

USEL (Ulster Supported Employment Ltd)

REPORT ON SCREENING OF POLICIES MARCH 2002

Report on the Screening of Policies

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1. INTRODUCTION

The Equality Commission's "Guide to Statutory Duties" specifies that consultation must take place on the impact of policies. Public Authorities are duty bound to engage in consultation regarding the likely impact on the promotion of equality of opportunity of its existing and proposed policies and procedures, and in making decisions about such policies and procedures it must take the consultation outputs into account.

USEL has conducted its screening of policies exercise in accordance with arrangements specified in its approved Equality Scheme and produced its consultation document, which detailed:

- An overview of USEL business
- Northern Ireland Act Equality obligations
- Purpose of Screening
- Definition of Policies and screening dimensions
- Rationale for Prioritisation for Impact Assessment

- List of USEL policies/functions

Consultees were invited to respond to the document, attend focus groups, or have a one-to-one discussion in person or by telephone. Comments by fax, email, or mail were also called for.

2. CONSULTATION STRATEGY

USEL issued the consultation document on the screening of policies on 15 October 2001. The consultation period ran from this date to the 31 December 2001. Due to a poor response rate to the consultation process, the period was extended to 31 January 2002. Consultees were informed of this and were again invited to attend a focus group meeting or to have individual meetings at venues and times of their own choice. Consultees were advised in advance that any assistance required to ensure full participation would be provided upon request. This included communication and access needs.

3. SUMMARY OF CONSULTATION COMMENTS

Down's Syndrome Association acknowledged the attempt to consult with them, but due to the many consultation requests they stated that they found it difficult to continue to respond to all and were unable to respond to USEL's request. However, they wished to be kept informed of progress made and wished to remain on USEL's mailing list. Action MS acknowledged receipt of the Equality Scheme, but no response to the document was made. Belfast Institute of Further and Higher Education acknowledged receipt of the consultation document and stated that they did not wish to attend a meeting or engage in the consultation process on the screening of USEL policies. Mencap provided a generic response on the difficulties faced by carers and people with learning disabilities in employment and consultation processes. Relevant comments have been broken down and allocated to USEL policy areas - although there was no direct comment that these were applicable to USEL. Disability Action provided a specific response and comments are listed below.

Employment Support Scheme

- USEL's delivery of Employment Support Scheme should be prioritised for impact assessment based on its geographic spread (Disability Action)

Job Broker Service

No Comments from any party

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Manufacturing Operation

- The Manufacturing Operation should be prioritised for full impact assessment -The location of the manufacturing operation may have an adverse impact on the religion/political opinion groups (Disability Action)

Terms & Conditions of Service

- USEL's terms and conditions of employment should be prioritised for full impact assessment – may adversely impact on people with disabilities (Disability Action)

Generic Response from Mencap

- Long hours of work make it difficult for carers to find time for caring responsibilities (Mencap)
- Lack of flexibility at work – need for time off work at short notice (Mencap)
- Policy and Practice – existence of policies does not guarantee good practice. Employees may not be aware of their entitlements (Mencap)

- Job Insecurity – increases reluctance to ask for flexibility or leave (Mencap)
- Lack of access to telephones in the workplace creates problems for carers (Mencap)
- Barriers to career opportunity- ability to travel to new location, to accept longer working hours cause difficulties (Mencap).
- Terminology of Job Advertisements –applicants unacquainted with jargon (Mencap)
- Attitudes of employers – recognition by employers of skills acquired when not in paid employment, ensure accessible training offered and used by carers (Mencap)
- Most adults with learning disabilities leave school without qualifications (Mencap)

Complaint Procedure and Guidelines

- USEL's complaint procedures and guidelines should be prioritised for full impact assessment – as they might point up areas for potential adverse impact – (Disability Action)

Written or unwritten policies not covered by consultation process

- USEL's procurement and information/publications policies should be included in the list of policies – (Disability Action)

Generic Response from Mencap

- Lack of accessible information is a significant barrier to people with learning disabilities (Mencap)

4. POLICY DECISIONS

REVIEW AND TIMETABLING

Below is an outline of the decisions taken by USEL (Ulster Supported Employment Ltd) following consideration of the issues raised during the consultation exercise.

EMPLOYMENT SUPPORT

The Employment Support Programme - The delivery mechanisms for this programme is currently under review by the Department for Employment and Learning. The Disablement Advisory Service is constructing a consultation document, which will be disseminated to consultees at the end of June 2002. The consultation period is likely to last three months. USEL is one of three Sponsor agents for this programme and while it can make representation or comments to DAS about the programme, it has not the authority to fundamentally change the policy. The other sponsor agents for the delivery of this programme are Disability Action and Action Mental Health. USEL will participate in the consultation process, alongside Disability Action and Action Mental Health, as current sponsors of the programme and other consultees in the shaping of the future delivery of the programme. USEL will not therefore be carrying out a separate full impact assessment but will work in partnership with DEL and others to ensure the revised programme, which is likely to be implemented late 2002 or early 2003, meets the needs of eligible participants.

Decision – Participate in DEL’s consultation process on programme review (June – September 2002).

JOB BROKER SERVICE

USEL is one of 11 organisations contracted by the Department for Employment and Learning (DEL) to deliver the New Deal for Disabled People. The other 10 agents are non-public body entities. As a contracted delivery agent USEL has no authority to change the policy, but can have

an input into making comments and recommendations on shaping the future service delivery. DEL's Disablement Advisory Service will be carrying out an Equality Impact Assessment of New Deal for Disabled People and USEL will work in partnership with the Department. The timing of the EQIA will depend on DEL's timetabling.

Decision: Work in partnership with DEL's EQIA on NDDP programme

MANUFACTURING OPERATION

USEL moved into modern premises sited between the Crumlin Road and Shankill Road in June 2001 from its previous site in an old Victorian Mill located in Lawnbrook Avenue on the Shankill Road in Belfast. The new location had been equality proofed by the Department of Finance and Personnel prior to the move. USEL will carry an Equality Impact Assessment on its recruitment procedures in 2003 and this will take into consideration the concerns raised by Disability Action.

GENERAL POLICIES

Terms and Conditions of Employment

The following list outlines USEL's decision in relation to carrying out full impact assessments on its terms and conditions of employment.

POLICY	DECISION
Recruitment & Selection – To select the most appropriate candidate for the post taking into consideration disability eligibility criteria set by DEL for manufacturing operation operative positions	EQIA
Training and Development – To ensure all employees have the skills and knowledge to do their job effectively and to encourage each employee to develop themselves to their full potential	EQIA

Harassment- to give guidance to management in handling complaints of harassment and bullying – general applicability.	X
Sickness/absence Managing Attendance – to manage attendance within acceptable levels – general applicability	X
Discipline – To ensure any disciplinary action initiated is necessary and is fair and consistent in its approach –general applicability	X
Grievance – To provide an opportunity to have employee grievances dealt with quickly and effectively and to resolve where possible – general applicability	X
Redundancy – all employees are entitled to statutory redundancy payment	X
Maternity – Statutory Guidelines apply	X
Paternity – Statutory Guidelines apply	X
Equal Opportunities – Equality Scheme and general policy to encourage, promote and implement equality of opportunity	X – monitor and review annually
Pension Scheme – all employees eligible to join company pension scheme	X
Annual leave – all employees entitled to 27 days annual leave	X
Subsistence and travel allowances – policy based on agreed rates	X
Health & Safety policy – To ensure compliance with Health & Safety legislation and procedure that promote safe working practices	X
Smoking Policy – to ensure smoking only allowed in designated areas	X

Whistle-blowing policy – to inform employees of how to raise concerns about unacceptable practices or conduct	X
Evacuation Procedures – To ensure safe and timely evacuation of premises in times of danger	X

X – screened out EQIA- full impact assessment

Complaints Procedure

USEL's complaint procedure provides customers and service users a mechanism to address areas of dissatisfaction. Any complaints received will be dealt with in the manner set out in the Equality Scheme. These will be monitored, reviewed and reported in USEL's annual returns to the Equality Commission. To ensure transparency these will also be made available to the consultees listed in USEL's Equality Scheme.

Decision- The Complaints Procedure and outcomes will be monitored and reported upon annually and will not be subject to a full equality impact assessment.

Information and Procurement policies

USEL currently does not have an Information Policy and its Purchasing Policy is contained within the Company's Financial Memorandum and follows government purchasing guidelines. An Information Policy will be developed and consultation on its development will occur with consultees listed in USEL's Equality Scheme.

5. EQUALITY IMPACT ASSESSMENT TIMETABLE

POLICY	DECISION	TIMETABLE	COMMENTS

Employment Support Programme	See comments	June-September 2002	Work with DAS's consultation on future shape of programme
New Deal for Disable People	See comments	Dependent on Department for Employment & Learning timetable	Work in partnership DAS's EQIA
Recruitment & Selection Policy	EQIA	2003	Consult with Equality Scheme consultees
Training & Development Policy	EQIA	2004	Consult with Equality Scheme consultees
Information Policy	Develop and consult	2002	Consult with Equality Scheme consultees

APPENDIX 1

List of those to be consulted

Action Mental Health

Age Concern Northern Ireland

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

Department of Employment and Learning (Disablement Advisory Service)

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

Liberal and Progressive Jewish Movement

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

Young Help Trust