

# **Information Commissioner's Office**

## **Disability Action Plan**

**June 2007**

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- **Large font**
- **Audiocassette**
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- **Computer Disc**
- **Main minority ethnic languages**
- **DAISY**

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# DISABILITY ACTION PLAN

## Information Commissioner's Office

1.1	<p><b>Introduction</b></p> <p>Under Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), the Information Commissioner's Office is required when carrying out its functions to have due regard to the need to:</p> <ul style="list-style-type: none"><li>• promote positive attitudes towards disabled people; and</li><li>• encourage participation by disabled people in public life ('the disability duties').</li></ul> <p>Under Section 49B of the DDA 1995, the Information Commissioner's Office is also required to submit to the Equality Commission for Northern Ireland a <b>disability action plan</b> showing how it proposes to fulfill these duties in relation to its functions.</p>
1.2	<p>As the statutory regulator of the Information Acts, we are committed to implementing effectively the disability duties and this disability action plan. We will allocate all necessary resources (in terms of people, time and money) in order to implement effectively this plan and where appropriate, build objectives and targets relating to the disability duties into corporate and annual operating plans.</p> <p>We will also put appropriate internal arrangements in place to ensure that the disability duties are complied with and that this disability action plan is effectively implemented. We will ensure the effective communication of the plan to staff and to providing all necessary training and guidance for staff on the disability duties and the implementation of the plan.</p> <p>We confirm our commitment to submitting an annual report to the Equality Commission on the implementation of this plan as well as carrying out a five yearly review of this plan.</p> <p>Responsibility for implementing, reviewing and evaluating this disability action plan and the point of contact within the Information Commissioner's Office will be:-</p>

	<p><b>Name: Mrs Marie Anderson</b></p> <p>Title: Assistant Information Commissioner (NI)  Address: Regus House, 33 Clarendon Dock , Belfast BT 1 3BG  Telephone number: 028 90 511270  Fax number: 511606  Email: ni@ico.gsi.gov.uk</p> <p>If you require this plan in an alternative format (such as in large print, in Braille, in DAISY, on audio cassette, easy read or on computer disc) and/or in a minority ethnic language, please contact the above person to discuss your requirements.</p>
1.3	<p>We confirm our commitment to submitting an annual progress report on the implementation of this plan to the Equality Commission and carrying out a five year review of this plan, or plans submitted to the Equality Commission over the five year review period.</p> <p>A copy of this plan, our annual progress to the Equality Commission and our five year review of this plan will be made available on our website <b>www.ico.gov.uk</b>.</p>
1.3a	<p><b>Consultation</b></p> <p>The Information Commissioner’s Office is committed to engage effectively with disabled people in the drafting, implementation, monitoring and review of this Plan.</p> <p>We are committed to carrying out consultation in a meaningful manner in the development of our disability duties.</p> <p>In addition we are keen to seek the views of disabled people in relation to the development of the Plan. This will be achieved through direct contact with disability organisations and joint working with other Northern Ireland public bodies.</p> <p>As part of the consultation process barriers to effective consultation will be removed by ensuring accessibility to documents in appropriate formats. Information will be made available on request in accessible formats including DAISY, Braille, large print, disc and</p>

	<p>audio cassette. Information will also be made available in accessible formats in a timely fashion. It will also be important to establish with disabled people the basis for dialogue and engagement during the life of the Plan. Consideration will also be given to how best to communicate information to young disabled people as well as considering additional dimensions such as ethnicity, age, gender, sexual orientation and religious belief.</p>
1.4	<p><b>Functions</b></p> <p>The Functions of the Information Commissioner’s Office include:</p> <ul style="list-style-type: none"><li>• Enforcing the Data Protection Act, the Freedom of Information Act, the Privacy and Electronic Communications Regulations and the Environmental Information Regulations.</li><li>• Maintaining the public register of data controllers under the Data Protection Act.</li><li>• Approving publication schemes adopted by public authorities under the Freedom of Information Act.</li><li>• Providing a general inquiry service for individuals and organisations.</li><li>• Publishing guidance and information to encourage organisations to achieve good practice and help individuals to understand their rights.</li><li>• Raising awareness of the law and how it works.</li><li>• Influencing thinking on privacy and access issues.</li><li>• Making rulings on eligible complaints from people who think the Data Protection Act or Freedom of Information Act has been breached.</li><li>• Prosecuting those who commit offences under the Act.</li></ul>

	<p>The Information Commissioner’s Office headquarters is based in Wilmslow, England has regional offices in London, Northern Ireland, Scotland and Wales. The Northern Ireland Regional office provides advice and guidance to both individuals and organisations on the Freedom of Information Act, the Data Protection Act, the Environmental Information Regulations and Privacy and Electronic Communications Regulations (the Information Acts). This office also investigates eligible Freedom of Information complaints concerning Northern Ireland public authorities.</p> <p><b>Public Life Positions</b></p> <p>As a Non-Departmental Public Body, the Information Commissioner’s Office does not have responsibility for public life positions. The Information Commissioner is appointed by Her Majesty The Queen and is an independent officer who reports to Parliament.</p>
<p>2.</p> <p>2.1</p>	<p><b>Previous Measures</b></p> <p>The Information Commissioner has already taken a number of measures to promote positive attitudes towards disabled people and encourage their participation in public life as a result of the duties under Section 75. These include:</p> <ul style="list-style-type: none"> <li>• Section 75 Awareness training</li> <li>• Training on mental health issues</li> <li>• Human Rights training</li> <li>• Workplace policies and Reasonable Adjustments</li> <li>• Accessibility policies</li> <li>• Dignity at work policies</li> <li>• User involvement policies</li> <li>• Policy Proofing</li> <li>• Awarded the Two Tick Disability Symbol User status</li> <li>• Development of a Section 75 Good Practice Note available on the website for all stakeholders</li> </ul> <p>The ICO is developing a Disability Equality Scheme in relation to its duties in England, Scotland and Wales. This scheme will set out the ICO’s duties and proposed actions taking into account the general duty requiring the ICO to have “due regard” to the need to:</p>

	<ul style="list-style-type: none"> <li>• Promote equality of opportunity between disabled people and other people</li> <li>• Eliminate disability related harassment</li> <li>• Promote positive attitudes towards disabled people</li> <li>• Encourage participation of disabled people in public life</li> <li>• Take steps to meet disabled people’s needs, even if this requires more favourable treatment.</li> </ul> <p>The ICO recognises that similar duties exist in Northern Ireland, primarily under Section 75 (Northern Ireland Act 1998) and the Disability Discrimination Act 1995.</p> <p>Whilst developing both the Disability Action Plan and the Disability Equality Scheme the ICO will seek to establish a degree of parity across both statutory documents, and also across the Section 75 Equality Scheme, to ensure a cohesive and consistent approach to the disability equality duties.</p>
<p>3</p> <p>3.1</p>	<p><b>Action Measures</b></p> <p><b>How the disability action plan will be published</b></p> <p>Following submission to the Equality Commission for Northern Ireland, this Plan will be available by contacting:</p> <p><b>Name: Marie Anderson</b>  <b>Title: Assistant Information Commissioner (NI)</b>  <b>Address: Regus House, 33 Clarendon House, Belfast</b>  <b>Telephone number: 028 90 511270</b>  <b>Fax number: 028 90 511606</b>  <b>Email: ni@ico.gsi.gov.uk</b>  <b>Website www.ico.gov.uk</b></p> <p>The availability of the Disability Action Plan will be advertised widely <b>including using disability specialist press</b>, and can be accessed on the ICO’s website (web address above):</p> <p>The ICO will, through our ongoing work with people with disabilities and people with learning disabilities, find appropriate ways of communicating the Plan. The Plan will be</p>

produced in clear print and plain language, will be available in alternative formats on request, including large print, Daisy, Braille, audio cassette and computer disc.

The Plan will be highlighted through mail shots and meeting directly with disability organisations and representative groups.

Consideration will also be given to requests to produce the Plan for people who speak a minority language.

In addition, a copy of the Disability Action Plan will be made available to all employees.

Outlined below are the measures which we propose to take over the next five years ending in 2012.

## Information Commissioner's Office: Appendix 1 Actions

Measures	Time scale	Performance Indicator	Measure of impact
<b>Theme :Mainstreaming Disability Duties</b>			
<b>Develop screening processes to assess the significance of the disability duties as part of S75 screening exercises</b>	By March 2008	<p>All policies screened by March 2008</p> <p>New duties built into Compliance Measures and list of policies reported in Annual progress report</p> <p>End of Year Screening Report includes reference to the screening of the new duties</p>	<b>Better promotion of equality for disabled people and due regard paid to positive attitudes and encouraging participation</b>
<b>Ensure positive and proportionate imagery in relation to disabled people in all Corporate documentation</b>	From September 2007 and ongoing	<p>Positive imagery in main Corporate Documents and information media.</p> <p>Expressly reported in Annual progress report by listing main information documents/media and reporting on how disabled people are portrayed</p>	<b>Promoting more positive approach to disability</b>

<b>Theme: Human Resources and Employment</b>			
<b>Maintain and regularly update staff monitoring system</b>	By March 2008 and then triennially	Initial HR report on disability by mid 2008 updated in 2011.  Main findings reported in Annual reports	<b>Reports inform HR policy</b>
<b>Build a relationship with organisations which provide training and employment placement opportunities and support to disabled people e.g USEL,</b>	From April 2008	Development of relationships with groups and greater participation in the workplace.  No's of relationships/partnerships identified.  No's placements identified  Reported in annual report	<b>More disabled people in the Information Commissioner's employment and more opportunities</b>
<b>Support staff with disabilities in respect of learning and development needs and career development opportunities</b>	By March 2008 and ongoing	All disabled staff advised of L&D opportunities and how to access them Disabled staff advised of support provided Uptake of training opportunities reported in Annual report,	<b>Increasing training Opportunities and greater employment opportunities for staff</b>

<b>Theme: Training</b>			
<p><b>Ensure all staff receive the appropriate training on their duties under the DDA and complementary legislation</b></p> <p><b>Continue programme of mental health issues training</b></p>	<p>2007 and ongoing to 2012</p> <p>2007 and ongoing to 2012</p>	<p>All staff trained in: Disability Awareness Section 75 Human Rights</p> <p>Key HR and other staff trained in Screening (including screening the new duties) and EQIA.</p> <p>All staff included in training strategy</p> <p>Reported in Annual Progress report</p>	<p><b>More sensitive service delivery</b></p> <p><b>Better attitudes to staff with disabilities</b></p> <p><b>Better attitudes to customers with disabilities</b></p> <p><b>An established culture where all staff behave in ways that encourage and foster ways of appropriate behaviour at work and respect for all colleagues</b></p>

<b>Theme: Research</b>			
<b>Include attitudinal studies in all research/ staff/customer surveys</b>	From 2007 subject to agreeing questions	Once questions are agreed (with input by Equality Commission and/or NISRA) these will be introduced to ICO research projects.  Results reported in Annual Progress report	<b>Better understanding of attitudes and barriers Results are used to form policies to improve on attitudes</b>
<b>Theme: Information and Communication</b>			
<b>Ensure that media briefings and press releases include disability press.</b>		Inclusion of disability press is mainstreamed into Communications policy. Reported in Annual report.  Communication policy screened (including for disability duties) and reported in Annual Progress report.	<b>Disability equality and a positive image of disabled people will be promoted through media exposure.</b>
<b>Evaluate effectiveness of current internal and external communications programme and identify areas for improvement.</b>	By September 2008	All forms of communication are assessed in relation to the two duties and disability equality generally. Policy improvements set out in Annual report.	<b>Inform Disability Action Plan on Promoting Positive attitudes and improve access to information</b>

			<b>and services</b>
<b>Theme: Working with third parties</b>			
<b>Work with other organisations to promote positive attitudes towards disabled people by developing principles, conditions, or terms that require the adoption of the actual principles or spirit of the duties. E.g Through our regulatory activities including approval of publication schemes under the Freedom of Information Act</b>	From April 2008 and ongoing	Establish clear disability requirements in model publication schemes.	<b>Broaden the impact of the duties to agents and partners</b>