



CONSULTATION DOCUMENT

Promoting WorkAbility

EQUALITY OF OPPORTUNITY:

SCREENING OF EXISTING POLICIES FOR FULL IMPACT ASSESSMENTS

October 2001

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1 EXECUTIVE SUMMARY

1.1 Ulster Supported Employment Ltd (USEL), in response to the statutory equality obligations placed on it by the Northern Ireland Act 1998, produced a draft Equality Scheme, and following consultation between April and June 2000, formally submitted a revised Scheme to the Equality Commission on June 30 2000. USEL's Equality Scheme received approval from the Equality Commission on 5 July 2001.

1.2 One of USEL's commitments in its Equality Scheme is to carry out a programme of full equality impact assessments on existing policies. The first step in drawing up this programme is the screening of all USEL's current policies to establish which have the most impact on equality of opportunity and should be subject to full impact assessment. The exercise will also identify the Section 75 dimensions where each current policy is expected to have a significant impact.

1.3 As part of the screening process USEL is now entering into a consultation process and is seeking

views on the equality implications of USEL's policies.

In brief, this consultation paper

- Identifies USEL's existing policies and describes the screening process;
- Outlines USEL's arrangement for consulting on the screening of its policies and on equality impact assessments; and
- Identifies specific issues on which USEL is particularly interested to receive evidence and advice.

1.4 As well as written submissions from interested organisations, USEL will seek meetings with a range of organisations, particularly with a view to effectively consult with young people and people with learning disabilities, and will consider requests for meetings from other organisations.

2 INTRODUCTION

2.1 USEL is concerned with providing employment and training for people with disabilities. USEL was established in 1962, under the provision of the Disabled Persons (Employment) Act (N.I) 1945 to provide supported employment for disabled people within its factory setting. USEL was also appointed by the Department of Economic Development in 1982 as the founder company to start the Training and Employment Agency's 'Employment Support Scheme'. This programme supports disabled people in mainstream employment environments throughout Northern Ireland. To implement its objectives USEL liaises with the Disablement Advisory Service (DAS) who have overall responsibility on behalf of Government for disability employment matters within Northern Ireland. The Disability Advisory Service is a function with the Department of Employment and Learning (DEL).

2.2 USEL provides specific programmes to assist people with a disability or health impairment gain paid employment under the direction of the Disablement Advisory Service, which determines the organisations primary role as a service delivery organisation for DEL. USEL's main areas of responsibility are:

- Delivery of the Employment Support programme throughout Northern Ireland;
- Delivery of the New Deal Job Brokering Service within specific areas of Northern Ireland;
- Operating a manufacturing business within a Belfast factory base.

3 NORTHERN IRELAND ACT EQUALITY OBLIGATIONS

3.1 In accordance with Section 75(1) of the Northern Ireland Act 1998, USEL shall " in carrying out its functions relating to Northern Ireland, have due regard to the need to promote equality of opportunity" between:

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

3.2 Without prejudice to these obligations, USEL is also required, in carrying out its functions, to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group. Schedule 9 of the Act requires USEL to set out in an Equality Scheme its arrangements for complying with the requirements of the Act.

3.3 Schedule 9 of the Northern Ireland Act 1998 requires each public authority to produce an Equality Scheme which states, among other things, "the authority's arrangements for assessing and consulting on the likely impact of policies adopted or proposed to be adopted by the authority on the promotion of equality of opportunity". USEL submitted an Equality Scheme to the Equality Commission for approval and this was received on 5 July 2001. In this Scheme USEL has undertaken to screen all its current policies to establish which have the most impact on equality of opportunity and should therefore be prioritised for full impact assessment. Each full impact assessment will include public consultation in accordance with USEL's Equality Scheme and the Equality Commissions impact assessment guidance principles.

4 PURPOSE OF SCREENING

4.1 Screening is the process of reviewing each policy area against set criteria to identify those policies that are likely to have the most impact on equality of opportunity. The degree to which each policy impacts on equality of opportunity will be the most important factor in USEL's decisions on (i) which policy/policies will be subjected to full Equality Impact Assessments and (ii) how the full equality impact assessments will be prioritised. In deciding those priorities USEL will give due weight to all relevant evidence. The screening process therefore needs to be informed by public consultation.

4.2 It is important to note that the purpose of screening is to prioritise policies for full impact assessments, not to assess the impact of any particular policy. The latter will be done within the assessment programme.

5 POLICIES

5.1 The Equality Commission for Northern Ireland's *Guide to the Statutory Duties* quotes the New Oxford Dictionary of English definition of "policy" as:

"a course or principle of action adopted or proposed by a government, party, business or individual".

For the purposes of identifying policies, which are likely to have a significant impact on equality of opportunity, USEL has taken an inventory of existing policies. This screening process will consider, in respect of each existing policy whether, in relation to the nine dimensions specified in Section 75:

- There are any inherent risks of adverse impact on the promotion of equality of opportunity; and
- There is any potential to enhance equality of opportunity through the policy in question.

5.2 A list of USEL's functional areas and policies is included in Appendix 1.

5.3 Each policy area is subject to consideration using the following criteria during the screening process:

- a) Is there any evidence of higher or lower participation or uptake by different groups within any of the nine categories in relation to the particular policy?
- b) Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the policy area?
- c) Is there potential to enhance equality of opportunity for any of the nine categories through the policy in question?
- d) Have consultations in the past with relevant representative organisations or individuals within groups indicated that a particular policy creates problems that are specific to them?

5.4 Consultees are asked to tick any of the boxes (a) to (d) to indicate that the answer to the relevant question is yes.

6 PRIOTITISATION OF POLICIES FOR IMPACT ASSESSMENTS

6.1 Where this screening exercise suggests that a particular policy may have an adverse impact on the promotion of equality of opportunity, or where it appeared that the function to which the policy relates may have the potential to enhance equality of opportunity, that policy will be identified as requiring a full Equality Impact Assessment.

6.2 In carrying out equality impact assessments USEL will follow the procedure set out in the Equality Commission's Guidelines. It will also draw on work being commissioned by the Equality Commission and any guidance from the Equality Unit of the Office of the First Minister and Deputy First Minister.

6.3 Equality Impact Assessments need to be prioritised. USEL has identified the following factors to help prioritise the assessments:

- How the policy or procedure affects the daily life of individuals/groups
- How the policy or procedure affects the social needs of individuals/groups
- The effects on economic, social and human rights

6.4 USEL currently monitors participation in and use of its programmes and services in terms of equality and will continue to review its arrangements to assess whether additional monitoring is necessary for the purposes of Section 75.

7 CONSULTATION

7.1 USEL recognises the importance of meaningful consultation and is committed to consulting in an open and inclusive manner. We will consult with those listed in Appendix 3. However, we will welcome the views of any organisation, group or individual with a particular interest in our work and/or the likely impact of our policies on:

(i) the promotion of equality of opportunity

- between persons of different religious belief, political opinion, racial group, marital status or sexual orientation;

- between men and women generally;
- between persons with a disability and persons without; and
- persons with dependants and persons without, and

(ii) the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

7.2 USEL is keen to ensure that all barriers to proper consultation can be removed particularly in relation to young people and those with learning disabilities. USEL will seek meetings with a range of organisations that have a particular interest and expertise in relation to Section 75 dimensions. USEL will also consider requests for meetings with special interest groups.

7.3 USEL wishes to ensure that its screening of its existing policies is comprehensive.

CONSULTATION QUESTIONS

- 1) Are you aware of any written or unwritten policies USEL has which are not covered by Appendix 1?**
- 2) Which, if any of USEL's policies, services, programmes or other functions should be prioritised for a full impact assessment?**

Wherever possible, please provide, or refer to, any evidence - quantitative or qualitative - which supports any recommendation you make.

- 3) What recommendations, if any, would you make to USEL about grouping any policies, services, programmes or other functions for an equality impact assessment, or about separating out any function for an equality impact assessment?**
- 4) Do you wish to provide any other advice or information that USEL should take into account when planning its programme of equality impact assessments?**
- 5) Do you wish to comment on any aspect of this consultation?**

8 FORMATS

8.1 This document will be available in alternative formats free on request from USEL, 182-188 Cambria Street, Belfast BT13 3JH. Telephone 028 9035 6600; fax 028 9035 6611. It can also be accessed on USEL's website at www.usel.co.uk

9 RESPONSE TO THIS DOCUMENT - HOW TO CONTRIBUTE

9.1 USEL invites advice and evidence, both quantitative and qualitative, and proposals from interested organisations, groups and individuals on USEL's policies. This will be taken into account by USEL in drawing up its programme of full Equality Impact Assessments and will inform the prioritisation exercise.

9.2 Comments on this document should be made by mail, fax or e-mail to:

Mrs Gwen Mills

USEL

182-188 Cambrai Street

Belfast

BT13 3JH

Fax: 028 9035 6611

E-mail: g mills@usel.co.uk

9.4 Your response should reach USEL no later than 31 December 2001.

APPENDIX 1

a) Functional area - Delivery of Employment Support Scheme

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Programme aims: To provide paid employment for severely disabled people in mainstream employment environments. Workplace support is offered to employers and disabled employees to ensure maintenance of employment, career progression, and personal and job development. Disabled employees receive the same terms and conditions of employment as their non-disabled colleagues. The employer currently receives a wage subsidy to off set productivity deficits resulting from the disabled persons impairment.

Target Groups: Severely disabled people who are unable to compete under competitive open employment conditions due to productivity deficits resulting from their impairments. Productivity levels must fall within 30 - 80% of their non-disabled colleagues.

Conditions of access to the programme: Must be referred to the programme by the Disablement Advisory Service within the Training and Employment Agency. The Disablement Employment Advisors determine suitability and eligibility for entrance to the programme.

b) Functional area - Job Broking Service

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Programme aims: To assist individuals who are claiming sickness or incapacity benefits improve their employability and enter into paid employment. The programme is funded under the Training & Employment Agency's New Deal for Disabled People policy instrument. USEL currently offers this service within a specified geographical spread. Currently this spread covers North & West Belfast, Newtownabbey, Lisburn, Lurgan, Portadown, Armagh, Banbridge and Newry. Individuals and employers receive a range of supports to sustain paid employment.

Target Groups: Individuals who are in receipt of particular Social Security Benefits i.e. Incapacity Benefit, Severe Disablement Allowance, Incapacity Credits, Income Support with a disability premium, Housing Benefit with a disability premium, War Pension with an unemployability supplement, Industrial Injuries Benefit with an unemployability supplement.

Conditions of access to the programme: The Training & Employment Agency Disablement Advisory Service and the Social Security Agency verifies individual eligibility criteria is met and approves entrance to the programme.

c) Functional area - Manufacturing Operation

Programme aims: To provide paid employment to severely disabled people in a supported environment. The manufacturing operation employs disabled people within its factory base in Cambrai Street, Belfast. Employees are directly employed by USEL and receive competitive terms and conditions of employment. Some employees are also supported and sub-contracted out to mainstream employers to ensure long-term integration and progression into less supported paid employment environments occur. The factory base produces a range of mattresses and divan beds, a specialist range of industrial carrying products, and also increasingly operates on a sub-contract work basis.

Target Groups: Severely disabled people who require to initially work in a more supported environment

Conditions of access to the factory operation: Individuals referred to vacancies is made by the Disablement Advisory Service.

d) General Policies

Terms & Conditions of Service:

These outline the conditions under which staff members are employed. They cover probationary periods, fixed term contracts, place and hours of work, payment of salaries and wages, pension arrangements, annual leave, sickness and absence, maternity leave, subsistence and travel allowances, grievance procedures, disciplinary rules and procedures, health & safety at work, equal opportunities, smoking policy, anti-harassment, whistle-blowing procedure, Code of Practice for staff, compassionate leave, time-keeping, risk assessment, evacuation procedures, and company rules and procedures.

Complaints Procedure and Guideline:

This outlines how stakeholders and other parties may make a complaint and outlines the various stages of the process. Guidelines also set out how staff members should handle the complaint and provide deadline parameters for dealing with the various stages.

APPENDIX 2

Screening of Policies

Policies/Services	Equality of Opportunity Criteria (see paragraph 5.3)			
	A	B	C	D
Employment Support Scheme - to provide paid employment for severely disabled people in mainstream employment settings				
Job Brokering Service - to assist individuals who are claiming sickness or incapacity benefits improve their employability and enter into paid employment.				
Manufacturing Operation - to provide paid employment to severely disabled people in a supported environment.				

<p>Terms & Conditions of Service - These outline the conditions under which staff members are employed</p>				
<p>Complaint Procedure and Guidelines: These outline the conditions under which staff members are employed</p>				

APPENDIX 3

List of those to be consulted

- Age Concern Northern Ireland
- Action Mental Health
- Action Cancer
- Action MS
- Alliance Party
- Association for Spina Bifida and Hydrocephalus
- Blind Centre for Northern Ireland
- Barnardos NI
- Barnardos, Tuar Ceatha Project
- Belfast Colleges of Further and Higher Education
- Belfast Baha'i Community
- Belfast Hebrew Congregation
- Belfast Islamic Centre
- Belfast Islamic Centre Women's Group
- Belfast Travellers Education and Development Group
- British Deaf Association (NI)
- British Diabetic Association
- British Red Cross
- Carers National Association Northern Ireland
- The Cedar Foundation
- Challenge

Chest Heart & Stroke Association
Child Care Northern Ireland
Children's Law Centre
Children's Project NI Ltd
Chinese Welfare Association
Church of Ireland
Church of Ireland Board for Social Responsibility
Coalition on Sexual Orientation
Committee on the Administration for Justice
Community Relations Council
Community Relations Network and Training Consortium
Counteract
Democratic Unionist Party
Disability Action
Downs Syndrome Association
Employers Forum on Disability
Equality Forum NI
Equality Coalition
Enterprise Technology
Garden Reach
Gay and Lesbian Youth Northern Ireland
Green Party
Gingerbread
Help the Aged Northern Ireland
Indian Community Centre
Jordonstown School for children with Auditory or Visual Disabilities
MENCAP
Methodist Church
Multi-cultural Resource Centre
Multiple Sclerosis Society (NI)
National Schizophrenia Society
Northern Ireland Unionist Party

Northern Ireland Women's Coalition
North West Forum of People with Disabilities
Northern Ireland Association for Mental Health
Northern Ireland Committee, Irish Congress of Trade Unions
Northern Ireland Council for Ethnic Minorities
Northern Ireland Council for Voluntary Action
Northern Ireland African Cultural Centre
Orchardville Society
Playboard (NI)
Parents and Professional and Autism
PHAB
Presbyterian Church
Praxis
Progressive Unionist Party
Putting Children First
Roman Catholic Church
Royal National Institute for the Blind (NI)
Royal National Institute for Deaf People (NI)
Rainbow Project
Save the Children
Sense NI
Shadow Trust
Sinn Fein
|Social Democratic and Labour Party
Traveller Movement Northern Ireland
UK Unionist Party
Ulster Cancer Foundation
Ulster Democratic Party
Ulster Unionist Party
UK Unionist Party
West Belfast Economic Forum
Women's Forum NI
Women's Resource and Development Agency (WRDA)

Women's Support Network

Women's Information Group

Worker's Party

Youth Council for Northern Ireland

Youth Initiatives

15th October 2001

Dear Sir/Madam

Re: USEL Equality Scheme Screening Process and Approved Equality Scheme

As you are aware, in keeping with the Northern Ireland Act 1998, USEL was required to produce an Equality Scheme for submission to the Equality Commission by 30 June 2000. USEL received approval for its scheme on 5 July 2001 and a copy of that approved scheme is enclosed.

The next stage of the implementation of USEL's Equality Scheme is the screening of policies and procedures. I am pleased to forward you a copy of USEL's consultation document on its policies. I hope you find the information useful in helping you to identify areas, which may be of particular interest to the individuals or groups you represent. This first stage in this screening process should help identify priorities for your organisation in relation to Equality Impact Assessments.

Consultation on the screening of our policies and procedures will run for a period of 11 weeks until 31 December 2001. You can participate in the process in a number of ways and these are explained more fully in the attached document.

Once consultation on screening is completed USEL will produce a draft timetable for Equality Impact Assessments. This will be forwarded to you with details of a further consultation period of at least 2 months.

USEL would like to encourage you to participate in these next stages, as this will help us to further promote equality of opportunity and good community relations.

I would like to take this opportunity to thank you for your interest in the continued implementation of USEL's Equality Scheme. Should you wish to discuss any aspect of this screening process or any other relevant matter, please do not hesitate to contact me.

Gwen Mills

Development Manager