

SUMMARY OF CONSULTATION RESPONSES

The PPS’s Consultation on the Draft PPS Disability Action Plan for 2017-18 issued on 13 April 2017 for a period of 12 weeks, and closed on 7 July 2017. The aim of the consultation was to seek a wide range of views to inform the Disability Action Plan.

Responses were received from:

The Equality Commission;
 FDA; and
 PPS Internal Stakeholders

All comments raised were taken fully into consideration.

We have provided feedback to each consultee and a summary of the main points raised are set out below.

The Equality Commission		
	Comment	PPS Response
1.	Performance indicators could be tightened to ensure they are “SMART”, challenging and outcome focused. For example:	<p>Where possible, specific actions and completion dates are included in the Action Plan. However, the nature of some of the actions in the plan mean that the timescales for completion must be ‘ongoing’ – e.g. they apply to the NICS as a whole.</p> <p>For example, as the staff in the NICS changes on a regular and ongoing basis, we must continue to ensure that all staff are aware of their obligations and receive appropriate and up to date training.</p>

2.	The second action measure relating to supporting the NICS work experience scheme for people with disabilities has as a key performance indicator “the number of participants will be recorded”. A more challenging and measurable indicator would be to set a goal for a specific number of placements facilitated – even if this is a small number.	Comment noted.
3.	For the 3 rd action measure relating to increasing the participation of disabled employees in the Equality and Diversity Steering Group, the performance indicator could be “to increase participation of disabled people to “x”% of total membership.	Comment noted.
4.	In relation to measures 5 and 6 the performance indicators could relate to the target number of people to be trained and the percent of positive evaluations of the effectiveness of the training provided.	<p>This will be included against action measure 5 (to provide training to all Assistant Directors and Corporate Services Heads).</p> <p>In relation to action measure 6, this is not possible as the staff in the NICS changes on a regular and ongoing basis. We will ensure that all staff are aware of their obligations and receive appropriate and up to date training, but cannot project the number of staff to undergo training.</p> <p>That part of the comment referring to the evaluation of effectiveness will be incorporated into the Action Plan.</p>

5.	With regards to training ECNI would recommend that the plan clearly and explicitly states that all employees and board members will receive training on both disability awareness and disability equality legislation, as this training is a must in a disability action plan if it is to be compliant.	Comment noted.
	<i>Other actions to consider could include:</i>	
6.	Carrying out a staff attitude survey in relation to attitudes towards different disabled people (mental ill-health, physical, learning disability, autism etc.) This could help identify where specific disability awareness training is most needed and would help provide a good base line against which to measure progress in improving positive attitudes amongst the workforce.	Comment noted.
7.	Surveying disabled employees to find out about their experiences and get suggestions as to how PPS could better promote positive attitudes / increase participation.	Comment noted.
8.	Signing up to the Commission's Mental Health Charter and / or Every Customer Counts.	Comment noted. PPS will give further consideration to signing up to both these initiatives.
FDA		
	Comment	PPS Response
	<i>The FDA would suggest that PPS should include the following in its Disability action Plan:</i>	

1.	It should undertake to review how reasonable adjustments are implemented within PPS, and that consideration should be given to having one workplace adjustments manager with specialist knowledge / training who has overall responsibility for implementing adjustments.	<p>Comment noted.</p> <p>The PPS is subject to NICS HR guidance in respect of the identification and implementation of reasonable adjustments. As the PPS is a relatively small / centralised department, management is confident that the structure within its Property Management function is sufficient to ensure that workplace adjustments are properly managed and co-ordinated.</p>
2.	Equally, consideration should also be given to appointing a workplace adjustments champion with specialist knowledge / training who could assist the employee in the process.	Comment noted (response immediately above also refers).
3.	Consideration should be given to identifying target times for implementing adjustments.	The NICS HR Handbook guidance does not stipulate specific target times for the implementation of workplace adjustments. However, PPS Property Management personnel endeavour to address all necessary adjustments as soon as is practicable in every instance.
4.	PPS should commit to exploring how it might set up processes to make reasonable adjustments, where appropriate, to enable employees with disabilities to work from home. This would assist in removing workplace barriers for employees whose disabilities may make it more difficult for them to attend their place	There is no current NICS policy addressing staff working from home. Introduction of such a policy by the PPS would mean that the organisation would be acting without support from the Department of Finance and NICS HR, and would

	of work on a daily basis. This could provide mutual benefits to the employee and PPS in that it promotes the wellbeing of the employee and can contribute to increased productivity.	bear all liabilities for security, wellbeing / health and safety and data protection issues. For these reasons the PPS does not permit staff to work from home, and will not unless the NICS policy changes and guidelines are provided for Departments.
5.	PPS should undertake to review the implementation of NICS attendance management policy in terms of how it may impact on employees who are absent for disability related reasons. It is submitted that PPS should ensure it does not have a disproportionate negative impact on employees with disabilities. It is further submitted that disability related absence should not lead to the issuing of a warning letter to an employee.	Comments noted. From 3 rd April 2017, NICS HR have assumed responsibility for all aspects of absence management across the NICS, including the PPS.

PPS Internal Stakeholders

	Comment	PPS Response
	<i>To encourage people with disabilities to engage in public life:</i>	
1.	Develop use of IT and conferencing facilities to allow for participation in meetings and training.	Webcam technology has recently been installed in PPS Foyle Chambers, to facilitate Skype contact with Belfast Chambers. Work is ongoing to develop this further, with the intention of accommodating such contact across multiple sites. It has also been proposed that in the future, tablet devices are augmented to allow video conferencing by users.

2.	Develop remote working at home or in nearest PPS Office.	<p>There is no current NICS policy addressing staff working from home. Introduction of such a policy by the PPS would mean that the organisation would be acting without support from the Department of Finance and NICS HR, and would bear all liabilities for security, wellbeing / health and safety and data protection issues. For these reasons the PPS does not permit staff to work from home, and will not unless the NICS policy changes and guidelines are provided for Departments.</p> <p>Scope for working from the nearest PPS office is subject to the agreement of local managers.</p>
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The PPS would like to thank all those who responded for their comments.

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