

Disability Action Plans

A report of the Consultation Feedback



April 2013

This document can be made available on request and where reasonably practicable in alternative formats, such as large print, Braille, Easy Read, Audi , Accessible html, DVD or other languages to meet the needs of those for whom English is not their first language.

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Introduction

This is a report of the consultation feedback in relation to our disability equality duties under the Disability Discrimination Order 2006. This law told us that that in our work we have to:

- promote positive attitudes towards disabled people; and
- encourage participation by disabled people in public life.

The law also told that we had to develop a Disability Action Plan telling others what actions we plan to take.

Ten health and social care organisations listed in Table 1, with help from the Equality Unit in the Business Services Organisation, worked together in the development of Disability Action Plans for the period 2013-2018.

Table 1

List of organisations that developed disability action plans

Blood Transfusion Service	www.nibts.org
Business Services Organisation	www.hscbusiness.hscni.net
Health and Social Care Board	www.hscboard.hscni.net
NI Guardian Ad Litem Agency	www.nigala.hscni.net
NI Practice and Education Council for Nursing and Midwifery	www.nipec.hscni.net
Northern Ireland Social Care Council	www.niscc.info
Patient and Client Council	www.patientclientcouncil.hscni.net
Public Health Agency	www.publichealth.hscni.net
Regulation and Quality Improvement Authority	www.rqia.org.uk
NI Medical and Dental Training Agency	www.nimdta.gov.uk

In three of the larger partner organisations, including the Health and Social Care Board, Public Health Agency and the Business Services Organisation, working groups made up of staff with disabilities or those with a specific interest in disability issues were set up. This proved a very useful way of capturing direct experiences of disability issues and also helped in joint learning for all. In addition, in the early stages we also met with a number of community and voluntary organisations with specialist knowledge of disability services. These groups included:

Disability Action
Action on Hearing Loss
National Deaf Children's Society
Action Mental Health New Horizons
Mencap
Aware Defeat Depression

From previous work we have done we know that consultees are busy people. To avoid duplication therefore the ten organisations listed in Table 1 worked together to launch our consultation exercise on each of our plans. This exercise ran for 12 weeks and ended in April 2013.

Thank you to those who responded

We would like to take this opportunity to say thank you to consultees who took the time to respond at any stage throughout the development of the disability action plans.

Range of responses received

Table 2 outlines the organisations who responded. Table 3 presents the comments received and our responses. We hope this reflects views and comments raised and that our responses provide the necessary detail to better understand how we have considered any issues raised.

Table 2

Organisations who responded to the consultation

Name of organisation	Type of response
British Deaf Association	Face to face meeting
Disability Action	Detailed comments
South Eastern Trust	Acknowledgment only

Table 3 Disability Action Plans - Comments made by consultees and responses

Consultee Comment	Responses
<p>British Deaf Association BDA</p> <p>See also comments raised by British Deaf Association in relation to a consultation exercise in relation Accessible Formats Policy. The outcome of this will be published shortly on the Business Services Organisation’s Website</p> <p>http://www.hscbusiness.hscni.net</p>	
<p>British Deaf Association welcome the production of organisation’s Disability Action Plans</p>	<p>Noted</p>
<p>Having signed content on websites would make a big difference (for example via You Tube)</p>	<p>This suggestion will be considered as part of Theme 1 in Disability Action Plan: Communication. Action “to assess and improve accessibility of website”.</p>

	<p>Progressing this overall action on website accessibility will require more detailed discussions across organisations in respect of funding bids and prioritisation.</p> <p>Any future developments will seek the input and advice from a range of voluntary organisations including British Deaf Association and Action on Hearing Loss.</p>
<p>Need for more information to be written in easy read format and in plain English</p>	<p>In addition to the Disability Action Plans, Health and Social Care Organisations are in the process of finalising an Accessible Formats Policy to ensure that information is easily accessible in a range of formats including easy to understand versions.</p>
<p>Need for organisations to be aware of diversity within sign language community as to BSL and ISL (especially in the Northwest)</p>	<p>Guidance associated with the Accessible Formats Policy includes details on the differences between British Sign Language and Irish Sign language.</p> <p>Point noted as to the importance of reminding staff of this diversity. To be included in any associated training associated with the Disability Action Plans and in other awareness raising initiatives.</p>

<p>Need to provide a range of options for making contact: by SMS/text messaging, by fax, by email</p>	<p>As noted above this comment is being addressed as part of the Accessible Formats Policy and associated guidance.</p> <p>Theme 3 in Disability Action Plan. Action: on the development of standards and guidance will take this issue into account.</p>
<p>Need for deaf awareness training and training on how to work with interpreters; best to bring in deaf people; share good practice of other GPs.</p> <p>Need to provide taster courses with basic health signs; could be recorded and staff could learn in their own time; good practice: Ulster Hospital</p>	<p>The Disability Action Plans take into account the need for a range of training to be undertaken in collaboration with people with disabilities and community and voluntary groups. When identifying the range of training needs, deaf awareness training will be part of this after which priorities for delivering within agreed time scale will be identified.</p>
<p>Events: more publicity of consultation events including advertising using sign language on websites and sending emails via deaf organisations for dissemination</p>	<p>Theme 1 in Disability Action Plan: Communication Action: adopt accessible information policy considers the wider issue of provision of information in alternative formats.</p>

<p>Need to provide information in the right format on the event in advance and at the event Best to promote events through deaf networks, such as signed information via Facebook</p>	<p>This issue will be considered under Theme 3 in Disability Action Plan Getting People involved in our Work Action: Develop standards and guidance for involvement of disabled people in services which includes meetings and events.</p>
<p>Need to promote jobs and advertise amongst deaf people – forward to organisations via Action on Hearing Loss and advertise through sign format; advertise through Yahoo group (NI Deaf Events Group)</p>	<p>Theme 4 in Disability Action Plan Action: “encourage disabled people to apply for employment opportunities and remain in the work force” addresses this issue as it refers to issuing adverts to local disability organisations.</p> <p>We note the reference to Action on Hearing Loss and Yahoo.</p> <p>We will liaise with BSO Human Resources to discuss use of signed formats for advertisements</p>
<p>Placements: Need to work with Action on Hearing Loss who hold a list of individuals looking for jobs</p>	<p>In Theme 4 in Disability Action Plan, Recruitment and Retention: Action: create and promote meaningful placements reference is made to making use of voluntary sector expertise in this area.</p> <p>The suggestion on liaising with action on Hearing Loss is noted.</p>

Disability Action SPECIFIC COMMENTARY

Consultee Comment	Responses
Disability Action	
Each measure should be numbered for ease of reference.	The plan has been updated accordingly.
Alternative accessible format timescale must be shortened. Contracts should already be in place to meet Section 75 and DDA obligations.	This action relates to a regional contract being put in place to achieve greater efficiencies and consistency across Health and Social Care organisations. Timescales for this hinge on the completion of regional procurement exercises. In the meantime, alternative accessible formats will continue to be procured under existing arrangements.
Staff training – Disability Action advocates Disability Equality Training.	Comment noted and is the term used within Disability Action Plans
The establishment of Forum timescale must be shortened.	Given other Year 1 actions and the context of the introduction of a new Human Resources Information System during this time, we consider it unrealistic to complete this action during the first year.
Champion timescale must be shortened.	Target date for this action shortened to 1 year.

<p>Welcome shadowing scheme. However recommend including targets, specific action, dates and clear realistic performance indicators within the Action Plan</p>	<p>Comment noted. The scoping exercise will include the feasibility of quantifying this.</p>
<p>Disabled people should be involved through the Disability Action Plan lifespan rather than at the end of 5 years.</p>	<p>A number of the actions throughout the Disability Action Plan involve people with disabilities.</p>
<p>Welcome mentoring and placement measures however recommends including specific actions, targets, dates and clear realistic performance indicators to enable informed comment to be made.</p>	<p>Mentoring opportunities will be delivered in accordance with demands raised by individual new members of staff, the volume of which cannot be predicted. The target thus cannot be quantified at this point.</p> <p>It is envisaged that the placement scheme will cover a number of equality groupings including people with disabilities.</p>
<p>Website measure timescale must be shortened.</p>	<p>Timescale has been shortened to year 3.</p>
<p>Physical access is a DDA Obligations should not be duplicated here.</p>	<p>Noted and has now been deleted.</p>

<p>E Learning resource – seek information on how content was equality proofed.</p>	<p>This initiative emerged as part of the outcome of the first generation of Disability Action Plans of a number of organisations. It is a robust E Learning training package developed across health and social care in collaboration with people with a range of people with disabilities. The content was the subject of a pilot prior to its launch.</p>
<p>Engagement of people with disabilities in key work is too vague to enable informed comment to be made /better engagement measure too vague to comment.</p>	<p>Precise areas of work to be defined during the first quarter 2013/2014.</p>
<p>Establishing a baseline timescale must be shortened.</p>	<p>Given other Year 1 actions and the context of the introduction of a new Human Resources Information System during this time, we consider it unrealistic to complete this action during the first year.</p>
<p>Welcome employment opportunities.</p>	<p>Comment noted</p>
<p>Regarding performance indicators/targets Disability Action believes that it would be more</p>	<p>Comment noted</p>

beneficial if Action Plans establish outcome driven measures which are specific, measurable, achievable, realistic and time-bound.(SMART)

This will enable Action Plans to be attainable and measured rather than creating unachievable aspirational goals which although commendable rarely achieve real change.

Conclusion

This report reflects the consultation exercise undertaken to capture feedback on the content of organisations Disability Action Plans. Senior Management Team and Board and Committee members have considered the submissions from each of the consultees and acknowledge the commitment of all those who responded.

Where it has been possible we have addressed comments raised and revised our Disability Action Plans. In other instances we feel that some comments raised can be better addressed by other methods. A number of these comments related to accessible information and formats. These have been considered in the revision of an Accessible Formats Policy (2013). A feedback report of the consultation on this policy will also be made available on the Business Services Organisation's website <http://www.hscbusiness.hscni.net>. You will be also able to find a link to it from each of the websites listed on p.4 of this document.

In some instances we will attempt to bring comments raised to the attention of other organisations where they can be dealt with more appropriately.

Disability Action Plans for each of the organisations named in Table 1 are now available on their websites. A copy has also been sent to the Equality Commission for Northern Ireland.