



Northern Ireland Ambulance Service HSC Trust Section 75 Equality Scheme and Action Plan Consultation Report

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Introduction

The Northern Ireland Ambulance Service Health and Social Care Trust would like to thank all those who responded to the Trust's consultation on our draft Equality Scheme. This invaluable input and expertise has helped to shape the final Equality Scheme and Action Plan.

Section 75 of the Northern Ireland Act 1998 requires that Health and Social Care (HSC) Trusts, when carrying out their work, to have due regard to the need to promote equality of opportunity between nine categories of persons, namely:

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- men and women generally;
- persons with a disability and persons without; and
- persons with dependants and persons without.

And to have regard to the promotion of good relations between:

- between persons of different religious belief;
- between persons of different racial group; and
- between persons of different political opinion

In April 2010 the Equality Commission of Northern Ireland issued new guidance on the implementation of Section 75 for public authorities, based on the findings of the Effectiveness Review of Section 75.

In October 2010, the Equality Commission notified the Trust's Chief Executive of the need to produce a revised Scheme as per Schedule 9 3(1) (b) of the Northern Ireland Act 1998. In conjunction with this, it was recommended that organisations produce an action-based plan to address Section 75 inequalities. The Equality Commission (ECNI) recommended that this was informed by an audit of inequalities.

The Equality Scheme provides a framework for how the Trust proposes to fulfil its Section 75 statutory duties and is co-signed by the Trust Chief Executive and Chairperson to demonstrate strategic commitment to Section 75.

The Action-based Plan has been developed to help address inequalities which relate to the Trust functions of provision of health and social care, procurement and employment. The Trust worked with other HSC Trusts in following the Equality Commission's recommendation to undertake an audit of inequalities to inform the development of the action plan. Health and Social Care Trusts have worked together to develop their Equality Schemes, carry out an audit of inequalities and develop action plans to tackle identified inequalities in health and social care. The NIAS action plan includes some shared HSC actions as well as actions which are specific to the functions of our own organisation.

The Trust submitted the draft Equality Scheme to the Equality Commission on 22 April 2011, in advance of the statutory deadline of 1 May 2011, and has now received confirmation from the Commission of its approval. The purpose of this

report is to summarise responses to the consultation and demonstrate how feedback has shaped the Equality Scheme and Action Plan.

Consultation

To help inform the development of an Equality Scheme, Action-based plan and Audit of Inequalities, the Trust worked in partnership with other HSC Trusts and engaged with key stakeholders representing Section 75 groups prior to formal consultation. Work streams were divided among the Trusts and NIAS engaged with Age NI and the Older Person's Advocate on behalf of all Health and Social Care Trusts. In addition, the Trusts engaged with the Equality Coalition in respect of the approach to the Audit of Inequalities and the development of new Equality Schemes and Action Plans. Within NIAS, Trade Union representatives were engaged as part of the pre-consultation process. This collaborative approach will continue throughout the implementation of Action Based Plans, in partnership with the voluntary and community sector.

The formal 12-week period of consultation on the Trust's Equality Scheme and Action Plan began on 6 January 2011 and ended on 31 March 2011. To formally launch the Health and Social Care Trusts' consultation, letters were issued to consultees from the each of the six Trusts' Chief Executives. Following this each Trust wrote to consultees with details of individual Equality Schemes and Action Plans. All those listed in the Trust's Section 75 Consultation Database received a letter informing them of the Trust's consultation arrangements. Consultation documents were made available on the Trust's website. The documents were also available in hard copy or in different formats on request.

In addition to welcoming written responses, the Trust outlined its commitment to meeting directly with those interested in participating in the consultation process. A regional Consultation Workshop was convened at the Health and Wellbeing Centre at Bradbury Place, Belfast on 21 February 2011. Equality leads from the six Health and Social Care Trusts presented on their draft Equality Scheme, their Audit of Inequalities and their Action-based Plan to those in attendance (a list of attendees is at Appendix 1). Following this a number of discussion groups took place, facilitated by Trust Equality leads to enable direct engagement and discussion with stakeholders in respect of this work.

An event organised by the Equality Coalition¹ for all public authorities in the process of consulting on new Schemes was held at Unison Headquarters on 9 March 2011. NIAS took this opportunity to engage member organisations in dialogue in respect of its Equality Scheme and Action Plan. A list of those organisations which attended is also provided at Appendix 1.

¹ The Equality Coalition is a broad alliance of non-governmental organisations working to ensure that the equality duty is put into practice, and to increase the public profile of the equality agenda in Northern Ireland. The Coalition consists of members of all the categories covered by Section 75 of the Northern Ireland Act. The Northern Ireland Council for Ethnic Minorities (NICEM), Disability Action, Women's Support Network, the Upper Springfield Development Trust and the Linc Resource Centre are among the founder members of the Equality Coalition.

Internally within NIAS, the Trust engaged with Trade Union representatives through the HR Joint Consultative Group and the Equality Forum to help inform the final draft document for consultation. The Trust's Equality Scheme was also presented to the Trust Board.

In addition to the outcome of the engagement set out above, at the closing date of the consultation process 10 written responses were received. Responses included constructive suggestions for improvement. A list of those who provided a written response is provided at Appendix 2.

Action Taken by the Trust

The Trust considered all the written responses and feedback provided throughout the formal consultation process in full and took account of these responses in the production of the final scheme submitted to ECNI. A summary of responses received and the Trust's response to is provided at Appendix 3.

The Trust will make every effort to communicate widely the existence and content of our Equality Scheme. We will write to all consultees to advise of the availability of the approved Equality Scheme on our website. An Easy Read version has also been produced and documents will be made available in other alternative formats on request.

Having considered and analysed the information and feedback received during the consultation process and made amendments where appropriate, the updated Equality Scheme and Action-based Plan was approved internally and subsequently submitted to the Equality Commission. NIAS received formal approval for its Equality Scheme has now been received.

Attendees at Regional Consultation Workshops**Health and Wellbeing Centre, Bradbury Place Belfast 21 February 2011**

Name	Organisation
Alison Irwin (<i>Speaker</i>)	N.H.S.C.T.
Barry Fitzpatrick	NICEM
David Mann	RNIB
Donna Heaney (<i>Speaker</i>)	Equality Commission NI
Ellen Finlay	Women's Support Network
Fiona Carroll	RCN
Frances Murphy	Contact A Family
Hilary Sidwell (<i>Speaker</i>)	W.H.S.C.T.
Ita McErlean	R.O.S.P.A.
Joan Peden (<i>Speaker</i>)	B.H.S.C.T.
Jocelyn Harpur	Speech & Language Therapy (South Eastern Trust)
Denise O'Boyle	Older People's Advocate
Siobhan Branton	Women's Resource & Development Agency
Louise Beckett (HR)	B.H.S.C.T.
Lynda Gordon (<i>Speaker</i>)	S.H.S.C.T.
Marion Ritchie	Chair of Trust Trade Union side South Eastern Health & Social Care Trust
Mary Creaney	Suicide Awareness & Support Group
Michael Wright	RNIB
Michelle Lemon (<i>Speaker</i>)	N.I.A.S.
Orla Barron (<i>Speaker</i>)	B.H.S.C.T.
Susan Thompson (<i>Speaker</i>)	SE HSCT
Suzanne McCartne (<i>Speaker</i>)	SE HSCT
Veronica McEneaney	Health & Social Inequalities, B.H.S.C.T.
Walter Stafford	D.H.S.S.P.S.
Angela Crocker	Speech & Language, B.H.S.C.T.
Miriam Gibson	HR, B.H.S.C.T.
Maureen Doyle	Health & Social Inequalities, B.H.S.C.T.

Equality Coalition Event, Unison Headquarters, 9 March 2011

Name	Organisation
Natalie Whelehan	Children's Law Centre
Elaine Campbell	Age NI
Barry Fitzpatrick	NICEM
Eoin Rooney	NICEM
Patricia McKeown	UNISON
Fidelma Carolan	UNISON
Colin Flinn	Cara-friend and Queerspace
John McCormick	Carers NI
Debbie Kohner	CAJ
Matthew McDermott	The Rainbow Project
Judith Cross	Age NI
Patrick Yu	NICEM
Patricia Bray	Disability Action
Thomas Mahaffy	UNISON
Pamela Dooley	UNISON
Paschal McKeown	Mencap
Aideen Gilmore	Committee for the Administration of Justice

Written Responses Received During Consultation

1.	Autism NI
2.	Committee on the Administration of Justice
3.	Disability Action
4.	Equality Coalition
5.	Equality Commission for Northern Ireland
6.	Northern Ireland Council for Ethnic Minorities
7.	Older People's Advocate
8.	Omagh District Council
9.	UNISON
10.	UNITE

SUMMARY OF RESPONSES TO CONSULTATION ON NORTHERN IRELAND AMBULANCE SERVICE EQUALITY SCHEME

COMMENT	NIAS RESPONSE AND CHANGES TO EQUALITY SCHEME
<p>Recommend that NIAS clarifies in the Equality Scheme that the Action Plan will not form part of the approved Scheme.</p> <p>Recommend quarterly reporting to senior management on progress against Service Delivery Plans and Corporate Plans.</p> <p>Elaborate in section 3.2.5 on additional steps to ensure effective consultation.</p> <p>Include link at para 2.5 to NIAS website.</p> <p>Insert full contact details and textphone/SMS number at section 4.13</p>	<p>Chapter 2 of the Scheme makes it clear that that Action Plan does not form part of the Scheme approved by the ECNI. The Action Plan has been removed from the Scheme.</p> <p>Paragraph 2.11 of the Scheme amended to state that progress will be reported quarterly to the Trust's Equality Steering Group and regularly to Trust Board and to the Senior Executive Management Team.</p> <p>NIAS will develop a programme of awareness-raising on the Section 75 statutory duties and the commitments in our Equality Scheme by displaying information in this regard on our website and providing this to any service user or other panels established. The Trust will produce guidance on good practice engagement and consultation for managers to ensure effective consultation processes. Specific training will be provided to those facilitating consultations to ensure that they have the necessary skills to communicate effectively with consultees. Paragraph 3.2.5 amended accordingly.</p> <p>Link to website included.</p> <p>Textphone number included.</p>

<p>Recommend that section 4.34 includes undertaking that NIAS will send monitoring information to consultees in addition to publishing on Trust website.</p> <p>Clarify at section 5.4 that staff in NIAS will receive briefing on the Equality Scheme within six months of Scheme approval in accordance with the Model Equality Scheme.</p> <p>Outline in section 6.3 the arrangements for providing information to children and young people and people with learning disabilities</p> <p>Equality Scheme should specify the timeline within which the Trust will respond to requests for information in alternative formats. The timeline should be as short as possible.</p> <p>Commitment by senior officers to ensure that equality scheme timetables and action plans are integrated into business and corporate plans.</p> <p>Specific deadlines should be set as required in the model scheme.</p>	<p>For all HSC Trusts, Health and Social Care Trusts monitoring information will be made available on the Trust's website. The Trust's commitment within its Equality Scheme to publish quarterly screening outcome reports and screening templates demonstrates openness and transparency in regard to screening decisions. Consultees will be informed of the Trusts' process for publication of screening documents.</p> <p>Paragraph 5.4 amended as requested.</p> <p>Paragraph 6.3 amended to say that Information will usually be made available in alternative formats within 20 working days.</p> <p>Paragraph 6.3 of the Equality Scheme has been amended to say that requests for information to be made available in alternative formats will be made within 20 working days.</p> <p>Objectives and targets relating to the statutory duties will be integrated into strategic and operational business plans. The Action Plan and Audit of Inequalities will be living documents and will be reviewed, revised and extended as new evidence is gathered. The Chairman and Chief Executive are committed to having in place effective internal arrangements to ensure effective compliance with the Section 75 statutory duties and for monitoring and reviewing progress. Progress on implementing the Equality Scheme will be reported quarterly to the Trust's Equality Steering Group, chaired by the Chief Executive and Trust Board and to the Senior Executive Management Team.</p> <p>The Trust is committed to ensuring action measures are specific, measurable, linked to achievable outcomes, realistic and time bound. Action measures include performance indicators and timescales for their achievement.</p> <p>NIAS has worked collaboratively to with other HSC Trusts to develop its Equality</p>
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<p>Equality Schemes should be customised to Trust functions.</p> <p>Equality Schemes should be both inward and outward looking – relevant to both the service users and those who work in the Trusts. Schemes should explain more fully the role of the Trusts.</p> <p>It is essential that a comprehensive collection of evidence is undertaken under the Trusts’ schemes.</p> <p>The causes on inequalities are not addressed in the ECNI guidance and Trusts’ audit of inequalities. Not sure how Trusts can set out actions, outputs and outcomes without identifying causes of inequalities.</p> <p>Need for more consultation and research on the inequalities suffered by ethnic and religious minorities. A gap analysis of inequalities is missing – should be included in the first year of Trusts’ action plans.</p> <p>There should be a full review of the audit of inequalities and action plan after the first year included in the Trusts’ annual reports to the ECNI.</p>	<p>Scheme, Action Plan and Audit of Inequalities using the ECNI’s model scheme as a framework. The Scheme has been customised where appropriate to reflect NIAS’s specific functions and role as an emergency service. The Action Plan includes specific measures for NIAS and measures which will be undertaken regionally across all HSC Trusts.</p> <p>The Scheme is designed to be relevant to both staff and service users. The services the Trust provides to the public are set out at paragraph 1.3 of the Scheme and our organisational structure and responsibilities are set out in Chapter 2. Arrangements for staff training are in Chapter 5.</p> <p>The Trust will gather information of staff and service users within each of the Section 75 categories as part of the Equality Screening process. We will collect and analyse qualitative and available quantitative data in order to monitor any adverse impact of policies and to identify opportunities to better promote equality of opportunity. The Audit of Inequalities will be revised and updated as new research and evidence becomes available.</p> <p>The audit of inequalities aimed to identify inequalities for specific Section 75 groups rather than the underlying causes of those inequalities. ECNI guidance did not address the specific causes of inequalities, but HSC Trusts, as well as indentifying specific inequalities, would also seek to address the causes of inequality by improving health outcomes across all disadvantaged groups.</p> <p>The Audit of Inequalities identified specific inequalities faced by members of ethnic minority communities. The Trusts’ Action Plan includes a review of the provision of interpretation services for people whose first language is not English and documents in other languages.</p> <p>The Trust will produce annual reports on progress made on implementing the arrangements set out in the Equality Scheme to discharge Section 75 statutory duties. We will monitor our progress on the delivery of our action measures annually and update the action plan as necessary to ensure that it remains effective and relevant to our functions and work.</p>
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<p>Action Plans should identify group-specific actions, outputs and outcomes.</p> <p>Information in the audit is sparse. Update Audit of Inequalities. Carry out a better audit of services re: needs of older people. The submission includes a summary of key reports. Audit of Inequalities needs to be regularly updated.</p> <p>Commitment should be given that complaints, whether internally from staff or externally from service users and carers, are dealt with empathetically, transparently and quickly.</p> <p>The Audit should contain a statistical profile of main users and staff, including a breakdown of managerial roles/Board members particularly of those Section 75 groups who might be under-represented: gender, age, disability and ethnic minority groups.</p> <p>When developing information need to consider older people: with no formal education, or no IT skills or equipment; with sensory impairments; with learning disability; who live in isolation with little access to IT, especially in rural areas.</p>	<p>The Action Plan includes group-specific actions including the availability of information in alternative formats, easy-read and large print, how best to communicate with children and young people, provision of interpreters and building accessibility.</p> <p>There has been a comprehensive review of the research relating to older people and the older people's section of the audit has been updated and additional regional actions identified. As a result of this feedback the 'Emerging Themes' document has been amended to include the reports suggested for inclusion. The 'Emerging Themes' document will be a living document and Trusts are committed to regularly reviewing relevant literature, updating the working document and amending the Action Based Plan as required.</p> <p>The Trust's complaint's process plays a vital role in the continuous improvement of our services and it is important that everyone can make a complaint. Chapter 8 of the Equality Scheme sets out the Trust's arrangements for handling complaints. All complaints will be treated sympathetically, investigated thoroughly and resolved within specific timescales. The Trust provides staff training on its complaints process</p> <p>The Equality Scheme commits NIAS to consider equality data when carrying out Equality Screening and Equality Impact Assessments of policies and therefore review demographic information referred to. The audit will be kept under review and added to with further research that becomes available. There are particular challenges associated with monitoring service users in the context of providing an emergency ambulance service which the Trust will continue to discuss with HSC colleagues to improve monitoring data available. Plans for a S75 audit of staff are included in the action plan.</p> <p>Noted. These comments will be included in the discussions at the Communication Sub Group and also at the Regional Accessible information Group.</p>
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<p>Needs to be ongoing consultation with users and particularly older people who currently use 70% of the available services.</p> <p>Recognise and respond to the different needs of groups – not one size fits all approach</p> <p>The Equality Scheme needs to be user friendly – particularly in the use of language.</p> <p>Equality Scheme needs to identify which actions are directed at enhancing equality within the organisation as well as providing equality of opportunity for service users.</p> <p>Need to commit to review audit on a regular basis</p> <p>It is important that all Trusts find a way to consult meaningfully and directly with users.</p> <p>Staff awareness training in respect of the needs of different S75 groups should be ongoing and include engagement with and delivery by organisations with the relevant knowledge.</p>	<p>Arrangements for consultation with Section 75 groups are set out in Chapter 3 of the Equality Scheme. This comment will be included in the consultation feedback on the PPI Strategy. There has been a comprehensive review of the research relating to older people and the older people's section of the audit has been updated and additional regional actions identified.</p> <p>Health and Social Care Trusts have worked collaboratively to develop their Equality Schemes and Action Plans and on the audit of inequalities. Where appropriate, the NIAS Equality Scheme has been customised and actions have been included in the Action Plan which reflects the specific nature of the ambulance service.</p> <p>The Health and Social Care Trusts have produced an Easy Read version of the Scheme and a summary version will also be provided.</p> <p>Some measures in the Equality Scheme will have benefits for staff and services users exclusively while other measures will benefits both groups. These are identified in the Equality Scheme.</p> <p>The audit of inequalities will be kept under review by all HSC Trusts</p> <p>Noted.</p> <p>NIAS recognises that awareness raising and training is crucial to the effective implementation of our Section 75 duties. we have introduced an effective communication and training programme for all staff. NIAS has worked with a range of external agencies with relevant knowledge to deliver Section 75 training, including equality training provided by Trademark. Training and awareness raising programmes will, where relevant, be developed in association with the appropriate Section 75 groups and our staff. The Trust will, where possible, work closely with other bodies and agencies in the development and delivery of training.</p>
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<p>Consideration should be given to the needs of older people who may wish to return to work after a period of unemployment, being made redundant or after children have left home or because of financial pressures.</p> <p>There needs to be monitoring of private service provision including staff training on S75, cost of living pay, guaranteed overtime pay or time in lieu and training in understanding the needs of older people and developing care packages to meet those needs.</p> <p>Older people are among the main users of services and there is substantial research which should be included in the audit.</p> <p>The audit needs to be monitored and assessed annually to ensure that policies that do not seem to be working for older people can be updated.</p> <p>It is important to develop new ways of including S75 groups who are not already represented in the workforce including: examining where positions are advertised; considering affirmative action; using criteria such as experience and skills rather than academic qualifications, shadow or mentoring schemes, ensuring that buildings are suitable for users and staff; and a breakdown of staff by S75 groups to ensure that their needs are met.</p> <p>From 2012, women will be in the workplace for 5 additional years. Consideration will need to be given to key areas which impact on this group such as:</p>	<p>The Trust has a range of effective equality policies in place, including a comprehensive Recruitment and Selection Policy, a Reasonable Adjustment Policy and a range of Work Life balance Flexible Working and Special Leave Policies.</p> <p>There will be further discussion with Contracts Managers on implementing the ECNI Guidance on: Equality of Opportunity and Sustainability and Procurement. The Equality Scheme Action Plan contains an action to ensure contract compliance by all external contractors with S75 equality duties.</p> <p>Noted. Further research in this respect has been added to the audit which will be kept under review in this regard.</p> <p>The audit of inequalities will be reviewed in collaboration with other HSC organisations.</p> <p>Noted. Action Plan reflects actions in respect of Employment Equality including a S75 audit of staff. The Trust will pick these up through ongoing equality employment activities including Article 55 Review, engagement with ECNI and with trade unions through the Trust's Equality Forum and Human Resources Joint Consultative Group.</p> <p>Noted</p>
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<p>not being able to carry on a job which requires considerable physical strength; retraining to be able to diversify and use skills differently; provision of flexible working hours and part-time working; returning to work once children have grown up.</p> <p>Foreword has separate page numbers from the main document.</p> <p>The word appropriate should be removed from the necessary resources statement.</p> <p>The Director of Human Resources and Corporate Services duties does not include any cognisance of good practice issued by the ECNI.</p> <p>Welcome the commitment to report progress on implementing the Equality Scheme but believe that “regularly” should be replaced by a set timescale (paragraph 2.11).</p> <p>Equality Scheme should state that the audit of inequalities is a living document that will be amended as evidence is gathered (paragraph 2.13).</p> <p>Where the audit of inequalities has identified information/evidence gaps, NIAS must commit to commission new research.</p> <p>Concerned that there is no commitment to ongoing</p>	<p>Page numbering in foreword has been revised.</p> <p>“Appropriate” has been removed from the necessary resources statement in the foreword.</p> <p>Paragraph 2.3 of the Equality Scheme has been amended accordingly.</p> <p>Paragraph 2.11 has been amended to say that progress on implementing the Scheme will be reported quarterly to the Trust’s Equality Steering Group.</p> <p>Paragraph 2.13 amended to reflect the fact that the audit of inequalities will be a living document.</p> <p>NIAS has worked collaboratively with the other Health and Social Care Trusts to develop the audit of inequalities. The audit of inequalities will be kept under review with regard to new research and work with other Trusts.</p>
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<p>consultation with representative groups and affected individuals as the action plan evolves (paragraph 2.16). Monitoring and evaluation of action plan should be ongoing to ensure new data and information can be effectively used in a timely manner (paragraph 2.17).</p> <p>NIAS should commit to consultation on the audit of inequalities and the screening of policies.</p> <p>Note that NIAS refers to “formal consultation”, but no definition of informal consultation” to enable informed comment to be made.</p> <p>Recommends that the list of consultees be reviewed and updated on a regular basis.</p> <p>Targeted consultation must be monitored and reviewed to ensure that it is open and accountable to all representative and affected individuals and does not result in a closed shop list of consultees.</p> <p>NIAS should make direct reference to its attitude and plans for pre-consultation (paragraph 3.2.1).</p> <p>Where a policy is implemented immediately without consultation, Equality Scheme should include commitment to post-implementation consultation (paragraph 3.2.6).</p> <p>No Appendix 7 (paragraph 3.2.8).</p> <p>Regarding policies adopted from other public</p>	<p>We will seek input from our stakeholders on our action plan, monitor our progress on the delivery of our action measures annually and update the action plan as necessary to ensure that it remains effective and relevant to our functions and work (paragraphs 2.16 & 2.17).</p> <p>The audit of inequalities will be reviewed in collaboration with other HSC organisations. The Equality Scheme sets out the process for publication of the outcome of screenings in line with ECNI guidance.</p> <p>Noted. Reference to “Informal consultation” has been removed from the Equality Scheme.</p> <p>Paragraph 3.4 states that the consultation list will be reviewed annually to ensure it remains relevant to our functions and policies.</p> <p>Noted.</p> <p>The Trust will engage with individuals and representative groups as early as possible to identify how best to consult or engage with them.</p> <p>Paragraph 3.2.6 has been amended to say that if a policy must be implemented immediately, we will consult after implementation of the policy in order to ensure that any impacts are considered.</p> <p>Paragraph 3.2.8 amended to read Appendix 6.</p>
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<p>authorities, whilst taking into account any assessment carried out by other public authorities, NIAS has statutory duty obligations. ECNI guidelines with respect to policies should be followed irrespective of the source of the policy.</p> <p>Policies which may appear at first glance to be devoid of equality implications require a fresh look to determine if there are any implications.</p> <p>Policy and decision makers should receive general training on Section 75 and specific training on each of the 9 categories. NIAS must establish a process and provide training for those making decisions on the likely impact of a policy on equality of opportunity.</p> <p>Equality screening decisions should be signed-off by a member of the senior management team.</p> <p>Community/voluntary organisations cannot check public authority websites on a daily basis. Consultees should be informed as soon as possible of the outcome of equality screening rather than having to wait up to for the publication of quarterly screening reports on the website. Particularly important where a policy has been screened out.</p> <p>Policies may at first sight appear devoid of equality implications but may on subsequently be found to have an adverse impact on one or more groups.</p>	<p>We will follow ECNI guidelines on adopted policies. Paragraph 3.2.10 says that any previous assessments and consultations on a policy will be taken into consideration.</p> <p>Noted.</p> <p>The Trust's training plan includes training to provide those staff involved in policy development/decision making and the assessment of policies (screening and EQIA) with the necessary skills and knowledge to do this work effectively.</p> <p>Equality screenings are signed-off by the appropriate manager with the Trust with lead responsibility for the policy (i.e. the policy decision-maker who has authority to make changes to the policy). The lead manager may not necessarily be a member of the senior management team.</p> <p>The Trust's commitment within its Equality Scheme to publish quarterly screening outcome reports and screening templates demonstrates openness and transparency in regard to screening decisions. Consultees will be informed of the Trusts' process for publication of screening documents.</p> <p>Screening decisions will be kept under review. Paragraph 4.14 of the Equality Scheme states that if a consultee raises a concern about a screening decision based on evidence, NIAS will review the decision.</p>
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<p>NIAS should commit to involving Section 75 groups and affected individuals in the screening process as early as possible.</p> <p>Note the absence of a timescale for staff briefing on the approved equality scheme.</p> <p>Recommend that S75 training should be reviewed and updated accordingly. Where training is centralised, NIAS must use its influence on the training provider.</p> <p>The necessary resources must be allocated to the provision alternative formats.</p> <p>No specific timeline for the provision of information in alternative formats.</p> <p>No details of arrangements for providing information to children and young people, people with learning disabilities, and minority ethnic communities – this should be addressed in the revised scheme.</p> <p>Disability Action requests further information on NIAS interpreting services and whether it includes British/Irish Sign Language.</p>	<p>Screening will be completed at the earliest opportunity in the development or review process. NIAS will endeavour to involve key stakeholders in the screening process.</p> <p>Appendix 4 of the Equality Scheme (Timetable for measures proposed) includes the development of a detailed training plan to include awareness of the Equality Scheme by June 2011.</p> <p>Training will be kept up to date in line with ECNI guidance. Training will be evaluated to assess to what extent those being trained have acquired the necessary knowledge and skills.</p> <p>NIAS is committed to providing information in alternative formats where reasonably practicable. Where the exact request cannot be met, NIAS will ensure that a reasonable alternative is provided.</p> <p>We will respond to requests for information in alternative formats within a reasonable timeframe. The exact timescale will be contingent on the specific nature of the request.</p> <p>We will provide information in alternative formats such as Easy Read and in minority languages to meet the needs of those whose first language is not English, usually within 20 working days. The Trust is committed to liaising with representatives of young people and minority ethnic organisations.</p> <p>The Trust will work alongside the Board and representative organisations to develop a Regional Interpreting Strategy. Regional sign language interpreting support has been established. A telephone interpreting service for those people who call an ambulance in an emergency and who may not speak English is available 24 hours a day, 365 days a year, and provides professional and confidential interpreters in more than 170 languages. Emergency staff also have access to a Multi-Lingual Phrasebook which covers basic emergency questions in over 40 of the most commonly spoken languages and includes sign language. It is more difficult to provide a Sign Language</p>
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<p>The Complaints Procedure should outline how NIAS will support individuals to complaints (e.g. interpreter services, specialist transport costs and advocacy services). The Complaints procedure must be fully accessible and proactively disseminated to those affected by the S75 duties.</p> <p>Departures from ECNI model scheme noted: removed commitment to seek input from stakeholders when reviewing action plan and to consult on “other matters relevant to S75 duties; resources that will be committed to ensure S75 compliance have been qualified from “necessary” to “necessary and appropriate resources”.</p> <p>Inform consultees when screening forms posted on website. Concerned that reports will only be sent out on a quarterly basis.</p> <p>Equality Scheme should go further than the ECNI’s model and explain the relationship between equality of opportunity and good relations.</p> <p>Data gaps identified in the audit of inequalities should be addressed</p>	<p>interpreter in a time-critical emergency situation, however, NIAS will engage with regional HSC colleagues in this context.</p> <p>Service users will be made aware of their right to complain and given the opportunity to understand all possible options for pursuing a complaint. The Trust will ensure that complainants have the support they need to articulate their concerns and successfully navigate the system. NIAS will promote equal access and provide appropriate facilities for people with disabilities and those who first language is not English, including interpretation services). The Patient and Client Council can also provide free and confidential advice, information and help to make a complaint. This might include help with writing letters, making telephone calls, and supporting an individual at meetings. Specialist advocacy services may also be available.</p> <p>Noted – Equality Scheme amended accordingly.</p> <p>Policies will be posted on the website as they are completed and approved. Consultees will be informed on a quarterly basis of the additional policies that have been posted on the website in accordance with ECNI guidance and the Model Equality Scheme. The Trust’s commitment within its Equality Scheme to publish quarterly screening outcome reports and screening templates demonstrates openness and transparency in regard to screening decisions.</p> <p>An explanation of the relationship between good relations and promoting equality of opportunity as well as additional paragraphs from the ECNI’s Guidance on Section 75 has now been included.</p> <p>An extensive literature review was carried out on all Section 75 categories. Gaps in information identified by consultees have been noted and many already addressed.</p>
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<p>Recommend in the Action Plan the collation of data and research regarding accessibility to services by all S75 groups on a sub-regional basis. For example, in the Western area, any decision taken on changes to service provision impacts on a greater number of the Catholic community and, in particular, Catholic women with children/carer responsibilities</p> <p>Chapter 2 - NIAS should recognise its accountability to the community and ensure that ambulance provision is equitable to everyone in a catchment area.</p> <p>Equality Scheme should go further than the ECNI's model and explain the relationship between equality of opportunity and good relations.</p> <p>Endorse and support the Equality Scheme and committed to playing a role in improving services and including staff in every aspect of equality. Believe that the steps taken by NIAS in relation to its statutory duties and the mechanisms introduced internally and externally are the way forward. Endorse newly established Equality Forum and believe NIAS has structures and people in place to make a difference to the promotion and implementation of legislation and policies.</p> <p>Should more clearly explain the relation between the equality and good relations duties.</p> <p>Should make it clear that the Action Plan does not</p>	<p>However this area will be discussed further with other HSC colleagues.</p> <p>NIAS recognises the concerns raised Equality screening and EQIAs undertaken regarding significant changes to service provision will take account of demographics outlined. .</p> <p>NIAS is committed to fulfilling its S75 obligations to all parts of the community. We recognise the important role that the community and voluntary sector and the general public have to play to ensure the statutory duties are complied with. The Equality Scheme seeks to demonstrate how we will ensure there are opportunities for people affected by our work to positively influence how we carry out our functions.</p> <p>An explanation of the relationship between good relations and promoting equality of opportunity as well as additional paragraphs from the ECNI's Guidance on Section 75 has now been included.</p> <p>Noted</p> <p>Noted</p>
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<p>detract from the statutory responsibility to ensure that all functions are scrutinised re: equality.</p>	<p>Noted</p>
<p>There should be a common definition of function.</p>	
<p>The foreword varies from the model scheme where it says the Trust will devote “necessary <i>and appropriate</i> resources” to comply with the statutory duties. Foreword should also state commitment to take “all necessary steps” to comply with the statutory duties.</p>	<p>Noted</p> <p>Noted. ““Appropriate” has been removed from the necessary resources statement in the foreword.</p>
<p>Provide more information on the context within which the Trust provides its services.</p>	
<p>Make clear that the Audit is a living document.</p>	<p>Noted and Equality Scheme amended accordingly where appropriate to contextualise the Scheme and relate it to its functions, the staff that it employs, and the population that it serves.</p>
<p>Monitor progress more frequently than annually</p>	<p>Noted.</p> <p>The Trust has established a more regular monitoring process. Progress on implementing the Equality Scheme will be reported quarterly to the Trust’s Equality Steering Group. Issues relating to equality and procurement are included in a key measure in the Equality Action Plan.</p>
<p>Set out clear procedure to ensure that the views of those consulted on have been fully considered.</p>	<p>Noted. Mainstreaming Section 75 is a key measure in the EAP.</p>
<p>Procurement: Must acknowledge that procurement is a function to which the equality duty applies.</p>	
<p>Need to include a full list of contractors and sub-contractors.</p>	<p>These have been considered. Equality and Procurement is a key measure within the HSC Trusts Action Plan. All measures regarding procurement will be considered through a regional work stream.</p>
<p>Should include measures that will more systematically ensure that unwritten policies are fully</p>	

<p>screened etc.</p> <p>Should make a specific commitment to discharging the equality obligation in its function of employment. The submission outlines a range of recommendations to be considered re employment. These include the following: Review of employment , policies covering all designated equality groups; recognition within policies of the nature of multiple oppressions and discrimination, visible integration of equality policy and health and safety policy given the strategic links such as sexual harassment, etc.</p> <p>Equality Screening: Report on screening recommendations shall be issued. Inform consultees.</p> <p>Constantly update consultee list.</p> <p>Essential that the Trust makes clear that financial considerations will not be a basis for limiting the equality impact assessment.</p> <p>Advised strongly to acknowledge policies which have been immune to challenge in the past require a fresh look.</p> <p>Recommendations re: procurement that strengthens the Trust's responsibilities to ensure that commissioning documents contain a proper process of equality assessment and commit both the provider and the purchaser to delivery and review of the service in light of the equality groups in the legislation. The Trust should commit to implementing</p>	<p>The Scheme recognises at paragraph 4.1 that any proposed, amended or existing strategy, policy initiative, practice or decision, whether written or unwritten, should be subject to equality screening.</p> <p>The Trust will engage through local partnership mechanisms on employment issues and reflect this in the Action Plan.</p> <p>A quarterly report on screening will be posted on to the Trust website. Consultees will be informed. This is specified in the Scheme.</p> <p>Consultee list will be updated annually.</p> <p>Decisions on EQIAs will be made on the basis of information gathered for equality screening and will be proportionate to the decision being made.</p> <p>Equality screening will be carried out as part of policy reviews.</p> <p>Procurement and equality is one of the key themes included in the Equality Action Plan which will give full consideration to the ECNI guide. See Section A: Theme 6.</p>
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<p>the ECNI's Equality of Opportunity and Sustainable Development in Public Sector Procurement (2008).</p> <p>Scheme should make more explicit that training is not dependent on grade, responsibilities or training needs assessments. Resources should be set out.</p> <p>Complaints: Implementation of the Scheme should be constantly reviewed to ensure that Section 75 groups are confident that they will get support and redress.</p> <p>Over the past 10 years there should have been collaborative research carried out by HSC organisations.</p> <p>Audit should have been more comprehensive e.g. include impact of Trust's functions and policies on TSN areas; challenges facing Trust on securing greater equality of opportunity.</p> <p>The significance of high levels of social deprivation and long term unemployment. Link with Health Inequalities.</p> <p>The Audit should be used to inform future screenings and EQIAs.</p> <p>Will the Audit of Inequalities inform the way that the Trust's budget is allocated?</p> <p>Lack of clear link between Audit and Action Plan.</p> <p>Little evidence of Trade Union involvement in the</p>	<p>Some changes have been made to enhance this section. This is a key measure in the Equality Action Plan.</p> <p>The Scheme includes a requirement for the Trust to review Scheme regularly to evaluate its effectiveness in relation to the implementation of the Section 75 duties.</p> <p>Noted. Regional HSC Trust approach to development and implementation of the Scheme plus regular review of Audit of Inequalities.</p> <p>Noted. Audit reviewed following consultation. Will continue to be updated.</p> <p>Noted.</p> <p>The Action Plan was informed by the results of the Audit of Inequalities.</p> <p>Information from the Audit will be used as part of the Trust's Equality Impact</p>
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