



Commissioner for Older People
for Northern Ireland

Disability Action Plan

Introduction

1.1 Under Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), COPNI is required when carrying out its functions to have due regard to the need to:

- promote positive attitudes towards disabled people; and
- encourage participation by disabled people in public life ('the disability duties').

Under Section 49B of the DDA 1995, COPNI is also required to submit to the Equality Commission a **disability action plan** showing how it proposes to fulfill these duties in relation to its functions.

1.2 As the Commissioner and Chief Executive of COPNI, we are committed to implementing effectively the disability duties and this disability action plan. We will allocate all necessary resources (in terms of people, time and money) in order to implement effectively this plan and where appropriate, build objectives and targets relating to the disability duties into corporate and annual operating plans.

We will also put appropriate internal arrangements in place to ensure that the disability duties are complied with and this disability action plan effectively implemented. We will ensure the effective communication of the plan to staff and to providing all necessary training and guidance for staff on the disability duties and the implementation of the plan.

We confirm our commitment to submitting an annual report to the Equality Commission on the implementation of this plan as well as carrying out a five yearly review of this plan.

We confirm our commitment to consulting with people with disabilities and their representatives when implementing and reviewing this plan.

Responsibility for implementing, reviewing and evaluating this disability action plan and the point of contact within COPNI is:

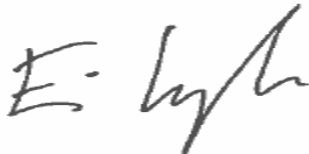
Marie Mullan
HR Manager
The Commissioner for Older People for Northern Ireland
6th Floor, Equality House
7-9 Shaftsbury Square
Belfast BT2 7DP
Tel: 02890 890884
Email: marie.mullan@copni.org

If you require this plan in an alternative format (such as in large print, in Braille, Easy Read, compact disc or audio cassette, flash drive) and/or language, please contact the above person to discuss your requirements.

1.3 We confirm our commitment to submitting an annual progress report on the implementation of this plan to the Equality Commission and carrying out a five year review of this plan, or plans submitted to the Equality Commission over the five year review period.

A copy of this plan, our annual progress report to the Equality Commission and our five year review of this plan will be made available on our website www.copni.org.

Signed



Eddie Lynch
Commissioner:



Evelyn Hoy
Chief Executive:

Date: **20/09/2107**

1.4 Functions of the office of the Commissioner for Older People for Northern Ireland

Outlined below are the range of functions of COPNI:

1. To promote awareness of the interests of older people in Northern Ireland.
2. To keep under review the adequacy and effectiveness of the law as it affects the interests of older people.
3. To keep under review the adequacy and effectiveness of services provided to older people by “relevant authorities”.
4. To promote the provision of opportunities for, and the elimination of discrimination against, older people.
5. To encourage best practice in the treatment of older people.
6. To promote positive attitudes towards older people and encourage participation by older people in public life.
7. To advise the Assembly, the Secretary of State and any relevant authority on matters concerning the interests of older people.
8. To take reasonable steps to communicate with older people.

General Powers

1. To make arrangements for research or educational activities concerning the interests of older people.
2. To issue guidance on best practice in relation to any matter concerning the interests of older people.
3. To conduct investigations for the purpose of any of the functions associated with the Office.
4. To compile and publish information concerning the interests of older people.
5. To provide advice or information on any matter concerning the interests of older people.

1.5 Public Life Positions

The recruitment and selection for all positions within COPNI will be undertaken in accordance with the Disability Discrimination (Northern Ireland) Order 2006 and with due regard to the disability duties.

The Commissioner for Older People is supported by a governing committee – the Audit and Risk Assurance Committee (ARAC). The membership of the ARAC is independent of the Commission and consists of 3 external members; these are the only public life positions open to adults within the Commission.

The ARAC supports the Commissioner (Accounting Officer) in monitoring risk, control, governance and financial reporting. Additionally, the ARAC gives advice to the Accounting Officer on the adequacy of coverage of audit arrangements (internal and external) to provide the required assurances.

ARAC members are appointed for 4 years and are eligible to be re-appointed at the end of this period for a further 4 years. A recruitment campaign took place in January 2017 and positions were advertised in the Press and on COPNI website. The Disability Employment Service was also advised of the recruitment campaign.

2. Action Measures

Outlined overleaf are the measures which COPNI proposes to take over the period 2017/2020 of this disability action plan, together with performance indicators or targets.

Action Measures

Business Area	Measure	Timescale	Performance indicators/Target	Lead
<p>Training</p>	<p>1. Ensure training on the 'Disability Code of Practice' is provided for staff involved in recruitment and selection panels.</p>	<p>As and when required.</p>	<p>All staff who are involved in recruitment and selection panels confirm attendance at recruitment & selection training course or refresher course prior to sitting on panel.</p> <p>Increased knowledge of anti-discrimination legislation which includes disability discrimination.</p> <p>Review of refresher training dates.</p>	<p>Human Resources Manager</p>

	<p>2. Equality and Diversity training will be provided to all new employees within one year of commencement of employment.</p> <p>3. Age Awareness training will be provided to all new employees within one year of commencement of employment.</p> <p>4. Dementia Awareness training will be provided to all new employees within one year of commencement of employment.</p> <p>5. Training will be on-going, relevant and updated to take account of changes in legislation, as required.</p>		<p>Staff awareness of issues affecting older people, those with dementia and disability, enhanced after training, leading to more positive attitudes to age, dementia and disability among staff.</p> <p>Staff increase knowledge of disability legislation.</p>	<p>Human Resources Manager</p>
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<p>Participation in Public Life</p>	<p>6. We will work towards amending COPNI's website to meet the W3C's requirements of WCAG 2.0 (Web Content Accessibility Guidelines) as well as Section III of the DDA in the provision of Goods, Facilities & Services.</p>	<p>March 2017</p>	<p>Obtain conformance standard "AA" within the next year.</p> <p>Low/zero complaints on accessibility.</p>	<p>Communications & Engagement Manager</p>
	<p>7. Identify & promote an advocate or specialist within the workforce with a role to support and advise staff on disability issues.</p>		<p>Appointment of permanent HR Manager who has responsibility to support and advise staff on disability issues.</p>	<p>Chief Executive</p>

	8. Annual monitoring of participation of disabled people and their accessibility to all COPNI activities.	Annually: July along with Equality monitoring information	Evidence of participation and accessibility via feedback forms provided at events. Evidence of participation and accessibility via low / zero complaints from stakeholders at events	Communications & Engagement Manager/Legal Team
	9. Monitoring of case work by Legal Team.	Quarterly update provided to SMT	Evidence of case work	Legal Team
	10. People living with a disability and their representatives will be invited to provide views on draft disability action plan and draft key priorities.	Within the engagement process.	Feedback from people living with a disability and their representatives.	Communications & Engagement Manager/Policy & Research Team

	11. Involve people living with a disability and their representatives in the delivery and review of this plan. Review will be undertaken in line with the development of the next Corporate Plan.	Within 5 Years	Feedback from people living with a disability and their representatives.	Communications & Engagement Manager
	12. Continue to liaise with organisations such as Disability Action, Advice NI, the Alzheimer's Society and NIAMH etc with regard to communication of and awareness of COPNI's duties.	Ongoing	Evidence of liaison with people living with a disability and their representatives.	Communications & Engagement Manager
	13. Working in partnership with other public authorities in order to maximise existing methods of raising awareness amongst people living with a disability and to explore new initiatives, such as, providing web links to	Ongoing	Online monitoring (Google Analytics) of traffic flow and usage of web links provided	Communications & Engagement Manager

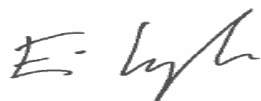
	disability sector sites within COPNI's website.			
	<p>14. Continue to work with and represent older people living with a disability, making an effort to reach those who find it harder to attend COPNI events.</p> <ul style="list-style-type: none"> ➤ Gain advice from other action groups on how they reach out to people living with a disability who cannot attend events. ➤ Conduct outreach to actively seek the views of older people whose voices are hard to hear, for example those in residential and nursing homes, those with disabilities including dementia. ➤ Commission similar work and monitor its progress (budget permitting). 	On-going	<p>Evidence from monitoring of outreach activities that COPNI is accessing the views of older people whose voices are hard to be heard.</p> <p>Attendance of Commissioner at Deaf Awareness PfG event.</p>	Communications & Engagement Manager
	15. Provide details of publicly advertised vacancies to the Disability Employment Service and other disability agencies/organisations	As and when recruitments take place.	Increase number of disabled people applying for posts.	Human Resources Manager

Promoting Positive Attitudes	16. Continue to press for introduction of older people safeguarding bill for Northern Ireland.	On-going	<p>Engagement with stakeholders and government to press for introduction of bill.</p> <p>Raised matter with Minister for Health, Social Services and public Safety.</p>	Head of Legal and Policy Advice
	17. Examining prevalence of financial abuse against older people, including proposals to government for better protection.	March 2017	<p>Conducted fieldwork for prevalence survey of financial abuse against older people in 2016.</p> <p>Publish findings using data to make recommendations and representations to government and Policymakers.</p> <p>Promotion of various campaigns – eg, “Scamwise” in conjunction with PSNI, “Make the Call” campaign in conjunction with social Security Agency, Department of social Development</p> <p>Publication of Scam Information Booklet</p>	Head of Legal and Policy Advice

	<p>18.Examine the role of the health & social care regulator and make recommendation to improve its effectiveness.</p>	<p>March 2018</p>	<p>Met with Bengoa Review Panel.</p> <p>Responded to DHSSPS consultation – Health and Social Care: Reform and Transformation, Getting the Structures Right.</p> <p>Expanded upon 2015 response to the Donaldson Report Recommendations.</p>	<p>Head of Legal and Policy Advice</p>
	<p>19.Encourage employment and entrepreneurship for those over 60.</p>	<p>March 2018</p>	<p>Monitoring Executive activity on recommendations made in the “Valuing an Ageing Workforce” report.</p> <p>Communicated with DEL re: progress on the “Valuing an ageing Workforce” recommendations.</p> <p>Raised matter with the Minister for Communities re: future plans his department has to build upon proposed measures in the Economic Inactivity Strategy.</p>	<p>Head of Legal and Policy Advice</p>

	20.Highlight the benefits of older people getting online and encourage digital inclusion.	March 2018	Attendance at relevant external stakeholder events.	Head of Legal and Policy Advice
	21.Press for introduction of legislation to end age discrimination in the provision of goods, facilities and services.	On-going	Responded to consultation on proposals to introduce age discrimination legislation. Raised matter in the COPNI response to the draft Programme for Government framework.	Head of Legal and Policy Advice
	22.Maximising Income through the Uptake of Benefits Programme (taken from Business Plan Objective 1)	On-going	COPNI to continue to support the “Make the Call” campaign run by DfC COPNI endorsement of the message for the 16-17 advertising campaign. Impact data from ongoing monitoring of the existing campaign.	Chief Executive

Commissioner _____



(Eddie Lynch)

Date 20/09/2017

Chief Executive _____



(Evelyn Hoy)

Date 20/09/2017

RESPONSE TO CONSULTATION

Stakeholders' Views

COPNI published its draft Disability Action Plan for consultation on 7th February 2017. The closing date for receipt of responses was 1st May 2017.

COPNI sent the proposed Plan to all our equality stakeholders, as identified in our consultee list.

COPNI received 4 consultation responses from, the South Eastern Health and Social Care Trust, the Royal College of Psychiatrists in NI, Lisburn and Castlereagh City Council and Disability Action. We will publish these responses on our website.

All 4 organisations welcomed the proposed Plan and no amendments were suggested. The Royal College of Psychiatrists asked that they be included in our consultee list and this has been actioned. Disability Action made a number of comments and suggestions to help improve the Plan and below we explain where we have made changes to the Plan as a result.

Our Response

Disability Action advised that COPNI should highlight measures for which we have responsibility within the Action Plan to identify those public life opportunities that may influence to increase the number of people with disabilities in public life. We have addressed this issue by adding additional information to Point 1.5 of our Plan detailing our last recruitment campaign for members of our Audit and Risk Assurance Committee.

COPNI notes the Equality Commission's guidance on encouraging participation in public life which is heavily weighted towards opening up public appointments to disabled people. But we also note that "public life" can include the way in which disabled people contribute to or are involved in public policy decision making. COPNI believes that our Action Plan addresses this through stakeholder engagement events.

In response to Disability Action's suggestion, we have numbered our Action Measures.

Disability Action sought clarity on who delivered training on equality, diversity and disability awareness to COPNI staff. COPNI can confirm that equality, disability awareness training and diversity training is carried out by the Equality Commission.

In relation to Disability Action's comments concerning annual monitoring of participation of disabled people at COPNI events, COPNI can confirm that all those attending events must register with us prior to attending. It is at this stage that we ask attendees about their mobility/accessibility/disability issues. COPNI records all information provided and

takes appropriate action to ensure full participation by people with a disability, i.e., wheelchair access, signer for the deaf, documents printed in large print etc.

Disability Action welcomed the involvement of disabled people and their representatives on the draft Disability Action Plan and asks how we will achieve this. COPNI has a range of disability groups on its' list of consultees representing disabled people and their representatives and we consult with them as and when necessary.

In response to Disability Action's suggestion that the Commissioner's objective should be to increase the number of disabled people employed, COPNI would advise that any applicant who meets the criteria for a vacancy advertised, regardless of whether they have a disability will be shortlisted. COPNI has also removed the driving requirement from employee specifications for disabled people to enable them to apply for posts.

Disability Action noted that it was difficult to compare what Action Measures are new or carried over from our last Disability Action Plan. They also suggested that it was difficult to determine timescales with 7 of the action measures recorded as "on-going". There are common topics which will be carried over from one plan to another as these are set pieces of work which are conducted annually. We provide an annual progress report to the Equality Commission which includes progress on our Action Measures.

