

PBNI Consultation Summary – Disability Action Plan 2015 - 2020

Consultee	Consultee Comment	Response
Catherine McCann Head of Finance	No comments to make. Thanks Catherine	Noted
Cheryl Lamont – Director of Probation	Further to your email dated 2 September 2014, I wanted to advise that Cheryl Lamont is content with the draft Plan. - Jackie	Noted
Northern Ireland Public Service Alliance – Joe McClenaghan	NIPSA have read through and have no issue with plan as it stands. Regards - Joe	Noted
Paul Doran – Deputy Director	<p>This is good. Couple of issues; At bottom of page 6/top of page 7 , I'm pleased to see the reference to Service Users; however, I think the wording ' to motivate the interest' could be changed to make clear that we would like the involvement of any person who may have a disability.</p> <p>On Page 9, I am unclear as to why it is the AD Risk that has responsibility for access to PBNI estate- I suggest this should be the Head of Finance (who has responsibility for accommodation).</p> <p>I think Gail and the Communications Unit are central in helping us meet our two core duties and will cc to Gail as I would like them to put on their creative hats. PD</p>	<p>Text has been changed to – <i>'PBNI will ensure that through the recruitment of members of this service user group that appropriate steps are taken to engage service users with disabilities.'</i></p> <p>Responsibility has been transferred to the Head of Finance and Accommodation.</p> <p>Noted</p>
Geraldine O'Hare – Head of Psychology	Paul, yes I am content with this - Geraldine	Noted
Gail McGreevy – Head of Communications	The actions down to us are all straightforward in this plan, but it might be good to have a think about 'creative' way of marking the launch of the action plan. - Gail	Noted and discussed with Ivor Whitten
Eithne McIlroy – Assistant Director Urban	Firstly we need to remember it is people with disabilities, rather than 'disabled people'. Depending on the model applied, medical or social...it is not the person but rather the environment which creates the disability. We need to ensure that everyone regardless of ability has the right to fully participate in society. To 'as a friend with a significant disability commented..." to boldly go where everyone else has	<p>Comments noted and discussed with EMcI</p> <p>Draft has been updated</p> <p>Noted and agreed –</p>

	<p>gone before!"</p> <p>WE need to ensure everyone is tuned in to the challenges faced by people with disabilities; there is a clearer understanding, particularly re learning disability, mental health and many of the challenges faced by people we work with.</p> <p>WE need to ensure we fully consult with service users with disabilities which can better inform how we deliver our service...</p>	<p>Further training will be of assistance in relation to this point.</p> <p>Noted and agreed.</p>
Good Relations Group	<p>Articles used internally should also be shared with external publications e.g. disability journals</p> <p>The Board may wish to have an input annually especially when the progress report is presented.</p>	<p>Noted and agreed – plan updated.</p> <p>Progress Report will be discussed and presented to the Board annually.</p>
Gillian Robinson – Head of Human Resources	<p>Obviously there are some practical changes re business planning etc. Also, is this solely outward facing?</p> <p>I am thinking of actions we already take and could be built upon regarding staff disability related issues.</p>	<p>Drafted updated to reflect changed internal responsibilities</p> <p>Agreed and a new action has been inserted to reflect work with external organisations.</p>
Alan Cartwright Management Support Branch NI Courts & Tribunals Service (NICTS)	<p>You have done an excellent job in making this statutory function clear and digestible to the general public, cutting out the Civil Service-style jargon and ‘management speak’.</p> <p>Very well done.</p>	<p>Noted with thanks Alan</p>
Disability Action	<p>PBNI should highlight measures for which it has responsibility within its action plan or at the very least identify those public life opportunities that it may influence to increase the number of people with disabilities in public life.</p> <p>Additionally, the definition of public life within the Equality Commission for Northern Ireland DDO Guide is much broader than public appointments therefore it is not appropriate to exonerate the responsibility in this area.</p> <p>Action 1 – whilst welcome is vague and requires information on formal structures, mechanisms and timescales.</p> <p>Action 2 – is a DDA 1995 obligation and should not be duplicated here.</p>	<p>PBNI will seek to address with DoJ the selection of new Board members mindful of DDO duties.</p> <p>Noted – PBNI have added two new ‘Public Life’ actions</p> <p>Time scale has been included; this action has become a business plan priority with SMART objectives for 2015-16.</p> <p>Agreed this action has been withdrawn</p>

	<p>Disability Action would recommend an action on recruiting people with disabilities as well as utilizing government programmes such as Supported Employment or Workable. Disability Action believes that this action would benefit from specific targets, a review of the recruitment/selection process to ensure no barrier exists to prevent people with disabilities from successfully applying including the job specification.</p> <p>Action 3 – requests more detail and the year 1 – 5 timeframe replaced with realistic timescales.</p> <p>Action 4 – welcome.</p> <p>Action 5 – whilst welcome (see Action 2 above) requests more detail to enable informed comment to be made. Disability Action believes that this action could go beyond publicising.</p> <p>Action 6 – welcome – however 3 years seems a somewhat generous timescale.</p> <p>Action 8 – welcome – however the articles must promote the positive social model rather than the negative medical model of disability.</p> <p>Disability Action would welcome articles for the DA News and E-zine.</p> <p>Disability Action finds no evidence of a specific action detailing how PBNI intends to involve people with disabilities in the implementation, monitoring and review of the Action Plan.</p> <p>Disability Action would recommend that ongoing timescales be replaced by specific actions, dates, clear performance indicators.</p>	<p>PBNI will work with Workability and work to promote the scheme to staff. This has become a new action.</p> <p>PBNI will update its Recruitment Policy as a new action.</p> <p>PBNI’s Estates Strategy will seek to ensure all new premises are fully accessible and this is an ongoing commitment.</p> <p>Autism Awareness training is a priority objective for PBNI and DoJ.</p> <p>PBNI will work with the Workable scheme to promote the scheme’s benefits to staff.</p> <p>This timescale has been shortened and now is in line with the review of PBNI’s communication strategy</p> <p>Agreed and noted</p> <p>Noted and agreed PBNI will be in touch about future articles.</p> <p>The operation of the DAP will be overseen by PBNI’s Disability Champion.</p> <p>Agreed and plan has been updated with both performance indicators and dates assigned for delivery of the actions.</p>
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	<p>Disability Action has found it difficult to identify what is actually new or carried over from the last DAP? If so, have these actions been monitored and evaluated and what has been the success to date?</p> <p>Regarding performance indicators/targets Disability Action believes that it would be more 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.</p> <p>CONCLUSION</p> <p>Whilst recognising the efforts to prepare this Plan Disability Action believes that it requires significant redrafting. Disability Action has welcomed the opportunity to respond to this important draft Plan and looks forward to seeing the comments above incorporated into the revised Plan.</p>	<p>A five year review will be commenced in the next business year.</p> <p>Agreed – Plan has been updated accordingly.</p> <p>PBNI notes Disability Action’s comments and has revised the draft in response to feedback described above.</p>
<p>Equality Commission for Northern Ireland Carole Dennis – Advice and Compliance Officer</p>	<p>Summary of Key Issues taken from consultation response dated 18th December 2014.</p> <p>Commitment I recommend including the following text – The necessary resources (in terms of people, time and money)</p> <p>Consultation and Engagement The Commission welcomes that PBNI is working to establish a Service Users Forum and that a Disability Champion has been appointed to the Good Relations Group</p> <p>Public Life Positions Public Life Positions must be defined more broadly than simply public life appointments. Public life can also include working groups, community associations, local strategy partnerships as well as Service User groups.</p> <p>The Commission encourages, where possible to:</p> <ul style="list-style-type: none"> Identify, provide and promote opportunities for more engagement for people with a disability in key work areas. 	<p>Given the current financial climate PBNI cannot make a commitment to making money available.</p> <p>Noted with thanks – however this action has changed to seeking service user feedback via a survey.</p> <p>The Disability Action Plan has been updated</p>

	<ul style="list-style-type: none"> • Offer meaningful work shadowing opportunities for people with a disability • Create meaningful job placement opportunities for people with a disability. • Encourage people with a disability to apply for employment opportunities by, for example, attending careers fairs, issuing job advertisements to disability organisations, reviewing job descriptions and personnel descriptions. • Raise awareness of specific barriers faced by people with disabilities by linking in with National Disability Awareness Days etc. <p>Achievements It is hoped that the Service User Forum will begin to collect information on the experiences of disabled service users. It would be useful to conduct staff attitude surveys to identify positive attitude measures and/or barriers to public life positions.</p> <p>Training I am pleased to note that staff training includes training on the disability duties, disability awareness and disability equality legislation etc.</p> <p>Disability Action Plan I would also add the measures you propose in relation to the Service Users Forum, monitoring the equality profile of service users and training measures etc. as action points in your Action Plan.</p> <p>With regard to point 8 it might also be useful to invite employees and service users with disabilities to contribute to the Probation News magazine where possible.</p> <p>Performance Indicators I note that your Action Plan does not include any Performance Indicators and, as discussed, these should be included.</p>	<p>to include an action around influencing others (DOJ).</p> <p>PBNI will also as part of its review of PBNI Recruitment Policy consider what opportunities exist to permit work placements for people with disabilities.</p> <p>Agreed – The Service User Forum action has been replaced with a Service User Survey to gather information on equality issues for this group.</p> <p>Noted with thanks</p> <p>Service Users action has been updated. Equality Monitoring and Training are both actions contained in PBNI’s Equality Scheme Action Plan.</p> <p>This is a good suggestion and one that we will follow up on.</p> <p>Noted - Performance indicators are now included.</p>
<p>Belfast Health & Social Care Trust Orla Barron – Via Bernie Kelly Physical &</p>	<p>I have just read through it and have a number of points. I would commend them on their equality monitoring to help inform their work.</p> <p>I know that the first criticism that they will receive is</p>	<p>Noted with thanks</p> <p>Performance indicators</p>

<p>Sensory Disability Service Manager</p>	<p>that their various measures are not SMART – i.e. they don't indicate how they will review their accessible information or what target for improvement they are setting themselves e.g. establish baseline and increase by 10% by end of year 1.</p> <p>The working on accessibility to their estate is something they have to do as part of DDA – it is legislative compliance and not linked to the two additional measures to promote positive attitudes or encourage full participation. Providing advice to managers on reasonable adjustments is again just down to basic DDA compliance.</p> <p>There is no mention of the UNCRPD and I would advocate that you do something like we have done and produce a leaflet for staff to raise awareness.</p> <p>I would suggest that PBNI need to set themselves more tangible actions and be more explicit in how they will seek engagement with disabled service users.</p>	<p>are now included in the final draft for each action.</p> <p>Removing barriers around accessibility we believe will help promote better engagement and promote positive attitudes. Providing advice has been removed from the final draft.</p> <p>Thank you for this suggestion. This issue is covered already in training.</p> <p>PBNI's proposed Service Users Survey will be used to understand disabled service users views and experiences.</p>
<p>Good Relations Group and SMT</p>	<p>The action about the use of a Service User Forum has changed in line with the Business Plan into using a Service User Survey to gather views of service users in relation to disability.</p> <p>The date for new Board members has been reset to November 2015.</p> <p>The wording of the third action has been changed from 'influence' to 'encourage'.</p>	<p>Actioned</p> <p>Actioned</p> <p>Actioned</p>