**Lisburn & Castlereagh City Council**

**Section 75 Equality and Good Relations Screening template**

**Part 1. Activity/Policy Scoping**

**Information about the activity/policy**

# Name of the activity/policy

|  |
| --- |
| **Draft Disability Action Plan 2021-2025** |

Please attach copy of the activity/policy to this document.

# Is this activity/policy

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| An existing policy? |  | A revised policy? |  | A new policy? | **X** |

This is LCCC’s second Disability Action Plan. It is a statutory requirement for LCCC as a public authority to have a plan that states how, in relation to its functions, it proposes to fulfil the duties set out in Section 49A of the Disability Discrimination Act 1995, as amended (DDA). These duties are to “pay due regard to the need to: promote positive attitudes towards people with disabilities and to encourage participation by disabled people in public life”. As committed to in our Equality Scheme, it will go out to public consultation as a Draft Plan and will be amended accordingly as a result of any feedback received.

What are the intended aims/outcomes the activity/policy is trying to achieve?

|  |
| --- |
| 1 More positive attitudes towards disabled people |
| 2 Increased opportunities for participation by disabled people in public life |
| 3 LCCC compliance with statutory duties under Section 49A of the DDA |
| 4 |
| 5 |

Are there any expected benefits to the Section 75 categories/groups from this activity/policy? If so, please explain

|  |
| --- |
| The Draft Disability Action Plan sets out measures designed specifically to benefit disabled people. There may also be opportunities to benefit disabled people with multiple characteristics, eg, young/old, male/female, etc. |

Who initiated or wrote the activity/policy?

|  |
| --- |
| The Plan is a statutory requirement on Council and is therefore a corporate document. It was drafted by the Council’s equality officer and has to be approved by the Corporate Management Team, the Corporate Services Committee and eventually adopted by full Council. |

Who owns and who implements the activity/policy?

|  |
| --- |
| The Plan is a corporate document and includes measures that will be delivered across all Council departments. All Directors and Heads of Service are responsible for delivery in relation to their service areas. Progress is co-ordinated and reported on by the Equality Officer and annually to the Equality Commission. Responsibility for overall implementation of the Plan and compliance with the Duties rests with the Chief Executive. |

**Implementation factors**

Are there any factors which could contribute to/detract from the intended aim/outcome of the activity/policy/decision?

If yes, are they

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Financial? |  | Legislative? |  | Other? | **X** |

If other, please detail below

|  |
| --- |
| While commitments are included in the Plan, it can be a challenge to ensure that they are actually implemented as intended. The successful delivery of action measures is dependent on awareness of the plan and delivery of training and support as necessary across Council functions. |

**Main stakeholders affected**

Who are the internal and external stakeholders (actual or potential) that the activity/policy will impact upon?

|  |  |
| --- | --- |
| Staff | X |
| Service Users | X, and specifically disabled people |
| Other Public Sector Organisations – please list | Equality Commission – in relation to the ECNI’s oversight role for the DDA Duties and its joint monitoring role for the United Nations Convention on the Rights of Persons with Disabilities)  NI Human Rights Commission (in relation to joint monitoring role for the UNCRPD) |
| Voluntary/Community/Trade Unions – please list | Disability support groups  Other community groups |
| Other, eg, Elected Members – please list | Elected Members |

**Other documents/activities/polices with a bearing on this activity/policy**

|  |  |
| --- | --- |
| **Name of document/activity/policy** | **Who owns or implements document/activity/policy?** |
| 1 Equality Scheme | Chief Executive’s Dept/all services |
| 2 Equality Action Plan 2021-2025 | Chief Executive’s Dept/all services |
| 3 Communications activity | Corporate Communications & Admin |
| 4 HR policies and activity | HR & OD |
| 5 Consultations and surveys | All services |

The above would include both internal and external documents/activities/policies.

If there is a web-link/link to any of the above please provide details.

**Available evidence**

What evidence/information (both qualitative and quantitative) have you gathered to inform this activity/policy? Specify details for each of the Section 75 categories.

A range of sources have been considered, including the previous Disability Action Plan and annual progress reports to the Equality Commission; previous Equality Action Plan and annual progress reports to the Equality Commission; Equality Commission publications/guidance; reports produced by disability support groups, eg, Disability Action; relevant Council policies, etc.

|  |  |
| --- | --- |
| Sec 75 Category | Details of evidence/information |
| Religious Belief | Census 2011 data for LCCC – 23.95% of the LCCC population were brought up in the Catholic religion and 66.9% were brought up in the Protestant & Other Christian religions. 9.14% identified as no religion or ‘other non-Christian’  Census and other data do not analyse by religion and disability. |
| Political Opinion | There tends to be a generally accepted link between religious community background and political opinion in Northern Ireland. In this instance, the majority political opinion of LCCC residents is Unionist. In terms of elected representatives, members of LCCC (May 2019 local government elections) belong to a range of parties across the political spectrum: DUP – 15; UUP – 11; Alliance – 9; SDLP – 2; Sinn Fein – 2; Green Party NI – 1.  Census and other data do not analyse by political opinion and disability. |
| Racial Group | Census and other data sources do not analyse by disability and racial group. Reasonable to suppose the proportion of people from racial minority groups with a disability will mirror the population as a whole at approximately 20%.  Census 2011 data suggests approximately 2% of the population are from a Black or Minority Ethnic group. |
| Age | Census 2011 data on age of LCCC population:  0-15 years - 20.3%  16-64 years – 62.3%  65+ years – 17.4%  Levels of disability increase with age.  The Family Resources Survey 2018-19 indicates that 8% of children in the UK have a disability. |
| Marital Status | Census and other data do not analyse by disability and marital status.  Census data for the 16+ population:  30.65% single  53.78% married  0.10% same sex partnership  3.27% separated  5.52% divorced  6.68% widowed |
| Sexual Orientation | Census data or other data sources do not analyse disability by sexual orientation. It is fair to suggest that the proportion of disabled people who are LGB will reflect the population as a whole – estimated at a minimum of 2%. However, some LGB&T support groups suggest that a much higher proportion of the population may identify as something other than 100% heterosexual. |
| Men & Women Generally | The LCCC population (2017) was 51% female and 49% male. This reflects the overall NI position.  No evidence of different level of disability by gender although some disabilities may affect more males or females. Some evidence of Trans people facing particular issues. |
| Disability | Estimated that approximately 1 in 5 (20%) people in Northern Ireland (and LCCC) have a disability – 18.29% in last Census but likely to be an under-reporting as many people do not define themselves as ‘disabled’ even though they meet the legal definition in the DDA.  [Reports](https://www.equalityni.org/Blog/Articles/October-2019/Diversity-and-Disability-in-Public-Life) from the Commissioner for Public Appointments and the Equality Commission have identified that disabled people are significantly under-represented in public life and have made recommendations for addressing barriers. |
| Dependants | There is limited analysis of the dependant status of the NI population and LCCC but there is some official data on the 75,000 carers’ allowance claimants. DfC information suggests that women are more than twice as likely to be a carers’ allowance claimant and therefore have care responsibilities for dependants who are elderly or disabled. 64% of claimants are 35-64 years old, and 31% are 65+.  Carers include those who care for children/young people, older people or those with a disability. Some carers will also have a disability themselves. |

### Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular activity/policy/decision? Specify details for each of the Section 75 categories

|  |  |
| --- | --- |
| **Sec 75 Category** | **Details of needs/experiences/priorities** |
| Religious Belief | No evidence of different experience or needs of disabled people according to religion in relation to this Disability Action Plan. |
| Political Opinion | No evidence of different experience or needs of disabled people depending on their political opinion |
| Racial Group | Disabled people who are from a minority ethnic background may face difficulties understanding their rights and how Council’s DAP is relevant to them. Information may need to be targeted to race support groups. The barriers experienced by disabled people generally may be compounded for those of different nationalities, etc. |
| Age | Older disabled people may not find it as easy to access information or to understand how the DAP is intended to benefit them. Additional steps may be needed to inform and communicate. Many older people will also meet the statutory definition of ‘disabled’ and will experience double disadvantage. |
| Marital Status | No different experience/needs identified |
| Sexual Orientation | Disabled people who are lesbian, gay or bisexual may face additional barriers to acceptance or participation – multiple disadvantage. |
| Men & Women Generally | Men and women’s lived experience of disability may be different. Disabled women may experience all the barriers encountered by women generally in relation to under-representation in public life, employment, etc. There is evidence of particular barriers and discrimination faced by Trans people which will be compounded for disability. |
| Disability | Disabled people are more likely to have fewer educational qualifications and less likely to be employed than non-disabled. Disabled people face attitudinal barriers as well as physical and accessibility barriers. They are more likely to require adjustments to enable them to participate on an equal basis. |
| Dependants | Disabled people who are themselves carers will face challenges in terms of having time to be involved in public life. |

**Part 2. Screening questions**

1 What is the likely impact on equality of opportunity for those affected by this activity/policy, for each of the Sec 75 equality categories? (minor/major/none\*)

|  |  |  |
| --- | --- | --- |
| **Sec 75 Category** | **Details of activity/policy impact** | **Level of impact (minor/major/none\*)** |
| Religious Belief | The measures in the DAP will potentially benefit all disabled people, regardless of religious belief or any other personal characteristic | No differential impact identified |
| Political Opinion | The measures in the DAP will potentially benefit all disabled people, regardless of political opinion | No differential impact identified |
| Racial Group | The measures in the DAP will potentially benefit all disabled people, regardless of racial background | No differential impact identified |
| Age | As more older people have disabilities, more older people may potentially benefit from the measures in the DAP | Minor - positive |
| Marital Status | The measures in the DAP are intended to potentially benefit all disabled people, regardless of marital status | No differential impact identified |
| Sexual Orientation | The measures in the DAP are intended to potentially benefit all disabled people, regardless of sexual orientation | No differential impact identified |
| Men & Women Generally | The measures in the DAP are intended to potentially benefit all disabled people, regardless of gender. | No differential impact identified |
| Disability | The measures in the DAP are specifically designed to benefit disabled people. | Significant - positive |
| Dependants | The measures in the DAP are intended to potentially benefit all disabled people, regardless of whether or not they have dependants. There is potential for some indirect benefit to those who care for a disabled dependant if the plan’s measures deliver positive outcomes for the disabled person. | Minor - positive |

\*See Appendix 1 for details.

2 Are there opportunities to better promote equality of opportunity for people within the Sec 75 equality categories?

|  |  |  |
| --- | --- | --- |
| Sec 75 Category | IF Yes, provide details | If No, provide details |
| Religious Belief |  | None identified through this screening exercise. Can be kept under review over the life of the plan. |
| Political Opinion |  | None identified through this screening but can be kept under review. |
| Racial Group | Effort could be made to ensure that people from minority groups are aware of the DAP and are encouraged to participate in any public life measures.  Training and awareness sessions should include reference to multiple identity so Council staff are aware of intersectionality in relation to their services/ work.  Council should also be aware of appropriate use of imagery, for example, images of disabled people could include people who are from a Black or minority ethnic background. |  |
| Age | Images of disabled people of different ages could be used in communications material.  The different needs of disabled people of different ages can be highlighted in staff training.  Effort can be made to ensure that all age groups are encouraged to participate in any public life activity. |  |
| Marital Status |  | None identified |
| Sexual Orientation | Effort can be made to ensure that staff are aware of multiple identity issues when dealing with disability |  |
| Men & Women Generally | Effort can be made to ensure that images of disabled people are representative of both sexes.  Staff can be alert to the need to ensure that public life measures and participation opportunities are taken up equitably by all. Monitoring may identify other issues. |  |
| Disability | The Disability Action Plan’s key purpose is to promote equality for disabled people. |  |
| Dependants |  | None identified other than some potential for indirect benefit for people who care for a disabled dependant. |

3 To what extent is the activity/policy likely to impact on good relations between people of different religious belief, political opinion or racial group? (minor/major/none\*)

|  |  |  |
| --- | --- | --- |
| Good Relations Category | Details of activity/policy impact | Level of impact (minor/major/none\*) |
| Religious Belief |  | No specific impact identified through this screening exercise |
| Political Opinion |  | No specific impact identified |
| Racial Group |  | No specific impact identified |

\*See Appendix 1 for details.

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

|  |  |  |
| --- | --- | --- |
| Good Relations Category | IF Yes, provide details | If No, provide details |
| Religious Belief |  | Not at this time, but can be kept under review |
| Political Opinion |  | As above |
| Racial Group |  | As above |

**Additional considerations**

**Multiple identity**

Provide details of data on the impact of the activity/policy on people with multiple identities. Specify relevant Section 75 categories concerned.

|  |
| --- |
| As identified above, disabled people generally are intended to benefit from the Council’s Disability Action Plan commitments. Disabled people will have other equality characteristics which may impact on how they are perceived, treated, participate in or benefit from Council activities and services.  For example, a person who has a disability and is Black may experience challenges a White disabled person may not. Likewise, young disabled people may have different service requirements than older disabled people and may need different opportunities to participate or adjustments to be made.  Disabled people who are lesbian, gay or Trans may experience additional challenges and barriers to participation. |

**Part 3. Screening decision**

There are 3 screening decision outcomes, as noted below.

Choose only 1 of these and provide reasons for your decision outcome and ensure evidence is noted/referenced for any decision outcome reached.

|  |  |
| --- | --- |
| Screening Decision Outcomes Options | Reasons/Evidence |
|  |  |
| Option 1  Screen out without mitigation |  |
| Option 2  **Screen out with mitigation** | Equality screening of the Draft Disability Action Plan has concluded that a full Equality Impact Assessment is not necessary. This is because the draft plan is actively intended to promote equality of opportunity for disabled people and should only have positive impacts. No negative impacts have been identified for any equality group.  However, efforts should be made to ensure that the outworking of the Plan is monitored so that disabled people with different personal characteristics benefit equitably from the measures it proposes.  The plan needs to be promoted widely, including to those disabled people who do not have English as a first language and to disabled people who face other barriers in accessing information about Council provision or barriers to participation. It can be made available in alternative languages and formats on request. |
| Option 3  Screen in for a full EQIA |  |
|  |  |

**Mitigation (Relevant to Option 2)**

When the public authority concludes that the likely impact is ‘minor’ and an equality impact assessment is not to be conducted, the public authority may consider mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Can the activity/policy/decision be amended or changed or an alternative activity/policy introduced to better promote equality of opportunity and/or good relations?

If so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative activity/policy.

|  |
| --- |
| This is a draft Disability Action Plan. Note will be taken of any feedback regarding further mitigation. It will also be reported on and reviewed on an annual basis and updated or amended accordingly. |

**Timetabling and prioritising (Relevant to Option 3) -** Not applicable

Factors to be considered in timetabling and prioritising activities/policies for equality impact assessment.

If the activity/policy has been **‘screened in’** for equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the activity/policy in terms of its priority for equality impact assessment.

|  |  |
| --- | --- |
| Priority criterion | Rating (1-3) |
|  |  |
| Effect on equality of opportunity and good relations |  |
| Social need |  |
| Effect on people’s daily lives |  |
| Relevance to a public authority’s functions |  |
|  |  |
| Total Rating Score |  |

Is the activity/policy affected by timetables established by other relevant public authorities?

If yes, please provide details

|  |
| --- |
| N/A |

**Part 4. Monitoring**

Public authorities should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007).

The Commission recommends that where the activity/policy has been amended or an alternative policy introduced, the public authority should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Effective monitoring will help the public authority identify any future adverse impact arising from the activity/policy which may lead the public authority to conduct an equality impact assessment, as well as help with future planning and activity/policy development.

Who will undertake and sign-off the monitoring of this activity/policy and on what frequency?

Please give details below:

|  |  |
| --- | --- |
| Will be undertaken by:  Name & Position/Job Title: | Frequency (eg. Annually): |
| Equality Officer in relation to the Plan as a whole | Progress will be monitored on a quarterly basis and the Plan reviewed at the end of each business year. It will be reported on formally on an annual basis through Council structures and to the Equality Commission in line with statutory Equality and Disability Duties reporting requirements. |
| Heads of Service/Directors in relation to their service area | Departments will report on progress on an annual basis and will contribute to the annual review. |
|  |  |
| Will be signed-off by: |  |
| Name & HoS Title: | Caroline Magee |
|  | Head of HR & OD |
|  |  |

**Part 5 - Approval and authorisation**

|  |  |  |
| --- | --- | --- |
| **Screened by:** | **Position/Job Title** | **Date** |
|  |  |  |
|  |  |  |
| Mary McSorley | Equality Officer | 07/04/21 |
| **Approved by:** |  |  |
| Caroline Magee | Head of Service | 02/11/21 |

Note: A copy of the Screening Template, for each activity/policy screened should be ‘signed off’ and approved by a senior manager responsible for the activity/policy, made easily accessible on the public authority’s website as soon as possible following completion and made available on request.

Appendix 1

Major impact:

1. The policy is significant in terms of its strategic importance;
2. Potential equality matters are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
3. Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
4. Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;
5. The policy is likely to be challenged by way of judicial review;
6. The policy is significant in terms of expenditure.

Minor impact

1. The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
2. The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
3. Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
4. By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

No (none) impact

1. The policy has no relevance to equality of opportunity or good relations;
2. The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Appendix 2

The following documentation (as a minimum) should be available to support the screening outcome decision:

* A written copy of the activity/policy in question;
* The screening template duly completed with the screening decision made explicit;
* All evidence utilised/referenced to support the screening decision to be available.