, that integration and sharing in schools are two very different things, and that acknowledging this difference is fundamental when it comes to measuring how often children are provided with the opportunity to be taught together via shared curriculum and shared classes.
- 4.8. To measure and monitor this key priority area, it was suggested to include data on the religion and community background of school children against the type of school they attend (Catholic, Protestant, integrated, etc). This would provide a measure of the mixed intake level of children in schools to monitor the opportunities available for children to be taught together. This suggestion also extended to considering data on the mix of children in school by faith and no faith as well as the mix of teachers and boards of schools, as a measure for sharing in education. Another comment suggested that while sharing in education is framed in terms of community background, this approach has its limitations when measuring equality in this key priority area. There is the potential for data collection and disaggregation considering other Section 75 equality categories to measure this outcome.
- 4.9. It was acknowledged that while schools’ participation in shared education programmes provide opportunities for children to be taught together via shared curriculum, the Education Authority does not record data on the community background of the children taking part in these programmes or the frequency and number of children involved in these activities.
- 4.10. There were few comments on the key priority area Bullying and Stereotyping, and the responses collected through email and the online forms suggest that consultees were confident that the population indicator and measure was appropriate for this key priority area.

Employment.

Outcome areas. Consultees broadly agreed that the two priority areas *“There is equality of opportunity in employment”* and *“The places we work are welcoming and inclusive”* constitute adequate outcome areas to measure equality in employment.

- 4.11. In general, consultees also agreed that the key priority areas: ‘Access to Employment and more Jobs’, ‘Better jobs’, and ‘Access to Support to be able to

work'; are adequate to measure the outcome area "*There is equality of opportunity in employment*". Furthermore, the statements attached to these key priority areas were reflective of the outcome area.

- 4.12. However, there were comments around the limitations of having only one source of data for this outcome area and its associated key priority areas, namely the Northern Ireland Labour Force Survey (NILFS). It was pointed out that the definition of employed and unemployed used in the survey prevents most disabled people from being counted. This means that while someone with a disability may be unemployed under the definition, research shows that over 25% of them want to work. The way that people who identify as LGBTQI+ is recorded as a category in the survey was also contested. In addition, it was noted that while the NILFS includes foster careers under the question of dependants, the NILFS does not include foster careers from the perspective of employment who receive payment and training. It was also mentioned that the measures should cover all areas of the employment cycle such as, recruitment, selection, retirement, redundancy, and redeployment.
- 4.13. In terms of Access to Employment and More Jobs, a number of consultees indicated that having more jobs available and access to employment does not mean an increase in quality of employment. For example, zero hours contracts might increase the workforce but might not increase the quality of working conditions overall. Some responses also made references to measures that should include data specifically on employment rates of people with disabilities (including learning disabilities), recruitment and promotions, and that monitoring of this should be similar to the recording of fair employment which specifically monitors employment based on religious background.
- 4.14. While consultees agreed with the key priority area of Better Jobs, to reflect equality outcomes in employment, some participants of the focus groups commented that measures based only on earnings and income with regards to occupation are insufficient as they do not consider satisfaction with employment. Some responses made the point that well paid jobs are not necessarily better or more rewarding jobs. In addition, participants commented that the measure for this key priority might not be reflective of the relationship between qualification, occupations, and salary, as there is no longer a clear correlation between higher qualification and higher income.
- 4.15. Comments were also made about including pay and low pay as measures, as these might reveal pay differentials by equality grounds such as, gender and ethnicity pay gaps. It was also mentioned that the new TEO policy around the real living wage could provide an opportunity to introduce monitoring questions to employers and those delivering public contracts.
- 4.16. The suggestions made about the priority area Access to Support to be Able to Work concerned the need to include a specific measure for support needs for employment of disadvantaged groups such as, vulnerable adults, the homeless, and people with caring responsibilities. These population groups have historically faced more barriers to entering employment.

- 4.17. In relation to the statement on access to support, some consultees were of the opinion that “flexible working” should be clearly defined, as this may imply precarious employment, such as zero-hour contracts. It was also recommended to include data on economic inactivity as a measure.
- 4.18. With regards to the outcome area “*The places we work are welcoming and inclusive*”, consultees mainly commented on the key priority areas concerning this outcome and the measures proposed. In general, it was indicated that the data sources to measure this outcome area were insufficient. Comments were made around the fact that there is only one source of data and that it is on people’s perceptions on this outcome area which is included in the Commission’s Public Opinion Survey. While important, this might not be representative of how under-represented groups (and hard to reach in surveys) experience the working environment.
- 4.19. In terms of the key priority area Welcoming and Inclusive Workplaces, the main comment was around the working environment and the impact on retention of workers. It was explained that in some specific male dominated fields, female employees’ retention is low, and this could be interrogated by asking questions to employers around gender and retention. It was suggested to look at the Northern Ireland Civil Service (NICS) staff survey data, as this captures a good proportion of the employed population, being the largest employer in Northern Ireland.
- 4.20. While there was general agreement with regards to including Discrimination as a key priority area to measure the outcome, a number of consultees suggested that data collected by the Commission in terms of employment complaints and discrimination cases, should be included as a measure to identify some trends. However, it was also acknowledged that this only captures a small section of the population; those who report and request the Commission’s advice and assistance on discrimination matters.

Participation in Public Life.

Outcome area. Overall, participants of the consultation were content with the outcome area “*There is equality of opportunity in access and participation in decision making*” as this adequately reflects equality outcomes in terms of participation in public life. Consultees mainly made comments around the definition and statements for the key priority’s areas identified for this outcome area.

- 4.21. The statement and data sources proposed for the key priority area Representativeness in Political Life were perceived by the consultees as straightforward. However, limitations on the disaggregation of the data for this measure, which is collected from the Northern Ireland Assembly, were acknowledged.
- 4.22. Consultees did not comment or challenge the statement associated with Representativeness in Public Life. However, one of the responses received via email clarified that disaggregated data on this area is no longer collected by the Commission of Public Appointments, but by the Northern Ireland Statistics and Research Agency (NISRA) in collaboration with the Executive Office (TEO). In

addition, it was suggested that more evidence of the nature and recruitment of public life positions would be useful in measuring equality in this key priority area.

- 4.23. A number of consultees commented that the population indicator associated with Access to Democracy was imprecise in terms of “percentage of people who feel supported to vote” which it was thought to be very different from access to vote. Some consultees explained that access to vote is where inequalities might lie. Examples were given to illustrate the nuances of the distinction between access and support. From an accessibility perspective, people with disabilities might encounter challenges to be able to vote; language barriers represent an obstacle for migrant workers or members of the Black, Asian and Minority Ethnic (BAME) community when registering to vote; and in general for people experiencing homelessness, as the system constitutes a challenge for them to be able to vote.
- 4.24. Similar issues to the above (Section 4.23) were identified by consultees with regards to Access to Participation in Public Life. Additional barriers to participation such as, recruitment process and limitations associated to the social security system (that might prevent people on social security benefits to apply to paid appointments in public bodies) were mentioned. Some examples were also provided by a number of consultees to illustrate how particular groups, such as foster carers, are excluded from influencing decision-making by not having the mechanism available to participate.

Health and Social Care.

Outcome area. In general, comments on this outcome area considered the development of this framework as a golden opportunity to identify areas of inequality and to reflect on how people in Northern Ireland experience health and wellbeing in more general terms. It was also mentioned that the framework provides an opportunity to identify equality data gaps in measures for health that can be brought to the attention of government and health providers.

- 4.25. It was acknowledged that compliance with the equality schemes was fundamental. However, in the absence of data collection or availability of data by some equality grounds, consultees were uncertain how these schemes can provide the evidence to measure progress in terms of equality of opportunity concerning health.
- 4.26. A significant number of responses collected about this outcome area challenged the definition associated with “*Everyone can enjoy long and healthy lives*” as being too ambiguous and aspirational. It was strongly stated by some participants in the focus groups that, in comparison with the other outcome areas, the health outcome is less precise and that there is a need for a harder descriptor. It was suggested by one consultee that achieving equality of access to health and wellbeing would be a more appropriate statement to describe the outcome.
- 4.27. In general terms, when commenting on the key priority areas for this outcome: ‘Standards of Health’, ‘Access to Health and Social Care’ and ‘Access to Information’; consultees were concerned about the limited scope of the health

outcome as described in the framework. It was mentioned that restricting the measures to only health, as social care does not come explicit in the framework, and wellbeing measures have not been included, is problematic, as this will not reflect and capture the complexity of factors when measuring equality in this area.

- 4.28. To address the issues raised above it was suggested to use the Programme for Government (PfG) indicators on health and social care services, as these provide measures for disaggregation of data, and include explicit wellbeing indicators.
- 4.29. During the consultation period, clarification was provided by the Department of Health (DoH) on the availability of the data concerning the population indicators proposed in the framework for the key priority areas of the health outcome. These are drawn from the annual Health Survey questions around perceptions of health, access to health services, and information, but these are included only on an ad-hoc basis. Therefore, these measures are not suitable for monitoring and comparison year-by-year.
- 4.30. Comments made about the key priority area Standards of Health raised similar issues about how reflective the statement is in pointing out realistic outcomes. While physical and mental health are considered, several consultees commented that wellbeing and health are interlinked. Therefore, measures for these would provide a more holistic approach to measure equality in standards of health. A number of reports and data sources that might provide better indicators than the ones currently proposed in the framework were cited by consultees with expertise in the area. It was further noted that these sources do not rely solely on survey data.
- 4.31. With regards to the key priority area Access to Health and Social Care, which addresses timely and good quality social care, some consultees were unsure how the population indicator will accurately cover issues of access to health for population groups which are regularly under-represented in surveys. In addition, comments on this also questioned the extent to which such measures consider the barriers to access health experienced by people with disabilities, and BAME communities. Some examples given include access to basic services such as the availability of interpreters when registering to a GP or accessible medical premises for people with disabilities.
- 4.32. In terms of availability of data, some consultees suggested that indicators concerning access to mental health should be included as the current GHQ12 is only one measure. The PfG provides some measures on mental health. In addition, it was advised to look at the Department of Health's detailed data on waiting lists. Although there is very little analysis or research on which sections of the population based on their equality grounds, are affected the most by waiting lists, this data could provide some pointers to potential inequalities.
- 4.33. While comments on Access to Information were linked to Access to Health and Social Care, and similar issues were shared concerning both priority areas, the statement and population indicator included in the framework for Access to Information, was not contested specifically in the responses received. However,

having a data source solely based on self-reporting surveys was considered inadequate in all the key priority areas proposed for the health outcome.

Standards of Living and Housing.

Outcome area. A general comment with regards to the outcome area “There is equality of opportunity in access and support for everyone in Northern Ireland to an adequate standard of living and to adequate housing” concerned the need to include measures on energy efficiency and fuel poverty.

- 4.34. It was also noted that inequalities experienced by households might be revealed more accurately if the focus to analyse standards on living is not only based on averages and data that assess performance of service delivery, but rather to identify indicators to measure equality.
- 4.35. The key priority areas proposed in the draft framework: ‘Standards of living’, ‘Access to Housing’, and ‘Independent living’; were found by consultees as important and adequate to measure the overall outcome area. However, there were a number of opinions about the statements associated with these key priority areas pertaining to the definition and clarity of terms such as adequate, satisfactory, appropriate, sustainable, and affordable housing.
- 4.36. In respect to the key priority area Standards of Living, it was suggested to consider the Northern Ireland Multiple Deprivation Measure which provides a wider range of indicators covering housing, poverty, health, employment which are interlinked when assessing population standards of living.
- 4.37. A number of consultees were of the opinion that the indicator proposed to measure this key priority area might not be appropriate. One of the limitations of using the 60% of median income, as explained by some consultees, is that according to the Affordable Housing Commission and the NIHE Strategic Housing Analysis, 60% is too low, and that 70% is used more often.
- 4.38. Considerations around Access to Housing included comments about the wording of the statement for this area. Some responses mentioned that “appropriate, sustainable, and affordable” are three very different things, and bringing these together into a sole indicator is misplaced.
- 4.39. Comments were also made around the segregated nature of public housing in Northern Ireland, which needs to be considered. This is of particular importance when monitoring access and availability to housing, as individual choices and preferences of where to live have an impact on access to housing.
- 4.40. A number of consultees commented that the indicator proposed for this key priority does not consider the affordability aspects of access to housing. Although it was noted that there is not an agreed definition for “affordability” and other complex concepts such as “housing costs”, including median and lower rent costs, affordability should not compromise quality of housing. Therefore, affordability and quality should be measured with separate indicators.

- 4.41. In addition, some comments pointed out that affordability for those in poverty might also depend on housing support (benefits) and this support is not always proportional to housing rent costs. This imbalance will have an impact on affordability of food and other non-housing living costs are determinants of a good standard of living.
- 4.42. In general, consultees believed that using the percentage of people in housing stress as the only measure for access to housing, is inadequate. Giving the definition of housing stress and the fact that it is a “trend” indicator, as pointed out by one of the consultees with expertise in the area, other measures should replace this indicator, or it should be used alongside housing stress.
- 4.43. Examples of measures for access to housing were provided in some responses such as: Public Housing waiting lists, and the corresponding disaggregation by all Section 75 categories (including disability and sexual orientation) and/or the Full Duty Applicant (FDA) Status which is the homeless assessment legal test, and the Affordability Test, which is based on the assignment of net new households by tenure.
- 4.44. In relation to the key priority area of Housing/Independent Living, comments were made around the importance of keeping this as a priority area, but some consultees were of the opinion that the statement should be worded in a more precise way and focused on disability.
- 4.45. In the absence of a proposed indicator and measure for this key priority area, and the lack of existing surveys on independent living, some consultees suggested to consider data on housing adaptations. However, it was acknowledged that this data only covers housing adaptations applications from people with physical disabilities, such as wheelchair users, as indicated by some consultees.

Communities that are Welcoming and Inclusive.

Outcome areas. In general, responses received around the outcome areas: “Everyone who lives in Northern Ireland can do so without fear of exclusion and disadvantage” and “There is equality of opportunity within the criminal justice system and within communities when people experience and access justice matters” showed a level of agreement with these outcome areas as they are reflective and cover key areas for equality in terms of Communities that are Welcoming and Inclusive.

- 4.46. With regards to key priority areas attached to the outcome area, *“Everyone who lives in Northern Ireland can do so without fear of exclusion and disadvantage”* a number of consultees were of the opinion that the key priorities areas: ‘Housing and Public Spaces’; ‘Discrimination and Harassment’; ‘Access to Good Facilities and Services’; ‘Participation in Cultural and Sporting Life’; and ‘Digital Inclusion’; were very important areas to achieve this outcome area but the measures proposed have limitations as they only capture the views of those who respond to the surveys.
- 4.47. It was noted that the statements alongside these key priority areas were to some extent vague and imprecise and could be formulated differently to make these

more specific. Some comments made references to the fact that these statements might help to identify if there is an issue of disadvantage but might not be the best for a further analysis of who is affected the most by the issue in terms of equality grounds.

- 4.48. The key priority area Housing and Public Spaces received responses around the need to acknowledge housing segregation and issues of sectarianism preventing the enjoyment of housing and public spaces. It was also mentioned that although the statement implies these issues, this could be made more explicit.
- 4.49. In addition to the measure proposed for this key priority, some comments made references to include a measure related to the development of Shared Housing Schemes. However, some participants of the focus groups were certain that there would be challenges in collecting data in this area.
- 4.50. With regards to the key priority area Discrimination and Harassment, while the statement was not contested in any of the responses, some consultees suggested the inclusion of Police Service for Northern Ireland (PSNI) statistics and data on hate incidents, and to analyse these by equality grounds if the data is disaggregated and available. This will complement the measure on perceptions and opinions about these key areas, as proposed in the Commission's Public Opinion Survey.
- 4.51. Comments made about the key priority area Access to Goods, Facilities & Services were focused mainly on transport needs and availability in rural areas. In the absence of a measure in the framework for these areas, some consultees suggested to use NISRA data on car ownership, and to look at the measures on accessibility of services included in the Rural Needs Act.
- 4.52. In general, the responses received were not concerned with specific issues related to the Participation in Cultural & Sporting Life and only one comment was recorded about the importance of accessibility to sport clubs and membership for people with disabilities.
- 4.53. The key priority of Digital Inclusion received a number of comments stressing the importance of this area in having an impact on people's ability to apply for jobs, or to access social services, given the general digitalisation of systems. Some responses pointed out that this issue became more relevant for elderly people, those with disabilities, and migrants during the COVID pandemic. In addition, a consultee added that these groups have traditionally been digitally excluded.
- 4.54. Some consultees also mentioned that the disparity in access and choice of broadband providers and availability of internet-based technology and equipment is more evident in rural communities than in urban areas.
- 4.55. General comments of the outcome area "There is equality of opportunity within the criminal justice system and within communities when people experience and access justice matters" made references to the high level of under-reporting of crime to PSNI that exists in Northern Ireland.

- 4.56. Several responses stressed the fact that front line support organisations might have a better picture of the limitations people face in accessing criminal justice. As these organisations deal with these issues on a daily basis, it would be important to capture the data they collect on access to justice, as this is not currently reflected in the framework.
- 4.57. It was suggested that the issues mentioned above need to be considered with regards to the population indicators for the key priority areas of 'Freedom from Discrimination and Hate', 'Freedom from Violence', 'Security', and 'Access to Justice', as proposed for the justice equality outcome area. Some consultees indicated that, as all these key areas rely only on PSNI data on reporting of crime or self-declared survey data, these alone cannot provide a good representation of the whole population, and that using this data would be insufficient to monitor equality within these key priority areas.
- 4.58. In terms of the key priority area of Freedom from Discrimination and Hate, it was suggested that measures on all types of violence, such as verbal, economic, state, etc. should be covered within this area and under the definition of "violent attacks". Consultees also made references to the new hate crime legislation, which should provide better measures for the monitoring of equality within this area.
- 4.59. When commenting on the priority area Freedom from Violence, responses were concerned that the PSNI data is the sole measure proposed in view of the high level of under-reporting of crime, especially sexual and domestic violence. A number of consultees from interest organisations cited sources of evidence that show disparities of data recorded on these areas, such as the Women's Policy Group Survey report, which included a sample size of more than 1000 women, and the research conducted by the Rainbow Project on LGBTQI+ experiences of crime and reporting.
- 4.60. It was also noted that data gaps and monitoring on ethnicity grounds explains the absence of specialised and targeted support for migrant women victims of sexual and domestic violence, making it almost impossible to assess and measure equality on Freedom from Violence affecting this particular section of the population.
- 4.61. Although Security, was included in the general comments about the key priority areas concerning sources of evidence and indicators, within the justice outcome, there were not specific responses or comments made on this key priority.
- 4.62. Comments made about the key priority area Equality of Opportunity in Access to Justice, focused on the confidence in the legal system and understanding of the system. Some consultees made the point that if people don't not know their rights and what they should expect, they cannot know if their rights have been breached.
- 4.63. Despite the high importance given to this key priority by consultees, it was acknowledged that identifying robust measures and data sources is challenging. However, it was mentioned that data on applications and concessions of legal aid might provide some trends in terms to access to justice.

5. Adopting consultee recommendations and the ongoing development of the framework

- 5.1. The Monitoring Framework for Measuring Equality in Northern Ireland is an important and long term project for the Commission, in order to produce statements on Equality in Northern Ireland. The review of the data sources used and adoption of the data related recommendations gathered during the consultation exercise is an ongoing process.
- 5.2. The Commission will undertake a process of verifying and validating the sources of evidence to identify which data sources are available on a regular basis for comparative purposes over time and if these provide full or partly disaggregation on Section 75 equality categories.
- 5.3. All the sources of evidence and possible measures suggested by consultees who took part in the exercise, are recorded in [here](#).
- 5.4. We will continue to engage with data holders/producers such as public authorities and voluntary organisations on the data sources suggested. Such engagement will help us to make public authorities aware of the data gaps identified so far, from the consultation and through our own verification process. We aim to work collaboratively with these organisations to improve data collection, monitoring, and disaggregation by S75 equality categories.
- 5.5. The Commission has adopted the following into the MENI framework, following consultation:
- 5.6. In Access to Curriculum and Career Paths, a population indicator has been added: 'Percentage of pupils who have access to the entitlement framework'.
- 5.7. The priority area Access to Education was removed as this area duplicates the purpose of the priority area Access to Curriculum and Career Paths.
- 5.8. In the priority area Sharing in Education, a population indicator has been added: 'Annual enrolment in grant aided schools', which will disaggregate data on community background of pupils and teachers.
- 5.9. In Better Jobs, a population indicator has been added 'Percentage of people who define "what is a better job"'. This question will be included in the ECNI Public Opinion Survey.
- 5.10. In Access to Support to be able to work, the population indicator 'Proportion of working parents who feel there is insufficient childcare in the area in which they live', has been removed.
- 5.11. The priority area Access to Democracy has been removed as no disaggregated data exists on the percentage of people who voted in the last election. Instead, the priority area Access to Participation in Public Life will address participation using the current indicator 'Percentage of people who would consider

participating in voluntary or community work' which is included as a question in the ECNI Public Opinion Survey.

- 5.12. The statement associated with the outcome area Health and Social Care: "Everyone can enjoy long and healthy lives" has been replaced with "There is equality of opportunity in access to health care, social care, and well-being". In addition, "care" has been added to the priority area, which now reads Access to Health Care & Social Care.
- 5.13. The population indicators for Standards of Health and Access to Health Care & Social Care needs to be reconsidered as the data sources provided are no longer available on a regular basis in the Health Survey. Instead, indicators included in the Programme for Government associated with health and wellbeing strategies are being assessed for the development of potential indicators in these priority areas.
- 5.14. In the priority area of Standards of Living, a fuel poverty measure will be included subject to data availability.
- 5.15. In Access to Housing, a population indicator has been added: 'NIHE waiting list' and measures on Housing/Independent living, such as 'Housing adaptations', will be explored further with the Department of Communities and Department of Health.
- 5.16. In Access to Transport Goods, Facilities & Services, the words Goods, Facilities and Services are now removed due to lack of disaggregated data and only consideration to Access to Transport measures will be considered subject to data availability.
- 5.17. The priority area Discrimination and Harassment has now been moved to the outcome area "There is equality of opportunity within the criminal justice system and within communities when people experience and access justice matters" and it is now embedded in the key priority area Freedom from Discrimination and Hate, which includes harassment. The population indicators remain the same for both priority areas.
- 5.18. The priority area of Security will include a population indicator of 'Percentage of adults who feel safe in their community' which will be added as a question in the ECNI Public Opinion Survey.