



**Derry City & Strabane**  
District Council

Comhairle  
**Chathair Dhoire &  
Cheantar an tSratha Báin**

**Derry Cittie & Stràbane**  
Destrict Cooncil

## **Final Equality Impact Assessment Decision Report following consultation**

**Draft Equality Action Plan 2024-2027**

**Draft Disability Action Plan 2024-2027**

December 2024

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## Executive Summary

# Final Equality Impact Assessment Decision Report - Equality Action Plan and Disability Action Plan

In line with our commitments regarding Section 75 of the Northern Ireland Act and Section 49A of the Disability Discrimination Act 1995 (as amended), Derry City and Strabane District developed a new [draft Equality Action Plan](#) and a new [draft Disability Action Plan](#) for the period 2024-2026.

These plans were informed by previous feedback from consultees and service users and an [Audit of Inequalities](#) that was carried out in 2023. In line with the commitments in our [Equality Scheme](#), the plans have been subjected to equality screening for impacts on equality of opportunity and good relations and to identify opportunities to better promote equality of opportunity and/or good relations. The plans have also been considered for rural needs impacts.

The Council's Governance and Strategic Planning Committee considered the two draft plans and the associated Audit of Inequalities and screening reports at a meeting on 9 January 2024.

Equality screening has not identified any potential negative impacts for any group in relation to the proposed actions. However, given that both plans have significant implications for equality of opportunity and good relations, in line with Equality Commission guidance, the Committee approved a proposal to carry out a public consultation.

The purpose of the consultation was:

- (1) to ensure that there are no impacts and/or mitigations that have not been identified through the screening process
- (2) to get feedback from affected groups/service users on the proposed actions, and
- (3) to get feedback on the Audit of Inequalities which informed the draft plans and evidence of other inequalities that Council needs to take into account in its future policy making and service delivery.

The public consultation ran from 7 June to 9 September 2024.

Feedback from consultation was generally positive and there were no suggestions that any actions in the draft plans were not welcome. However, stakeholders made some suggestions for other actions and areas for future attention to better promote equality of opportunity. These suggestions will be reflected in the final plans and in policy/service development.

Following the consultation, the plans have been updated as appropriate and submitted for Council approval. As required, the Disability Action Plan will be submitted to the Equality Commission.

The final plans will be publicised on the Council's website and progress against both plans will be reviewed annually and reported in the annual Progress Report to the Equality Commission.

## **1 Introduction**

Section 75 of the Northern Ireland Act 1998 requires Derry City and Strabane District Council, in carrying out its powers and duties, to have due regard to the need to promote equality of opportunity:

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

In addition, without prejudice to its obligations above, the Council must have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

Section 75 requires Derry City and Strabane District Council to develop an Equality Scheme which sets out how it will fulfil these statutory duties. This Scheme has to be approved by the Equality Commission and reviewed every five years.

Council's [Equality Scheme](#) commits the Council to assess how policy proposals impact on the promotion of equality of opportunity and good relations. If significant potential impacts are identified, a more detailed equality impact assessment, which includes consulting with those likely to be affected by the policy/project, may be required.

While not a statutory requirement, Council has committed in its Equality Scheme to maintain an Equality Action Plan and has now developed a new Plan for the period 2024-2027.

Under Section 49A of the Disability Discrimination Act 1995 (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), Derry City and Strabane District Council also has duties, when carrying out its functions, to have due regard to the need to:

- Promote positive attitudes towards people with a disability and
- Encourage the participation of disabled people in public life.

This legislation requires Council to develop and maintain a Disability Action Plan which sets out how we will fulfil these duties. The plan must also be submitted to the Equality Commission. A new plan has been developed for

the period 2024-2027.

This final Equality Impact Assessment (EQIA) report relates to the new Equality Action Plan and new Disability Action Plan and the Audit of Inequalities which informed these plans.

Copies of this EQIA report and associated documents are available on our website at [www.derrystrabane.com/equality](http://www.derrystrabane.com/equality)

If you have any queries about this document, and its availability in alternative formats, please contact: Policy Officer (Equality), Harbour House, Derry, BT48 6AF.

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## 2 Background and Aims of the Equality Action Plan and Disability Action Plan

### Equality Action Plan

Although not a statutory requirement, in its Equality Scheme, Derry City and Strabane District Council commits to producing an Equality Action Plan. The purpose of the plan is to set out actions designed to address identified inequalities or potential inequalities in relation to the Council's functions and service delivery for the different equality groups covered by Section 75. It also includes actions to support the promotion of good relations.

The duty to screen for impacts on equality of opportunity for different groups and consider opportunities to better promote equality and/or good relations is **in addition to** obligations under anti-discrimination law not to discriminate on grounds of religious belief, political opinion, sex, race, disability, sexual orientation and age.

Progress against the Equality Action Plan is reported annually in Council's Section 75 Progress Report to the Equality Commission.

Council has developed a new Equality Action Plan for the 2024-27 period. The plan does not include every action that Council will take that assists in the promotion of equality of opportunity and/or good relations. It is designed to help address any key inequalities that exist and ensure a focus on emerging issues.

The action measures in the Plan relate to Council's latest **Audit of Inequalities (2023/24)** and are set out under the following inter-related thematic areas:

- Mainstreaming
- Policy and Practice Review
- Monitoring and Review
- Training and Awareness
- Service Delivery
- Council Motions and Resolutions.

## Disability Action Plan

The Disability Discrimination Act (1995) Disability Duties (introduced 2006) recognise that, despite anti-discrimination law and the positive duty to promote equality of opportunity for people with disabilities under Section 75, disabled people still face significant disadvantage.

The duties on public bodies to promote positive attitudes towards people with a disability and to encourage their participation in public life are **in addition to** disabled people's rights under the Disability Discrimination Act (for example, the right to have reasonable adjustments that ensure access to employment or services) and the requirement for public bodies to consider policies and practices for negative impact and opportunities to better promote equality of opportunity (Section 75 duties).

Council has developed a new Disability Action Plan for the period 2024-2027 which details the measures it intends to take in order to implement the Disability Duties.

Through the initiatives identified in the Plan, Council will endeavour to:

- Promote understanding
- Raise awareness
- Challenge stereotypes, and
- Encourage respect.

Ultimately, the Disability Action Plan measures are intended to make life better for people with disabilities.



### 3 Consideration of available data and research

In developing the latest Equality and Disability Action Plans, Council has carried out equality screening exercises (see Appendix 1 and 2) as required by Section 75 of the Northern Ireland Act and considered rural needs (as required by the Rural Needs Act 2016).

Council has taken into account a wide range of information and evidence, including:

- Analysis of progress made against previous plans
- Feedback, advice and guidance from the Equality Commission
- Feedback from stakeholders and individuals/service users
- Feedback from Elected Members
- Evidence from Council's latest [Audit of Inequalities](#)
- Feedback gained through previous consultations, including on our [Inclusive Strategic Growth Plan](#) (Community Plan)
- Customer service feedback, including complaints
- Analysis of Census data and other NISRA data
- Relevant external research, for example, the Expert Panel reports to the Department for Communities to inform key Northern Ireland Executive equality strategies for gender, disability, sexual orientation; Equality Commission research on Key Inequalities; and research carried out by community and voluntary sector organisations representing Section 75 groups.
- Additionally, feedback from stakeholders and the public was sought through the public consultation that ran from May to September 2024. This further feedback is reflected in this updated impact assessment report.

## 4 Consideration of Impacts for Section 75 Groups

The initial screening questionnaires which identify the impacts of the action plans are set out in Appendices 1a and 1b. A summary of this analysis along with the results of the consultation exercise is provided below.

**Religious belief** - Equality screening has not identified any negative impact related to religious belief for the proposed actions in either the Equality Action Plan or the Disability Action Plan. Both plans are intended to apply regardless of religious belief.

We have identified that there may be minor positive impacts from the commitment in the Equality Action Plan to equality screen policies and initiatives as screening may identify opportunities to better promote equality and good relations.

We would welcome any evidence that suggests there may be impacts and/or mitigations related to religious belief that have not been identified.

**There was no feedback from public consultation that suggests there may be other impacts and/or mitigations needed in relation to religious belief.**

**Political Opinion** – Equality screening has not identified any negative impact related to political opinion of the proposed actions in either the Equality Action Plan or the Disability Action Plan. Both plans are intended to apply regardless of political opinion.

We have identified that there may be minor positive impacts from the commitment in the Equality Action Plan to equality screen policies and initiatives as screening may identify opportunities to better promote equality and good relations.

We would welcome any evidence that suggests there may be impacts and/or mitigations related to political opinion that have not been identified.

**There was no feedback or evidence from public consultation that suggests there may be other impacts and/or mitigations needed in relation to political opinion.**

**Racial Group** - Equality screening has not identified any negative impact for any racial group for the proposed actions in either the Equality Action Plan or the Disability Action Plan. Both plans are intended to apply regardless of racial background.

We have identified that there may be minor positive impacts from the commitment in the Equality Action Plan to equality screen policies and initiatives as screening may identify issues and opportunities to better promote equality and good relations.

There are some specific actions that are intended to address underrepresentation or low participation among minority racial groups as identified in the Audit of Inequalities so there may be minor positive impacts from these. Examples include a commitment to ensure information is accessible to all, targeting minority groups to increase their use of leisure facilities and targeting people from minority ethnic groups for enterprise support programmes.

We would welcome any evidence that suggests there may be impacts and/or mitigations for any racial group that have not been identified.

**Feedback from consultation suggests that actions to target underrepresentation are welcome but that more are needed. There was no feedback that suggests potential negative impacts for any racial group.**

**Age** – Equality screening has not identified any negative impacts on grounds of age for either action plan.

We have identified that there may be minor positive impacts for different age categories related to some actions in the Equality Action Plan. For example, there are specific actions in the Plan that are targeted at children and young people and older people in response to identified needs, known inequalities or lower participation rates (for example in physical activity programmes). Actions such as our Age Friendly activities and Policing and Community Safety Partnership (PCSP) initiatives will particularly impact positively on some older people. Young

people are a specific target group for employability and enterprise support programmes, good relations activity and Child Friendly actions.

The commitment in the Equality Action Plan to equality screen all programmes and projects may also identify potential opportunities to better promote equality of opportunity and/or good relations.

We have also identified that there may be minor positive impacts related to the Disability Action Plan for some older people as there is a correlation between older age and disability. People of all ages who have a disability may benefit in future from changes in attitudes towards disability and increased involvement of disabled people in public life which leads to their experience and views informing Council policies and practices.

We would welcome further evidence of any potential impacts and/or mitigations for different age groups that have not been identified.

**Feedback from consultation did not suggest any potential negative impacts for people of different ages. There was some feedback that reinforced the need for Council to be alert to the needs of older people, particularly in relation to accessibility of services and in recognition of the link between older age and disability.**

**Marital status** – Equality screening has not identified any negative impact on grounds of marital status for the proposed actions in either the Equality Action Plan or the Disability Action Plan. Both plans are intended to apply regardless of marital status.

We have identified that there may be minor positive impacts from the commitment in the Equality Action Plan to equality screen policies and initiatives as screening may identify issues and opportunities to better promote equality.

We would welcome any evidence that suggests there may be impacts and/or mitigations on grounds of marital status that have not been identified.

**Feedback from consultation did not suggest any potential negative impacts in relation to marital status.**

**Sexual orientation** – Equality screening has not identified any negative impacts on grounds of sexual orientation for the proposed actions in either the Equality or Disability Action Plan.

We have identified that there may be minor positive impacts from the commitment in the Equality Action Plan to equality screen policies and initiatives as screening may identify issues and opportunities to better promote equality.

There is a specific action in the draft Action Plan to develop customer care guidelines for the LGBTQI+ community, which is intended to have a positive impact. Some Policing & Community Safety Partnership initiatives which include targeting hate crime may also have a positive impact.

We would welcome any evidence that suggests there may be impacts and/or mitigations on grounds of sexual orientation that have not been identified.

**Feedback from consultation did not suggest any potential negative impacts in relation to sexual orientation. Since the draft plan was published, Council has passed a Motion to look at options to support and work with the LGBTQI+ community. This has been added to the updated plan and should have a positive impact.**

**Men & Women generally** – Equality screening has not identified any actions in either the Equality Action Plan or the Disability Action Plan that would have a negative impact on men or women generally. Actions that are gender-specific are intended to address known/identified inequalities.

There will be potential positive benefits for some groups where actions are specifically targeted at addressing a known/identified inequality. For example, where women and girls are currently underrepresented in some leisure and sporting/physical activity programmes, specific targeting is intended to improve participation rates. Some Policing & Community Safety Partnership initiatives will potentially impact positively on women.

We would welcome any evidence that suggests there may be impacts and/or mitigations in relation to men or women that have not been identified.

**Feedback from consultation did not suggest potential negative impacts in relation to men or women. However, a number of comments were made about the specific needs of women, including women from different racial groups and women with disabilities, in relation to Council services.**

**Disability** – Equality screening has not identified any negative impacts of proposed actions in the Equality Action Plan and Disability Action Plan for people with disabilities. Both plans are intended to improve equality of opportunity for people with a disability.

There may be minor positive impacts for some disabled people from the commitment in the Equality Action Plan to equality screen policies and initiatives as screening may identify opportunities to better promote equality.

There are some actions in the Equality Action Plan that are specifically aimed at addressing known/identified inequalities faced by people with a disability. Examples include targeted initiatives to increase participation in leisure/sporting/physical activity services and programmes, arts activities, participation in public life and employability/enterprise support programmes.

The commitment to ensure accessibility of information and access to services for people with a disability is intended to have a positive impact.

All the actions in the Disability Action Plan are intended to have positive impacts for people with a disability – that is the primary aim of the Disability Duties.

We would welcome any evidence that suggests there may be impacts and/or mitigations that have not been identified and particularly welcome feedback from people with a disability and their representative groups.

We would also welcome suggestions for other actions Council should be taking or considering that would better promote equality of opportunity for people with a disability.

**Feedback from consultation did not suggest any evidence of potential negative impacts in relation to proposed actions. However, individuals and stakeholders made a number of suggestions for other actions that Council could take to better promote equality for people with disabilities.**

**People with or without dependants** – Equality screening has not identified any negative impacts of proposed actions in the Equality Action Plan and Disability Action Plan in relation to having or not having dependants.

We have identified that there may be minor positive impacts from the commitment in the Equality Action Plan to equality screen policies and initiatives as screening may identify issues and opportunities to better promote equality for different groups, including people with dependants.

There is a specific action to pilot leisure programmes tailored for women and girls with dependants which is intended to have a positive impact. Some people with care responsibilities for dependants (children, older people or those with a disability) will potentially benefit indirectly from actions that are targeted at these groups.

We would welcome any evidence that suggests there may be impacts and/or mitigations related to dependant status that have not been identified.

**Feedback from consultation did not produce evidence of any negative impacts of proposed actions. However, there were a few suggestions around further steps Council could take to better meet the needs of people with dependent children and family members with a disability.**

## **Good Relations**

Equality Action Plan – The Equality Action Plan includes actions that are specifically designed to promote good relations. Examples include through delivery of the Council’s Good Relations Strategy and Action Plan (TBUC funding) and the PEACEPLUS programme.

The commitment in the Equality Action Plan to screen all policies and initiatives for potential impacts will mean that where opportunities to better promote good relations are identified, they will be considered and addressed by a Designated Working Group in line with the Council’s Equality Scheme.



Disability Action Plan - Equality screening has concluded that the actions in the Draft Disability Action Plan are not directly relevant to the promotion of good relations.

**There was no feedback from the public consultation that relates directly to the promotion of good relations.**

## **5 Consideration of measures to mitigate any adverse impact and alternatives to better promote equality of opportunity**

The measures set out in both action plans are generally intended to address identified or potential inequalities and therefore to benefit affected groups.

The equality screening process that is committed to in the Council's Equality Scheme should ensure that any negative impacts identified in relation to any Council policy or initiative are considered for mitigation at the planning stage.

The consultation process was intended to ensure that Council will be made aware of any potential impacts that have not already been identified so that they could be addressed.

**There were no potential negative impacts raised by consultees in relation to either action plan.**

However, if potential negative impacts are identified in future, or other suggestions are made to better promote equality of opportunity, promote good relations, or more effectively implement the Disability Duties, these will be considered as part of the annual review process.

The consultation provided a number of areas and suggestions for future actions and these have been considered in finalising the plans and will be further considered in the annual review process.



## 6 Consultation

Following consideration of the draft Equality Action Plan, Disability Action Plan and Audit of Inequalities at a [meeting of the Governance and Strategic Planning Committee on 9 January 2024](#), Members approved a recommendation to progress an equality impact assessment, including public consultation.

The purpose of the consultation was:

- to get feedback on any impacts and/or mitigations that have not been identified through the screening process
- to get feedback from affected groups/service users on the proposed actions, and
- to get feedback on the Audit of Inequalities which informed the draft plans and obtain evidence of other inequalities relating to Section 75 groups that Council needs to take into account in its future policy making and service delivery.

In line with commitments in the Council's Equality Scheme, the consultation ran for 12 weeks (from 17 June to 9 September 2024).

Details of the consultation questions are provided at Appendix 2.

The consultation report which includes the consultation methodology, responses and implications for the amended action plans is set out in Appendix 3.

## 7 Next steps – Decision by Public Authority and Publication of Report on Results of EQIA

Following consideration of the consultation feedback, the two draft plans will be finalised and brought, along with this Final EQIA Report to the Governance and Strategic Planning Committee for decision and subsequent approval by Council.

Feedback received will be added to the Audit of Inequalities and communicated to staff to inform policy and service development/delivery.

Final versions of the plans, this updated EQIA report and the consultation report will be published on the Council's website and promoted to consultees and staff.

As required, the final Disability Action Plan will be submitted to the Equality Commission.

## **8 Monitoring for Adverse Impact in the Future**

While it is not anticipated that there should be adverse impacts from the implementation of either of the Action Plans, both plans will be subject to regular review which will identify any unforeseen impacts.

Specific actions will be monitored as appropriate and the overall plans will be reviewed annually and reported on to the Governance and Strategic Planning Committee as part of our Section 75 Annual Progress Reporting.

The Annual Report will be made available on the Council's website.

**Copies of this EQIA report and associated documents are available from the Policy Officer (Equality). Documents can be made available in alternative formats/languages on request.**

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# Appendices

## Appendix 1 a Draft screening questionnaire – draft Equality Action Plan



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Draft Equality Action F

## Appendix 1 b Draft screening questionnaire – draft Disability Action Plan



Draft Screening Draft  
Disability Action Plan

## Appendix 2

### Consultation Questions

- 1.1 Are there any **data, needs or issues** in relation to any of the Section 75 equality categories that have not been identified in the Audit of Inequalities and Equality screening reports for the draft Equality Action Plan and draft Disability Action Plan? If so, what are they? Please provide details of any evidence.
- 1.2 Are there any **impacts** in relation to any of the Section 75 equality groups that have not been identified in the Equality Impact Assessment document for the Equality Action and Disability Action Plans? If so, what are they? Please provide details of any evidence.
- 1.3 Are there other actions that you think Council should prioritise in the **Equality Action Plan**? Please provide details and rationale.
- 1.4 Are there other actions that you think Council should prioritise in the **Disability Action Plan** to better promote positive attitudes towards people with a disability and encourage their participation in public life? Please provide details.

1.5 Are there any other comments you would like to make in relation to this consultation generally?

## Appendix 3

### Report on public consultation on Draft Equality and Disability Action Plans 2024-2026

#### 1 Introduction

As a public authority, under Section 75 of the Northern Ireland Act, Derry City and Strabane District Council has to comply with statutory equality and good relations duties when carrying out our functions.

Specifically, we must have “due regard to the need to promote equality of opportunity between:

- 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
- persons with dependants and persons without.”

We must also have “regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.”

Our Equality Scheme sets out how we propose to fulfil these duties. While not a statutory requirement, one of our commitments is to produce an Equality Action Plan.

Our last Equality Action Plan covered the period 2020-2023 and we consulted on a new plan for the years 2024-2026.

Under Section 49A of the Disability Discrimination Act (DDA) 1995, Council must also comply with statutory “Disability Duties”. These duties are in addition to our duty to make reasonable adjustments under the DDA and to consider the needs of people with a disability under Section 75. They require us to:

- Promote positive attitudes towards disabled people, and

- Encourage participation of disabled people in public life.

Section 49B of the DDA requires us to develop a Disability Action Plan and submit it to the Equality Commission. Our last plan also covered the period 2021-2023 and we consulted on a new plan for 2024-2026.

## **2 Consultation methodology – how we consulted**

Our public consultation on the Draft Equality and Disability Action Plans opened on 17 June 2024 and closed on 9 September 2024.

It was promoted on our website and via social media channels. In addition, details were sent directly to all the organisations on our Section 75 consultee list (c200 contacts), to Disability-related contacts (29), to stakeholders who have attended meetings of our Equality Assurance and Oversight Group, and to contact databases held by various departments, including Community Development and Good Relations.

Consultation documents included the following:

- Draft Equality Impact Assessment (EQIA) report on the two plans
- Draft Equality Action Plan with associated screening report
- Draft Disability Action Plan with associated screening report, and
- Draft Audit of Inequalities 2023.

Consultees were invited to send feedback via a short survey on the website consultation hub but were encouraged to provide feedback in any other format that suited, for example by email or telephone. There was also an offer to meet with stakeholders if they wished and an offer to provide consultation information in alternative formats or languages on request.

A meeting of the Council's Equality Assurance and Oversight Group was held on 4 September to discuss the draft plans. A summary of the proposed actions in the two plans was presented and feedback invited. Feedback from an earlier meeting of the Oversight Group (15 May 2024) has also been considered as consultation feedback.

We received requests for consultation documents in Word and hard copy format and hard copies/large print versions were provided at the meeting on 4 September. There were no requests for information in other languages.

### **3 Overview of respondents**

There was a lower-than-expected response to the online consultation survey. Analysis suggests a total of 197 visits to the consultation hub page, with 21 visits to the consultation survey, but only five actively engaging. Individual consultation documents – EQIA report, draft screening reports, draft action plans and draft Audit of Inequalities - were viewed/downloaded between 7 and 33 times.

Only two valid responses were received via the consultation survey on the website – one from RNIB and one anonymous; the others had clicked through the survey but no feedback was recorded.

Four responses were received via email, three from individuals (a parent of a child with a disability, a person with acquired brain injury, and a staff member who has a disability) and a substantive response from Mencap on behalf of people with a learning disability.

An Equality Assurance and Oversight Group (EAOG) meeting held on 4 September, specifically to seek feedback on the draft plans, attracted representatives from RNIB, Foyle Down Syndrome Trust, Ardnashee School and College, Mencap and the North West Migrants' Forum.

An earlier meeting of the EAOG also received feedback from organisations representing older people (COSY) and the women's sector (The Women's Centre Derry and Foyle Women's Information Network) which has been reflected in Council's consideration of the draft plans.

### **4 Consultation responses - summary of feedback**

#### **4.1 Comments relevant to the draft action plans**

No respondent disagreed with the proposed actions or asked for any actions to be removed from the draft plan.

Several respondents, including stakeholders who attended the meeting of the Equality Assurance and Oversight Group on 4 September, specifically commented that they were very pleased with the range of actions included. Comments and feedback reflected the remit of stakeholders who responded/attended meetings and covered issues relating to disability and the needs of Black & Minority ethnic people, including refugees and asylum seekers, and women/carers.

**Suggestions for further actions or focus in the future included:**

- **Employability support for disabled people** - Mencap, RNIB, Ardnashee School and College, and Foyle Down Syndrome Trust all agreed the current proposed actions are welcome but felt more is needed.

RNIB specifically recommended that Council take further action to encourage local employers to provide more work experience and job opportunities for people with disabilities. They also requested that Council promotes the Department for Communities Access to Work support programme. Mencap suggested that the target to ring fence posts for disabled people could be more ambitious.

- **Training** - Mencap specifically requested that training in Learning Disability be made more explicit in the Disability Action Plan.

An individual respondent (parent of a child with a disability), commenting on the draft Disability Action Plan, welcomed the commitment to training in disability awareness/issues for staff but reinforced the need for **ongoing** training and awareness raising for staff. They also recommended that Council works with and/or takes advice from Disability Sport NI in relation to sports/leisure provision for children/people with disabilities.

- **Accessibility of Information** – respondents wanted more proactive provision of key information, for example, information provided in Easy Read or short video format for people with certain disabilities, including learning disability, rather than ‘on request’. Where information and surveys etc are communicated on the council website, hard copy and Word versions of documents should be readily available.
- **Special provision for disadvantaged groups** including newcomer communities, migrants, refugees and asylum seekers, particularly those who cannot afford mainstream provision, for example, sports/leisure activities.
- **Language support** for those who do not have English as a first language.

- **Special provision for women/carers** where they are under-represented as service users.
- **Co-design approach** to developing programmes and services.
- **Accessibility of services for people with a learning disability** – Mencap recommended that bespoke initiatives should be considered for people with a learning disability.
- **Role of Equality Assurance and Oversight Group** – Mencap made a number of suggestions around the role of this group. For example, Council should consider involving the group in planning events, in reviewing the effectiveness of equality screening exercises and reporting on progress against the equality and disability action plans.
- An individual respondent suggested that more awareness of acquired brain injury as a disability is required. There should be more consideration of accessibility provision that reflects the particular circumstances and needs of people with brain injury and those who have developed mental and cognitive disability as a result of stroke. Council plans should mitigate substantive and historic inequalities for disabled people and reflect need. People need information to be accessible in order to be able to access services. There needs to be more awareness of the specific situation of women with disabilities as they will experience greater vulnerability due to social and cultural barriers, etc.
- A respondent via the website survey (anonymous) suggested that consultation between Rural and Urban groups is important (Equality Action Plan); and consultations between community groups and disability organisations to gather as much information as possible (Disability Action Plan).
- Suggestions, including how the plans and progress against them are publicised on the council website, were made by a staff member.
- Amendments of an editorial/formatting nature were suggested by staff.

#### **4.2 Comments on the Equality Screening Reports and EQIA report**



There were no direct comments on either screening report or the EQIA report.

### **4.3 Comments/feedback on Audit of Inequalities**

RNIB, Mencap and one individual respondent provided information to be added to the Audit of Inequalities.

### **4.4 Other comments**

RNIB made a number of recommendations as a member of the Equality Coalition which relate to public authority Equality Schemes generally and to the screening process. They suggested that these would enhance the effectiveness of equality screening, clarify the relationship between equality and good relations duties, and improve the overall effectiveness of Section 75.

## **5 Council consideration of feedback**

Council greatly welcomes feedback from stakeholders and the additional information provided will be appended to the Audit of Inequalities document and promoted to staff. Feedback from this consultation will be shared so it can be used in the equality screening process to inform policy and service delivery, where relevant.

It is not considered that the current draft plans require significant amendment to actions that can be delivered/progressed in year 1 of the plans. However, new actions have been added for years 2 and 3 and plans updated to reflect feedback.

The Equality Action Plan has also been updated to reflect work that has been progressed since the draft plans were developed:

- Council Motion (passed March 2024) - Council has established a Working Group to explore options to support and work with the LGBTQI+ community.
- Council Motion (passed July 2023) – Council pledged to work towards becoming a Dementia Friendly city and district.

Both plans will be reviewed at the end of the 2024-25 business year (year 1) as part of the Section 75 statutory progress reporting process.

General feedback regarding the Council’s Equality Scheme and screening process will be considered as part of the statutory 5-year review of the Scheme (due in 2025). Changes to the current Equality Scheme and screening arrangements require consultation with the Equality Commission.

Council will continue to engage with key stakeholders and through the Equality Assurance and Oversight Group mechanism and will respond to suggestions/feedback on an ongoing basis, as appropriate.

**Council’s response to feedback is summarised in the table below:**

Feedback	Council response/ Recommended action	Lead responsibility
<b>Target for ring-fenced jobs for disabled people</b> could be more ambitious (Mencap).	Target in Disability Action Plan to be reviewed for years 2 & 3 (Action 2.8).	Lead HR officer
Consider providing more <b>employability support (work placement and job opportunities, including volunteering)</b> for students/people with disabilities (EAOG, FDST, RNIB, Mencap, Ardnashee School and College)	To be addressed under Action 2.10 of Disability Action Plan and Measures 46 & 47 of Equality Action Plan.	Lead HR officer  Director Business & Culture
Can Council take further action to encourage employers to provide <b>more opportunities for disabled people and promote awareness of employability support</b> (eg, DfC Access to Work Scheme) to employers? (RNIB, EAOG)	The needs of people with disabilities will be considered in relevant Council economic development initiatives, eg, Labour Market Partnership programmes.  Council will take any available opportunities to promote awareness of support	HR/Economic Development          HR/Economic Development

	programmes to employers we work with.	
Mencap requested that specific mention of <b>training in learning disability</b> be added to the training actions.	Disability Action Plan updated and learning disability now clearly referenced (Action 2.5). Learning disability will be included in the training programme for year 2.	Equality Officer
<b>Training in disability issues</b> should be ongoing (member of the public/service user)	Council agrees with this feedback. Disability issues will be reflected in training programme on an ongoing basis.	Relevant Heads of service to identify training needs. Equality Officer to coordinate.
Council should work with and take advice from Disability Sport NI in relation to leisure/sports provision for children/people with disabilities (member of the public/service user)	Council Sports & Leisure teams already take advice from Disability Sport NI and other advisory/expert groups, eg, Mae Murray Foundation.  There is also regular consultation with local disability support groups and service users and this will continue.	Lead Health and Community Officer  Sports Services Managers
<b>Accessibility of Information</b> – respondents suggested more proactive provision of alternative formats (Mencap)	Council’s current policy is to provide alternative formats on request. However, where there is a known need/demand for particular formats, information should be made available routinely as part of publication planning.  Council’s Accessible Information Guidance is due for review in year 1 of the Equality Action Plan. (Measure 10).	Marketing team  Relevant Heads of Service  Equality Officer to coordinate review and provide advice
<b>Special provision for disadvantaged groups</b> including newcomer communities, migrants, refugees and asylum	Targeted provision already included in Equality Action Plan (for example, Measure 29) and in service delivery plans and Performance Objectives for	Relevant Heads of Service

<p>seekers, particularly those who cannot afford mainstream provision, for example, sports/leisure activities (EAOG, North West Migrants' Forum, The Women's Centre, Foyle Women's Information Network, Mencap).</p>	<p>services including leisure provision for 2024-25.</p> <p>Feedback to be shared with relevant services for consideration in business planning in years 2 and 3.</p>	<p>Equality Officer</p>
<p><b>Language support</b> for those who do not have English as a first language (NWMF).</p>	<p>Feedback to be shared across council services for consideration in future business planning.</p>	<p>Equality Officer</p> <p>Heads of Service</p>
<p><b>Special provision for women/carers</b> where they are under-represented as service users (The Women's Centre, FWIN)</p>	<p>Provision already included in Equality Action Plan (Action Measure 29).</p> <p>Feedback to be shared across council services to inform future business planning.</p>	<p>Relevant Heads of Service</p> <p>Equality Officer</p>
<p><b>Co-design approach</b> to developing programmes and services (Mencap, RNIB, EAOG)</p>	<p>Council is committed to a co-design approach to business planning.</p>	<p>All Heads of Service</p>
<p><b>Accessibility of services for people with a learning disability</b> – Mencap recommended that bespoke initiatives should be considered.</p>	<p>This feedback will be shared and all relevant services encouraged to consider in relation to their activities.</p> <p>Sports Services is already working with Mencap to ensure accessibility of gyms/leisure facilities. Learning from this will be implemented across venues.</p>	<p>Relevant Heads of Service</p> <p>Sports Services Managers</p>

<p><b>Role of Equality Assurance and Oversight Group:</b> Council should consider involving the group in planning events, in reviewing the effectiveness of equality screening exercises and reporting on progress against the equality and disability action plans. (Mencap)</p>	<p>It is already planned that the Group will be consulted on a scheduled review of council guidance on accessible information and organising accessible events.</p> <p>The EAOG will have the opportunity to comment on the effectiveness of equality screening exercises.</p> <p>The Group will also be updated on progress against the action plans at scheduled meetings.</p>	<p>Lead Democratic Services and Improvement Officer/Equality Officer</p> <p>Lead Democratic Services and Improvement Officer/Equality Officer</p>
<p>An individual respondent suggested that <b>more awareness of acquired brain injury as a disability</b> is required.</p>	<p>Relevant feedback will be shared as appropriate and available information will be circulated to staff.</p> <p>Consideration will be given to training in year 2/3 of the training programme.</p>	<p>Equality Officer</p> <p>Equality Officer</p>
<p>Consultation between Rural and Urban groups is important (Equality Action Plan); and consultations between community groups and disability organisations (Member of the public)</p>	<p>Council agrees with this feedback and endeavours to facilitate such consultation routinely.</p>	<p>All relevant Heads of Service</p>
<p>Comments on how the plans and progress against them are recorded and publicised on the council website and to staff (Mencap, staff)</p>	<p>Council already publishes the annual Section 75 and Disability Duties Progress report (which is submitted to the Equality Commission) on its website. This report includes updates on actions in the two plans. The Equality Officer will ensure that such reports are publicised to the S75 consultee list and to staff.</p>	<p>Lead Democratic Services Officer/Equality Officer</p>

Editorial/formatting comments (from staff)	A number of formatting and editorial amendments have been made to the updated plans. The plans are now dated 2024-2027.	Equality Officer
Suggestions from RNIB relating to Council’s Equality Scheme and screening template (including addition of other questions relating to the Disability Duties)	<p>The DCSDC Equality Scheme is due for review in 2025 as per Equality Commission guidance. This feedback will be considered as part of that review. Proposed changes to the Scheme require approval from the Commission.</p> <p>Council’s screening template already includes questions regarding the Disability Duties and complies with Equality Commission guidance. The template will also be reviewed as part of the five-year review of the Equality Scheme and amendments considered as appropriate.</p>	<p>Lead Democratic Services Officer/Equality Officer</p> <p>Lead Democratic Services Officer/Equality Officer</p>

**Next steps**

The updated plans will go to the Council’s Governance and Strategic Planning Committee for approval. The final plans will then be added to the Council’s website and promoted to the Section 75 consultee list.

The final Disability Action Plan will be submitted to the Equality Commission. An Easy Read version will be made available.

This consultation report will be added to the Council’s website and communicated to the consultee list and to staff.

Progress against the actions in the two plans will be reviewed and reported to the Equality Commission in the annual S75 and Disability Duties Progress Report before 31 August 2025 and annually thereafter. The annual progress report is published on the council’s website.

The two plans will be updated, if necessary, following the annual progress reviews.

**A copy of this consultation report will be made available in other formats or languages on request.**

**Please request from [equality@derrystرابane.com](mailto:equality@derrystرابane.com)**

- 1 Draft Equality Action Plan 2024-2026
- 2 Draft Disability Action Plan 2024-2026
- 3 Draft Audit of Inequalities
- 4 Equality Screening report Draft Equality Action Plan
- 5 Equality Screening report Draft Disability Action Plan