



## **Disability Action Plan**

# **Outcome Report of the Equality Impact Assessment of Youth Arts Strategy under Section 75 of the Northern Ireland Act 1998**

## **Disability Action Plan**

Meeting with RNIB (CAN Development Officer and Campaigns & Research Manager)

Meeting with Disability Action (Statutory Duty & Policy Officer)

Meeting with Arts & Disability Forum (Chief Executive)

## **Written responses**

Disability Action

MEAPP

Autism NI

Re:Play

Open Arts

Equality Commission

## Consultation Responses

**Table 1:** The following responses have been received as a result of the consultation process of the Draft Disability Action Plan

Comments received from RNIB	ACNI Response
<p>In relation to Action Measure 20, please amend the language to read: <i>Support the delivery of the NI Vision Strategy Implementation Plan which seeks to address the needs of blind and partially sighted people.</i></p> <p>Omit the acronym RNIB from the KPI in Action Measure 20.</p> <p>In relation to the KPI in Action Measure 20, change name of group mentioned to the 'Steering Group'.</p>	<p>ACNI thanks RNIB for engaging with the Arts Council as part of the consultation process. ACNI will amend the language as noted.</p> <p>ACNI will remove the acronym RNIB, and recognizes that the NI Vision Strategy Implementation Plan 2014-16 is a plan created/ led by the NI Visual Impairment Sector Forum</p> <p>ACNI will note this change.</p>
<p>In relation to Action Measure 21, the RNIB NI Model of Excellence is presently on hold.</p>	<p>ACNI will remove this Action Measure from the Disability Action Plan. ACNI highlights the Arts and Disability Equality Charter. This is a 'kite-marking' project developed by disabled people to encourage and reward good practice amongst arts venues</p>
<p>RNIB highlighted that increasing awareness of the services already provided is key. Resources into marketing where access is already available would be of value.</p>	<p>ACNI will highlight the importance of communications in the outworking of the Disability Action Plan. We will work closely with our Communications Department to profile access already available.</p>
<p>RNIB is keen to work with the Arts Council in the future</p>	<p>ACNI welcomes this offer and looks forward to working with RNIB in the future.</p>
<p>RNIB provided the Policy Development Officer with a copy of the Vision Strategy: NI Implementation Plan 2014-16</p>	<p>Noted.</p>

<b>Comments received from Open Arts</b>	<b>ACNI Response</b>
<p>The description relating to Open Arts in the Section Funding of Arts and Disability Organisations is incorrect. Please change to:  <i>Open Arts provides a variety of high quality activities across a range of art forms, ensuring both participation and artistic excellence for people with disabilities’.</i></p>	<p>ACNI thanks Open Arts for the response to the consultation. ACNI thanks Open Arts for bringing this to our attention. ACNI will make this amendment.</p>
<b>Comments received from Autism NI</b>	<b>ACNI Response</b>
<p>The following comments from Autism NI are confined to Autism specific issues that require prioritisation in this context. Beyond this, we wish to support the general disability sector comments provided by MENCAP and Disability Action.</p>	<p>ACNI thanks Autism NI for the response to the consultation and notes this comment.</p> <p>A response to the consultation was received from Disability Action.</p>
<p>The natural consequence of the Autism Act (NI) 2011 is a legal requirement upon all Public Bodies to take account of the social and communication barriers faced by individuals with Autism in accessing public services and public facilities, e.g.</p> <ul style="list-style-type: none"> <li>• improved visual signage and attention to sensory barriers;</li> <li>• clearly structured public areas delineated by function;</li> <li>• assessments based upon social functioning, not merely mental and physical ability;</li> <li>• adjustments to “customer service” procedures that provide for people with Autism;</li> <li>• specific workforce Autism training to assist compliance and competence;</li> <li>• information must be conveyed in a literal style with visual prompts when appropriate or required.</li> </ul>	<p>ACNI notes this comment.</p> <p>This Disability Action Plan recognizes the recent legislation, the Autism Act (NI) 2011. Action Measure 12 states:</p> <p>All ACNI staff to be provided with Autism awareness training by March 2015.</p> <p>(This measure is also contained within the ACNI Equality Scheme Action Plan 2013-2018.)</p>

<b>Comments received from Mid &amp; East Antrim Agewell Partnership (MEAPP)</b>	<b>ACNI Response</b>
MEAPP is submitting comments for consideration specifically relating to older people.	ACNI thanks MEAPP for the response to the consultation.
<p><u>Transport</u> MEAPP fully agree and acknowledge that access to transport remains one of the top priorities for older people in Mid &amp; East Antrim Area. We would also like to note that many of the performances themselves are scheduled to take place in the evenings, and for many older people public transport is especially difficult to access then as no regular bus or train services are operational.</p>	<p>ACNI recognises that certain groups within society face barriers to engaging in the arts. ACNI has previously noted in the Arts and Older People Programme (AOPP) literature that transport can be a barrier and the AOPP Guidance Notes state that transport is an eligible cost. A number of AOPP projects have been awarded funding for transport costs.</p> <p>Additionally, the Premium Payment Scheme is a unique award for applicants who can demonstrate additional costs associated with delivery of their project for people with particular needs as defined under the Northern Ireland Act 1998, Section 75. A Premium Payment of up to £3,000 each year per successful applicant improves Section 75 related access. This can include financial support for transport requirements.</p>
<p><u>Cost</u> In terms of helping mitigate the cost associated with attending events, for older people who are managing on a low income, MEAPP fully support the 'Community Ticketing Schemes' that are on offer by many Arts Based Organisations such as the Belfast Waterfront. We would however like to emphasize, that in order for Community Groups to truly benefit from this scheme, more timely and effective communication is required. A recent example was provided which also highlighted that the notice given was not enough to then apply for and</p>	<p>The Arts Council notes this comment. The Arts Council recommends that as timely as possible communication is given in order that community groups can benefit from initiatives such as the Community Access Ticketing Scheme and other community ticketing schemes offered by ACNI funded clients such as The Lyric.</p> <p>The Arts Council recommends that MEAPP contact the Arts &amp; Community Coordinator at Belfast Waterfront &amp; Ulster Hall.</p> <p>ACNI also funds Audiences NI to</p>

<p>access additional funds to cover transport and refreshments costs.</p>	<p>deliver Test Drive the Arts which seeks to introduce people to the arts for the first time or in some cases re-attend venues and artforms.</p>
<p>Refreshment is also a common theme when it comes to encouraging older people to attend. It receives little or no grant funding support through AOPP. Many 'Community Ticketing Scheme' events take place in Belfast and so refreshments will need to be purchased by the community group or the older person, again raising the costs associated with enjoying an arts based event or activity.</p>	<p>ACNI notes this comment and appreciates that this is a difficulty faced by some organisations.</p> <p>Projects such as the AOPP are partially-funded by Lottery funding and as a general rule we are restricted from offering funding support for refreshments and hospitality.</p>
<p><u>Social Barriers</u> For many older people, actually having the confidence to attend art based activities without the support of a friend or family can lead to social isolation, especially in an area outside of their immediate area. Therefore, arts organisations truly wanting to increase the participation of older people in arts based activities need to create and sustain partnerships with local community based organisations who have the volunteers and networking skills to gain buy-in and build the confidence of the older person prior to participation, as well as be there as a friendly face and comfort whilst attending the events/ activities.</p>	<p>ACNI notes this comment and recommends that arts organisations and community based organisations endeavor to develop sustainable relationships to effect change and so increase the number of older people engaged in arts activity. One of the strategic themes of the AOP Strategy is <i>Isolation and Loneliness - Working with older people to combat feelings of isolation and loneliness</i>. ACNI hopes that strengthened relationships between arts organisations and local community based organisations will be a consequence of AOPP. As outlined in the Guidelines, ACNI is interested in proposals that are <i>based on a partnership approach</i> and which <i>consider legacy and sustainability</i> (p8)</p>
<p><u>Information and Awareness</u> Community based organisations need further advance notice if we are to take up the 'Community Ticketing Scheme' opportunities to encourage older people to attend.</p>	<p>ACNI notes the importance of information and awareness. The Arts Council recommends that timely communication is given in order that community groups can benefit from initiatives such as the Community Access Ticketing Scheme and other ticketing schemes offered by ACNI funded clients.</p>

<p>Other simple things like engaging with the community organisations through their local newsletters/ luncheon clubs/ craft classes, would also educate them what art and art based activities can involve.</p> <p>Information also needs to be provided in a readable, user-friendly format, as many older people struggle to read the brightly coloured leaflets and flyers which have small writing on a coloured background.</p>	<p>ACNI notes this comment. As outlined in the AOPP Guidelines, ACNI is interested in proposals that are <i>developed through consultation with older people</i> (p8).</p> <p>ACNI notes this comment and will share this with our Communications Department</p>
<p><u>Evaluation &amp; Monitoring</u></p> <p>Having been awarded funding from the recent AOPP, it is evident that the traditional evaluation and monitoring techniques required as part of the funding terms and conditions are not suitable to capture the true effect it can have on older people. Expecting older people, especially those who are particularly vulnerable and disabled, to complete several large forms is not realistic. And the 'Audience Form' is equally as difficult for an older person to read and understand, due to the font size and the number of questions.</p> <p>Being an AOPP (recipient), asking for creativity from the applicant to apply new approaches to engage with and support older people to become involved in art, MEAPP would ask that the Arts Council consider applying those same principles to the way in which the programme needs to be evaluated by the applicant as well as the independent evaluator, to capture the true barriers to inclusion, through short films, case studies and photographs for example.</p>	<p>The Arts Council takes its ethical responsibilities regarding the evaluation process very seriously with the characteristics of participants at the centre of the deign process.</p> <p>The consulting team appointed to oversee the evaluation process has clearly communicated to the client group, both at workshop events and during one-to-one consultations, that where they felt the standardized tools were inappropriate they should contact them to make alternative arrangements. Alternative arrangements have been put in place with a number of clients as a consequence of this offer.</p> <p>ACNI would be happy to discuss this further with MEAPP.</p>

Comments received from Disability Action	ACNI Response
<p>Regarding public life, Disability Action believes that ACNI must more than 'consider' ways to encourage people to participate in consultation process during the life of this DAP.</p>	<p>ACNI thanks Disability Action for its response to the consultation. ACNI has changed the action to 'develop' ways to encourage disabled people to participate in consultation process during the life of this DAP.</p>
<p>The Arts Council is asked to outline measures to promote public life opportunities which are not confined simply to the public appointment process. The Arts Council 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.</p> <p>For example, Recommend to DCAL that when appointing future Arts Council Board members, that they are as representative as possible and seek to appoint disabled Board members.</p> <p>Also, Recommend that the Arts Council seeks to appoint disabled people to its stakeholder groups.</p>	<p>The Arts Council has revised Action Measure 14 to reflect more specifically its obligation to promoting public life opportunities for disabled people.</p> <p>ACNI notes this comment</p> <p>ACNI notes this comment and will monitor the composition of ACNI advisory groups with representation from Section 75 groups, including disability.</p>
<p>Additionally, the definition of public life within the ECNI DDO Guide is much broader than public appointments therefore it is not appropriate to exonerate the responsibility in this area. (Item 5, Page 8)</p>	<p>ACNI notes this comment.</p>
<p>Regarding training for staff, Disability Action advocates Disability Equality Training rather than Disability Awareness Training (Page 11)</p>	<p>ACNI notes this comment. The training will be amended to Disability Equality Training.</p>



<p>Regarding the DAP, Disability Action would make the following comments:</p> <ul style="list-style-type: none"> <li>• Action 2 – Disability Action would advise that disabled and older people and other low income families do not have the economic power to purchase computers and internet services.</li> <li>• Action 3 – welcome and interested in this innovative measure</li> <li>• Action 4,5 &amp; 9 – welcome, however would seek information on planned next steps after reviews</li> <li>• Action 7 – welcome, however require further information to enable informed comment</li> <li>• Action 11 – refer to bullet point 1 above</li> <li>• Action 14 – welcome, however require more information on how this action will be implemented</li> </ul>	<p>ACNI notes this comment and welcomes the information. Information on the Art Council’s activities is also available by phone or one-to-one meetings with relevant staff members.</p> <p>ACNI notes this comment.</p> <p>ACNI notes this comment.</p> <p>ACNI notes this comment.</p> <p>ACNI notes this comment.</p> <p>ACNI notes this comment.</p>
<p>Disability Action finds no evidence of a specific action detailing how the Arts Council intends to involve people with disabilities in the implementation, monitoring and review of the Action Plan as referred to at paragraph 5, page 8.</p>	<p>ACNI notes this comment and will be working in partnership with the sector to implement the strategy actions.</p>
<p>Disability Action has noted that 12 of the 18 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. Have these actions been carried over from the last DAP? Disability Action would recommend that ongoing timescales be replaced by specific actions, dates, clear performance indicators.</p>	<p>ACNI notes this comment. More specific timescales will be noted in the published Disability Action Plan, where possible.</p> <p>These actions have not been carried over from the previous DAP but some measures are contained within ACNI’s Equality Scheme Action Plan 2013-2018 available on the ACNI or in hard copy on request.</p>

Regarding performance indicators/ targets, Disability Action believes that it would be more beneficial if Action Plans establish outcome driven measures which are SMART. This will enable Action Plans to be attainable and measured rather than creating unachievable aspirational goals which although commendable rarely achieve real change	ACNI notes this comment.
Whilst recognizing the efforts to prepare this Plan, Disability Action believes that it requires significant redrafting and to support this Disability Action encloses its generic response for public authorities regarding the two new duties.	ACNI notes this comment.
Disability Action has welcomed the opportunity to respond to this important draft Plan and looks forward to seeing the comments above incorporated into the revised Plan.	ACNI notes this comment.
Disability Action informed the Policy Development Officer that they have an Employment Unit which may be of value in the forthcoming Creative Apprenticeships and Internships Programme.	ACNI notes this comment and will share with those involved in the forthcoming Creative Apprenticeships and Internships Programme.
<b>Comments received from the Equality Commission for Northern Ireland</b>	<b>ACNI Response</b>
The Commission acknowledges the considerable effort made by the Arts Council of Northern Ireland in developing a Disability Action Plan which is meaningful, achievable and focused on the disability duties to promote positive attitudes towards disabled people and to increase the participation of disabled people in public life. This action plan provides a comprehensive range of actions which will assist the Arts Council of Northern Ireland to achieve its obligations arising from the Disability Duties. It is also encouraging that the	ACNI thanks the Equality Commission for its response to the consultation. ACNI notes this comment.

<p>organisation has developed its plan not simply with a focus on its own internal structures but also on those organisations which it funds and interacts with in the course of carrying out its functions as a public authority.</p>	
<p>The Commission also welcomes the general approach taken by ACNI in developing this draft Disability Action Plan and notes the fact that the Disability Action Plan includes what appears to be a comprehensive and proactive programme of measures to facilitate its promotion of positive attitudes towards disabled people and encouraging participation of disabled people in public life.</p>	<p>ACNI notes this comment.</p>
<p>Our comments are broad feedback with some suggestions on areas we have noted rather than a detailed response to all of the individual actions contained in the plan or an endorsement of individual actions. Our response has attempted to set out constructive feedback and advice in relation to the plan currently under consultation with reference to good practice.</p>	<p>ACNI notes this comment.</p>
<p>The Commission recommends that the ACNI Disability Action Plan identifies which of the two duties each action measure is intended to address. This should make it easier for stakeholders to understand how ACNI intends to fulfil its obligations with regard to each of the two duties and facilitate the reporting of progress in the Annual Progress Report.</p>	<p>ACNI notes this comment and will add this column to the final Disability Action Plan when published.</p>
<p><b>Monitoring</b> The Commission welcomes the focus on monitoring within the ACNI Disability Action Plan. Monitoring, evaluation and reviewing measures contained within a Disability Action Plan and the degree to which actions have been effective in achieving</p>	<p>ACNI notes this comment.</p> <p>The Policy Development Officer attended the launch of the report: <i>Shortfalls in public policy and programme delivery in Northern Ireland relative to the articles of the UNCRPD</i>. The 2014 research found</p>

<p>tangible outcomes is critical to the successful implementation of the Disability Duties. Monitoring can assist public authorities to determine whether measures have been implemented within agreed timescales. It will also assist in determining whether performance indicators have been met and provide an opportunity to review the effectiveness of action measures in achieving tangible outcomes for disabled people.</p>	<p>that the priority gaps identified in the 2012 Report remained and one of these gaps is Statistics and Data Collection (Article 31).</p> <p>Acting on the 2012 report, the Arts Council inserted the following question in the General Population Survey 2014, specifically to those who indicated they have a disability:  <i>Q. Which of the following, if any, prevent you from attending arts events?</i></p>
<p><b>Performance Indicators</b></p> <p>When developing measures to be included in a Disability Action Plan it is important to bear in mind that the Disability Duties require public authorities to consider what proactive steps they can take regarding the promotion of positive attitudes towards disabled people and to encourage their participation in public life.</p> <p>It is also important to ensure as much as possible that performance indicators are clear and measurable and demonstrate how actions and intended outcomes are relevant to the disability duties. The Commission notes that a number of actions in the ACNI plan have very specific targets and this is to be welcomed because it will allow the organisation the opportunity to measure progress over time and to take any remedial action where necessary. However, there are a number of actions contained in the plan where the targets are less specific. Whilst acknowledging that it may not always be possible to set specific targets the Commission would encourage all public authorities to identify any available baseline information at the outset and to set</p>	<p>ACNI notes this comment.</p> <p>ACNI notes this comment. We will review the targets and endeavour to publish more specific targets in the finalized Disability Action Plan, where possible.</p> <p>ACNI notes the importance of baseline information and will add this information to Action Measure 16: Increase attendance to the arts for disabled people and Action Measure 17: Increase participation in the arts for disabled people, using the baseline of 21%, established in 2014</p>

<p>achievable targets where possible.</p>	
<p><b>Promoting Positive Attitudes</b>  The Commission’s guidance on the Disability Duties suggests measures which public authorities can take in order to promote positive attitudes towards disabled people as follows:</p> <ul style="list-style-type: none"> <li>• Review of a public authority’s external and internal communication policies, practices and procedures in order to ensure that disabled people are portrayed in a positive role.</li> <li>• Measures to promote positive attitudes amongst employees, office holders and others.</li> <li>• Measures which encourage others to adopt / promote positive attitudes towards disabled people.</li> </ul> <p>There are a number of measures contained in the ACNI Disability Action Plan which focus on accessibility, participation and access. Whilst these actions in themselves are very important and have the potential to have a significant impact on disabled people in a positive way, it is important that public authorities are mindful when developing actions which are closely associated with the Disability Discrimination Act (DDA 1995) requirements or indeed Section 75 equality scheme commitments, that it is clear how these actions are designed to meet the requirements of the two Disability Duties, to promote positive attitudes to disabled people and to improve the participation of disabled people in public life.</p>	<p>ACNI notes this comment. Action Measure 1 states that ACNI will employ positive imagery of disabled people accessing and participating in the arts as well as the work of disabled artists. We will work closely with our Communications Department during the outworking of the Disability Action Plan</p> <p>ACNI notes this comment. One action ACNI will take is to provide ACNI staff with disability equality training.</p> <p>ACNI notes this comment. Action Measure 11, states that disability equality training will be offered to ACNI funded organisations on at least three occasions per annum through Arts and Disability funded organisations.</p>
<p><b>Participation in Public Life</b>  The Commission’s guidance on the Disability Duties outlines a number of measures which public authorities can take to encourage disabled people to</p>	<p>ACNI notes this comment.</p>

<p>participate in public life which include;</p> <ul style="list-style-type: none"> <li>• encouraging disabled people to apply for/participate in public life positions</li> <li>• removal of barriers to the selection process and the participation of disabled people</li> <li>• creating opportunities for the involvement of disabled people and measures which encourage others to promote the participation of disabled people.</li> </ul> <p>The Commission welcomes the focus that ACNI has placed on this particular duty and notes a number of measures contained in the ACNI Disability Action Plan associated with it. However, the Commission recommends that further consideration is given to our comments below. With regard to measure 7, 'to monitor the composition of Arts Council advisory groups', it is unclear whether there is currently an under-representation and what action if any is necessary. The Commission recommends that the ACNI plan contains more detailed information in relation to this particular measure. Measures 23 and 24 refer to 81% of funded organisations without any representation from disabled people at Board level. The Commission recommends that a more specific target is set in relation to this measure because this particular type of measure is fundamental to the disability duty, to increase the participation of disabled people in public life positions.</p>	<p>ACNI notes this comment regarding Action Measure 7. We have recently rolled out a new monitoring system called the Annual Funding Survey. This will provide us with stronger quantifiable intelligence in board composition, allowing us to develop targeted interventions to increase representation where necessary.</p>
<p><b>Training</b> The Commission notes the actions contained in the Disability Action Plan in relation to training. We particularly</p>	<p>The training offered will be disability equality training.</p>

<p>welcome the fact that ACNI also intends to influence its client organisations by also making disability training available to them. The Commission would recommend however that the plan includes more detail on the type and nature of training.</p> <p>Training provision demonstrates the authority's commitment to the Disability Duties and it also ensures that staff and office holders are aware of the duties and the Disability Action Plan. Focused training is also an example of an action which both promotes positive attitudes towards disabled people and by removing attitudinal barriers to appointing disabled people, can encourage participation in public life.</p>	<p>ACNI notes this comment.</p>
<p>Public authorities will be aware that the Disability Code of Practice on Employment and Occupation recommends that employers provide training and guidance for all employees to ensure they understand their duties under the DDA 1995 and indicates that the training and guidance should also include disability awareness and etiquette training.</p> <p>Public authorities should use such training opportunities to promote positive attitudes towards disabled people as well as communicating its commitment to the Disability Duties and implementation of its Disability Action Plan. It is also important that such training is provided to both office holders and managers as well as those staff engaged in recruitment and selection and front line staff who come into contact with disabled customers, service users and</p>	<p>ACNI notes this comment.</p> <p>ACNI notes this comment.</p>

members of the public.	
<p>The Commission acknowledges as set out in our introduction, the considerable efforts made by the Arts Council of Northern Ireland to develop a comprehensive and meaningful Disability Action Plan which includes a set of proactive and wide ranging actions. It is also notable that the plan extends beyond internal structures of the Arts Council of Northern Ireland and includes a determination to extend the influence of the plan to external client organisations and others.</p> <p>The Commission recommends that the Arts Council NI considers our comments outlined above in relation to performance indicators and general comments regarding measures proposed to fulfil the organisations obligations under the Disability Duties.</p>	<p>ACNI notes this comment.</p> <p>ACNI notes this comment.</p>
<b>Comments received from Replay</b>	<b>ACNI response</b>
<p>In 2010, we organized RE:FOCUS, a cross-sectoral event designed to bring together professionals, organisations and emerging artists who create work, with and for children with disabilities. This consultation highlighted the need for radical action to address the lack of arts provision for this group – attributed largely to the lack of skills within the sector and the subsequent lack of programming.</p>	<p>ACNI thanks Replay for its response to the consultation.</p> <p>ACNI notes this comment and proposes broad based equality training for all core funded organisations</p>
<p>RE:FOCUS also identified that children with profound and multiple learning difficulties (PMLD) in NI had limited opportunities to participate in the arts and where existed, often they were inaccessible or inappropriate. In response, Replay developed a series of innovative and specialized theatre and arts programmes for children with profound disabilities which were</p>	<p>ACNI notes this comment. Replay will be included in any future sectoral meeting regarding arts and disability.</p>



<p>delivered in Special Schools in order to maximize accessibility in settings which are equipped for the children's specialized needs. This work has since expanded by the launch of UP – which aims to provide year-round, high quality arts experiences for every pupil with PMLD in Northern Ireland.</p>	
<p>We have outlined where we feel the gaps and areas for attention lie in response to the questions within the consultation, however, we would also welcome the opportunity to be involved in further consultations or working group activities associated with this exercise.</p>	<p>ACNI notes this comment and welcomes Replays offer to engage further with the Arts Council.</p>
<p><b>Do you think the Arts Council has identified all actual or potential adverse impacts?</b> There are some barriers to attending and participating in the arts for young people with a learning disability which Replay feels have not been identified including:</p> <ul style="list-style-type: none"> <li>• Chronic ill-health</li> <li>• Lack of role models</li> <li>• Lack of provisions of appropriate / accessible arts, as a result of:</li> <li>• Increased expense of making theatre for these audiences (due to cost of expert practitioners, high ratio of artists to audience members, and specialize equipment)</li> <li>• Lack of specialized training for artists</li> </ul>	<p>ACNI notes this comment and has kept the barriers deliberately wide to ensure a sufficiently broad range of actions could be developed.</p>
<p><b>Is there any additional data or research that you could bring to the attention of the Arts Council to help?</b> Replay has enclosed our Re:focus report. Re:focus was an extended consultation with the arts, disability and education sectors in 2010, which was followed by a week long cross-sectoral training and</p>	<p>ACNI notes the Re:focus report and is mindful of its recommendations.</p>

<p>sharing event with representatives from the above sectors. Since the report, Replay has taken significant steps to address the issues raised throughout Re:focus, not least of which is the addition of a SEN Coordinator to the core staff team. However, there is still learning from the report which could be applied throughout the arts sector.</p>	
<p><b>Are there any measures or actions that you can identify that would help mitigate against any adverse impacts?</b></p> <ul style="list-style-type: none"> <li>• Recognition from ACNI (and appropriate funding responses) that work for Section 75 groups (especially audiences with PMLD) can be more expensive, and that audience numbers are lower by design</li> <li>• Support for the introduction of a charter mark (like the Arts and Disability Equality Charter Mark) which would apply not only to venues, but to producing companies / organisations. This mark would mean that the company promotes true accessibility through its work by producing shows specifically for audiences with disabilities, (as well as making inclusive work for all audiences), employing disabled personnel and specifically training artists to create work for audiences with disabilities. This would clearly identify and raise the profile of the company and the work for audiences who want to access it, and mean that audience members engaging with the producing organisation, (wherever it may tour) can be</li> </ul>	<p>ACNI notes this comment.</p> <p>ACNI notes this recommendation and looks forward to working with Replay in the future.</p>

<p>confident that the company promotes and excels in providing access for all.</p>	
<p><b>There may be some issues that the Arts Council has not fully considered. Please outline any additional comments you may have in relation to the policy.</b></p> <p>Replay would like to address the narrow definition of ‘Accessibility’ within the Consultation Document. It appears within the document that accessibility for those with severe learning disabilities fall under themes which are mainly practical and operational eg. Physical barriers, financial constraints, social barriers and information and general awareness barriers (p.15). While Replay absolutely agrees that all these issues must be addressed and barriers removed, we also believe that reactionary measures to enable people with disabilities to access the same work as everyone else is not enough. We must be pro-actively accessible – creating work which is specifically and creatively designed to make the disability an advantage when engaging with the work. (For example sensory theatre). Accessibility is a creative objective as much as an operational objective.</p>	<p>ACNI notes this comment.</p>
<p><b>There may be some issues that the Arts Council has not fully considered. Please outline any additional comments you may have in relation to the policy.</b></p> <p>Replay also believes there needs to be an inter-departmental approach to the DAP across education, health and arts for a number of reasons. Firstly there is a paradox in the provision of arts activities for young people with severe learning</p>	<p>ACNI notes this comment and seeks to continue to widen access opportunities for disabled young people.</p>

<p>difficulties. On one hand, as mentioned in the consultation, much arts provision for these young people takes place in a school setting within school hours as it is a common sense, sensible solution to the following: a distinct lack of appropriate activities outside of core school hours; the possibility that after a long school day they could be too tired to go elsewhere; lack of qualified care available to support them in attending activities after school hours; and, parents and carers who are often unable to take them.</p> <p>However, common sense and sensible though it may be, it also means that young people with severe learning difficulties become ghettoised within their schools and homes.</p>	
<p>So the paradox is that while in-school provision is current best-practice, arts organisations must find better ways to give young people with complex disabilities ways to leave school and access exciting, bespoke magical arts experiences in new environments. This best practice will require contributions from the arts, health, and education sectors. Replay is aware that inter-department working (as agreed by the OFMDFM) is challenging. Replay brought DCAL, DE and DHSSPS together for an inter-departmental event at Stormont to share work that Replay had delivered to date for children and young people with PMLD, and to explain departmental steps necessary in order to progress the work. While all departments were vocal in their support of the work, to date only DCAL have had resources which they are able / willing to leverage to support access and provision of UP. Departments must find better ways of</p>	<p>ACNI notes this comment and commends Replay for its event. ACNI will continue to advocate the power of the arts to other departments across government with the aim of supporting the delivery of best practice works.</p>

<p>working together to support the delivery of best practice work.</p>	
<p><b>There may be some issues that the Arts Council has not fully considered. Please outline any additional comments you may have in relation to the policy.</b></p> <p>There is a need or inter-departmental working in terms of providing education and training to artists. In order to develop the skills of the artists who create the work and make it accessible. The more artists there are who are trained and skillful in this sort of work, the more work will be created, and the more accessible the whole sector becomes. Replay currently run training in sensory theatre and relaxed performances for artists, but it is necessary for this informal training to become formal, accredited education through arts GNVQs, Diplomas and Degrees at FE Colleges and universities in NI.</p>	<p>ACNI notes this comment. We agree that formal, accredited training would have a significant benefit on the accessibility of the sector.</p>
<p>Finally, Replay would like to restate our commitment to Article 30 of the UN Convention on the Rights of Persons with Disabilities, and to working alongside ACNI and the arts sector in NI to continue to uphold these rights:</p> <p>“Recognizing that children with disabilities should have full enjoyment of all human rights and fundamental freedoms on an equal basis with other children, and recalling obligations to that end undertaken by States Parties to the Convention on the Rights of the Child. “</p> <p>Article 31 of the UN Convention on the Rights of the Child:</p> <p>“Children have the right to relax and play, and to join in a wide range of cultural, artistic and other recreational activities.”</p>	<p>ACNI notes this comment and like Replay is committed to Article 30 of the UNCRPD as well as Article 31 of the UNCRC.</p>

<b>Comments received from meeting with Arts &amp; Disability Forum (ADF)</b>	<b>ACNI Response</b>
ADF recommends that ACNI does not use the term 'those with a disability' because it objectifies and distances disabled people.	ACNI will remove this phrase from the document and Action Plan
ADF recommends the use of the term 'disabled and deaf people' as this is 'social model' language and includes culturally deaf people, who identify as and are recognised as a language minority	ACNI notes this comment
In relation to the Individual Disabled Artists scheme (iDA), which replaces the Arts & Disability Awards Ireland scheme, feedback from artists is that the ADF's work ensures a flexible approach that cannot be offered by the Arts Council. There has been considerable anxiety amongst artists at the thought that the scheme might be discontinued. This is what has come up in consultation with disabled artists.	ACNI notes this comment and will continue to work closely with ADF in the delivery of iDA.
<p>In relation to Action Measure 1, ADF recommends Action Measure be changed to read:</p> <p>'Positive imagery of disabled people accessing and participating in the arts and the work of disabled and deaf artists prominent on ACNI website and in publications.'</p> <p>The aim of this is to show ACNI commitment at every level.</p> <p>ADF recommends that ACNI removes the phrase 'those with a disability' in the Outcome, as previously – insert 'disabled and deaf people'</p>	ACNI notes this comment and will amend the text of the Action Measure.

<p>In relation to Action Measure 2, ADF recommends that we amend the text to read:</p> <p>‘Conduct review of ACNI website to ensure it is as user friendly as possible for all disabled and deaf people.’</p> <p>ADF recommends that the ACNI removes the phrase ‘a range of disabilities’ from the KPI.</p>	<p>ACNI notes this comment and will amend the text.</p> <p>ACNI will remove the phrase noted from the KPI.</p>
<p>In relation to the KPI in Action Measure 3, ADF recommends it be amended to read:</p> <p>‘Medium to long-term ACNI key information publications such as funding guidelines available in British and Irish sign languages. Prioritise documents such as funding guidelines which have a long future ahead and which offer the most practical benefit to deaf people.’</p> <p>In relation to the Outcome of Action Measure 3, ADF recommends that ACNI remove ‘or have a hearing loss’. ADF advises that people with hearing loss have different requirements to people who are culturally deaf.</p>	<p>ACNI notes this comment and will amend the Action Measure to the text suggested.</p> <p>ACNI notes this comment and will remove the text suggested.</p>
<p>In relation to Action Measures 5 and 9, ADF recommends that these two Measures should be presented together since they both relate to the Premium Payment Scheme.</p>	<p>ACNI notes this comment.</p>
<p>In relation to Action Measure 8, ADF recommends that ACNI move ‘Implement changes that will encourage greater access and participation by disabled people in public life’ from the Outcome to the Action Measure.</p>	<p>ACNI notes this comment.</p>
<p>In relation to Action Measure 10, ADF recommends that ACNI removes ‘artists with a disability’ and insert</p>	<p>ACNI notes this comment and will amend the text as suggested.</p>

<p>'disabled artists'.</p>	
<p>ADF considers that the current application process is not working for disabled artists in a uniform fashion across ACNI, such as the use of reasonable adjustments. This is reflected in feedback to the ADF that might not be given to the Arts Council direct.</p> <p>ADF recommends the introduction of a process where disabled artists could tick a box on the application form to trigger involvement of a specific officer charged with reviewing the application and ensuring that reasonable adjustments are made. ADF suggests that this would allow an overview and safeguard a uniform approach across artforms.</p>	<p>ACNI notes this comment and would wish to work closely with ADF on this matter.</p> <p>ACNI is currently looking at ways in which we make reasonable adjustments with Arts Development</p>
<p>In relation to Action Measure 11, ADF recommends that the training should be disability equality training, not disability awareness training. This is what is considered good practice.</p>	<p>ACNI notes this comment and will amend the text and training offer.</p>
<p>In relation to Action Measure 12, ADF recommends the outcome be amended to read:</p> <p>'Increased awareness of autism amongst staff including line managers with the purpose of enabling them to better assess applications and manage staff'</p> <p>ADF suggests that ACNI moves this action to be grouped with other impairment-specific actions contained in the DAP, with a view to helping the DAP reader.</p>	<p>ACNI notes this comment and will amend the text as suggested.</p> <p>ACNI notes this comment.</p>



<p>In relation to Action Measure 13, ADF recommends the text be amended to read:</p> <p>‘ACNI annually funded client organisations that work with disabled people to be provided with disability equality training.’</p>	<p>ACNI notes this comment and will amend the text to read</p> <p>“Provide training on disability related issues including disability equality for annually funded clients working with disabled people”.</p>
<p>In relation to Action Measure 14, insert <i>flexible</i> in the KPI so that it reads:</p> <p>‘A range of <i>flexible</i> options will be considered, such as apprenticeship schemes, internships, positive recruitment and mentoring opportunities.’</p> <p>This would enable disabled people to be employed by arts organisations, which would benefit the individual and the arts organisation.</p>	<p>ACNI notes this comment and will amend the text to read:</p> <p>“Increase the number of disabled people employed by arts organisations using a range of flexible positive recruitment and mentoring opportunities.”</p> <p>We will share this comment with the organisation delivering the forthcoming Creative Apprenticeships and Internships Programme.</p>
<p>In relation to Action Measures 15, 16 and 17, ADF suggests that the Premium Payment Scheme evolve to become more responsive and operate as a flexible, rolling scheme to which organisations could apply when a specific need arises. This would avoid money being locked into grants where it isn’t needed and enable organisations to access funds for much more short terms requests.</p> <p>Would it be possible for local government and other organisations that are not directly core or project funded by the Arts Council to apply to the Premium Payment Scheme?</p>	<p>ACNI notes this comment and will consider it when reviewing the Premium Payment Scheme.</p> <p>This option will be considered during the review process.</p>

<p>In relation to Action Measure 19, ADF suggests that the current Buddy Scheme is more adequately described as a ‘carer goes free scheme’.</p> <p>ADF suggests that the Arts Council explores a pilot ‘Buddy Scheme’ which would enable a pool of volunteers to be Access NI-checked and be available to attend arts events with a disabled person as a ‘buddy’. This would increase the disabled person’s independence and give them more opportunities to attend and participate in arts activity. This has been highlighted by learning disability organisations as an issue for events like Bounce!</p>	<p>ACNI notes this comment.</p> <p>ACNI notes this comment.</p>
<p>In relation to Action Measure 19, ADF suggests that there is a possible need to evaluate current ‘carer goes free’ schemes and other concessions: such as where is it offered, how it is applied by the venue / organisation, are reduced price tickets offered etc.</p>	<p>ACNI notes this comment. As part of outworking of the Measure, we will determine the baseline of funded organisations participating in this initiative.</p>
<p>In relation to Action Measure 22, ADF recommends that ACNI removes ‘or sensory/communication disorder’ from the Action Measure.</p>	<p>ACNI notes this comment and will remove this reference.</p>
<p>In relation to Action Measure 23, ADF recommends that ACNI takes a more realistic approach. ADF recommends that ACNI amends the language to read:</p> <p>‘Recommend to funded organisations that they engage directly with stakeholders who are disabled or deaf; this may also lead to encouraging Board Member applications from disabled/deaf people.’</p>	<p>ACNI notes this comment and has amended the KPI accordingly.</p>

<p>In relation to Action Measure 27, ADF recommends that this be included with other groups or impairments contained within the Action Plan.</p> <p>ADF recommends that ACNI clarifies the Outcome to read:</p> <p>‘A greater number of people with mental ill-health benefiting from participating in the arts as audience members, as employees within organisations, as project participants and as artists.’</p>	<p>ACNI notes this comment.</p> <p>ACNI notes this comment and will amend the text as suggested.</p>
<p>General comment in relation to the entire Disability Action Plan that there needs to be more recognition in the document of disabled people as artists.</p>	<p>ACNI notes this comment and we will refresh the document accordingly.</p>
<p>General comment for ACNI to take a proactive approach and recommend to DCAL that the Department appoints disabled Board Members on the departure of current Board members who are disabled.</p>	<p>ACNI notes this comment and will share this comment with DCAL for their consideration when the Disability Action Plan is published.</p>
<p>In relation to GIFTS, could there be a box for officers to tick when there is significant involvement of disabled people as artists or if disabled people have been specifically targeted for participation in the arts activity. The aim of this recommendation is to produce more easily obtainable and reliable statistics.</p>	<p>ACNI feels that the Annual Funding Survey would be a more appropriate vehicle to source this information and will review the survey to ensure the relevant questions are asked.</p>