

Feedback Responses on Equality Action Plan and Disability Action Plan

Organisation	Actions to consider	MLKDC Response
Mid Ulster Council	Equality Action Plan - Responses	
	<p>‘The Council also notes that the Executive Office does not require MLKDC to have a current corporate plan and there is no published annual business plan for 2019-20.</p> <p>The absence of a corporate plan covering the period of the draft action plans makes it difficult to provide substantive feedback as to how relevant and appropriate the proposed actions will be to the organisation’s operation over the next three years.’</p>	<p>We acknowledge your comments, the requirement for a Corporate Plan for MLKDC has been waived by TEO in the absence of Ministerial agreement on a way forward for the site.</p> <p>MLKDC prepare a Business Plan on an annual basis. It is not appropriate to publish draft plans in the absence of Ministerial approval.</p> <p>Should circumstances change a three year Corporate Plan will be prepared and the Action Plans revised accordingly.</p>
	<p>‘However, the council feels that MLKDC needs to be prepared for a time when there is Ministerial agreement to progress plans for the site and the coming period presents an opportunity to lay the groundwork for the future.’</p>	<p>Noted</p> <p>However, given MLKDC’s restricted remit our activity in this area is limited at this point in time.</p> <p>We will amend our Equality Action Plan (EAP) and Disability Action Plan (DAP) following Ministerial agreement on a way forward for the site.</p>
	<p>‘Action 2: The Council welcomes the commitment to review equality and good relations screening processes and to mainstream equality and good relations in business planning.’</p>	<p>Noted</p>
	<p>‘Action 6: While the commitment to review consultation and engagement systems is welcome this may not in itself, improve engagement with Section 75 groups.’</p>	<p>Noted</p> <p>We believe it is essential to review the consultation and engagement systems to improve engagement with Section 75 groups.</p>

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		We have amended our action: Review consultation and engagement systems and benchmark against best practice models.
	'Actions 9-11: The council supports training and positive targeting in relation to any recruitment.'	Noted
	'Action 12: The undertaking of a staff survey may not in itself result in 'improved wellbeing' and focus may be best be on what is done with the findings of the survey.'	Noted and action amended. We have carried out a staff attitude survey and will in due course add relevant actions to take forward as appropriate.
	'Action 13: Whilst the inclusion of equality-related duties in job descriptions is to be welcomed, it should be perhaps clearer on whether this equally applies to current or future posts. Greater clarity should be considered on the measure, " <i>% applicants applying with knowledge of equality legislation</i> ". For example, does this mean that job descriptions for new posts will ask for equality knowledge/expertise?'	Noted and action amended.
	'Actions 14 & 15: Whilst these are welcome actions, they may not be adequate and sufficient to promote equality and good relations. Consideration should be given to how MLKDC could work towards promoting the site and its potential to the wider community.'	Noted and action amended.
	'Overall, consideration should be given to making an enhanced reference to the promotion of good relations in the plan, given that the significance of the site to all communities in Northern Ireland.'	Noted Unfortunately, our activity in this area is limited at this point in time.

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	‘There is reference in the strategic objectives (p4) to <i>“taking account of requirements relating to public access”</i> to fulfil MLKDC’s responsibilities as a landowner though associated actions would help in understanding the activity which will be undertaken around this.’	MLKDC’s remit is currently restricted to health & safety, security and maintenance activities.
	‘The Council feels that MLKDC should take account of rural needs when developing future planning. Although MLKDC may not be subject to the requirements of the Rural Needs Act, it is important that people across Northern Ireland, including those in rural areas, benefit from the proposed significant public investment in this project.’	Noted Unfortunately, our activity in this area is limited at this point in time.
	Disability Action Plan – Responses	
	‘The public life duty in the Disability Discrimination Act (DDA)/Disability Discrimination Order duties refers specifically to <i>“participation in public life”</i> and not participation generally or access to services generally. The latter is covered under the access provisions of the DDA and could be best catered for to some extent in the Equality Action Plan.’	Noted and amended. We have amended the DAP. We have removed DDA items and recorded these items in the EAP.
	‘The wording of the section heading above may be too narrow to reflect the duty as improving accessibility is only one element of the action required to address this duty.’	Noted and amended.
	‘Some of the actions (measures) outlined appear to be about general accessibility. For example, website accessibility and appropriate communications channels to reach disabled people are requirements of the DDA. The intention to engage with the Equality Commission’s Every Customer Counts initiative is to be welcomed, though it is not directly relevant to this DDA disability duty.’	Noted and amended. We have amended the DAP. We have removed this action and recorded this in the EAP.

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	<p>'We suggest that MLKDC could increase awareness of its public life positions even though the Executive Office is responsible for the public appointments process. MLKDC can take further steps to promote awareness of its role and work and help ensure that people with disabilities consider applying. The appropriate outcome might be more people applying and being appointed and disabled people's views influencing future policy/decision making.'</p>	<p>Noted and amended.</p>
	<p>'Again, the council is unclear as to whether or not this heading is directly relevant to the two disability Duties and would suggest that the actions are either included in Sections 1 and 2 or appear in the wider Equality Action Plan.</p> <p>For example, action 1 could go in Section 1. Action 3 would sit well in Section 2 and would further add that other external disability related groups, as well as Employers for Disability, be asked to communicate/advertise the availability of public life or participation opportunities.'</p>	<p>Noted and amended.</p> <p>Section 3 changed to section 2.</p> <p>Action 1 in section 2 now added to section 1.</p>
<p>Northern Visions/NvTv</p>	<p>Equality Action Plan & Disability Action Plan - Responses</p>	
	<p>'You really need to address diversity on the Board, no women, no younger people, all white.</p> <p>We have had occasion to work with a number of your Board members, all good experiences, but still, would suggest you add to the mix significantly.</p> <p>It will also add to the diversity of skills and experience you will need to make this a success.'</p>	<p>Noted</p> <p>While it is our intention to create a diverse and dynamic organisation the composition of our Board is the responsibility of The Executive Office and we have shared your comments with them so that they can take these into account in the future.</p>

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ECNI	Disability Action Plan – Responses	
	‘Ensure as much as possible that performance indicators are clear and measurable and demonstrate how actions and intended outcomes are relevant to the disability duties.’	Noted We have revised the DAP and have made changes to the performance indicators throughout the plan.
	‘Review measures to ensure that actions go beyond what the MLKDC is already required to do under the DDA Part II employment and Part III access to Goods, Facilities and Services.’	Noted We have reviewed the DAP and ensured that actions go beyond DDA Part II Employment and Part III Access to Goods, Facilities and Services.
	‘It is important that individual actions are clearly defined in order that monitoring can effectively measure the impact that individual actions have and enable adjustments to be made where necessary. Clear targets can encourage staff at all organisational levels within a public authority to take ownership and allocate resources appropriately.’	Noted We have reviewed the DAP and have revised our actions to incorporate clearer targets in order that monitoring can effectively measure the actions.
	‘The Commission recommends that the MLKDC provides more detail on the training which it intends to deliver over the course of the disability action plan and consider in more detail how monitoring and evaluation could measure the impact of training on both the duties.’	Noted We have reviewed the DAP training actions and have included more detail to ensure monitoring and evaluation measures impact of the two duties. We have included targeted training topics over the life time of the Plan.