

Feedback Responses on Disability Action Plan 2019-2022

Organisation	Actions to consider	Our response
Equality Commission NI	Encourage Council to continue challenging employment/positive action targets, as given the Council's size and influence it has an opportunity to effect positive change in this area.	We will continue to review our employment/positive action targets and when externally recruiting look to every opportunity to continue our programme of outreach and positive action.
	Disability training should focus on the sim of the Section 49A duty; to oblige public authorities to think appropriately about taking positive action to improve the lives of disabled people.	Disability awareness training material will continue to be reviewed to ensure this is adequately covered.
	Disability training should be practical in nature and include guidance on how to implement other aspects of the Section 49A duty i.e. monitoring, consulting, reviewing and analysing data and information.	Disability awareness training material will be reviewed to ensure this is adequately covered.
	Disability Awareness training to be offered to elected members in the members training programme. Elected council members should be aware of the council's statutory obligations with regard to the disability duties. The Commission recommends that public authorities should consider how they can encourage other organisations/bodies, such as political parties and private employers, to promote the participation of disabled people in public life. (Reference to para. 1.15, page 5 in the ECNI's Key Inequalities in Participation in Public Life).	<p>Disability Awareness training will be included in the Councillor's ongoing training and development programme.</p> <p>An approved suite of Elected Member Profiles includes a Member Champion role. The purpose of a Member Champion is to provide political legitimacy to advocate and lobby for policies and where appropriate funding and resources to support, advance and promote underrepresented groups and associated issues. The Disability Strategy and Action Plan will be added to key council documents on the members' portal, once approved.</p>
	Consider using the 'Every Customer Counts' initiative as a useful framework for council's action measure to 'engage with city centre retailers to consider how to support disabled people as part of the customer focus programmes.'	<p>All of our engagement with retailers in the city centre is generally done through our work with the Business Improvement Districts and Belfast City Centre Management. We are working with the City Regeneration and Development Team to deliver the retail action plan and city revitalisation programme and within the retail action plan there is an action to look at accessibility.</p> <p>We will link up with the Equality and Diversity Unit to discuss synergy with the Every Customer Counts initiative.</p>

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Cedar Foundation	A member of the Disability Advisory Panel should attend 1 Cedar Forum's User Forum meetings per year.	Noted - this will be raised with the Disability Advisory Panel or a Belfast City Council Equality & Diversity Unit staff member may be more appropriate. We will meet the Cedar Foundation to discuss the way forward.
	Easy-Read version – consider including 'DISABILITIES ARE NOT ALWAYS VISIABLE' in what is our Disability Action Plan section.	We will update the Easy Read version once the Disability Action Plan has been finalised. We have amended the Disability Action Plan and included an extra action addition.
	Easy-Read version – We want new members to join – the word 'want' should be highlighted.	We will update the Easy Read version once the Disability Action Plan has been finalised.
	Easy-Read version – We will provide more opportunities? How? How do we find out about this? Easy-Read version – We will make it easier for people with disabilities to apply for jobs – how?	We will update the Easy Read version once the Disability Action Plan has been finalised.
	Easy-Read version – We will make a video – excellent but where will it be posted?	The video will be posted on our website and consultees informed when finalised.
	Other queries: how can people apply to sit on any Belfast City Council Forum?	Expression of interest to a particular Forum can be issued by contacting Michael Johnston at the Equality & Diversity Unit johnstonm@belfastcity.gov.uk
	Other queries: Disability Staff Network should give brief inductions to new staff starting.	HR staff promote all staff networks at corporate induction. We will review the information provided and update, if required.
	Other queries: Will we be advised when 'gig buddies' is launched?	We will communicate with all stakeholders when the gig buddies is launched.
	Makaton signs should be used more.	Noted – we will keep you up to date of all developments.
AutismNI	<p>Currently, inequalities regarding access to services, external and internal training for the workforce and families, as well as public awareness of Autism, are supported by the failure of past disability legislation to recognise Autism. This situation must be addressed as part of required compliance with the Autism Act (NI) 2011 (attached).</p> <p>The natural consequence of this legislation is a legal requirement upon all public bodies to take account of the social and</p>	<p>Noted. We have a Language Strategy including an action plan and a Customer Focus Programme in place to implement required changes. Issues raised with AutismNI will be shared with the relevant departments.</p> <p>We keep our Language Strategy Action Plan under review and note these issues for actions 20/21.</p>

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	<p>communication barriers faced by individuals with Autism in accessing public services and public facilities, e.g. improved visual signage and attention to sensory barriers; clearly structured public areas delineated by function; assessments based upon social functioning, not merely mental and physical ability; adjustments to “customer service” procedures that provide for people with Autism; specific workforce Autism training to assist compliance and competence; information must be conveyed in a literal style with visual prompts when appropriate or required.</p>	
Epilepsy NI	<p>Hidden disabilities, such as epilepsy, and the specific issues that sit alongside these should also be considered throughout this action plan. People with epilepsy often report discrimination and a lack of understanding about their condition, with many suggesting that this could be because the condition is largely invisible. We have heard several reports of people with epilepsy being unfairly treated when trying to use a disabled bus pass for example, being told by the driver that they ‘don’t look like’ they have a disability.</p>	<p>We note that disabled people with hidden disabilities requires further mention in our Disability Action Plan. To that end we will highlight in our Disability Action Plan and easy read version that disabilities are not always visible. We will include this message more strongly in our training programmes.</p>
	<p><i>Improve opportunities for disabled people to engage with and influence policy makers/Carry out a targeted consultation to identify the potential impact of living in a rural area for those within the council area.</i> Actively engage with the epilepsy community as part of this consultation process. Some people with epilepsy are unable to drive because of their condition, meaning it can be difficult for those in rural areas to access high quality health services or community initiatives. Social isolation is commonly reported among some people with epilepsy.</p>	<p>EpilepsyNI are on our consultation list and will be asked to support the Council by circulating and providing feedback from the epilepsy community.</p>
	<p><i>Disabled people are provided appropriate support to enhance employability and obtain employment.</i> Only 30-40% of working age people with epilepsy are reported to be in employment. Concerns around stigma and misunderstanding around the condition mean that people with epilepsy are fearful of disclosing their epilepsy to employers, particularly at recruitment stage.</p>	<p>BCC revised its Disability Awareness training in conjunction with Employers for Disability NI. Epilepsy is now included within both employee and managers training. Training covers general background information, good practice advice and examples of reasonable adjustments.</p>

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	<p>Consideration should be given on how people with epilepsy can be empowered to disclose their condition at an early stage without fear of discrimination or limiting their job prospects (reference: Employment support for people with epilepsy, Institute of Employment Studies, 2018).</p>	
	<p>In reviewing recruitment processes and reasonable adjustments, the council should advertise more jobs on a flexible and/or part-time basis regardless of seniority/grade/level. In addition, job adverts which state an applicant must hold a full driving licence can discriminate against people with certain disabilities, for example epilepsy, that mean that they cannot hold a driving licence. Section 20 of the Equality Act 2010 imposes a duty on all employers to make "reasonable adjustments" to any provision, criterion or practice that places a disabled person at a substantial disadvantage in comparison with people who are not disabled. In considering imposing a requirement that job applicants must hold a driving licence, the council should therefore consider whether or not it is necessary for the job-holder to drive, or whether alternative arrangements could be made, such as enabling a disabled employee to travel by other means.</p>	<p>Job vacancies are advertised as they arise and these may be on a part-time or job share basis where this is the vacant post, regardless of job grade. All staff can request flexible working under that council's Flexible Working Scheme and can request to work on a job share basis. There are certain posts for which a driving licence is essential i.e. driving posts, and the council will specify which class of licence is required.</p> <p>For posts where employees are considered car users, the council asks applicants, as part of the essential criteria on the employee specification, to possess a full current driving licence which enables them to drive in NI and have a car available for business use, or, have access to a form of transport which enables them to meet the requirements of the post in full.</p> <p>For these posts, recruitment documentation advises applicants that this is a reasonable adjustment specifically for applicants with disabilities, who, because of their disability are unable to hold a full current driving licence. However the 'reasonableness' of this adjustment will be thoroughly considered, based on the business need for the post holder to provide a comprehensive service, at pre-employment stage.</p>
	<p>As part of its work to ensure all managers are aware of the provisions of the council's attendance policy, the council should review the policy and consider recording time off because of a disability separately from non-disability sick leave. This would recognise the fact that some disabled people may have different and higher forms of sickness absence.</p>	<p>Whilst disability related absence forms part of an employee's overall absence record, it is also recorded separately on BCC's absence management system.</p> <p>If an employee with disability related absences falls outside the minimum standards of attendance (i.e. meets a trigger point for</p>

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Belfast City Council Equality & Diversity Unit		warning), it may be appropriate as a reasonable adjustment, to set lower standards of attendance (extend trigger points) or not to issue warnings until the reasonable adjustments (such as home working, altered hours, redeployment etc.) have been tested out.
	<i>Programmes and activities are promoted to persons with a disability through suitable mediums/Engage with under-represented groups via umbrella organisation representation on the Enterprise and Business Growth Working Group. The council should also engage with patient organisations, such as Epilepsy Action Northern Ireland, who can offer valuable insight into the lived experience of people with disabilities.</i>	Epilepsy NI are on our consultation list and will be asked to engage with the council. We will alert all our events teams to ensure engagement with Epilepsy NI regarding advice on events.
	<i>Engage with city centre retailers to consider how to support disabled people as part of customer focus support programmes. Engage with city centre retailers to consider how to support disabled people as part of customer focus support programmes. Customer focus support programmes should include an acknowledgement of hidden disabilities and first aid for epileptic seizures. The council should consider extending this programme to include all retailers, not just those in the city centre.</i>	All of our engagement with retailers in the city centre is generally done through our work with the Business Improvement Districts and Belfast City Centre Management. We are working with the City Regeneration and Development Team to deliver the retail action plan and city revitalisation programme and within the retail action plan there is an action to look at accessibility. We will link up with the Equality and Diversity Unit to discuss synergy with the Every Customer Counts initiative.
	<i>Public attitudes to disabled people are more positive and negative attitudes are challenged. In a recent study looking at public attitudes towards epilepsy in the general population, one in 10 people had a negative or very negative attitude towards the condition. In a 2019 study 10,000 people with neurological conditions, which included 1,000 people with epilepsy, almost half of epilepsy respondents (1,157) said that they had felt discriminated against because of their condition, compared with a third of respondents across all conditions. Epilepsy should therefore be considered as part of any initiatives to improve attitudes or raise awareness of specific disabilities. (References: Attitudes towards epilepsy in the UK population, Bangor</i>	We will ensure that this info is added to our training and awareness programmes and alert events teams.

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	<p>University, 2018/Neuro Patience, The National Neurology Patient Experience Survey 2018/19, Neurological Alliance, 2019.</p>	
	<p><i>Public attitudes to disabled people are more positive and negative attitudes are challenged. Effective partnerships working with the British Deaf Association. The council should consider partnerships with other patient organisations representing a variety of disabilities, including Epilepsy Action Northern Ireland.</i></p>	<p>Epilepsy NI are on our consultation list and will be asked to engage with council.</p>
	<p><i>Disabled people have appropriate support so that they can participate in the cultural life of the city on an equal basis/Consult with internal staff and Mencap to explore the introduction of appropriate communications tools for people with learning disabilities. The council should note throughout the implementation of this action plan that epilepsy is particularly prevalent among people with learning disability. Epilepsy should therefore be considered in any initiatives specifically targeting this group, for example, by ensuring an awareness of first aid for seizures. Epilepsy Action Northern Ireland can offer advice and training on any aspects of living with epilepsy.</i></p>	<p>Noted. Internal staff will refer to Inclusive Events Plan. Internal relevant staff are aware of ensuring people with learning disabilities are supported. Further information regarding this issue will be forwarded to training teams.</p>
	<p><i>Promotion of positive attitudes towards disabled people/Include articles related to disability and ensure photography of disabled people is included. The council should ensure that hidden disabilities such as epilepsy are considered as part of this work, and also note that some people have more than one disability.</i></p>	<p>Yes, this will be done through our compulsory training programme.</p>
	<p><i>Staff will be engaged and awareness will be raised about particular disabilities/Include annual disability days on Interlink and consider awareness raising activity. Consider epilepsy awareness days as part of implementation (Purple Day 26 March, National Epilepsy Week – May each year, date for 2020 tbc).</i></p>	<p>Noted. We will consider this as part of our disability planning activities.</p>
	<p><i>Develop the capacity of staff to ensure awareness of the legal obligation in relation to employment and service delivery/Roll-out diversity awareness training. Consider involving charities and patient organisations in delivering disability equality awareness training. Epilepsy Action Northern Ireland is able to provide this in</i></p>	<p>A number of staff have been trained to deliver disability awareness and diversity awareness training. We recently revised our disability awareness training in conjunction with Employers for Disability NI and have now included additional information on a number of disabilities, including epilepsy.</p>

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	relation to epilepsy and highlight the importance of appropriate first aid when dealing with seizures.	We will make staff and managers aware, via the training sessions, that advice and support can be provided by Epilepsy Action NI.
Member of public	Missing emphasis on transport and access throughout city. While the council is not necessarily responsible for all public transport and access, more could be in the plan on this topic. Better public transport & street environments will support all.	Noted. The council as part of the Belfast Agenda does work with other stakeholders to try to encourage a more accessible city. The new Belfast Resilience Strategy is addressing connectivity and transport. Planning Legislation and Building Control does consider street environments. The Disability Action plan will be revised to incorporate these issues.
	Put more emphasis on accessible travel and access throughout the city. The council is now leading planning, so much more you could do to help support all with accessible buildings.	The council as part of the Belfast Agenda does work with other stakeholders to try to encourage a more accessible city. The new Belfast Resilience Strategy is addressing connectivity and transport. Planning Legislation and Building Control does consider street environments. The Disability Action plan will be revised to incorporate these issues.
Member of public	I would like the council to give consideration to improvement of accessibility to services for those with hidden disabilities and in raising public awareness in relation to this	Noted. We will consider this as part of our disability planning activities and is part of Language Strategy & Action Plan.
Member of public	I love the idea of the buddy card currently on offer on Lisburn city council I really think all city council run leisure centres should do these. My son is disabled and loves to swim. He also suffers from social skills so I think with this card being more local I could bring him more and also try new things with him e.g. golf, passes etc. stuff that is on the buddy card for Lisburn.	Noted. We have a Language Strategy including an action plan listing a range of disability communication tools to introduce in front-line services. We will consider the Buddy Card Scheme and we have signed up to the JAM Card Initiative with the Now Group.
Belfast City Council staff	BCC Staff must also be supported in the same way as the public, even if only to lead by example.	The Disability Action Plan and other diversity action plans are agreed by the council's Corporate Management Team (CMT), Strategic Policy and Resources Committee (SP&R) and Council.
	As long as the monitoring aspect of this plan is taken seriously, there should be no problem. But there is no such thing in place at our BCC offices, where disability issues are regularly "forgotten about".	We have established a Strategic Equality and Diversity Network. Directors are actively involved with monitoring the development and progress of the action plans.
	There is little accountability - this needs to improve. BCC have known about my reasonable adjustments for years, and have	All managers are required to attend Disability Awareness Training and are advised of the reasonable adjustment duty.

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	agreed to them, but it is a constant struggle to ensure they are being adhered to. This is not a good starting point. Monitoring. Ask disabled people what problems they have, instead of 'identifying' them.	BCC has established a Disability Staff Network. This group acts as a consultation forum providing members with an opportunity to influence council policies, procedures and practices and feed into future disability action plans. It also provides a forum to raise issues or barriers that disabled staff experience in their workplace and discuss possible solutions.
Member of public	Nothing for visually impaired people also the accessible toilets/changing facilities need to be RADAR key locked and monitored to ensure that only those who are entitled to use them do.	Our standard public toilets have inbuilt visual cues for visually impaired people. We do realise that these are probably dated, however as we in the process of conducting a toilet strategy for the City and this will be reviewed. All our public toilets are RADAR key controlled. We cannot monitor the RADAR key use as the Keys are supplied by many organisations and available for sale online.
	RADAR key locks on accessible systems e.g. toilets, changing area, and wheelchair stair lifts etc...	All of our public toilets are RADAR key controlled. All areas of the public toilets are tested with appropriate external partners for accessibility.
	Does this screening take into account the varied needs of people in all aspects of life and living?	The screening considers area the council has direct influence over its goods service facilities and services for all customers.
Member of public	I am not a disabled person; I am a person with a disability. The repeated references to 'disabled people' are insensitive and offensive. On page 1, you make reference to the Disability Discrimination Order (Northern Ireland) 2006. No such legislation exists.	Noted. We strive not to use words that may offend and are insensitive to people with disabilities. However, we are conscious that many people with disabilities also prefer to be called disabled people. We often use both terms; disabled people and people with disabilities. Section 49a of the Disability Discrimination Act 1995 was amended in 2006 and named the Disability Discrimination Order (Northern Ireland). This is a separate legislation which addresses attitudes to disabled people and participation of disabled people in public life.