



NORTHERN
IRELAND
HUMAN
RIGHTS
COMMISSION

**ANNUAL PROGRESS REPORT ON
SECTION 75 OF THE NORTHERN IRELAND ACT 1998
AND SECTION 49A OF THE
DISABILITY DISCRIMINATION ORDER (DDO) 2006**

Name of public authority (Enter details below)

Northern Ireland Human Rights Commission

Equality Officer name and contact details (Enter details below)

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Section 75 Executive Summary

- *What were the key policy/service developments made by the authority during this reporting period to better promote equality of opportunity and good relations and what outcomes were achieved?*

Equality and human rights are inextricably linked. From its inception, the Commission has worked tirelessly to promote human rights and equality issues in public policy and practice, and in legislation, using the full range of functions and the powers available to it. However, given the nature of the Commission's work, promoting a culture of respect for human rights and preventing human rights abuse, and the fact that much of our work involves working through others to achieve these aims, tangible outcomes can be difficult to identify.

The Commission is founded on a commitment to equality, and respect for, human rights and diversity, which permeates throughout the Commission and its ways of working. We also work closely with the Equality Commission on a number of important policy matters. In 2007-08, the two Commissions worked together to raise awareness of the new UN Convention on Disability Rights, continued to consider the human rights and equality implications of the use of Tasers by the Police Service of Northern Ireland (PSNI) and worked to commission work on a research project to scope the extent of human trafficking in Northern Ireland.

The Commission's current Strategic Plan for 2006-09 identifies support to minority and vulnerable communities such as disabled people, older people, people who are lesbian, gay, bisexual or trans, and Travellers as particular priorities for the Commission for the period of this plan. The plan also sets out the Commission's commitment to challenge racism and provide support to migrants. Furthermore, it identifies Unionists and people in faith groups as under-represented in their interaction with the Commission and where particular attention will also be paid.

In 2007-08, the Commission undertook important work in respect of women in detention, migrant workers, conflict transformation, the intersect between faith and human rights, health and human rights, and issues affecting victims and survivors, disabled people, and gender equality and women's rights. Furthermore, we observed closely the progress made by the Bill of Rights Forum (BORF), comprising the main political parties and representatives of a broad cross-section of civil society, to seek to build consensus on the nature and content of a Bill of Rights, which will impact on everyone in Northern Ireland, particularly people in vulnerable groups. The Commission is now finalising its advice to the Secretary of State for Northern Ireland on the Bill of Rights, taking into account the recommendations made by the BORF.

This work is summarised in section 1, below, and described in detail in the Commission's Annual report for 2007-08, which will be published in October 2008.

During 2007-08, the Commission's Equality Committee undertook the Five Year Review of the Commission's Equality Scheme and completed the Disability Action Plan. Furthermore, equality screening exercises in four major areas of the Commission's work commenced during 2007-08 and were completed shortly after the year end.

- *What are the main initiatives planned in the coming year to ensure the authority improves outcomes in terms of equality of opportunity and good relations for individuals from the nine categories covered by Section 75?*

A programme of screening and equality impact assessment has been agreed by the Commission's Equality Committee for 2008-09. This includes the equality impact assessment of Commission's new Strategic Plan for the three-year period commencing April 2009.

The Commission's Disability Action Plan, which was submitted to the Equality Commission at the end of June 2007, sets out a programme of work and training in respect of measures to promote positive attitudes towards disabled people and encourage participation by disabled people in public life.

The Commission will submit its advice to the Secretary of State for Northern Ireland on a Bill of Rights for Northern Ireland in December 2008.

Other priorities in terms of the Commission's wider human rights and equality agenda for 2008-09 include delivery of a human rights training programme to public authorities and representatives from the voluntary and community sectors, completion of joint research with the Equality Commission on the extent of human trafficking in Northern Ireland, joint designation with the Equality Commission as the independent mechanism under Article 33(2) of the UN Convention of Disability Rights to promote, protect and monitor its implementation, and completion of two investigations concerning people affected by immigration policy and procedures.

- *Please give examples of changes to policies or practices which have resulted in outcomes. If the change was a result of an EQIA please tick the appropriate box in column 3:*

	Outline change in policy or practice which have resulted in outcomes	Tick if result of EQIA
Persons of different religious belief	None	
Persons of different political opinion	None	
Persons of different racial groups	Pre-screening discussions led to a change in the proposed use of paper-based procedures relating to access to the Commission's legal services, which might have adversely affected people whose first language is not English	n/a
Persons of different age	None	
Persons with different marital status	None	
Persons of different sexual orientation	None	
Men and women generally	None	
Persons with and without a disability	As above, pre-screening discussions led to a change in the proposed use of paper-based procedures relating to access to the Commission's legal services, which might have adversely affected people whose first language is not English	n/a
Persons with and without dependants	None	

Section 1: Strategic Implementation of the Section 75 Duties

- *Please outline evidence of progress made in developing and meeting equality and good relations objectives, performance indicators and targets in corporate and annual operating plans during 2007-08.*

The Commission's Strategic Plan for the three-year period 2006-09 identifies support to minority and vulnerable communities such as disabled people, older people, people who are lesbian, gay, bisexual or trans, Travellers, and challenging racism and providing support to migrants as particular priorities. It also identifies Unionists and people in faith groups (as well as people in rural areas and the business sector) as under-represented in their interaction with the Commission. The Strategic Plan is operationalised through objectives and targets set out in annual business plans, which are published on the Commission's website.

Key activities and outcomes achieved in respect of equality and good relations objectives during 2007-08 were:

Gender

- The launch on 5 July 2007 of a major report on the Commission's investigation into conditions for women in Hydebank Wood Prison. The report, *The Prison Within: the imprisonment of women at Hydebank Wood 2004-2006*, documented the daily routine of women prisoners and found that they are subject to long periods of lock-up, have difficulties in maintaining contact with their families – especially children – and have few opportunities for work and education. The Commission argued that locking women in isolation for long periods is particularly damaging for those who are vulnerable, depressed or self-harming. The research also found that the shared site between the women's prison and the male Young Offenders' Centre was creating many problems and leading to rights being breached
- Hosting, in May 2007, a research meeting on developing an integrated strategy on violence against women
- Hosting, in November 2007, an event to explore links between trafficking, violence against women, and immigration issues
- Hosting, in March 2008, a joint event with the Equality Commission and the Northern Ireland Women's European Platform on the UN Convention on the Elimination of Discrimination Against Women (CEDAW)

Race

- Progressing an investigation into the Border and Immigration Agency (now the UK Border Agency) and the power of immigration officers to authorise the detention of some asylum seekers and perceived immigration offenders – the research report is due for publication in autumn 2008
- In partnership with the Law Centre (NI), the Commission worked on the production of the second edition of *Your Rights in Northern Ireland: A Guide for Migrant Workers*, which was launched on International Workers' Day in May 2008

Religion

- Hosting, in November 2007, a conference entitled *Rights and Righteousness: Religious Pluralism and Human Rights* to consider issues concerning faith and human rights. Papers from this event are available on the Commission's website (www.nihrc.org)

Sexual orientation

- An intervention in a judicial review challenge to the Equality Act (Sexual Orientation) Regulations (Northern Ireland) 2006 to make a number of submissions in respect of the right to freedom of thought, conscience and religion and the right to act accordingly, and raise issues in respect of the right to freedom of expression, non-discrimination and the right to education.

Good relations

- The Commission's annual stakeholder conference, held on the International Day of Peace (21 September 2007) focused on dealing with the legacy of the conflict in Northern Ireland
- In partnership with the Institute for Conflict Research, the Commission delivered two training programmes in October and December 2007 to 24 interface workers in Derry / Londonderry and Belfast on the synergy between conflict transformation and human rights. A tutor's guide on this theme has been produced and we intend to share this toolkit with training providers in good relations and mediation work. Interface workers are an important stakeholder group and the Commission hopes to further develop work with this constituency.

Cross-cutting issues

- Hosting, in February 2008, a major international conference on health and human rights
- Working in collaboration with the Policing Board and other relevant bodies to seek to ensure that the equality impacts of the use of Tasers by the PSNI were properly assessed.

Section 2: Screening

- *Please provide an update of new/proposed/revised policies screened during the year.*

Screening on four policy areas commenced during 2007-08 and was completed in June 2008. These are:

- human resource management policies
- Information and Communications Access
- Legal services
- Legislation and Policy Strategy.

After careful consideration the Commission decided that these have no adverse equality impact and screened them out for EQIAs.

The Commission is currently consulting widely on these decisions – the closing date for consultation responses is 31 October 2008. In addition, six non-governmental organisations (NGOs) from a range of sectors have been invited to comment on the helpfulness of the screening report, which the Commission used, as well as the decisions themselves.

Section 3: Equality Impact Assessment (EQIA)

- *Please provide an update of policies subject to EQIA during 2007-08, stage 7 EQIA monitoring activities and an indicative EQIA timetable for 2008-09.*

EQIA Timetable: April 2007 - March 2008

The Commission did not conduct any equality impact assessments during 2007-08.

Ongoing EQIA Monitoring Activities: April 2007 - March 2008

The Commission had not conducted any equality impact assessments as at the year end.

Where the EQIA timetable for 2007-08 (as detailed in the previous annual S75 progress report to the Commission) has not been met, please provide details of the factors responsible for delay and details of the timetable for re-scheduling the EQIAs in question.

In last year’s report, the Commission envisaged having to undertake an EQIA on its revised legal strategy as pre-screening discussions identified potential adverse impacts for some equality categories. However, we were able to divert additional resources to the delivery of the strategy and adjust our approach accordingly, and the subsequent screening confirmed that potential adverse impacts had been dealt with successfully.

2008–09 EQIA Timetable

Title of EQIAs due to be commenced during April 2008 - March 2009	Existing or New policy?	Please indicate expected timescale of Decision Making stage i.e. Stage 6
The Commission’s Strategic Plan for the three–year period 2009-12	New	January 2009

Section 4: Training

- *Please outline training provision during the year associated with the Section 75 Duties/Equality Scheme requirements including types of training provision and conclusions from any training evaluations.*

The Commission undertook the following training activities relating to its Section 75 duties and Equality Scheme during 2007-08:

- A senior representative from the Equality Commission gave an overview of the future direction of Section 75 to our Equality Committee on 18 May 2007
- A disability equality workshop for Commissioners and staff, facilitated by Kevin McLaughlin (Human Rights Commissioner until 30 November 2007 and disability rights trainer/consultant), took place on 15 November 2007
- A screening and EQIA workshop for Commissioners and staff, facilitated by John Kremer of Queen’s University Belfast, took place on 16 January 2008 (a follow-up workshop was conducted on 20 May 2008)

- A training workshop on recruitment and selection was conducted for new managers and Commissioners on 27 February 2008.

Section 5: Communication

- *Please outline how the authority communicated progress on delivery of the Section 75 Duties during the year and evidence of the impact/success of such activities.*

The Commission continued to invest significantly in its communications during 2007-08.

In respect of the Commission's delivery of its specific Section 75 duties, the screening reports referred to in Section 2 above have been published on our website (www.nihrc.org) and all stakeholders and Equality Scheme consultees informed of this. A sample of these were also sent copies of the screening reports and invited to comment on the helpfulness of the format.

The Commission published three editions of its magazine, *NIHRC Review*, highlighting a range of human rights and equality issues and issued 12 e-bulletins during 2007-08, all of which are intended to update our broad range of stakeholders on the Commission's activities.

The Commission's Annual Report for 2007-08 is, at the time of writing, being prepared to be laid before Parliament and published in October 2008. This document provides further information on the Commission's activities and outcomes during 2007-08.

Lastly, the Commission's Equality Commitment is contained in all of its corporate documents (strategic and business plans and annual reports) and published on our website.

Section 6: Data Collection & Analysis

- *Please outline any systems that were established during the year to supplement available statistical and qualitative research or any research undertaken/commissioned to obtain information on the needs and experiences of individuals from the nine categories covered by Section 75.*

During 2006-07, the Commission developed and implemented a Stakeholder Survey. Questionnaires were sent to all the Commission's key stakeholders in December 2007 to seek views on the effectiveness of its services and communications. This is now an annual survey and provides an opportunity for stakeholders to provide feedback to the Commission on a range of issues.

Furthermore, the Commission continued to monitor take-up of its main services – legal support and education and training – during the year against all nine equality categories.

- *Please outline any use of the Commission's Section 75 Monitoring Guide.*

In consultation with NIPSA and our Equality Committee, the Commission is in the process of revising its equality monitoring form, which draws heavily on the Equality Commission's Section 75 Monitoring Guide. We expect to introduce the revised monitoring form from autumn 2008.

Section 7: Information Provision, Access to Information and Services

- *Please provide details of any initiatives/steps taken during the year, including take up, to improve access to services including provision of information in accessible formats.*

Substantial work was undertaken during the previous year to improve access to the Commission's offices and website accessibility. Other improvements included the use of business cards for Commissioners and staff in Braille.

We continue to review the effectiveness of our accessibility arrangements and in 2007-08 the Commission acquired an SMS text number (07786 202075) as another means of people being able to communicate with us (texting is a communication vehicle particularly favoured by younger deaf people).

Section 8: Complaints

- *Please identify the number of Section 75 related complaints:*
 - *received and resolved by the authority (including how this was achieved);*
 - *which were not resolved to the satisfaction of the complainant;*
 - *which were referred to the Equality Commission.*

No Section 75 related complaints were received during 2007-08.

Section 9: Consultation and Engagement

- *Please provide details of the measures taken to enhance the level of engagement with individuals and representative groups during the year.*

The Commission identified that, through its strategic planning process for 2006-09, Unionists and people in faith groups as under-represented in their interaction with the Commission. As a result the Commission was particularly keen to engage with people and groups in these equality categories through meetings, training events, etc.

The Commission organised a major conference on faith and human rights, which took place on 1/2 November 2007, in conjunction with the Irish School of Ecumenics. Papers from this event have been published.

We have also continued to engage extensively with all political parties during 2007-08, including the main Unionist parties, on a range of human rights issues and, in particular, a Bill of Rights for Northern Ireland.

Section 10: The Good Relations Duty

- *Please provide details of additional steps taken to implement or progress the good relations duty during the year. Please indicate any findings or expected outcomes from this work.*

The Commission continued to work throughout 2007-08 on human rights issues relating to victims and survivors of the conflict, and locally with interface workers and internationally with other national human rights institutions on human rights and conflict transformation.

As described in Section 1 above, the Commission's annual stakeholder conference, held on the International Day of Peace (21 September 2007) focused on dealing with the legacy of the conflict in Northern Ireland, and delivered in partnership with the Institute for Conflict Research training programmes to interface workers on the synergy between conflict transformation and human rights. A tutor's guide on this theme has been produced and we intend to share this toolkit with training providers in good relations and mediation work. Interface workers are an important stakeholder group and the Commission hopes to further develop work with this constituency.

Based on our experience in Northern Ireland, the Commission also continued to play a significant role helping advise other national human rights institutions on human rights and conflict transformation. Building on a workshop the Commission hosted jointly with the United Nations in 2006 in Belfast, the Commission contributed substantially to a follow-up event for NHRIs from countries coming out of conflict in November 2007 in South Africa.

More recently, the Commission has engaged extensively with the Review Body undertaking the Strategic Review of Parading in Northern Ireland,

whose interim consultative report contains four recommendations which could result in a significant role for the Commission in this area.

- *Please outline any use of the Commission's Good Relations Guide.*

No specific use as yet, but it is born in mind in the development of our work. We have also commissioned workshops for Commissioners and staff on understanding and appreciating anti-prejudice, good relations, and diversity, which will take place in November 2008 and which will draw on the guide as appropriate.

Section 11: Additional Comments

- *Please provide any additional information/comments*

None.

Annual Report July 2007 - March 2008
'Disability Duties' Questions

1. How many action measures for this reporting period have been?

6

**Fully
Achieved**

3

**Partially
Achieved**

2

**Not
Achieved**

2. Please outline the following detail on all **actions that have been fully achieved** in the reporting period.

2(a) Please highlight what **public life measures** have been achieved to encourage disabled people to participate in public life at National, Regional and Local levels:

Level	Public Life Action Measures	Outputs ¹	Outcomes / Impact ²
National ³	None achieved		
Regional ⁴	None achieved		
Local ⁵	None achieved		

¹ **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

² **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

³ **National** : Situations where people can influence policy at a high impact level e.g. Public Appointments

⁴ **Regional**: Situations where people can influence policy decision making at a middle impact level

⁵ **Local** : Situations where people can influence policy decision making at lower impact level e.g. one off consultations, local forums.

2(b) What **training action measures** were achieved in this reporting period?

	Training Action Measures	Outputs⁶	Outcomes / Impact⁷
1	Ensure that all Commissioners and staff have received disability equality training, so that they understand disability rights and access issues	A disability equality workshop for Commissioners and staff, facilitated by Kevin McLaughlin (Human Rights Commissioner until 30 November 2007 and disability rights trainer/consultant), took place on 15 November 2007.	A greater understanding among Commissioners and staff of the rights of disabled people and requirements of employers and service providers, as enshrined in legislation, and wider cultural issues such as attitudes and access issues. This was confirmed from post event evaluation.
2	Train Corporate Services Team members, who greet visitors to the Commission, in basic sign language	Five members of staff undertook a bespoke six week course, 'Sign Language for Frontline Staff', which equipped staff with the ability to communicate on a basic level with sign language users who may visit, using language applicable to the nature of likely exchanges (ie relating to human rights issues). The training was delivered by Deaf Awareness Northern Ireland.	All staff successfully completed the training and can use basic sign language. Further work is needed to look at how levels of competence are maintained. Another group of staff will undertake the 'Sign Language for Frontline Staff' course during autumn 2008.

⁶ **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

⁷ **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

2(c) What Positive attitudes **action measures** in the area of **communications** were achieved in this reporting period?

	Communications Action Measures	Outputs⁸	Outcomes / Impact⁹
1	Install an SMS text number for the Commission to further improve accessibility for deaf people, and others	SMS text number (07786 202075) installed in January 2008.	Limited take up of this facility to date, but it is quoted on all corporate information, which may in turn encourage other organisations to follow the Commission's lead.

⁸ **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

⁹ **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

2(d) What action measures were achieved to ‘**encourage others**’ to promote the two duties:

	Encourage Others Action Measures	Outputs¹⁰	Outcomes / Impact¹¹
1	Review opportunities with relevant partners to promote positive images of disabled people, through short films and pod casts on human rights themes, and in the development of an arts strategy	The Commission’s corporate branding and exhibition resources include positive images of disabled people.	The Commission’s branding permeates the Commission’s image from its website, to external window displays to corporate documents, which are seen widely, both in Northern Ireland and internationally. The Commission’s exhibition resource is also displayed in community venues across Northern Ireland.

¹⁰ **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

¹¹ **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

2(e) Please outline **any additional action measures** that were fully achieved other than those listed in the tables above:

	Action Measures fully implemented (other than Training and specific public life measures)	Outputs¹²	Outcomes / Impact¹³
1	Put in place positive action measures to encourage applications from disabled people when recruiting new staff, including a statement on all advertisements welcoming applications from disabled people, guaranteeing interviews to all disabled people who meet the essential criteria specified for each vacant post, and using disability networks to circulate job vacancies	All job advertisements state that disabled people who meet the essential criteria will be guaranteed an interview, and are disseminated widely through networks in disability sector.	A number of disabled people have been interviewed for posts, although none has yet been successful.
2	Offer work placements each year to disabled students	Three disabled people undertook work placements with the Commission during 2007–08.	Evaluation has shown that the work placements were valuable. More placements are being undertaken during 2008–09.

¹² **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

¹³ **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

3. Please outline what action measures have been **partly achieved** as follows:

	Action Measures partly achieved	Milestones¹⁴ / Outputs	Outcomes/Impacts	Reasons not fully achieved
1	Promote the effective implementation in Northern Ireland of the UN Convention on Disability Rights.	The Commission will be jointly designated with the Equality Commission as the independent mechanism under Article 33(2) to promote, protect and monitor its implementation. We have been involved in high level discussions with government to encourage ratification without reservations. The government is aiming to ratify the convention by end 2008. The first report to the UN from the two commissions will be due two years after this date.	Formal Commission involvement in monitoring the convention and an active role in promoting it to disabled people and public bodies, which in turn will increase awareness of disability issues.	A long term project of first ratification, then ongoing promotion and monitoring.

¹⁴ **Milestones** – Please outline what part progress has been made towards the particular measures; even if full output or outcomes/ impact have not been achieved.

2	Explore with key stakeholders in the disability sector the potential of outreach work to raise awareness of human rights with greater numbers of disabled people.	Initial discussions have been held with various organisations in the disability sector. The key focus from now on will be in relation to the effective involvement of the disability sector and disabled people in monitoring the implementation of the UN Convention on Disability Rights, from January 2009 once it has been ratified.	Formal Commission involvement in monitoring the convention and an active role in promoting it to disabled people and public bodies, which in turn will increase awareness of disability issues.	A long term project of first ratification, then ongoing promotion and monitoring.
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3	<p>Survey Commissioners and staff each year to update equality monitoring information, which provides an opportunity for disabilities to be declared and/or reasonable adjustments to be identified.</p>	<p>In consultation with NIPSA and our Equality Committee, the Commission is in the process of revising its equality monitoring form, which draws heavily on the Equality Commission's Section 75 Monitoring Guide. We expect to introduce the revised monitoring form from autumn 2008 and it will be used to resurvey all Commissioners and staff about disabilities.</p>	<p>Awareness of disability among the Commission workforce and the nature of reasonable adjustments required</p>	<p>An ongoing process.</p>
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4. Please outline what **action measures have not been achieved** and the reasons why?

	Action Measures not met	Reasons
1	Make representations to the Northern Ireland Office to adopt positive action measures to encourage applications from disabled people when recruiting successors for two Commissioners whose terms of office end on 30 November 2007	While the representations were made, no people with a known disability were appointed during the recent round of Commissioner appointments. Further representations will be made for the next round of appointments, which will be due in 2010.
2	In light of the new appointments to the Commission, to review the composition of the Commission, and its committees and working groups, in respect of the representation of disabled people, and consider ways of co-opting disabled people to address any under representation in those fora	<p>As described above, work is ongoing with the Equality Commission to develop the independent mechanism under Article 33 of the UN Convention on Disability Rights to promote, protect and monitor its implementation. This will involve extensive involvement of the disability sector and the use of the expertise of disabled people.</p> <p>Furthermore, a planned survey of Commissioners using an expanded equality monitoring form may identify 'hidden' disabilities.</p>

5. What monitoring tools have been put in place to evaluate the degree to which actions have been effective / develop new opportunities for action?
(a) None as yet, but these will be developed as part of work to ensure the effective involvement of the disability sector and disabled people in monitoring the implementation of the UN Convention on Disability Rights.
(b) In consultation with NIPSA and our Equality Committee, the Commission is in the process of revising its equality monitoring form, which draws heavily on the Equality Commission's Section 75 Monitoring Guide. We expect to introduce the revised monitoring form from autumn 2008

6. As a result of monitoring progress against actions, has your organisation either:
<ul style="list-style-type: none"> ▪ made any revisions to your plan during the reporting period or ▪ taken any additional steps to meet the disability duties which were not outlined in your original disability action plan / any other changes.
No

7. Do you intend to make any further revisions to your plan in light of your organisations annual review of the plan? If so, please outline proposed changes?
No

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