

Ack 29.11.05

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24 November 2005

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Julie Stephenson  
Age Team  
Room E3.18  
Castle Buildings  
Stormont  
Belfast BT4 3SR

Dear Julie

**Re: Public Consultation On Draft Employment Equality  
(Age) regulations (Northern Ireland) 2006**

Thank you for contacting us as part of the consultation process on the above.

Attached is Disability Action's response to the document. If you wish to discuss the points raised in more detail please do not hesitate to contact me at the above number.



Yours sincerely

A handwritten signature in black ink, appearing to read 'Kieran Teague'.

**Kieran Teague**  
Human Resources Manager



**OFFICE OF THE FIRST & DEPUTY FIRST MINISTER**

**EMPLOYMENT EQUALITY (AGE) REGULATIONS  
(NORTHERN IRELAND) 2006**

**PUBLIC CONSULTATION**

**DISABILITY ACTION'S RESPONSE  
November 2005**

Any enquiry concerning this document should be made to the  
Office of the Chief Executive  
Disability Action, 189 Airport Road West  
Belfast, BT3 9ED  
Tel: 028 90 297880  
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## **Introduction**

- 1 Disability Action is a pioneering Northern Ireland charity, working with and for people with disabilities. We work with our members to provide information, training, transport, awareness programmes and representation for people regardless of their disability; whether that is physical, mental health, sensory, hidden or learning disability.
- 2 More than one in five (300,000) people in Northern Ireland has a disability and the incidence is higher here than in the rest of the United Kingdom. Over one quarter of all families here are affected.
- 3 As a campaigning body, we work to bring about positive change to the social, economic and cultural life of people with disabilities and consequently our entire community.
- 4 Our range of services is provided from a network of 5 local offices, with 100 staff and 250 volunteers.
- 5 Disability Action welcomes the opportunity to respond to this draft. To aid our response we have put the relevant page/paragraph number, where appropriate, in brackets at the end of our comments.

## **General Commentary**

- 6 Disability Action is pleased to see that OFMDFM has made the document available in alternative formats. However we note that the OFMDFM's letterhead does not include a textphone number, which immediately disadvantages deaf people. We would also recommend that contact details be placed at the beginning of the documents rather than on the back cover.
- 7 The use of the Website as part of the consultation process should be in line with Accessible Website Guidelines.

## **Specific Commentary**

- 8 The link between old age and disability suggests that the Age Regulations need to ensure that older disabled people are protected in line with the reasonable adjustment measures of Disability Discrimination Act.

- 9 We would also stress the need to remember that this issue concerns young people as well as older people and consequently employers need to consider the accessibility of premises and materials not only for employees but also for young people under vocational training placements.
- 10 Disability Action does not believe in the concept of justified discrimination whether justified or not and consequently disagrees with this section in its totality.
- 11 However, we do agree with the use of Genuine Occupational Requirements and Positive Action and commend these sections.
- 12 We commend the process of Duty to Consider as outlined in the consultation.

### **Conclusion**

- 13 Disability Action recognises the time and effort that has gone into producing this document for consultation and thanks OFMDFM for the opportunity to respond.