

Equality Action Plans

A report of the Consultation Feedback



April 2013

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Introduction

This is a report of the consultation feedback we received in relation to our Section 75 equality duties specifically the review of our equality action plan. Our first action plan looking at what we could do differently to target inequalities and promote equality of opportunities across any of the 9 equality categories was in place until March 2013.

In our equality scheme we gave a commitment to monitoring progress and updating the plan as necessary. We also said we would engage and consult with stakeholders when reviewing the action plan.

During the autumn 2012 each organisation listed in Table 1 undertook an internal review. With help from the Equality Unit in the Business Services Organisation we launched our 5 year action plans (2013-2018) for public consultation between December 2012 and March 2013. The equality action plan of the Health and Social Care Board which is one of the partner organisations is currently out for consultation and is available on its website at www.hscboard.hscni.net

Table 1 List of organisations that reviewed their equality action plans

Blood Transfusion Service	www.nibts.org
Business Services Organisation	www.hscbusiness.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

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 to this consultation exercise.

Organisations who responded

Table 2 outlines the organisations who responded with comments which in some instances were targeted at specific organisations whilst in others the comments were generic. Table 3 presents the generic comments received and our responses. Where specific issues were raised these have been directed to the target organisation for a precise response. We hope that the responses provided in Table 3 reflect the 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

Name of organisation	Type of response
*Disability Action	Detailed comments
Northern Ireland Rare Disease Partnership	To PHA only

*Disability Action targeted responses to each of the organisations listed in Table 1. An analysis of the comments revealed that these were in the main generic and were targeted likewise to all 9 organisations. A decision was taken to provide one consultation feedback report. In the review of their plans each organisation however considered both generic and specific comments raised.

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

Consultee Comment	Response
Disability Action	
<p>Disability Action is disappointed that the Audit of Inequalities has not accompanied this Equality Scheme and Action Plan. The Audit of Inequalities is a systematic review and analysis of inequalities which exist for service users and those affected by the Organisation’s policies. The audit should include analysis of information gathered to inform the development of an Action Plan. The absence of the Audit of Inequalities renders it impossible for the consultee to understand the rationale for measures in or omitted from the Action Plan.</p>	<p>During 2011-2012 organisations carried out major audit of inequalities in order to produce 2 year equality action plans</p> <p>The Action Plan produced for the period 2013-2018 reflects a review and update of the 2011-2013 plan. In its development consideration was given to a review of priorities and consideration of new priorities.</p> <p>An additional audit of inequalities was not undertaken.</p> <p>To clarify this, an explanatory paragraph has been added to the document.</p>
<p>Disability Action believes that the organisation should state that the audit of inequalities is a “living” document that will be amended as continued evidence is gathered on newly</p>	<p>The nature of the plan in that it is reviewed on an annual basis determines that it is in fact a living document. This has been clarified in the preamble.</p>

<p>identified inequalities.</p>	
<p>Where the audit of inequalities has identified information or evidence of gaps the Organisation must commit to commission new research.</p>	<p>We have limited capacity at this stage to commission new research but we acknowledge the contribution made by other organisations in this respect.</p> <p>In some cases if relevant, research will be conducted, such as in relation to lesbian, gay, bisexual, and transgender issues.</p>
<p>Audit of Inequalities</p>	
<ul style="list-style-type: none"> • The audit does not provide a clear link to the organisation’s actual functions, policy areas and strategies. • The organisation must clearly show how it has utilised the consultation responses provided by Section 75 representative groups and affected individuals over the past 10 years on equality schemes/screening and EQIAs. 	<p>We have attempted in this action plan to produce an easier to understand document outlining in jargon free language what our organisation does.</p> <p>In the contents page precise actions across a range of business functions are listed.</p> <p>This was a “review exercise”. Its development was informed by a number of sources of information including:</p> <ul style="list-style-type: none"> • 2010-11) Audit of Inequalities completed templates or notes by service area • Consideration on any equality issues emerged since 2010-2011

<p>It must clearly show how it used qualitative and quantitative data held by other public authorities.</p> <ul style="list-style-type: none"> • All the relevant qualitative and quantitative data that was used as well as findings for each Section 75 category must be provided to consultees. • Data, research, evidence and publications must be set out under each of the 9 categories listed under Section 75. • The organisation must provide a clear audit trail not a literature review with no findings. 	<ul style="list-style-type: none"> • new research undertaken by other organisations new data, both quantitative and qualitative having become available new equality screening exercises having been completed issues raised in consultations or through other engagement with staff and service users . <p>The BSO's Equality Unit collate and provide evidence on their website from recent research, statistical studies, Census report and other documents.</p> <p>This "Information Bank" relates to all of the Section 75 categories and includes issues in relation to disability duties. This is available on: http://www.hscbusiness.hscni.net/services/1798.htm</p> <p>Likewise our equality screening reports which also document the evidence for the purposes of screening are also published quarterly</p> <p>http://www.hscbusiness.hscni.net/services/2246.htm</p> <p>Unclear what this point actually means in context of reviewed action plan.</p>
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- A gap analysis should have been undertaken.
- The Audit of Inequalities should clearly outline any gaps in its knowledge and detail how these gaps will be filled, for example, provide details of the specific commissioned research necessary to fill these gaps.

In terms of gaps in information and systems our current review of information systems is one attempt to identify current gaps in information.

The recent Census 2011 has been a useful source of contemporary quantitative data and is currently utilised to support the equality agenda.

Gaps in data are an acknowledged issue within the organisation. A specific action relates to systems, information sharing and monitoring to facilitate better collection of equality data.

No new commissioned research is proposed at this stage.

The BSO provides human resources support to a range of health and care organisations with Human Resources functions and is committed to introducing a new Human Resources Information System (Human Resources, Payroll, Travel and Subsistence). As part of the roll out of this staff will be prompted to complete equality monitoring records which address any gaps in data relating to employment.

<ul style="list-style-type: none"> • Audit findings must be cross-referenced to each measure within the Action Plan. • The organisation should clearly show how the Audit of Inequalities will be used to inform the screening process. Data collected must be used to inform future screening and EQIA's. • There should be information on how the Audit of Inequalities informs the Organisation's necessary resource allocation in terms of people, time and money. • Absence of evidence must not mean that acknowledged inequalities are ignored. There is an opportunity to tackle entrenched and persistent inequalities faced by disabled people. 	<p>As previously noted this action plan is a review of the previous action plan rather than an additional audit of inequalities.</p> <p>In the on-going screening exercises evidence collated as part of the first tranche of audits of inequalities have, where relevant, been used in screening exercises alongside more up to date evidence. Some of the actions identified may in themselves be subject to further equality screening.</p> <p>The previous audit and equality screening outcomes constitutes one source of information taken into consideration, alongside other data, in the allocation of resources.</p> <p>Comment noted. This key requirement is communicated to all staff in equality screening sessions.</p>
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<ul style="list-style-type: none"> • Data on inequalities must be collected across both Duties1 and 2 of Section 75 of the Northern Ireland Act 1998. • Disability Action expects an audit of inequalities to be a robust analysis of all 9 Section 75 categories, in particular for disabled people, across all functions and policy areas. Failure to do so will render the Action Plan fundamentally flawed. 	<p>Comment noted.</p> <p>As indicated previously the exercise in 2012-2013 was a review exercise which built on previous work. In terms of cost effectiveness however the Organisation also needed to exercise some pragmatism in prioritising actions to be taken across diverse function areas. Where relevant and feasible issues in relation to disability categories are included in the action plan. Further targeted actions are included in the Disability Action Plan for 2013-2018.</p> <p>It is important to highlight that the Equality Action Plan is intended to reflect some priority areas where the organisations can make a difference, not all areas of equality activity.</p> <p>Other mainstream activity particularly screening of policies supports the wider agenda.</p>
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Action Plan	
<ul style="list-style-type: none"> • Action measures should be clearly linked to the functions of the organisation. This is not the case. • A cross reference of the Organisation’s audit findings and their link to action measures should be included for ease of reference. • Action measures must be clearly specific to each of the 9 affected groups listed under Section 75. Multiple identity action measures must also be clearly specified across the 9 categories. • An Action Plan should detail whether measures are new or on-going action. This Plan does not provide such detail. 	<p>Contents page outlines the action measures across the functions of the organisation.</p> <p>As previously noted this was a review exercise, an additional audit of inequalities was not undertaken. Wherever possible the underlying inequality has been referenced.</p> <p>The action measures identified are targeted at specific equality categories and in some instances, where relevant, multiple inequalities are addressed.</p> <p>This has been addressed in the preamble to the new action plan.</p>

<ul style="list-style-type: none"> • Clear indication if actions are new as a direct result of the audit of inequalities. The organisation's Action Plan must include measures to address any gaps identified. • The collection of qualitative and quantitative data, on the gaps, must be an action measure in each subsequent year. • Information must be provided on how the Action Plan measures were prioritised. • The Action Plan must contain SMART objectives including a timetable with expected outputs and outcomes. 	<p>Actions in this action plan build on or, are in some instances, new actions. They were developed in response to the organisation's initial audit of inequalities conducted in 2010-2011 and subsequent prioritisation of actions.</p> <p>Responses to previous points raised explain how the review of this action plan was undertaken.</p> <p>Comment noted</p> <p>Action measures were prioritised in respect of, mainstreaming, potential benefits, risk of not taking action, importance for the business of our organisations and scope within the function area to make a difference within the timescale and resources.</p> <p>Comment noted. We believe objectives and timelines set are based on a realistic view when actions and outcome can be realised.</p>
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<ul style="list-style-type: none"> • Timetables must relate to achieving outcomes and not implementation dates which reflect the beginning of a process. • The review of the audit of inequalities must be an action measure. Monitoring and evaluation must be an action measure. • A full review of the Action Plan after 1 year should be included as an action measure. • The Plan should include a clear outline of how the Action Plan interacts with Corporate and Business Planning measures. 	<p>Comment noted. The annual review of progress will allow for dialogue on longer term outcomes.</p> <p>Comment noted. Inequalities will be kept under review on a regular basis as part of annual reviews within the lifetime of the plan and at the end of the plan in its 5 year review.</p> <p>Monitoring of the delivery of actions in the plan will take place as part of the Section 75 reporting requirements to the Equality Commission.</p> <p>Reference to this has been made in the preamble which refers to the fact that an annual review is already required as part of Equality Commission's reporting consequently a precise action in the action plan is not included as it does not add any further value</p> <p>Now included in preamble.</p>
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<ul style="list-style-type: none"> • Action measures related to the Organisation's strategic as well as operational functions should be included. • The Organisation must make clear that the Action Plan is a living document that can be added to and amended as other inequalities are identified. • A Clear statement on whether action measures are relevant to Duties 1 and 2 of Section 75 should be included. 	<p>A range of Actions are included that relate to accessible information, corporate engagement, information sharing, user engagement and human resources covering strategic functions of the organisation. Specific service areas are identified.</p> <p>The nature of the action plan in that it is reviewed on an annual basis determines that it is in fact a living document.</p> <p>This has already been highlighted in the preamble to the action plan.</p> <p>Clarity has been provided in the revised plan.</p>
<ul style="list-style-type: none"> • The Organisation must not concentrate only on the Action Plan measures to the detriment of its Section 75 obligations in terms of other functions and policy areas 	<p>The Organisation continues to review all its Section 75 Equality duties in relation to, for example, training, communications, screening and consultations. Regular reporting, within the</p>

<p>and newly emerging inequalities.</p>	<p>organisation and externally, including to the Equality Commission highlights on-going progress in this area.</p>
<ul style="list-style-type: none"> • Actions should be grouped across 9 Section 75 groups. 	<p>Given the diversity of the functions of the organisation and how it operates a decision was taken to present the action plan by function rather than equality category. Consideration will be given to this in reports to the Equality Commission where impacts by category will be highlighted.</p>

Conclusion

This report reflects the consultation exercise undertaken to capture feedback on the content of organisations equality action plans. Senior Management Team and Board or 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 reviewed our draft action plans accordingly.

Equality Action Plans for each of the organisations named in Table 1 are now available on their websites. These plans will be reviewed on an on-going basis and an annual report on progress will be submitted to the Equality Commission Northern Ireland.