



**Commission for  
Victims and Survivors**

**Disability Action Plan**

**August 2014**

## **Accessible Information Statement**

The Commission for Victims and Survivors is committed to making information as accessible as possible.

This document can be made available on request and where reasonably practicable in the following alternative formats:

- Easy Read;
- Braille;
- Audio formats (CD, mp3 or DAISY);
- Large print; and
- Minority languages to meet the needs of those for whom English is not their first language.

We will respond to requests for information in alternative formats in a timely manner, usually within 10 working days unless third party timescales dictate otherwise.

To ask for an alternative format, please contact the Commission using the following information:

**Telephone:** 028 9031 1000

**Textphone:** 028 9060 7400

**Email:** [commission@cvsni.org](mailto:commission@cvsni.org)



## Disability Action Plan

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 Commission for Victims and Survivors (the Commission) 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 Commission is also required to submit to the Equality Commission a <b>disability action plan</b> showing how it proposes to fulfil these duties in relation to its functions.</p>
1.2	<p><b>Implementation</b></p> <p>The Commission is committed to implementing effectively the disability duties and this disability action plan. We will allocate sufficient resources in order to implement this plan effectively and where appropriate, build objectives and targets relating to the disability duties into our Corporate Plan and annual Work Programme.</p> <p>We will also put in place appropriate internal arrangements to ensure that the disability duties are complied with and this disability action plan is effectively implemented. We will ensure the effective communication of the plan to staff and provide all necessary training and guidance for staff on the disability duties and implementation of the plan.</p>

1.3	<p><b>Consultation</b></p> <p>The Commission consulted on the draft disability action plan over a twelve week period between April and July 2014 with organisations and individuals who might have an interest in it. Substantive comments were received from Disability Action and these have been fully taken into account in the preparation of this final version of the action plan (see Appendix D). Several other consultees responded indicating that they were content that the action plan was fit for purpose.</p> <p>Responsibility for implementing, reviewing and evaluating this disability action plan and the point of contact within the Commission will be:-</p> <p>Title: Head of Corporate Services  Address: Head Line Building, 10-14 Victoria Street, Belfast BT1 3GG</p> <p>Telephone: 028 90 311 000  Textphone: 028 90 607 400  Fax number: 028 90 607 424</p> <p>Email: <a href="mailto:commission@cvsni.org">commission@cvsni.org</a></p> <p>If you require this plan in an alternative format (such as in large print, in Braille, on audio cassette, easy read or on computer disc) or in another language, please contact the above person to discuss your requirements.</p>
1.4	<p><b>Communication to staff</b></p> <p>The Commission will ensure effective communication of the Disability Action Plan to staff and will provide training and guidance. All staff will be provided with information on the Plan via staff meetings and e-mail.</p>
1.5.	<p><b>Reporting Arrangements</b></p> <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 report to the Equality Commission and our five year review of this plan will be made available on our website <a href="http://www.cvsni.org">http://www.cvsni.org</a></p>
1.6	<p><b>Functions</b></p> <p>The Commission's principal aim is to 'promote the interests of victims and survivors of the conflict'. While the detailed powers are set out in legislation, they may be grouped under six statutory duties;</p> <ul style="list-style-type: none"> <li>(i) To promote awareness of matters relating to the interests of victims and survivors and the need to safeguard those interests</li> <li>(ii) To keep under review the adequacy and effectiveness of law and practice affecting the interests of victims and survivors</li> <li>(iii) To keep under review the adequacy and effectiveness of services provided for victims and survivors</li> <li>(iv) To provide advice to government on matters affecting victims and survivors</li> <li>(v) To ensure that the views of victims and survivors are sought by the Commission in carrying out its work</li> <li>(vi) To make arrangements for a forum for consultation with victims and survivors.</li> </ul>
1.7	<p><b>Public Life Positions</b></p> <p>The Commission has one Commissioner supported by a governance committee: the Audit and Risk Committee (ARC). The membership of the ARC is independent of the Commission and consists of three external members; these are the only public life positions open to adults within the Commission.</p> <p>The ARC supports the Accounting Officer in monitoring Commission risk, control and governance systems (including financial reporting). Additionally the ARC gives advice to the Accounting Officer on the adequacy of coverage of audit arrangements (internal and external) to provide the required assurances.</p> <p>The ARC Members are appointed for three years and are eligible to be re-appointed at the end of this period for a further three years. Vacant positions are advertised widely in the press and on the Commission website. The next appointments will be made in 2015.</p>

**The Forum for Victims and Survivors**

The Commission has established the Forum for Victims and Survivors. This is a representative group to facilitate consultation and discussion with victims and survivors of the conflict and to support the Commission in its work.

The Forum has three objectives, each of which reflects the three key themes of the OFMDFM's Strategy for Victims and Survivors 2009:

- 1) To contribute to the Commission's assessment of the needs of victims and survivors; funding arrangements and the provision of services;
- 2) To advise the Commission on dealing with the past;
- 3) To advise the Commission on the contribution of victims and survivors to building a shared and better future.

The Forum members are divided into three working groups:

- 1) Services;
- 2) Dealing with the past;
- 3) Building for the future.

Each working group has its own work programme and agreed outputs.

These are not public life positions but the Commission is committed to developing a diverse yet inclusive panel. Currently 22% of those on the Forum have declared some form of disability and the Forum therefore provides an opportunity for the Commission to hear the views of disabled people on a regular basis and makes a major contribution to promoting positive attitudes to disabled people.

2.	<p><b>Previous Measures</b></p> <p>Outlined below are the key measures which the Commission for Victims and Survivors (the Commission) has taken already to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life.</p> <p><b>Promoting Positive attitudes towards disabled people</b></p> <p>2.1 <b>Staff Training</b> - The Commission has provided all staff with training in relation to our duties under Section 75 and carried out additional Disability Equality training. The Commission has also gone beyond the statutory training obligation and has recently undertaken a programme of training events on mental health as part of our commitment to being an Employer of Choice.</p> <p>2.2 <b>Accessibility</b> - The Commission has developed an Accessible Information Policy (Appendix B) to reinforce our commitment to making information as accessible as possible and to ensure that thought is given to providing information in a format appropriate to meeting a range of information needs, including those of:</p> <ul style="list-style-type: none"> <li>• People with hearing impairments</li> <li>• People with sight impairments</li> <li>• People with learning difficulties</li> <li>• People with literacy difficulties</li> <li>• People with physical disabilities</li> </ul> <p>All our public documents are available in alternative formats – Easy Read, Braille, audio formats (CD, mp3 or DAISY) and large print.</p> <p>In terms of information distribution, the Commission reviews the methods of distribution on an annual basis with a view to developing new methods to ensure that our information is accessible to everyone in Northern Ireland.</p> <p>Commission staff are directed to the Accessible Information Policy when organising meetings and events involving members of the public, such as exhibitions, launches, seminars, conferences, focus groups etc. to make sure that information is provided in an equitable and accessible manner.</p>
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2.3	<p><b>Our staff and recruitment</b> - The Commission is committed to ensuring that the composition of our workforce is representative of the wider population, with 8% of our workforce having declared some form of disability. The Commission conducts annual equal opportunities monitoring of staff as well as monitoring applicants for posts.</p> <p>The Commission has in place a Managing Disability Policy (Appendix C) in order to maximize the contribution of disabled employees and to promote disability awareness thus reducing stereotypical assumptions and attitudes towards disabled people.</p> <p>The Managing Disability Policy emphasises the need to consider reasonable adjustments to disabled staff. The policy allows disabled staff to consider taking a more flexible approach to their working hours in order to accommodate their individual needs.</p>
2.4	<p><b>Research</b> - The Commission's Policy, Development and Research Team have been actively seeking the views of disabled victims and survivors in the course of their work and engagement with victims and survivors. The team consults with disabled groups and NGOs in order to facilitate the participation of a wide range of disabled people in their work.</p> <p><b>Encourage the participation of disabled people in public life</b></p>
2.5	<p><b>Audit and Risk Committee</b> - As stated above the Commission has a very limited number of public life positions for adults. However in terms of the recruitment process for our ARC and staff the Commission is developing a robust open recruitment procedure with an emphasis on making these positions accessible to all.</p> <p>All posts are advertised widely in the press and on the Commission website which is fully accessible to all disabled people. In addition all recruitment information can be requested in alternative formats and applicants with disabilities may submit their application in a format of their choice.</p>
2.6	<p><b>Forum for Victims and Survivors</b> - The Commission is committed to developing a diverse and yet inclusive panel. People with disabilities are currently represented on the Forum.</p>

**Action Measures**

Outlined in the attached Appendix A are the measures which we propose to take over the next five years of this disability action plan ending in 2019, together with performance indicators and targets. These include the continuation of the previous measures outlined above together with a number of new measures arising from the consideration of the disability duties.

Appendix B sets out the Commission's Accessible Information Policy and Appendix C sets out the Commission's Managing Disability Policy, both of which are an integral part of our approach to implementing the disability duties.

Appendix D sets out the comments received from Disability Action during the consultation period and explains how these have been taken into account.

## Appendix A

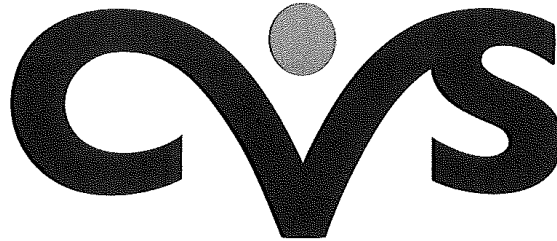
The table below outlines measures to be taken by the Commission to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life.

Measures	Timescale	Performance Indicators/ Targets
<b>1. Training</b> Provide initial training and annual refresher training to Commission staff and governing committees on the disability duties.	Annual refresher training in March of each year.	Number of staff and governing committee members trained each year. Number of staff and committee members indicating an increase in their understanding of the disability duties as a result of training.
<b>2. Induction training</b> Develop module on disability equality training regarding the disability duties for incorporation into the induction process and ensure that all new staff receive it.	Develop module by March 2014. Provide induction as required.	Number of new staff receiving induction training per year.
<b>3. Screening</b> Revise policy screening template to include assessment of the implications of the disability duties when carrying out policy screening in accordance with the Equality Scheme.	Revise policy screening template by March 2014. Carry out screening as required.	Number of policies revised to promote the disability duties as a result of screening. Number of mitigating measures taken to promote the disability duties as a result of screening.
<b>4. Recruitment</b> Ensure the Commission statement detailing our commitment to interview all candidates who meet essential criteria is included in all recruitment advertisements.	Ongoing. Review annually in March to ensure provision is effective.	Number of candidates for each advertised post who indicate a disability on the monitoring form.

<p><b>5. Reasonable adjustments</b></p> <p>Monitor satisfaction level of disabled interviewees with reasonable adjustments we have made for their interview.</p> <p>Communicate to all managers any new ideas for reasonable adjustments resulting from the monitoring.</p>	<p>Each disabled interviewee to be asked for comments.</p>	<p>Satisfaction levels.</p> <p>Number of new ideas communicated.</p>
<p><b>6. Monitoring</b></p> <p>Continue to conduct annual confidential monitoring survey to determine the number of disabled staff and extend this monitoring to include ARC and Forum members.</p>	<p>Monitoring survey to be undertaken annually in March.</p>	<p>Results of monitoring survey to be reported in annual progress report to the Equality Commission.</p>
<p><b>7. Website accessibility</b></p> <p>Continue to maintain accessibility of website in line with the Commission Accessibility Policy and RNIB recommendations.</p>	<p>Ongoing.</p> <p>Accessible Information Policy to be reviewed on an annual basis with particular reference to website.</p>	<p>Website will meet with standards as laid out by Accessible Information Policy.</p> <p>Amendments to Accessible Information Policy to be undertaken as required upon review.</p> <p>Monitoring information will be used to develop more detailed objectives.</p>
<p><b>8. Managing Disability Policy</b></p> <p>In recognition of the value and contribution of disabled staff we will continue to monitor and evaluate the existing Managing Disability Policy.</p>	<p>Review on an annual basis.</p>	<p>Amendments to be undertaken as required upon review.</p> <p>Monitoring information will be used to develop more detailed objectives.</p>
<p><b>9. Imagery in publications</b></p> <p>Publications and website, where applicable, to use positive imagery of disabled people.</p> <p>Review situation annually to ensure positive portrayal and avoid tokenistic inclusion of disabled people.</p>	<p>Ongoing.</p> <p>Review annually in March.</p>	<p>Percentage of publications which include photography and other positive imagery of disabled people.</p> <p>Target: to increase the percentage on an annual basis.</p>

<p><b>10. Consultation</b></p> <p>The Commission Policy Development and Research Team will continue to actively seek the views of disabled people in its research programmes. The team will continue to consult with disabled groups and NGOs in order to facilitate the participation of a wide range of disabled people in their work.</p>	<p>Ongoing Review results annually in March to ensure consultation and engagement process is effective.</p>	<p>Number of disabled groups/individuals consulted on each report.</p>
<p><b>11. Accessibility</b></p> <p>Take appropriate steps to improve the accessibility of the work premises to people with different types of disability. This will include a review of signage, manuals, workplace instructions and electronic information.</p>	<p>Complete review by September 2014 and build required revisions into the Work Programme.</p>	<p>Feedback will be sought from disabled employees and visitors as the opportunity arises. Any further suggestions for improvements will be considered during the annual review of this plan.</p>
<p><b>12. Review of the Action Plan</b></p> <p>Review action plan on an annual basis with input from disabled staff and members of the Forum.</p>	<p>Review annually in March.</p>	<p>Continue to develop actions, target and indicators to improve the effectiveness of the Commission's initiatives that affect disabled people.</p>

## Appendix B



# Commission for Victims and Survivors

## Accessible Information Policy

Version	1
Date Approved	12 December 2013
Date of Previous Version	7 March 2013

**Approving Officer:** 

**Signed:** Secretary to the Commission

**Name:** John Beggs

**Date:** 12/12/13

## **Accessible Information Statement**

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## Introduction

The Commission for Victims and Survivors (the Commission) is committed to equality of opportunity as outlined in Section 75 of the Northern Ireland Act 1988 ("the Act") and to the principle of making oral and written information as accessible as possible to all members of society.

The purpose of this policy is to help the Commission meet the information and communication needs of stakeholders and the wider community as effectively as possible. We want to make sure that our approach to the provision of written accessible information is clear, balanced, fair, transparent and accurate.

The policy sets out the standards people can expect from the Commission when we provide information.

## Scope

The policy relates to all of the nine categories covered by Section 75 equality legislation including age, gender, disability, ethnicity, sexual orientation, political opinion, dependants, religion and marital status.

The Commission has developed an Equality Scheme which sets out how we propose to fulfil the duties imposed by Section 75. You can view the full Scheme at [www.cvsni.org](http://www.cvsni.org)

The policy specifically complies with 'Chapter 6 – Our arrangements for ensuring and assessing public access to information and services we provide' of the Commission's Equality Scheme (Appendix B).

The policy acknowledges that there are specific needs in relation to sensory impairment, learning disabilities, sexual orientation, older people, younger people, translation for minority ethnic groups and more general literacy levels that are of particular importance.

It recognises the need for information to be produced in a style and format that is easy to understand and accessible, and that promotes alternative formats to make sure information provided is as equitable as possible.

The policy applies to the many ways in which the Commission communicates its work. It covers a range of communication methods including:

- Telephone
- Text phone
- Internet
- Email
- Public consultation
- Research
- Meetings
- Seminars and conferences
- Exhibition material
- Printed material
- Public launches
- Press releases

- Public advertisements and
- Distributing information

The Commission is committed to maximising available resources to best effect to make sure positive and meaningful communication and involvement in working for and on behalf of victims and survivors.

The Commission's commitment will be reflected in a test of reasonableness. That is, we will proactively seek to inform people that alternative versions are available.

All publications including information leaflets and smaller publications should include information on alternative formats. Despite the small size of some publications, it is still important to plan for alternative formats. Publications such as the Annual Report & Accounts, results of research and the Corporate Plan should always contain information on alternative formats, because of the nature of the information and the length of the publication. Each request for an alternative format will be dealt with on an individual basis.

## **Priority Groups**

The following people have been identified as having particular communication needs:

- People who are blind or have a sight impairment
- People who are deaf/hard of hearing
- People who are deaf and blind
- People with literacy difficulties
- People with learning difficulties
- Children and young people
- People from minority ethnic groups whose first language is not English

The Commission is committed to providing accessible information and therefore the accessible information statement, found on the following page, should be included in any new publication.

The Commission for Victims and Survivors is committed to making information as accessible as possible.

This document can be made available on request and where reasonably practicable in the following alternative formats:

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**Email:** [commission@cvsni.org](mailto:commission@cvsni.org)

The Royal National Institute for the Blind recommends that this statement is placed in a prominent position on a publication, preferably in 14 point type size. The inside front cover or the back cover are the recommended places for the statement. The Commission will adopt this recommendation

## Supporting the Policy

It is necessary that all Commission staff are aware of the Accessible Information Policy so that it can be effectively implemented.

The Commission's policy will be supported by a Guidance and Information Pack for all staff which will be available on the Commission's internal server - CVSNI Data (V:). This pack will include the following documentation:

- Accessible Information Policy
- Corporate Identity Guidelines and
- Event Management Guidance

To ensure effective implementation, each member of the Senior Management Team will be responsible for making sure that all public information produced by staff within their respective teams, adheres to the Commission's Accessible Information Policy.

Support, advice and training for staff can be provided as and when required.

### **Distribution Channels**

The Commission will continue to review and develop new methods of distribution to ensure that all of our information is accessible to everyone in Northern Ireland.

Some examples of alternative channels include:

- Talking Newspapers
- Belfast Telegraph Deaf/Talkabout column
- Distributing information through minority ethnic community groups
- The Commission information and press releases published in newsletters, and publications of local voluntary organisations, support groups and ethnic minority organisations
- Widening the circulation of the Commission publications, such as the Commission Newsletter and the Annual Report & Accounts, to voluntary organisations, support groups and ethnic minority groups and
- Distribution of the Commission information to GP surgeries, libraries, Post Offices and Citizens Advice Bureau

### **Review**

This policy will be reviewed on a yearly basis. If legislation changes or if there are major changes to policy or practice then the date for review may be brought forward.

### **Monitoring**

All public information produced by the Commission staff will be monitored regularly to make sure the policy is being applied.

## **Appendix 1 – Language**

The Commission will take reasonable steps to provide information in the languages stated under the Belfast Agreement 1998 and subsequent legislation. As this recognises Irish and Ulster-Scots as official languages the Commission acknowledges that we have a requirement, on request, to produce information in Irish and Ulster-Scots.

We will consider requests for the Commission information to be supplied in other languages upon request.

## **Appendix 2 - Chapter 6: Our arrangements for ensuring and assessing public access to information and services we provide**

6.1. The Commission for Victims and Survivors is committed to ensuring that the information we disseminate and the services we provide are fully accessible to all parts of the community in Northern Ireland. We keep our arrangements under review to ensure that this remains the case.

6.2. We are aware that some groups will not have the same access to information as others.

In particular:

- People with sensory, learning, communication and mobility disabilities may require printed information in other formats
- Members of ethnic minority groups, whose first language is not English, may have difficulties with information provided only in English
- Children and young people may not be able to fully access or understand information.

### **Access to information**

6.3. To ensure equality of opportunity in accessing information, we provide information in alternative formats on request, where reasonably practicable. Where the exact request cannot be met we will ensure a reasonable alternative is provided.

6.4. Alternative formats may include Easy Read, Braille, audio formats (CD, mp3 or DAISY), large print or minority languages to meet the needs of those for whom English is not their first language.

6.5. The Commission for Victims and Survivors liaises with representatives of young people and disability and minority ethnic organisations and takes account of existing and developing good practice.

6.6. We will respond to requests for information in alternative formats in a timely manner, usually within 10 working days.

6.7. Where we provide information to children and young people, people with learning disabilities and minority ethnic communities we will contact representative groups or experts to establish the most effective and practicable approaches for contact.

6.8. In disseminating information through the media we will seek to use different methods of communication i.e. radio, press, social media, leaflets etc as appropriate.

## **Access to services**

- 6.9. The Commission for Victims and Survivors is committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories.
- 6.10. The Commission for Victims and Survivors also adheres to the relevant provisions of current anti-discrimination legislation.

## **Assessing public access to information and services**

We will monitor annually across all our functions, in relation to access to information and services, to ensure equality of opportunity and good relations are promoted. The Commission will also have due regard to its duties on the promotion and encouragement of good relations between people of different racial groups, religious beliefs and political opinions. The Commission will ensure, where possible, that all literature promoting the Commission will display role models from different ethnic backgrounds.

## **Appendix 3 – Practical advice on making information accessible**

In line with the Accessible Information Policy, the purpose of this guidance is to provide practical advice on how to make written information accessible.

### **Presenting Information**

To make sure all Commission information is as accessible and equitable as possible, all public documents will be produced using the following style:

- Use simple language and plain English where appropriate. This makes information easier to understand for everyone.
- To address literacy difficulties use simple, clear text with short sentences, simple punctuation and no jargon, acronyms or abbreviations.
- Use 12 point Arial (as used in this document) as minimum but when appropriate, consideration should be given to using font size 14 point Arial.
- Avoid block capitals, italics or underlining. They all make text harder to read.
- Short titles of documents or headings can be in upper case e.g. VETTING REVIEW. However, upper and lower case is recommended for longer titles and most headings e.g. Review of Speech and Language Therapy Service. Titles and headings can be in bold.
- The use of unjustified right hand margins creates even spacing between words and makes text easier to read (as used in this document).
- Plan what you want to write. Cut out any unnecessary detail and present important ideas in a logical order.
- Use active and personal language. Using 'you' and 'we' makes your writing clearer and more direct.
- Avoid using slashes between words. It is better to say "and" or "or" rather than "and/or".
- Finish a sentence at the end of a page. Do not run a sentence across two pages.
- Clear and simple design and layout of information.
- Use of black ink on white or yellow paper where appropriate.
- Keep the layout of regular publications consistent for example, a monthly newsletter. But make sure that you are flexible and can give people the information in different ways.

- Consider the range of alternative formats that include Easy Read, Braille, audio formats (CD, mp3 or DAISY), large print or minority languages to meet the needs of those for whom English is not their first language.
- For large documents there should be consideration given to the binding. For example where the document is large it may be more appropriate to use ring binding rather than stitching.
- Where you are using information that another organisation has produced (for example information about a venue) ask them for that information in different formats so that you can pass it on to anyone who needs it. If they are service providers, they will have duties under the Disability Discrimination Act NI (DDA) 1995 to provide information in this way.

## **Printing handouts of PowerPoint presentations**

If you are producing handouts of a Powerpoint presentation avoid using the option offered by Powerpoint for printing handouts 3 slides per page. This is because it renders the font size completely inaccessible for your reader. Instead, keep the full page slide and use the option to print out 2 (or 4) pages per sheet in the Printer Properties. This will keep the font size accessible and still provide sufficient space for the reader to write down notes. In short.

### **Use:**

Print – Settings – Full Page Slide

### **Do not use:**

Print – Settings – Handouts – 3 slides per page

## **Using the internet to present information**

- In theory the internet makes information more accessible to a wider public and allows internet users to adjust certain formatting elements according to their needs. However, be aware that some groups are less likely to use the internet, above all older people and people with a disability.
- Provide text alternatives for any visual or audio content (including images) so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language.
- Create content that can be presented in different ways (for example simpler layout) without losing information or structure.
- Make it easier for users to see and hear content including separating foreground from background. If the information is conveyed through colour differences in an image (or other non-text format), the colour may not be seen by users with colour deficiencies.
- Provide users enough time to read and use content. People with disabilities such as blindness, low vision, dexterity impairments, and cognitive limitations may need more time to read content or to perform functions such as filling out on-line forms. If Web functions are time-dependent, it will be difficult for some users to perform the required action before the set time runs out. This may make the service inaccessible to them. Provide options to disable time limits.
- Do not design content in a way that is known to cause seizures. Ensure you do not include anything that flashes more than three times in any one second period.
- Moving, blinking, scrolling, or auto-updating information can distract users during their interaction with a Web page. Content that moves or auto-updates can be a barrier to anyone who has trouble reading stationary text quickly as well as anyone who has trouble tracking moving objects. It can also cause problems for screen readers. Include a mechanism for the user to pause, stop, or hide this information.

- Provide ways to help users navigate, find content, and determine where they are.
- 

### **Where to go for further support and advice on presenting information on the internet**

Practical guidelines have been developed on an international level. The Web Content Accessibility Guidelines (WCAG) 2.0 cover a wide range of recommendations for making web content more accessible. The above advice is taken from these guidelines. Following these guidelines will make content accessible to a wider range of people with disabilities, including blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity and combinations of these. It will also often make your Web content more accessible to users in general.

Web Content Accessibility Guidelines  
[www.w3.org/TR/WCAG20](http://www.w3.org/TR/WCAG20)

## **Appendix 4: Guidelines on making information accessible for and inclusive of particular equality groupings**

### **Making information accessible for older people**

- Avoid using blue as it is often harder for older people to read.
- Use matt paper to avoid brightness and glare which make it hard for older people to read.
- Use a minimum font size of 14 point and 20 point for people with visual impairments.
- Consider using an A3 format (as an A4 booklet) as you can use larger print and images which are easier for people to see.

### **Making information accessible to people who are blind or partially sighted**

Make sure you adhere to the General Guidelines presented in Part 1. In addition, the following is important:

- Use line spacing that provides for at least 1.5 to 2 times the space between words within a line.
- Make sure that your text clearly contrasts with your background. Use dark against light rather than the other way round.
- Avoid setting text vertically.
- Avoid columns. If you need to use them, make sure there is a sufficient gap between them.
- Don't put text on top of images.
- Don't use glossy paper.
- Some people who are blind or partially sighted find it difficult to read numbers. Use words instead.
- You can easily produce documents in large print. These use a larger type size, between 16 and 22 points. If you are unsure, ask the individual what size they prefer.

### **Making information accessible to people who are deaf or hard of hearing**

People who are deaf or hard of hearing and are sign-language users communicate in a different language. This means that English is not their first language. Their needs are not automatically met by providing written information; some will have a level of literacy in English that is below average.

It is important that you consider providing written information as visual alternatives. This includes creating signed content on websites or British or Irish Sign language DVDs.

Consider the use of SMS text message facility for provision of short pieces of information.

### **Making information accessible to people with dyslexia or literacy difficulties**

Make sure you adhere to the General Guidelines presented in Part 1. In addition, the following is important:

- Make sure you structure your text into short chunks of text. Clearly separate these.
- Consider including a glossary to explain any terms that you are using.
- Use words and concepts consistently throughout a document.
- If you are using illustrations, place them at the end of a paragraph. Don't put them in the middle of them.
- Avoid letting text run over illustrations.
- Avoid dark colours as background, especially blue and purple. They make reading harder.
- Some people with dyslexia find it easier to read if text is presented against a cream background or a pale pastel colour.
- When using difficult words, repetition can be very helpful.

### **Making information accessible to people with a disability**

As mentioned at the start, the HSC Trusts recently produced new guidance focusing on communicating with people with a disability, which looks at various ways of communicating. The focus of this document is advice relating to the provision of written information (and alternative formats).

Following the advice provided in Part 1 (General guidelines on making information accessible) will ensure that you meet many of the specific needs of people with a disability. Over and above these, the following guidelines apply to specific types of disabilities.

### **Making information accessible to people with a learning disability**

- Use 16 point Arial or bigger.
- Avoid using green as colour for paper.
- Avoid words in white on a coloured background – they can be harder to read.
- Avoid shiny paper.
- Avoid punctuation other than full stops.
- Use bullet points for examples and instructions.
- Use numerals for numbers not words (10 instead of ten).
- Use just 1 idea in every sentence.
- Use words and concepts consistently throughout a document.
- Consider including a glossary to explain any terms that you are using.
- Use pictures of places rather than maps.
- Avoid using charts.
- Avoid splitting sentences over 2 pages.
- Avoid using columns.
- Consider using alternative formats such as Easy Read or Makaton.

## **Making information accessible for children and young people**

- Consider using coloured fonts, but make sure you use colours that are clearly visible.
- Do not use the font Comic Sans as this is difficult to read.
- Consider using cartoons and photographs. This may be more appropriate for younger children.
- Use simple language.

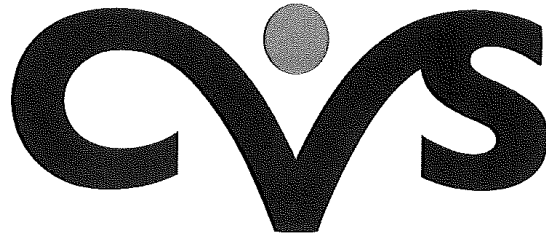
## **Making information accessible to lesbian, gay, bisexual and transgender people**

- Lesbian, gay, bisexual and transgender people are often grouped together because they are all targets of similar forms of discrimination. Within these communities, however, there is a tremendous diversity of experience. Materials that are produced and the images used for lesbian, gay, bisexual and transgender communities need to recognise the wide range of backgrounds that people come from.
- Many languages use terms to describe lesbian, gay, bisexual and transgender people which may be derogatory. If you are translating material, be aware of the cultural context of the terms you are using.
- As a general rule avoid using the label 'homosexual' as it is still viewed negatively. Most people are happy with lesbian, gay, bisexual or transgender but if in doubt - ask!
- Use neutral language such as 'partners', 'parents' and 'he or she'. Avoid using the term 'spouse' and exclusive pronouns (referring to 'he' only or 'she' only) as those assume that all couples are heterosexual.
- Having lesbian, gay, bisexual and transgender information on display creates a welcoming atmosphere. This could include lesbian, gay, bisexual and transgender people showing people from the diverse community in which we live.
- Use images and photographs of lesbian, gay, bisexual and transgender people – such as same sex couples – in a wide range of your publicity materials, not just in documents which are specifically aimed at lesbian, gay, bisexual and transgender people. This sends out a clear message that you recognise the positive contribution that lesbian, gay, bisexual and transgender people can make to our society and that your entire organisation is welcoming to lesbian, gay, bisexual and transgender people.

## **Making information accessible for black and ethnic minority people**

- People who are black or who identify themselves as ethnic minorities have very varied needs. Try to avoid making assumptions.
- Work with people from black and minority ethnic communities to ask them how they want their information presented.
- Find out as much as you can about the black or minority ethnic community group or groups your information is for, so you can make sure it meets their needs.
- Do not just translate information into another language as direct translation from English into another language doesn't always make sense. Translations need to take account of culture.
- Use translators and interpreters who have proper training and who understand cultural differences. The translator may use words and pictures to help people feel the information is right for them.
- Produce leaflets in different languages if required.

## Appendix C



# Commission for Victims and Survivors

## Managing Disability Policy

Version	1
Date Approved	12 December 2013
Date of previous approval	7 March 2013

**Approving Officer:**

**Signed:**

Secretary to the Commission

**Name:** John Beggs

**Date:** 12/12/13

## **1. Statement of Policy**

- 1.1. The Commission is fully committed to promoting a good and harmonious working environment where every employee is treated with respect and dignity and has equality of opportunity within the workplace.

## **2. Objectives**

- 2.1. The objectives of this policy are to;

- (i) Ensure that people with disabilities have equal opportunities in the workplace
- (ii) Recognise and value the talents of all staff
- (iii) Improve employment prospects for persons with disabilities
- (iv) Promote a safe, accessible and healthy workplace
- (v) Maximize the contribution that workers with disabilities make to the Commission
- (vi) Promote disability awareness (through training, publicity and advice) to reduce stereotypical assumptions and attitudes

## **3. Implementation**

- 3.1. Preparing for Recruitment;
  - 3.1.1. The Commission will ensure that job vacancies are available in formats that are accessible to people with different disabilities.
  - 3.1.2. Where the Commission uses Recruitment Agencies, it will stipulate the need for practices which attract applications from all qualified candidates.
- 3.2. In considering a candidate with a disability for a specific job, the Commission will be prepared to make reasonable adjustments, if required, to the workplace, workstation and work conditions. These will be planned in consultation with disabled and non-disabled workers and their representatives (where appropriate).
- 3.3. Interviewing and testing;
  - 3.3.1. Pre-employment and selection criteria will focus on the specific skills, knowledge and abilities regarded as essential to the functions of the job. Selection criteria and selection tests will be carefully examined to ensure that they do not indirectly exclude persons with disabilities.
  - 3.3.2. Employees who sit on interview panels will be trained on how to conduct the interview and selection process appropriately. All interview panels will have at least one person who has been trained in disability awareness.
  - 3.3.3. All interviewees will be invited to state in advance any specific needs that they might require in order to participate in the interview.

- 3.4. Employee induction;
  - 3.4.1. The Commission will ensure that all induction information is communicated to employees with disabilities in a format which ensures that they are fully informed.
  - 3.4.2. In offering a job to a candidate with a disability or disabilities, the Commission will discuss any reasonable disability-related adjustments to the work environment, workstation, work schedules or training which are proposed with the candidate.
- 3.5. Career Development;
  - 3.5.1. Workers with disabilities will be afforded equal opportunities with other employees in acquiring the skills and experience necessary to advance their careers. Information will be accessible to employees with different disabilities in the Commission.
  - 3.5.2. The Commission will make reasonable adjustments to internally organised training courses to ensure the maximum participation of persons with disabilities.
  - 3.5.3. The Commission will inform external training providers of any modifications required for disabled candidates.
- 3.6. Review and Appraisal;
  - 3.6.1. The performance appraisal of workers with disabilities will be carried out according to the same criteria as holders of similar jobs.
- 3.7. Job retention;
  - 3.7.1. When existing employees acquire a disability, steps will be taken to enable the employee to retain their employment within the Commission - these will be in consultation with the employee and their medical advisor. Measures include early intervention and referral to appropriate services, gradual resumption of work, consideration of an alternative role, where possible, the use of support and technical advice to identify any opportunities and reasonable adjustments which might be required.
- 3.8. Facilitation of any of the above steps may require training/retraining, the provision of information to supervisors and co-workers, the use of devices and appliances, and so on.
- 3.9. In developing measures for the redeployment of employees with disabilities, the Commission will take into account the occupational preferences of those employees and consult with employee representatives, if necessary.
- 3.10. Adjustments;
  - 3.10.1. In making a request for an adjustment an employee should speak to their Line Manager in the first instance, and the Line Manager should then inform the Head of HR & Corporate Services.

3.11. Accessibility;

- 3.11.1. The Commission will take appropriate steps to improve the accessibility of the work premises to people with different types of disability. This will include signage, manuals, workplace instructions and electronic information.
- 3.11.2. Emergency planning should ensure that employees with disabilities are able to safely and effectively evacuate the workplace to an area of safety.

3.12. Adaptations;

- 3.12.1. In planning adaptations the Commission will consult with the disabled employee and their medical advisor.
- 3.12.2. Adaptations may include the amendment of the employee's role or flexibility in work schedules. This will be done in consultation with the disabled employee and their medical advisor.
- 3.12.3. Performance requirements will be reviewed in consultation with employees with disabilities and their representatives (where appropriate). This will be done at an early stage after recruitment or after an existing employee has acquired a disability.

3.13. Confidentiality of information;

- 3.13.1. With their consent, any relevant information concerning a person's reduced function or impaired health status will be kept in a manner that maintains confidentiality (as per the Data Protection Act 1998).

#### **4. Variation**

- 4.1. The Commission reserves the right to vary this Policy as it deems appropriate to include compliance with any legal requirements. The appropriate staff/Union(s) will be notified of any proposed variation and consulted in advance. However in the absence of any agreement, the Commission reserves the right to vary this Policy on 4 weeks notice.

## Appendix D

The table below outlines the comments received during the consultation period and the Commission's response to the points made.

No.	Consultee	Comment	Commission Response
1.	<b>Disability Action</b>	<p>1.1. The Commission for Victims and Survivors are asked to outline measures to promote public life opportunities which are not confined simply to the public appointment process. The Commission should highlight measures for which it has responsibility within its action plan or at the very least identify those public life opportunities that it may influence to increase the number of people with disabilities in public life. The definition of public life within the Equality Commission for Northern Ireland DDO Guide is much broader than public appointments therefore it is not appropriate to exonerate the responsibility in this area. (Item 1.7/1.8)</p>	<p>The focus of the statutory duty, as set out in the Equality Commission guidance, is involving disabled people in public policy decision making, either through representation on decision making/ advisory bodies or through consultation and engagement. The Commission's Disability Action Plan sets out details of the two decision making/ advisory bodies that currently exist, namely the Audit and Risk Committee and the Forum. It also sets out (at para. 2.4) how the Commission Policy Development and Research Team actively seeks the views of disabled victims and survivors in its research programmes. (This is also highlighted in Action 10). We consider that these paragraphs accurately and adequately portray the areas where the Commission has the ability to promote public life opportunities.</p>
		<p>1.2. Regarding training Disability Action would recommend Disability Equality Training rather than Disability Awareness Training. (Item 2.1)</p>	<p>All references have been amended throughout the document.</p>

		<p>1.3. Regarding previous measures for both duties Disability Action would advise that it is not sufficient to list actions taken to address legal obligations rather it is an opportunity to identify what has and hasn't worked and to use this information to develop achievable objectives across the Commission's functions that move the aspirational into practical outcomes that can be effectively measured.</p> <p>Whilst a public authority can take account of previous actions taken in respect to Section 75 duties and the DDA 1995 this DAP must specifically address the DDO 2 duties. (Items 2.0).</p>	<p>The Commission was established in 2008 and section 2 of the Disability Action Plan reflects the initiatives that the Commission has put in place which have an impact on disabled people, in particular, the Accessible Information Policy and the Managing Disability Policy. We acknowledge that more can be done to monitor the impact of these policies in order to evaluate their effectiveness and have clarified Actions 7 and 8 to highlight this.</p>
		<p>1.4. Regarding recruitment Disability Action welcomes the range of accessibility for applicants however Disability Action would ask if interviews are offered to people with disabilities who meet the minimum criteria for a vacancy and if they are considered on their abilities?</p>	<p>The Commission has a commitment to interview all disabled candidates who meet essential criteria and a statement to this effect is included in all recruitment advertisements (see Action 4).</p>
		<p>1.5. <b>Action 1</b> – As training is delivered every year Disability Action would ask if existing materials are updated and who equality proofs the content.</p>	<p>We arrange for training to be provided by experienced and reputable trainers who prepare tailored materials.</p>
		<p>1.6. <b>Action 2</b> - Disability Action would ask if existing materials are updated and who equality proofs the content.</p>	<p>Similarly, induction materials are prepared by those with the requisite experience and expertise.</p>
		<p>1.7. <b>Action 5</b> – Reasonable adjustments are a DDA 1995 obligation and should not be duplicated here.</p>	<p>We acknowledge the point but consider that it is useful to include the action in order to ensure that the annual review of DDA obligations becomes part of the annual review of the disability action plan.</p>

		1.8. <b>Action 10</b> - Disability Action finds no evidence of a specific action detailing how the Commission intends to involve people with disabilities in the implementation, monitoring and review of the Action Plan.	We acknowledge this point and have added a further action (no. 12) indicating that the Disability Action Plan will be monitored and reviewed on an annual basis with the involvement of disabled members of staff and the Forum.
		1.9. <b>Action 11</b> – Reasonable adjustments are a DDA 1995 obligation and should not be duplicated here.	See comment at 1.7 above.
		1.10. Disability Action has noted that 8 of the 11 actions are ongoing. Disability Action would advise that ongoing timescales are vague and make it difficult to determine what has been achieved to date and to identify new or next step actions. Disability Action would recommend that ongoing timescales be replaced by specific actions, dates, clear performance indicators.	We acknowledge that ongoing timescales may be vague, but it is not possible for the Commission to determine at this time exactly when certain actions will be taken; e.g. screening of new policies, recruitment exercises, consultations, additions to the website, publication of documents. Most of the actions which have an ongoing element also include an annual review and we have amended Actions 4 and 10 to include this provision.
		1.11. Regarding performance indicators/targets Disability Action believes that it would be more beneficial if Action Plans establish outcome driven measures which are specific, measurable, achievable, realistic and time-bound. (SMART) This will enable Action Plans to be attainable and measured rather than creating unachievable aspirational goals which although commendable rarely achieve real change.	We agree that outcome indicators are very useful and, once the plan is in operation, it may be possible to use the results of annual monitoring and evaluation to develop an outcome driven approach. At this stage the Commission does not have sufficient information to do so.