

# PBNI Equality Scheme Consultation Summary (November 2011)

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## Introduction

The Probation Board for Northern Ireland (PBNI) received formal notification in May 2011 that the Equality Commission required a revised Equality Scheme to be submitted to the Commission by 1<sup>st</sup> November 2011. PBNI consulted on the preparation of its equality scheme and action plans from 17 June to 28<sup>th</sup> September 2011.

The following is an overview of the consultation process and a summary of findings and responses to comments made by staff, offenders and PBNI consultees.

### Pre-Consultation Meetings Where Held With:-

- Social Work Degree Partnership ref Gender Equality
- Northern Ireland Social Care Council ref Gender Inequality
- Head of Psychology PBNI – Ref Making a Difference strategy
- Head of Human Resources PBNI – Ref Gender inequality
- Corporate Services and Operations meeting – Presentation of consultation draft
- Probation Board - approved the consultation draft of the revised scheme

## Consultation

- Consultation draft was emailed to 300 plus PBNI consultees
- Consultation draft and response form uploaded to PBNI website
- Twitter updates announcing the consultation where made and reminders issues throughout the consultation period.
- A stakeholder meeting was held with representatives from each Criminal Justice Organisation to discuss common themes and approaches
- A meeting was held under the auspices of JNCC arrangements to formally present the Equality scheme and Action Plans to Staff Associations NIPSA and NAPO
- All PBNI staff (circa 400) where notified of the consultation via email
- Questions about equality where inserted in the PBNI Cultural Survey to identify what staff perceived to be the key inequalities facing both staff and service users – 46 replies received.
- Face to face meetings where arranged with staff working with offenders
- Four focus groups where arranged with offenders as follows:-
  - Group of offenders undergoing the Think First programme in Londonderry
  - Group of Offenders on Community Service in Craigavon
  - Group of Offenders at the Programme delivery unit in Belfast
  - Group of women offenders in greater Belfast area

- Reminder follow-up email sent to all PBNI consultees in August
- Attendance at the Equality Coalitions Criminal Justice Consultation convened to meet with section 75 representative organisations to discuss Equality Schemes and Action plans.

### Written Responses Received

- Autism NI
- NIPSA
- Equality Commission
- Positive Futures
- 46 Staff Responses via Cultural Audit
- Diversity Champion for PBNI (Board Member)
- Disability Action
- NICEM
- Committee for the Administration of Justice

### Outcome of Consultation

Following PBNI's consultation over 40 changes have been made to the consultation draft of the Equality Scheme and Equality and Good Relations Action Plans. The Equality Commission in response to PBNI's consultation are supportive of the approach that PBNI has taken and have recorded this in the foreword and conclusion of their feedback to our scheme. PBNI have followed the template equality scheme provided by the Equality Commission and therefore much of the consultation focused on the content of equality and good relations action plans.

### Consultation Themes

#### Monitoring

All offenders who were interviewed expressed that they were happy to complete equality monitoring forms although only a few could actually remember completing them. Staff also commented that more research is required to affect change. **This feedback supports the commitment in the Equality Action Plan to continue this longitudinal research.**

#### Disability

Disability frequently features in feedback from staff especially in relation to learning difficulties. Probation programmes require offenders to complete workbooks; and for a significant number this presents a difficulty, staff assist as best as they can and as time permits. PBNI staff suggested that **the Probation Board should identify volunteering opportunities for the public** to provide 'learning support' to assist those with specific learning disabilities or those for whom English is not their first language.

Autism NI have recommended that more attention needs to be given to assessment of offenders to ensure those with learning issues are identified early. PBNI's **Equality Action Plan will put measures in place in relation to the screening of offenders for low IQ and communication difficulties.**

Offenders believe that PBNI show sufficient interest in their health, although some expressed reluctance in talking about mental health issues. Offenders (particularly males) also stated that they currently do not routinely read pamphlets issues by PBNI or visit our website. **This will inform how PBNI approaches the redesign of information leaflets.** Positive Futures strongly support the production of 'easy read' information to assist those with learning disabilities. Women offenders have suggested that PBNI should promote the use of PBNI's website more as a source of information **and have asked that better use is made of email and text messaging for appointment reminders.**

## **Gender**

Feedback from male offenders suggests that they generally are not concerned about the gender of PBNI staff. Female offenders interviewed for this consultation have stated that they prefer to be supervised by female probation staff. The Equality Commission welcomed PBNI's recognition of gender as an issue and undertakes to work with PBNI in relation to addressing this issue. **Feedback generally validates that Gender is an issue that PBNI should include in our Equality Action Plan.**

## **Good Relations/Hate Crime**

Staff expressed a view that PBNI should consider a Good Relations (Hate Crime) programme for offenders. This view was most notable in the North West. **PBNI's commitment to hosting programmes that engage both Protestant and Catholics was received well by offenders and staff,** although staff have expressed that this causes anxiety for some offenders. Staff commented that PBNI needs to improve visibility and links with external community and agencies.

The meeting of Criminal Justice Equality Practitioners on the 6<sup>th</sup> July agreed that Hate Crime is an area that needs to be addressed by each CJO. Staff consultation suggests that a **Good Relations Group should be formed to take forward a programme of work in this area.**

## **What has Been Learnt through Consultation?**

The consultation exercise has largely confirmed PBNI analysis of the key inequalities, however a number of new actions will be considered as a result of consultation: these are:-

1. Over 40 clarifications and amendments have been made to the Equality scheme as a result of feedback from the Equality Commission and CAJ.
2. The review of easy read materials should also review the use of electronic communications. The offenders' focus group work has identified that leaflets are not widely read by those that are designed to reach.
3. In line with CJI recommendations PBNI will seek to recruit women Community Service Supervisors for future vacancies. This issue was raised by the Equality Commission in their response to PBNI's Equality Scheme and now included in the Appendix 6 Action Plan.
4. PBNI staff suggested that the organisation should seek to identify volunteers to offer learning support to offenders to assist those with learning disabilities to successfully complete programmes. This will be explored along with other measures designed to support people with these difficulties.
5. A Good Relations/Hate Crime programme should be developed and delivered for service users to create a better understanding of cultural differences in Northern Irish society.

6. To convene a Good Relations Working group to progress the good relations agenda on behalf of the Probation Board.

# Consultation Summary and Responses

Date	Consultee	Comments	Response
16 <sup>th</sup> May	SW Degree Partnership	PBNI initiated discussion ref re- imaging social work profession to increase the numbers of male applicants.	Agreement that this work should take place however this will require concerted effort of behalf of the partnership and NISCC
18 <sup>th</sup> May	Head of Psychology	Discussion on the contents of the action plan as it related to mental health awareness	Plan amended to reflect the making a difference strategy
23 <sup>rd</sup> May	Equality Steering Group	Some of the actions could be clearer especially in relation to disability – The meeting agreed that further detail should be included  Good relations aspect of the action plan was accepted  It should be reflected that this scheme is a revised scheme and not our first Equality Scheme	The format of the action plan has been revised to make it more outcome focused  Noted  Accepted and scheme updated to reflect this
1 <sup>st</sup> June	Head of HR	Discussed the actions relating to increasing male representation through affirmative action	Agreed actions to be included in the Equality Action Plan
2 <sup>nd</sup> June	Northern Ireland Social Care Council	PBNI initiated a discussion on what action can be taken to increase the numbers of male applicants for social work as a career	Agreement that this work should take place however this will require concerted effort of behalf of the SW Degree Partnership and NISCC
7 <sup>th</sup> June	Corporate Services and Operations Meeting	General agreement of the actions contained within the action plans.  Staff should also be consulted as well as external consultees.	Noted  Agreed and noted

<p><b>June 2011</b></p>	<p>PBNI Staff were asked <b>Are there any ways that PBNI could further promote equality of opportunity for PBNI staff?</b></p>	<p>Greater consistency and fairness</p> <p>Improve staff balance (representation, number and role types)</p> <p>More openness and transparency</p>	<p>PBNI's revised equality scheme promotes equality both internally and in the provision of services externally. Further equality training will be delivered to staff to enhance everyone's awareness of these equality duties.</p> <p>Gender representation will be specifically addressed in the Equality Scheme's Action Plan.</p> <p>Comments are noted and will be reflected on the communication and training that will support the implementation of PBNI's revised equality scheme.</p>
<p><b>June 2011</b></p>	<p>PBNI Staff were asked <b>Are there any ways in your view that PBNI could further promote equality of opportunity or better community relations for service user?</b></p>	<p><b>Improve visibility and links with external community and agencies</b></p> <p><b>Improve the way we operate and work</b></p> <p><b>Better training and resources</b></p>	<p>PBNI will convene a Good Relations working group to progress the good relations. One Small Step Programme will assist in raising awareness community groups.</p> <p>A skills audit will be considered to identify in-house skills that support diversity.</p> <p>Equality Training will be delivered as part of the revised equality scheme. Consideration of e-learning will be one option for staff.</p>

4 <sup>th</sup> July	Autism NI	<p>Recommendations include</p> <ul style="list-style-type: none"> <li>• Improved Visual Signage</li> <li>• Clearly structured public areas delineated by function</li> <li>• Assessments based upon social functioning, not merely mental and physical ability</li> </ul>	<p>This is part of PBNI's Disability Action Plan</p> <p>PBNI offices consist of public office waiting areas and interview offices only.</p> <p>Agreed – PBNI are implementing the recommendations of the 'Making a Difference' strategy 'that will substantially address this concern.</p>
6 <sup>th</sup> July	Stakeholders meeting at Equality Sub-Group of the Criminal Justice Board	<p>Agreement that the action plan reflects current priorities and is in general alignment with other CJO's i.e. Hate Crime, Disability, and Reflective Workforce issues (gender)</p> <p>Comments made that the PBNI approach of including a good relations and disability action plan was sound and of clear benefit to the reader.</p> <p>DOJ representatives and Court Services felt that consulting four times a year is too much especially if there are infrequent policy screenings to report on.</p> <p>Consideration should be given to holding a joint consultation event.</p>	<p>This supports PBNI's analysis of current issues facing the justice sector</p> <p>This supports the approach that PBNI has taken</p> <p>Consideration will be given to only contact consultees if there are issues to be considered upon instead of an arbitrary 4 times per year</p> <p>Agreed</p>
15 <sup>th</sup> July	Audit Team	Comments received on formatting and presentation.	Scheme amended to reflect received comments
20 <sup>th</sup> July	JNCC Meeting with NAPO and NIPSA	Consultation draft was presented to union representatives in detail. General agreement with the action plans.	Noted

		NIPSA will forward their comments separately in relation to problems with translation requests.	Noted
28 <sup>th</sup> July	NIPSA	<p>Concerned about information on ICOS re language of offender as this is not always specified. Concern has been raised about the lack of Chinese translated documents.</p> <p>Concerns have been raised that translations are sometimes slow in coming through.</p>	<p>Court Service will be approached to see if more accurate recording of language/dialect can be recorded.</p> <p>The issue of the speed of translation requests will be addressed with the service provider through evaluation.</p>
25 <sup>th</sup> August	Offender Focus Group – Rural Programmes	<p>No objections to filling in equality monitoring forms</p> <p>No one had read the leaflets produced by PBNI – All said that they do read the letters we send out</p> <p>No offender had visited the PBNI website and would not follow PBNI on Twitter or LIKE PBNI on Facebook.</p> <p>Generally offenders stated that they are uncomfortable talking about mental health issues with PBNI but <u>all</u> agreed PBNI are interested in identifying disability issues.</p> <p>Gender of staff is not an issue for offenders</p> <p>Offenders had not witnessed sectarian comments in groups work with PBNI. Although one offender made a racist remark that was challenged by the PSO</p>	<p>Equality monitoring of offenders will continue</p> <p>This supports the Equality Action Plan work on the production of easy read materials</p> <p>More work is required to highlight the information that is available for service users.</p> <p>Disability issues are explored in assessment sufficiently</p> <p>Noted, however PBNI are keen to become reflective of the working population in Northern Ireland</p> <p>Current policy in this area is working</p>
25 <sup>th</sup> August	Probation Service Officers – Londonderry	<p>Sectarianism is a problem for some offenders who find it difficult to travel across the city.</p> <p>A programme is needed on hate crime and sectarianism that raises awareness of each other’s cultures.</p>	<p>The Good Relations Action plan commits PBNI to maintain the delivery of integrated programmes.</p> <p>PBNI is currently considering the possibility of developing a specific hate crime programme for offenders.</p>



<p><b>30<sup>th</sup> August</b></p>	<p>Community Service Offenders – Focus Group</p>	<p>No objections to filling in equality monitoring forms</p> <p>Offenders tend not to read the pamphlets that PBNI send to them. Probation staff are good at explaining what they need to do.</p> <p>4 of the 5 offender said they had Facebook accounts but no one would LIKE a PBNI page. No one had viewed PBNI’s website.</p> <p>3 of the 5 offenders had disabilities that affect their everyday life and felt they had been treated well in relation to their disabilities by PBNI.</p> <p>Gender of staff is not an issue for offenders.</p> <p>All offenders knew that sectarian attitudes are not acceptable on community service.</p>	<p>Equality monitoring of offenders will continue</p> <p>The Equality Action Plan describes the production of easy read materials to make communication of written information more effective</p> <p>Noted – This feedback will be shared with Communications Dept.</p> <p>Present systems appear to be working</p> <p>Noted, however PBNI are keen to become reflective of the working population in Northern Ireland</p> <p>Present procedures appear to be working</p>
<p><b>30<sup>th</sup> August</b></p>	<p>Community Service Supervisor and Probation Service Officer – Interview</p>	<p>Very few women are referred to community service.</p> <p>There are occasionally offenders who object to work placements in areas that are perceived to be either broadly a nationalist or unionist area. These are usually concerns about personal security. These concerns are dealt with on an individual basis.</p>	<p>Statistically women make up 10% of offenders – Women Offender Policy is currently being revised to ensure that women offenders are supervised appropriately.</p> <p>PBNI is currently considering the possibility of developing a specific hate crime programme for offenders.</p>

<p><b>31<sup>st</sup> August</b></p>	<p>Women Offenders Focus Group – INSPIRE Project Belfast</p>	<p>The Equality Monitoring form was easy to complete, no objection to completing this type of information.</p> <p>Difficult language is used, the forms could be made easier to understand; people had read them but felt that they were bombarded with information at the start.</p> <p>Women offenders would prefer to get a text and email reminders to attend appointments as letters get lost. They were aware that PBNI has a website but few had visited this. PBNI could publicise the website more.</p> <p>PBNI does show a good level of interest in disability issues as they affect women offenders.</p> <p>Female offenders were unanimous in agreeing that they would prefer to speak to a female Probation Officer. One person described that a recent sexual assault made it difficult for her to speak or confide in men. Another person said that they have never felt comfortable around men.</p> <p>Women are content with PBNI’s arrangements for making complaints. One person within the group had made a complaint and while her complaint was not upheld she did have faith in the system.</p>	<p>Equality monitoring of offenders will continue</p> <p>PBNI will work on the production of easy read materials</p> <p>Sending of text appointments and emails will be addressed by the planned introduction on a new case management system</p> <p>Present processes appear to be working to support disability related issues</p> <p>Noted, however PBNI are keen to become reflective of the working population in Northern Ireland</p> <p>Present procedures appear to be working</p>
<p><b>9<sup>th</sup> September</b></p>	<p>Equality Commission for Northern Ireland</p>	<p>The Commission welcomes the approach taken by the Probation Board; particularly with regard to use of the Commissions model equality scheme and the new Guide to the Statutory Duties.</p>	<p>The ECNI provided substantial feedback on our scheme and action plans. Over 40 changes to the wording of Equality Scheme have been made as a result; a copy of this is available <a href="#">here</a>.</p>

12 <sup>th</sup> Sept	Positive Futures	<p>Positive Futures acknowledges the commitment, proactivity and determination of PBNI to the implementation of the Equality Scheme, as evident from the associated Equality and Good Relations Action Plans. We also warmly welcome the acknowledgement of the role the community and voluntary sector have to play in its implementation.</p> <p>Positive Futures welcomes the pilot screening of all offenders at Pre- Sentence Report stage</p> <p>Positive Futures strongly supports individualised planning, our considerable experience of using Person Centred Planning methods and tools has evidenced the success of this approach to planning for people with a learning disability.</p> <p>We also welcome the commitment to providing training all ‘offender facing’ staff to assist in raising awareness of mental health disabilities.</p> <p>One of the key issues Positive Futures has identified is access to information, generally and specifically access to information in a format that people with a learning disability or difficulty can understand. We have found that the key to developing effective communications materials is to involve people with a learning disability/ difficulty in the development process.</p> <p>Positive Futures suggests that people with a learning disability could participate in the training of PBNI staff.</p> <p>Positive Futures believes that the plan as outlined represents a realistic achievable plan.</p>	<p>Comments are welcomed and noted.</p> <p>Noted</p> <p>Noted and agreed</p> <p>Noted</p> <p>PBNI will seek to take forward this suggestion in the development of easy read materials.</p> <p>PBNI will examine the feasibility of this suggestion with Positive Futures.</p> <p>Noted</p>
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		Positive Futures believes that the actions as outlined in this plan will contribute to the promotion of better community relations.	Noted
13 <sup>th</sup> Sept	Belfast Programme Delivery Unit Offender Focus Group	<p>One offender out of four remembered the monitoring form. No one expressed concern about being asked for this information.</p> <p>Offenders thought that all the leaflets look the same and this is a barrier to reading them. They didn't like the use of 'big words'. All read the letters that PBNI send them.</p> <p>No one would be interested in using social media to follow PBNI – No one could see any benefit in doing so.</p> <p>PBNI has shown good interest in discovering health and mental health issues.</p> <p>Two people expressed the few that they preferred to speak with female staff as they appeared to be better listeners.</p> <p>The group realised that PBNI had zero tolerance for sectarianism and had not experienced this on PBNI premises.</p>	<p>Equality monitoring of offenders will continue</p> <p>This will inform the way forward for easy read materials</p> <p>Noted – This feedback will be shared with Communications Dept.</p> <p>Present procedures appear to be working</p> <p>Noted, however PBNI are keen to become reflective of the working population in Northern Ireland</p> <p>Agreed and noted</p>
13 <sup>th</sup> Sept	Interviews with Programme Facilitators in Belfast	<p>Literacy problems are a key consideration in programme work as a lot of time and effort is needed to help offenders with the reading and writing part of the courses. Learning disabilities are frequently displayed in those going through the programmes unit.</p> <p>Consideration should be given to using volunteers to help offenders with literacy issues to further promote equality of opportunity by assisting those less able to cope with the academic side of programmes.</p>	<p>This information will inform the development of a volunteering policy.</p> <p>As above</p>

		<p>Volunteers could also have a role in befriending offenders.</p> <p>It would be beneficial to have specific Hate Crime programme for offenders or amend existing programmes to examine issues specific to Northern Ireland especially the IDAP programme.</p> <p>Identifying those who should attend is also a problem for PBNI, what criteria would be used in selecting people.</p> <p>Staff training and support will be an important element in delivering successful Good Relations courses.</p>	<p>Both option will be reviewed as part of the Good Relations action plan</p> <p>Agreed – This is a key consideration for the successful outcome and maximum impact.</p> <p>Agreed staff support is essential to maximise impact</p>
26 <sup>th</sup> Sept	PBNI Diversity Champion	<p>Arrangements for consulting are detailed and clearly set out (Chapter 3), while the list of consultee organisations is comprehensive and inclusive (Appendix 3).</p> <p>The section on screening, EQIAs, and publishing (Chapter 4) is detailed and should fully meet the requirements of s.75. The section on staff training (Chapter 5) is important, as staff are key to implementing the Scheme. Their active and informed engagement is crucial to the success of the whole strategy. My other comments are as follows:</p> <p>Using a targeted approach to consultation is a useful approach, as only those sectoral organisations which are directly affected by PBNI policies will be approached. This helps reduce ‘consultation fatigue and promotes improved response rates.</p> <p>The inclusion of the <i>Polish Association</i> as a consultee (Appendix 3) is sensible, as Polish people now constitute the</p>	<p>Noted</p> <p>Agreed and noted</p> <p>PBNI will continue to target consultations to ensure that we engage with informed opinion. PBNI will work to reduce the burden on consultees by ensuring that consultation documents are concise and informative.</p> <p>Agreed</p>

		<p>largest minority ethnic group in Northern Ireland (42,000 living here in 2010).</p> <p>The significant number of Traveller representative organisations on the list is a reflection of the marginal status of this particular group.</p> <p>The decision to conduct longitudinal research on s.75 groups to identify any differential impacts is a welcome and commendable development. This may involve considerable resources, and shows the commitment of the Board to equality issues during a time of austerity and cutbacks in expenditure.</p>	<p>Agreed</p> <p>Noted with thanks</p>
28 <sup>th</sup> Sept	Committee for the Administration of Justice	<p><u>Screening</u> In the interests of transparency and accountability, we request that PBNI include the relevant passages in its equality scheme in order to ensure that its screening reports contain all relevant information on any consideration given to measures which might mitigate adverse impact or alternative policies which might better achieve the promotion of equality of opportunity.</p> <p>It is therefore important for civil society to be informed as soon as possible of policies for which ‘no’ or ‘minor’ impact was found, but for which they may have specialist knowledge of otherwise unforeseen equality impacts.</p> <p><u>Consultation Methods</u> We are concerned that, by not allowing for extended consultation periods over holiday periods, or when a policy is particularly complex.</p>	<p>This has been amended as suggested</p> <p>PBNI have committed to the provision of screening reports every three months as a minimum and will review the effectiveness over the period of the scheme.</p> <p>Agreed and amended</p>

	<p>PBNI has removed the commitment, at para 3.14, to make available for consultees ‘detailed information on the policy proposal being consulted upon and any relevant quantitative and qualitative data’.</p> <p>it is not clear why PBNI has qualified para 3.2.4 ECNI model scheme, so that it will only offer ‘support’ instead of ‘training’ to its staff, in order to ensure that those facilitating consultations have the effective skills to communicate effectively with stakeholders (para 3.9 PBNI draft scheme).</p> <p>Without engagement with the affected groups and their representatives, PBNI might not know the ‘most effective’ forms of consultation.</p> <p>PBNI has not included disability organisation’s within those with which it will work to develop best practice.</p> <p>Special arrangements might be required to consult with or provide information or services to people with disabilities, children and young people and ethnic minorities.</p> <p><u>Collection of Data</u></p> <p>PBNI has removed the references to ‘qualitative and quantitative data’ (see para 4.29 PBNI draft scheme)</p> <p>It is therefore crucial that such monitoring and gap analysis is undertaken, and we recommend that the relevant paragraph be included in the PBNI equality scheme.</p> <p>We recommend that PBNI commits to publish and consult on its audit of inequalities and action plan in the future.</p>	<p>Agreed this omission has been rectified</p> <p>PBNI’s consultation policy ensures that all staff must liaise with the PBNI Consultation Manager who will provide the necessary support and training. The Equality Scheme has been amended to reflect this.</p> <p>Agreed and now reflected in the scheme</p> <p>This omission has been rectified.</p> <p>Agreed and scheme amended to reflect this</p> <p>Noted – The scheme has been amended to reflect that qualitative and quantitative data is currently collected by PBNI</p> <p>This analysis has been completed prior to the implementation of the scheme.</p> <p>This is already an action contained within the</p>
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		<p><u>Staff Understanding of s75</u></p> <p>It is not clear why PBNI has removed the commitment, at para 5.5, to ‘share resources and expertise and, where possible, work closely with other bodies and agencies in the development and delivery of training.</p> <p>As the PBNI’s equality scheme will be used as a point of reference for its staff’s application of s75 and any training provided, it is crucial that the equality scheme itself contains clear statements on the relationship and difference between the two s75 duties.</p>	<p>Equality Action Plan</p> <p>No opportunities have been identified at the point of writing the scheme and therefore we do not which to make this commitment.</p> <p>PBNI are of the view that the relationship between Section 75 1 and 2 is indeed not particularly clear, however what we intend to achieve under both has been well articulated within the actions plans contained in Appendix 6 and 7.</p>
<p>28<sup>th</sup> September</p>	<p>Equality Coalition meeting with LASI, NICEM, Disability Action and CAJ</p>	<p><u>NICEM</u></p> <p>Asked why PBNI has used WHITE as an ethnic classification as this does not identify all migrants e.g. east Europeans.</p> <p>Discussed the Victim Information scheme</p> <p><u>Disability Action</u></p> <p>General discussion in relation to what our research shows about high levels of offenders with disabilities.</p> <p><u>LASI</u></p> <p>Discussed opportunities to explore training opportunities including opportunities for PBNI staff to hear more about the</p>	<p>PBNI is following the ethnic classifications used by the census of population so that meaningful comparisons can be made. PBNI also collect nationality data to identify country of origin.</p> <p>There may be future opportunities to collaborate on future disability research.</p> <p>There may be opportunities for PBNI staff to link in with DoJ sexual orientation staff</p>



		services that LASI offer in relation to support for women.	association.
29 <sup>th</sup> Sept	NICEM – Points raised in the Conclusion of the consultation response.	<p>We have picked up some apparent regression from the standards of the Model Scheme (and indeed the ECNI ‘Guide to Public Authorities’ and we feel that these should be fully explained to the ECNI when the scheme is submitted for approval (and copied to interested consultees).</p> <p>We have significant reservations on the partial and opaque manner in which the Board has sought to identify inequalities without conducting a comprehensive audit of inequalities.</p> <p>We would like to see a commitment from the Board to undertake a thorough audit of inequalities, including a gap analysis of both quantitative and qualitative data, during the first year of the Scheme’s timetable.</p> <p>We also encourage the Board to conduct a thorough gap analysis, so that it can identify areas of potential inequality upon which it not yet collected quantitative and qualitative data.</p> <p>There are valuable initiatives in the draft action plans, including action measures of relevance to ethnic minority communities in NI. But a comprehensive audit of inequalities is needed before the draft action plan can be properly assessed.</p>	<p>PBNI have received advice from the ECNI in relation to our variations from the model scheme and around 40 changes have been made to bring greater alignment.</p> <p>PBNI has completed an audit of key inequalities which informed the development of PBNI’s Equality Action Plan. This has been published in the 2011 Irish Probation Journal which is a publication which is publically available via the internet.</p> <p>PBNI’s Action Plan contains the following action:-  <i>To publish a research paper that clearly identifies differential impacts if they exist in terms of outcomes for all nine categories identified under section 75.</i></p> <p>A gap analysis was conducted in 2009 within the Probation Board and as a result a comprehensive monitoring strategy has been put in place.</p> <p>As stated above this work has been completed and has been published.</p>