



DEPARTMENT FOR THE ECONOMY

EQUALITY SCHEME, AUDIT OF INEQUALITIES AND ACTION PLAN AND DISABILITY ACTION PLAN 2022-27

Consultation Comments

August 2023

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Summary of consultation

The Department held a public consultation on drafts of an Equality Scheme, Disability Action Plan and Audit of Inequalities for the five year period (2022-2027). The consultation opened on 3 April 2023 and closed 4 June 2023, and invited views and comments from key stakeholders and the general public on the content of the draft documents.

Each of the draft consultation documents were available on the Department's website and were also available in hard copy or in alternative formats on request. An electronic consultation questionnaire was provided to encourage the expression of views across a number of key areas. However, responses via other methods were also accepted, including e mails.

The consultation received a total of 3004 views on the Department's website.

Downloads of the individual documents consulted upon were as follows:

- Draft Equality Scheme. 55
- Draft Audit of Inequalities. 39
- Draft Disability Action Plan. 35
- Privacy Notice. 14

The Department received three consultation responses:

- No responses were submitted on the Equality Scheme;
- Two responses on the Audit of Inequalities and Disability Action Plan were received by e-mail - one from The Northern Ireland Equality Commission and from Sinn Féin; and
- One response was received from a member of the public via electronic survey questionnaire. This was not specific to any of the consultation documents.

DfE Equality Scheme 2022-27 Consultation Comments

	Comment	Response
	None	None

DfE Audit of Inequalities and Action Plan 2022-27 Consultation Comments

Responses from consultees have been grouped around a number of specific themes relating to the Audit of Inequalities and Action Plan. These comments and the Department's responses are presented below.

	Comment	Response
1.	<p>Ethnicity</p> <ul style="list-style-type: none"> • Can further information be provided on ethnic minorities within employment, such as information based on a sectoral basis etc? 	<p>Existing information from the Labour Force Survey provides some information on employment by ethnicity, however the data is limited due to small data sample size. Going forward, it may be anticipated that some further information on employment by ethnicity will become available from other sources, such as Census 2021 analyses.</p> <p>The Racial Equality Strategy 2015-2025 recognised a lack of available data on minority ethnic populations to be a significant barrier to racial equality in Northern Ireland. In consequence, all Departments within the NI Executive agreed the Strategy including a commitment to introduce Ethnic Equality Monitoring in the public sector by 2025. Towards this commitment, The</p>

	<ul style="list-style-type: none"> • The Action Plan should include measures to promote job vacancies to ethnic minority communities; engagement with communities to identify barriers to recruitment and how to tackle these. • The Refugee community faces particular barriers to employment. In some cases, refugees could be highly qualified in their home country before being forced to flee but that qualification may not be recognised in NI. The Action Plan should consider the recognition of qualifications, particularly given current workforce shortages in many sectors. 	<p>Executive Office published Guidance for Ethnic Equality Monitoring in the Public Sector (June 2023).</p> <p>The Department published a pamphlet that sets out the eligibility requirements for access to English Speakers of Other Languages (ESOL) in further education (FE) colleges for asylum seekers, refugees, those granted Humanitarian Protection, persons granted Indefinite leave to remain under Afghan Relocation and Assistance Policy (ARAP) and the Afghanistan Citizen Resettlement Scheme (ACRS), Ukrainians under 'Homes for Ukraine', Ukrainian Family Resettlement schemes and Ukrainians granted a six month settlement visa whilst they apply for one of the afore mentioned schemes.</p> <p>Asylum seekers, Refugees and those granted Humanitarian Protection, are eligible to access ESOL provision, and other further education courses as soon as they have made an application for refugee status or are granted refugee status. Asylum seekers, Refugees and those granted Humanitarian Protection are eligible for free access to ESOL provision.</p> <p>Anyone residing in Northern Ireland and wishing to check their qualifications against UK equivalents may access the free Qualification Equivalence Service by contacting local Jobs and Benefits offices or JobCentre.</p>
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	<ul style="list-style-type: none"> • The Department should recognise the Traveller community as an indigenous ethnic minority in Ireland who face high levels of discrimination, particularly in employment. Specific measures aimed at the Traveller community should be included within the Action Plan following engagement with the Traveller community. • It is unclear whether the Department offers Careers Services, i.e., advice and guidance, in minority languages. If not, the Department should explore the possibility of doing so as a means of addressing the inequalities that impact ethnic minorities in finding work. 	<p>The relevant categories of people for which regard must be paid to the desirability of promoting good relations, according to Section 75, are between persons of different religious belief; persons of different political opinion; and persons of different racial group. The Department is aware that this duty embraces and extends beyond the religious/political dimension of 'community relations'. The Department already considers the needs and interests of all minority ethnic groups, including Irish Travellers, in policy development.</p> <p>Interpretation services are provided by the Careers Service upon request.</p>
<p>2.</p>	<p>Gender</p> <ul style="list-style-type: none"> • The audit reveals there is a larger percentage of males in full time employment with 89% of the male workforce in full time employment compared to 64% of females. Notably the statistics show clear correlation between women being unemployed, under-employed and underpaid once they have childcare responsibilities or caring responsibilities for dependants. The Action Plan must contain provisions to mainstream gender equality within Departmental policies. Officials should be trained to recognise gendered impacts and how to address this. 	<p>The Department routinely equality-screens its policies to identify potential adverse impacts on members of the nine Section 75 groups, including females. Also, the Department ensures that where possible, its programmes and services offer equality of opportunity to all Section 75 groups, in accordance with the Department's Equality Scheme.</p> <p>Training in equality screening is provided for all departmental officials responsible for policy, and a dedicated Equality Unit provides advice and guidance to officials on equality related matters.</p>

<ul style="list-style-type: none"> • The Action Plan should consider ways to improve access to affordable childcare and to flexible work and leave requirements so that women can stay and progress in the labour market. • The Action Plan should also consider how segregated the labour market is by gender and introduce measures to address this, such as targeted apprenticeships for females for the construction, manufacturing or transport industries, and measures to create better pay for essential jobs such as Public Administration, Education and Health. • Women often take on the primary responsibility for caring for dependants and as result may have to work part time or in some cases drop out of work altogether. Without reinforcing gender stereotypes the Careers Service should try to inform people with caring responsibilities of careers opportunities that may arise, and which facilitate flexible working. 	<p>The Early Learning and Childcare Strategy is being led by the Department of Education on behalf of the Executive, and DfE like other Departments, is actively involved in the process. One of the key aims of the Strategy is the enablement of parental employment. This will assist the Department's 10X delivery plan for inclusive growth, which aims to benefit all sections of the workforce including women.</p> <p>The Department promotes apprenticeship opportunities through twice yearly advertising campaigns, together with facilitation of the annual NI Apprenticeship Week when contributors are encouraged to consider events that promote apprenticeships in STEM-related sectors, to females and those with disabilities in particular. Gender inclusion is also promoted through the NI Apprenticeship Awards which introduced a new Special Award in 2023 for Diversity and Inclusion.</p> <p>The Department is also striving to encourage greater up-take of STEM skills and related employment opportunities by females. Towards this aim, the Department developed and published a Women In STEM Action Plan in March 2022 in conjunction with the Women STEM Steering Group.</p> <p>DfE Careers Service is currently an all age, all ability service available to everyone, including women and people with caring responsibilities. Careers advisers provide professional and impartial tailored careers guidance which includes advice on transferable skills, reskilling and upskilling. Advisers have access to up-to-date labour market information provided by the Department's economists which they use with the client to inform careers guidance discussions about reskilling, training,</p>
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	<ul style="list-style-type: none"> Programmes aimed at helping women return to the labour market should include provision for childcare. 	<p>apprenticeships, further and higher education. This support is professional, free, specific and tailored to the needs of each individual, with the aim of supporting citizens in their career planning and career progression.</p> <p>The Department currently offers childcare support to eligible participants across a wide range of programmes, including the Skill Up Women’s Returner Programme and Step Up’s Women Returners Access Programme, both of which factor in support for childcare costs should that be required by the participant. Support relating to childcare costs is also available for eligible students in both Further and Higher Education.</p>
<p>3.</p>	<p>Age</p> <ul style="list-style-type: none"> The rate of young people not in education, employment or training emphasises the importance of programmes like the Youth Traineeships in ensuring young people can access skills. The Department needs to ensure that training providers continue to facilitate traineeships at Level 2 rather than these being confined solely to FE Colleges. Training providers are well placed to provide skills and training to young people who may need more personal and one to one teaching opportunities. This needs to be considered as part of the Youth Training strategies particularly for students who may have 	<p>The Step Up Project offers provision across the range of age groups, including young people. For example, the interventions offered in further education colleges provide individualised support to meet participant’s needs, to enhance access and participation in skills and education opportunities. Specific interventions are in place for younger cohorts, including those who are not in employment, education or training, and includes qualifications up to level 2.</p> <p>The Skill Up initiative provides fully funded courses from Entry Level to Level 7 across priority economic sectors. Courses are accessible by all NI citizens aged 18 years and older and primarily delivered online to enable greater access. Skill Up promotes lifelong learning enabling NI citizens the opportunity to skill, reskill and upskill.</p>

	<p>dropped out of Further Education or do not feel ready to go into that system from school.</p> <ul style="list-style-type: none"> • Those aged 16-24 appear to have suffered the most in terms of redundancy and a reduction in hours since the Pandemic. The fact that 16-24 year olds who are in work are more likely to want more hours than the general population suggests that younger people still tend to be employed on short hour or precarious employment contracts. The Department should therefore ban Zero Hour Contracts which create insecurity for workers, and primarily young workers. • For older learners the Department should also look to invest in opportunities for lifelong learning. Promoting all-age apprenticeships which provide funding to those aged over 25 would open up opportunities for people to develop their skills and earn as they learn. 	<p>Skills for Life and Work, which replaced Training for Success in 2021, is a vocational education programme for 16 - 17 year olds (with extended eligibility for those with a disability or from an in-care background) who are in need of learning and achievement primarily at Entry Level and Level 1 (with opportunity for Level 2 achievement in certain circumstances). It aims to deliver a portfolio of personal development, employability and essential skills alongside professional and technical training in occupational areas chosen by the participants and includes world of work activities and work placements. It is delivered by a mixture of FE colleges and non-statutory training providers across Northern Ireland. The programme which will replace Skills for Life and Work in 2024 is also planned to be mixed delivery.</p> <p>The draft Programme for Government contained measures to protect workers' rights, including action on zero hours contracts. Further consideration of these issues has been delayed by the absence of a Northern Ireland Executive.</p> <p>The Department is currently developing a lifelong learning action plan in line with the Skills Strategy's aspiration to create a culture of lifelong learning. Also, All Age Apprenticeships are recognised by the Department as a key enabler towards creating a culture of lifelong learning in Northern Ireland and also have a role to play in reducing the gender gap in apprenticeships.</p>
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4.	<p>Sexual Orientation</p> <ul style="list-style-type: none"> The Department has not included a section on inequalities relating to LGBTQI+. This may be on the basis that there was not a disproportionate impact identified on LGBTQI+ due to DfE policy. However, in such cases this should be stated clearly in the audit of inequalities. 	<p>The Department routinely equality- screens its policies to establish whether there are any disproportionate impacts on any of the nine Section 75 categories, including people belonging to LGBTQI+ groups. The Department also ensures where possible all of its programmes/services provide equality of opportunity for all of the nine Section 75 categories.</p>
5.	<p>Disability</p> <ul style="list-style-type: none"> Within the Audit there is no mention of the role of Social Enterprises despite their role that these groups can play in helping move people from skills into employment or pre-employment role. Training providers provide localised and bespoke skills provision for young people who benefit from a smaller learning environment. It is important that the Department considers this as part of the Youth Training Strategy as these programmes can be beneficial to learners with disabilities and other challenges. 	<p>Vocational work-based and education learning programmes, such as Training for Success and Skills for Life Work, provide young people with skills required to progress into employment. Disability support provision has been in place for programme participants on work based learning programmes since 2013. Training at this level is currently delivered by both contracted non-statutory training providers and FE Colleges. Also, Disability Support is in place to work in conjunction with training suppliers delivering ApprenticeshipsNI (AppsNI) training.</p> <p>The Department's Step Up Project provides flexible interventions to suit the individual needs of participants and includes one to one support in mentoring and tuition where this is necessary. In Step Up's higher education offering, small groups and one to one intervention is provided to cohorts, including those with particular care requirements or those with disabilities.</p>
6.	<p>Careers Service</p>	

<ul style="list-style-type: none"> • One obvious omission in the Audit of Inequalities is the failure to include Section 75 and Equality Screening into the Department's Independent Review of Careers Services. The Department should set out why it failed to carry out this screening and whether it intends to include Equality Screening once the reforms in Careers Services are announced. • We would like to see the Department's Career Service working closer with schools. Closer engagement from Careers Service with schools would give young people at ages 14 to 18 a comprehensive insight into career opportunities, including vocational pathways to success. 	<p>The Independent Review of Careers Services was undertaken as a research project. Its recommendations were cross cutting in nature and so no further work has been undertaken in the absence of an Executive.</p> <p>As and when new policies are developed they will be subject to Section 75 equality screening.</p> <p>The Department's Careers Service currently offers partnership working arrangements with all publicly funded Post Primary schools in Northern Ireland. Services are offered to all pupils 14 - 19 with a priority focus on the year 12 cohort. Services are also prioritised to pupils with SEN and other barriers. Future work of DfE Careers Service will be informed by 10X and 14-19 framework.</p>
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	<ul style="list-style-type: none"> ● Regarding barriers to participation in work and inadequate work life balance for those in work, are there more measures that could be added relating to barriers to participation in public appointments? 	<ul style="list-style-type: none"> - Advanced notification is provided to S75 representative groups including disability groups to enable them to target advertisement of upcoming public appointment competitions among their distribution lists and to advertise on their websites. - Working with the NICS Disability Champion to provide advance notification a competition launch and obtaining his input and assistance with promotion and outreach. <p>Other organisations also provide initiatives to inform under-represented groups on public appointments – such as CPANI (Commissioner for Pubic AppointmentsNI) which provides workshops to assist all citizens to familiarise and improve their skills and knowledge of the public appointments process.</p> <p>DfE public appointments are made to DfE Partner Organisations. These organisations have their own policies related to the issues referenced. The time commitment required to serve on a Board is set out in the Candidate Information Booklet for each competition. Most Boards meet around 1 day per month so should have limited impact on work life balance.</p> <p>DfE provides the assistance to applicants during the public appointments process, including payment for travel to and from interviews upon request, and payment for childcare while at interview upon request.</p>
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<p>8.</p>	<p><u>Higher/Further Educational Enrolments and Skills programmes</u></p> <ul style="list-style-type: none"> • Despite the increase in student enrolments the Audit fails to provide any information as to whether Widening Participation targets increased over the last ten years to match the increase in Enrolments. 	<p>Between 2012/13 and 2020/21 figures¹ show that the overall number of NI domiciled undergraduate students at NI HE providers has dropped slightly from 51,643 to 48,384 representing a 6.3% decrease.</p> <p>While the proportion of enrolments of some under-represented groups have decreased, for example adult returners dropped from 32.1% to 26.6% between 2021/13 and 2020/21, there have been some very positive outcomes for other under-represented groups. The proportion from the two most deprived Multiple Deprivation Quintiles has increased from 34% to 35% and the proportion of the lowest quintile has held steady over this period of overall declining enrolments. The proportion of students in receipt of Disabled Student Allowance (DSA) has increased from 4.1% to 5.8% with over 2,200 students in receipt of DSA in the 2020/21 academic year. The proportion of students who self-declare a disability has significantly increased from 7.4% to 13.6% with approximately 6,500 students falling into this category. Although it is unknown if this is due to increased enrolments of disabled students or increased awareness and recognition of disabilities over the same period.</p>
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¹ Figures sourced from HESA for HEIs and CDR for FECs

DfE Disability Action Plan 2022-27 Consultation Comments

Consultees' comments and the Department's responses are grouped by the individual Measures as they appear in the Disability Action Plan, and are presented below.

	Comment	Response
1.	<p>Measure 2 (improve the accessibility and usability of the Department's webpage) The measure does not have performance indicators/targets attached. Specific outcomes should be identified.</p>	<p>In response to consultee comments the information below has been added to the Disability Action Plan.</p> <p>The Department adheres to the international Web Content Accessibility Guidelines (WCAG) 2.1., which aim to optimise websites to accommodate specific needs, such as for example, assistive technology, screen readers, and keyboard-only navigation. The Department complies with the guidelines by screening all documents for accessibility before they are published on the website site.</p> <p>Compliance with (WCAG 2.1) guidelines will be ensured by:</p> <p>Updating the economy-ni website Accessibility Statement annually, which relies on an accessibility audit.</p> <p>Performing accessibility checks on 100% of documents before publication on website</p>

		Ensuring all social media posts are accessible within the parameters of the social media channel including use of graphics and ALT text where possible.
2	<p>Measure 3 (provide refresher Equality Screening to staff and ongoing support) The measure does not have performance indicators/targets attached. Specific outcomes should be identified.</p>	<p>In response to consultee comments the information below has been added to the Disability Action Plan.</p> <p>The Department's Equality Unit will offer refresher training sessions on equality screening to all departmental business areas during 2023-24 and will repeat the offer biennially.</p>
3.	<p>Measure 7 (publication of internal briefing articles to promote staff awareness of the DAP) It would be helpful to identify the number of articles that the Department aim to publish on a yearly basis.</p>	<p>In response to consultee comments the information below has been added to the Disability Action Plan.</p> <p>The Department will publish 1-2 internal articles each year to promote staff awareness of the DAP</p>
4.	<p>Measure 9 (informing staff of progress on the new DAP 2022-2027) When will staff be informed on progress of the results of the consultation on the DAP, where to find the final agreed Plan and what the Plan contains.</p>	<p>In response to consultee comments the information below has been added to the Disability Action Plan.</p>

		Staff will be informed of the outcome of the consultation on the DAP and how it may be accessed within one month of the final document being agreed and published.
5.	<p>Measures 11 and 12 (under-representation of disadvantaged groups in Tertiary Education and Higher Education)</p> <p>The appropriate and effective action measure which the Department intends to take should be clearly defined, with timescales for implementation.</p>	<p>The Access to Success strategy set the direction of travel for widening access and participation in higher education, this was published in 2012 and was intended to cover until 2020. Consideration of a new approach to widening participation is underway, and as a first step, research was commissioned into Understanding Widening Participation (WP) in Northern Ireland. This independent report reviewed the progress that has been made towards achieving the vision set out in Access to Success. It also examined how the higher education landscape and widening participation practice has evolved over the last ten years and the extent to which access and participation of under-represented groups has increased. The report also identifies a number of strategic priorities to inform the future approach to widening participation in Northern Ireland, including the establishment of a WP Forum.</p> <p>The Forum has been established and provides a place for the WP representatives from relevant Government departments, representative bodies, Further Education and Higher Education institutions in Northern Ireland to jointly consider the future approach to WP, to share best practice and facilitate collaboration in Northern Ireland. The work of the Forum will shape the development of policy and monitoring activities including specific targets on access, retention, participation and outcomes. This will lead to development of proposals that will inform advice to a future Minister.</p>
6.	<p>Measures 18 (encourage participation by people with disabilities in public life) and 19 (increase representation</p>	

	<p>of women, people with disability and minority ethnic groups on Departmental Board)</p> <p>What are the specific action measures to increase representation of people with a disability onto Boards?</p>	<p>In response to consultee comments the information below has been added to paragraphs 18 and 19 of the Disability Action Plan.</p> <ul style="list-style-type: none"> • Advanced notification to S75 groups including disability groups to give them time to circulate to their distribution lists and put on their websites. • Letter to NICS Disability Champion Ronnie Armour advising him of the competition launch and seeking his input and help with promotion and outreach. • The Boardroom Apprentice Scheme NI is overseen by TEO and this feeds in to DfE Boards of Partnership Organisations. • Welcoming statement in candidate information booklet says <i>“Women, young people, people with a disability and those from minority ethnic communities are currently under-represented on the Board and applications from members of these groups would be particularly welcome. Applicants with a disability who meet or exceed the pass-mark set for the criteria will be offered an interview. Their application will not be subjected to short-listing.”</i> • Online Applications accepted using Citizenspace platform. • Applications accepted in a number of formats which includes email, hand-written, postal or hand delivered. • Direct contact with the equality officers in the local councils. • Payment for travel to and from interviews is available upon request. • Online interviews or face to face interviews are facilitated. • All requests for reasonable adjustments are considered for interviews. • Application forms are offered in alternative formats – for example Braille, large print, audio etc.
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		<ul style="list-style-type: none"> • DfE uses consistent positive language to flag the diversity monitoring from within our application packs and ensure the form is accessible in the same ways referred to above for application forms. • Phone numbers and Text Relay contact details are provided throughout all competition material. • Ministers and Permanent Secretaries promote competitions at various events. • CPANI offer workshops to assist all citizens to familiarise and improve their skills and knowledge of the process. • The Department feeds in to TEO and CPANI initiatives on inclusion and diversity as and when required. • The Department operates the Guaranteed Interview Scheme for public appointments. • All candidates who are unsuccessful at sift stage of a competition who have applied under the Guaranteed Interview Scheme are provided written constructive feedback. Further one to one feedback from the panel chair is also available upon request.
7.	<p>General</p> <p>The Action Plan should include measures that ensure accessibility, and the provision of reasonable adjustments are a priority for the Department and its Arms Length Bodies.</p>	<p>Accessibility and the provision of reasonable adjustments is already a priority for the Department and its business partners. One of the most notable features of the disability discrimination legislation is that in prescribed circumstances it imposes a duty on employers, service providers and public authorities to take such steps as are reasonable to remove or reduce particular disadvantages experienced by people with disabilities in those circumstances.</p>