

Northern Ireland Audit Office
Draft Equality Scheme
Summary of Consultation Responses

NIAO received responses from the Committee on the Administration of Justice (CAJ) and Disability Action on its draft equality scheme and draft action plan which had been issued for consultation over the period 1 April to 24 June 2011. The comments raised were taken fully into consideration in finalising the draft for submission to the Equality Commission for Northern Ireland (ECNI) for approval.

We have provided feedback to each consultee. A summary of the main points arising from consultation is set out below. Paragraph references relate to the ECNI Model Equality Scheme.

The submissions focused to a large extent on areas where the NIAO draft Equality Scheme had deviated from the ECNI Model Equality Scheme. While we understood the model to be a guide that could be adapted, we have decided to align our wording more closely with the ECNI Model Equality Scheme in a number of places in response to some of the points/concerns raised by consultees.

Comment	Received from	NIAO Response
Commitments to follow ECNI good practice or guidance should be strengthened in accordance with paragraphs 2.3, 4.3, 4.17 and 4.27 of the ECNI Model Equality Scheme.	CAJ	Wording in NIAO Scheme has been aligned with the paragraphs in the ECNI Model Equality Scheme.
Omission of ECNI Model Equality Scheme wording: <ul style="list-style-type: none"> • Making annual progress report to ECNI available on website (paragraph 2.8). • Completing screening at the earliest opportunity in the policy development/review process (paragraph 4.5). • Commitment to monitor more broadly to identify opportunities to better promote equality of opportunity (paragraph 4.28). 	CAJ CAJ Disability Action CAJ Disability Action	Wording inserted in NIAO scheme
<ul style="list-style-type: none"> • Commitment to carry out consultation in accordance with principles contained in the Equality Commission's Guide for Public 	CAJ Disability Action	Our commitment to fulfilling our Section 75 statutory duties had been set out in the Foreword and in chapters 2 and 3 of the

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<p>Authorities (paragraph 3.2)</p>		<p>consultation draft. For clarity, our scheme now includes the wording in paragraph 3.2.</p>
<ul style="list-style-type: none"> Liaison with representatives of young people and disability and minority ethnic organisations, taking account of existing and developing good practice (paragraph 6.3). 	<p>Disability Action</p>	<p>Our consultation draft committed to ensuring that the information we disseminate and the services we provide are fully accessible for all parts of the community in Northern Ireland. For further clarity we have added the wording in paragraph 6.3.</p>
<ul style="list-style-type: none"> Re consultees, developing a programme of awareness raising on section 75 statutory duties and the commitments in our equality scheme (paragraph 3.2.5). 	<p>Disability Action</p>	<p>We questioned the proportionality of this for NIAO and therefore continue to omit.</p>
<ul style="list-style-type: none"> Reference to NIAO liaising closely with the Equality Commission for Northern Ireland (paragraph 2.9). 	<p>CAJ Disability Action</p>	<p>Inserted that we would liaise with the Equality Commission – we propose to confer with the ECNI on the most suitable form of liaison (in addition to the more formal communication of annual progress reports already contained in the scheme etc).</p>
<ul style="list-style-type: none"> Regarding the accessibility of meetings, that NIAO will include the provision of childcare and support for other carers within the range of examples listed. 	<p>Disability Action</p>	<p>We will take appropriate measures to ensure full participation in any meetings that are held. The paragraph in the scheme provides examples and therefore is not exhaustive.</p>
<p>Chapter 1 contains a commitment to providing ‘necessary available resources’ in terms of people, time and money. ‘Available’ should be removed.</p>	<p>Disability Action.</p>	<p>We have retained the word ‘available’. This replicates the ECNI Model Equality Scheme.</p>
<p>To meet its statutory duty obligations, NIAO must more than ‘consider’ how best to make relevant information in appropriate formats available to consultees (paragraph 3.2.9).</p> <p>Comments also raised on NIAO’s wording on providing alternative formats in paragraphs 4.22, 6.3, 9.1 and 9.3.</p>	<p>Disability Action</p>	<p>Throughout its scheme, NIAO has now aligned its wording on the provision of alternative formats with the ECNI Model Equality Scheme.</p>
<p>If screening concludes that the likely impact of a policy is ‘major’ in respect of one or more of the equality of</p>	<p>Disability Action</p>	<p>Wording aligned with ECNI Model Equality Scheme.</p>

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opportunities and/or good relations then the policy should be subjected to an EQIA.		
For clarity and transparency, the NIAO Equality Scheme must adhere to the ECNI screening report details listed in para 4.20.	Disability Action	We retained the wording in our consultation draft. The screening templates, accessible via our website or on request, will provide more detailed information.
Consultees to be informed when screening forms are posted on the NIAO website.	CAJ	We have not incorporated the suggestion to notify consultees when each screening form is posted on the website - we note this is not stated in the ECNI Model Equality Scheme. However, we have reviewed and changed the timeframe for issuing screening reports to consultees from six monthly to quarterly.
Regarding availability of screening outcomes on the website, consultees to be informed as soon as possible.	Disability Action	
<p>Section 75 training should be reviewed and updated accordingly.</p> <p>Provision of general and specific training on Section 75 to policy and decision makers to ensure all equality of opportunity implications are considered, and that decision-making in this area is consistent.</p>	Disability Action	Wording has been inserted stating that we will review our existing training arrangements and will draw up a detailed working programme. Chapter 5 of the scheme sets out comprehensive commitments in relation to training.
Absence of a timeframe for the provision of alternative formats and requests that one be added to the revised Equality Scheme.	Disability Action	Timeframe inserted.
NIAO should outline its arrangements for monitoring access to information and services (paragraph 6.9).	Disability Action	We have retained the wording of the consultation draft which advises that we will take appropriate steps to monitor.
<p>NIAO has not consulted on its audit of inequalities. NIAO should publish and/or consult on its audit of inequalities</p> <p>The Audit of inequalities is a living document - where it has identified information/evidence gaps, NIAO must commit to commission new research.</p>	CAJ Disability Action	We followed the Section 75 Guide for Public Authorities which recommended that consultation should take place on action plans. We consulted on our action plan alongside the draft equality scheme. We now state in the scheme that 'we will seek input from stakeholders and consult on our action plan when reviewing the plan.' We

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		will monitor and update the action plan to ensure it remains effective and relevant to our work activities. The action plan states that it will be flexible, adaptable and responsive to changing circumstances.
<p>Some additions to the wording in the ECNI Model Equality Scheme were suggested.</p> <p>For example: CAJ recommended that we include statements to explain the operation of s75, in particular the relationship between the equality duty and the good relations duty.</p>	CAJ Disability Action	<p>We were generally content with the wording of the ECNI Model in relation to the relevant areas.</p> <p>We decided not to include this wording but will ensure this comment is taken fully into consideration in the provision of training to staff.</p>
<p>Some comments offered advice/highlighted matters to be alert to.</p> <p>For example, regarding targeted consultation, Disability Action advised that NIAO must ensure that it monitors and reviews this approach to consultation to ensure that it is open and accountable to all representatives and affected individuals and does not result in a “closed shop” list of consultees.</p>	CAJ Disability Action	<p>Noted</p> <p>The approach in our scheme is in line with the ECNI Model Equality Scheme.</p>
<p>A number of comments were made on the Action Plan, including disappointment at the lack of content. It was noted, inter alia, that NIAO should clearly link action measures to the functions of the Office and that an action plan should detail whether measures are new or ongoing action.</p>	Disability Action	<p>We noted the range of comments provided. The narrative of the Action Plan has been expanded to provide context. Measures relating to the Action Plan have been incorporated in Appendix 4 of the scheme.</p>