



Screening

Policy scoping

Information about the policy

Name of the policy – Disability Action Plan 2024-2029

Is this an existing, revised or a new policy? Revised

What is it trying to achieve? (intended aims/outcomes)

This document is a strategic action plan setting out how ICRIR will meet its statutory disability duties under Section 49A of the Disability Discrimination Act 1995. It informs organisational practices, service delivery, staff training, communications, accessibility, engagement, and governance.

Who initiated or wrote the policy?

Chief of Staff

Who owns and who implements the policy?

Director of People and Culture

Are there any S75 categories which might be expected to benefit from the intended policy? If so, explain how.

The revised policy delivers a strong positive impact for people with disabilities, with additional positive and enabling effects across other Section 75 categories, particularly where disability intersects with age, gender, caring responsibilities, and community background. This reinforces equality of opportunity and supports inclusive participation in public life.

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision? No

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

- Staff
- Victims, survivors, families and members of the public who use our services
- Stakeholders and consultees, including disability support organisations.
- Board members

Other policies with a bearing on this policy

What are they?

- Section 75 Equality Scheme
- Equality, Diversity and Inclusion Policy
- Recruitment and selection policy
- Reasonable adjustments policy
- Flexible working policy
- Attendance and wellbeing policies
- Performance management and training policies
- Health and safety policy
- Communications and information policy
- Trauma-informed practice / engagement framework
- Risk management policy
- Annual work plan
- Complaints and feedback policy

Who owns them?

The Commission owns our policies.

Available evidence

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Please note policy written before any staff employed so no internal information available.

Age

Northern Ireland's workforce generally reflects an aging population, with approximately 18% of the population being over 65 and about 20% under 15. In the public sector, the average age of employees is typically between 35–55. Age-related issues in employment could include older employees facing challenges in adapting to new technologies or younger employees feeling underrepresented in leadership roles.

Surveys from sources like the Northern Ireland Statistics and Research Agency (NISRA) show concerns about intergenerational

fairness and age-based discrimination in the workplace, including opportunities for younger workers to access training and promotions, and challenges older workers may face when adapting to evolving work practices.

ICRIR has the remit to investigate deaths and serious injuries related to the Troubles/Conflict in the period between 1 January 1966 and 10 April 1998 which caused serious physical or mental harm.

A victim or survivor can request that the Commission investigates an incident involving a serious injury to them.

A close family member of the deceased can ask the Commission to investigate an incident involving a death.

Given the time period in which these deaths or serious crimes occurred, Requesting Individuals are likely to be older than the general population.

Disability

According to the NISRA, around 21% of Northern Ireland's population lives with a disability. This percentage increases with age. Requesting Individuals who have themselves suffered serious harm as a result of a serious injury related to the Troubles / Conflict will be more likely than the general public to be living with a disability.

Gender Reassignment (required under Equality Act 2010):

Data on individuals who have undergone or are undergoing gender reassignment is scarce due to privacy concerns. However, estimates suggest that around 1% of the UK population identifies as transgender or non-binary.

(Not required for section 75 but is required under the Equality Act)

Marriage and civil partnership

The most recent Northern Ireland Census shows a declining trend in marriage rates, with more people opting for civil partnerships or remaining single.

Northern Ireland Census 2021 data shows a decline in marriage rates, with 42% of adults married, 11% divorced, and an increasing number of people opting for civil partnerships or remaining single.

Dependants

No information available.

Race (including colour, nationality, and ethnic or national origin):

Around 98% of Northern Ireland's population identifies as white, with 2% belonging to minority ethnic groups (e.g., Black, Asian, Mixed). The 2021 Census data also revealed growth in the minority ethnic population. Within the time period in which the deaths and serious harm which the ICRIR can investigate occurred, the percentage of the population which identifies as white was even higher.

Religious Belief

Northern Ireland is traditionally split between those identifying as Protestant (around 42%) and Catholic (about 41%), with increasing numbers identifying as having no religion or other religions.

Sex and sexual orientation

Sexual orientation data indicates around 2% of the population identifies as LGB (Lesbian, Gay, Bisexual) based on NISRA's Continuous Household Survey.

Political Opinion

The political landscape in Northern Ireland is unique, with political opinions often aligning with religious or national identity.

Political affiliations in Northern Ireland often correlate with religious and national identity, with Unionists (typically Protestant) and Nationalists (typically Catholic) making up the largest groups. However, no precise statistics on political opinions are routinely collected due to sensitivities surrounding this information.

Men and Women Generally

According to the NISRA, around 21% of Northern Ireland's population lives with a disability. This percentage increases with age. Requesting Individuals who have themselves suffered serious harm as a result of a serious injury related to the Troubles / Conflict will be more likely than the general public to be living with a disability.

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision?

Specify details of the needs, experiences and priorities for each of the Section 75 categories below:

Religious belief

Needs

- Neutral, inclusive service delivery that respects religious practices.
- Accessible venues and meeting arrangements.

Experiences

- Communities affected by legacy issues may carry additional trauma-related needs.

Priorities

- Respect, fairness and the ability to participate without disadvantage.

Political Opinion

Needs

- Assurance of impartiality and inclusive engagement.
- Accessible opportunities to participate regardless of background.

Experiences

- Historical mistrust among some communities affected by conflict.

Priorities

- Transparency, accessibility and equal treatment.

Racial Group

Needs

- Accessible and culturally sensitive communication.
- Outreach that addresses potential additional language or cultural barriers.

Experiences

- Disabled people from minority ethnic backgrounds may face multiple barriers to engagement.

Priorities

- Equitable access to services and opportunities.

Age**Needs**

- Accessible information formats and clear communication.
- Physical access and flexible engagement arrangements.

Experiences

- Older people are more likely to experience disability.
- Potential digital exclusion or mobility barriers.

Priorities

- Independence, inclusion and ease of access to information and services.

Marital status**Needs**

- Equal access to services and employment opportunities.

Experiences

- No distinct or differential impacts identified.

Priorities

- Fair treatment and non-discrimination.

Sexual orientation**Needs**

- Inclusive and respectful service delivery and workplace practices.
- Safe environments that enable disclosure where appropriate.

Experiences

- Risk of compounded discrimination for disabled people who identify as LGBTQ+.

Priorities

- Dignity, privacy and equal treatment.

Men and Women generally**Needs**

- Flexible working arrangements and reasonable adjustments.
- Supportive workplace culture.

Experiences

- Women may be more likely to experience caring responsibilities alongside disability.
- Men may be less likely to declare disability due to stigma.

Priorities

- Fair access to employment, progression and support regardless of gender.

Disability

Needs

- Accessible services, buildings, information and digital platforms.
- Reasonable adjustments in employment, engagement processes and service delivery.
- Recognition of hidden, fluctuating and mental health-related disabilities.

Experiences

- Barriers to participation in public life and employment.
- Increased risk of exclusion where services or communications are inaccessible.
- Previous negative experiences of engagement due to trauma or lack of understanding.

Priorities

- Equal access to services and decision-making.
- Respect, dignity and autonomy.
- Opportunities for meaningful participation and employment.

Dependants

Needs

- Flexible engagement and working arrangements.
- Consideration of caring responsibilities, including for disabled dependants.

Experiences

- Carers may face time and access constraints.
- Increased stress where support is not available.

Priorities

- Flexibility, understanding and accessible participation options.

Part 2. Screening questions

Introduction

1. **What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 equality categories?**

Details of the likely policy impacts on **Religious belief**:

- No adverse impact identified.
- The policy is expected to have a neutral or positive impact on equality of opportunity for people across all religious beliefs.

Rationale

- The Disability Action Plan promotes fair and accessible engagement, which benefits individuals of all religious beliefs equally.
- Actions relating to accessible services, information, buildings, and participation apply consistently and without distinction.
- Inclusive and trauma-informed practices help ensure that people from different religious communities are not excluded or disadvantaged when engaging with the organisation.
- The plan supports participation in public life, which may positively impact trust and engagement across religious communities.

Mitigations

- No specific mitigation is required, as no negative impacts are anticipated.

Level of impact	Major	Minor	None
			X

Details of the likely policy impacts on **Political Opinion**:

- Assessment: Neutral to positive impact.

Rationale

- The Disability Action Plan promotes impartial, accessible and respectful engagement.
- Trauma-informed approaches support participation across all community backgrounds.

Mitigations

- None required.
- Ongoing review will ensure continued impartiality and accessibility.

Level of impact	Major	Minor	None
			X

Details of the likely policy impacts on **Racial Groups**:

- Details of the likely policy impacts on equality of opportunity
- The Disability Action Plan may have a positive impact on disabled people from minority ethnic backgrounds by reducing access barriers and promoting inclusive engagement.
- Assessment: Neutral to positive impact.

Rationale

- Accessible communication and inclusive consultation benefit people regardless of ethnic background.
- The plan helps address compounded barriers where disability intersects with ethnicity.

Mitigations

- No specific mitigation required.
- Monitoring and consultation will help identify any additional needs.

Level of impact	Major	Minor	None
POSITIVE		X	

Details of the likely policy impacts on **Age**:

- Assessment: Positive impact.

Rationale

- Improved accessibility and flexible engagement arrangements benefit older people.
- Clear communication and accessible formats help mitigate age-related accessibility issues, such as mobility or digital exclusion.

Mitigations

- No mitigation required.
- Ongoing engagement will ensure age-related needs continue to be identified and addressed.

Level of impact	Major	Minor	None
POSITIVE		X	

Details of the likely policy impacts on **Marital Status**:

- Assessment: Neutral impact.

Rationale

- No differential treatment, barriers or benefits are identified in relation to marital status.
- All actions apply equally regardless of marital or civil partnership status.

Mitigations

- None required.

Level of impact	Major	Minor	None
			X

Details of the likely policy impacts on **Sexual Orientation**:

- Details of the likely policy impacts on equality of opportunity
- The policy is not sexual-orientation specific but supports inclusive and respectful environments for all individuals.
- Assessment: Neutral impact.

Rationale

- Actions apply universally and do not introduce any barriers or differential treatment based on sexual orientation.
- Disabled people who identify as LGBTQ+ may benefit from an inclusive and dignity-based approach.

Mitigations

- None required.
- Commitment to equality and dignity remains integral to implementation.

Level of impact	Major	Minor	None
			X

Details of the likely policy impacts on **Men and Women**:

- Assessment: Neutral to positive impact.

Rationale

- Inclusive employment and flexible working practices benefit disabled people of all genders.
- Trauma-informed and respectful engagement supports equity across gender identities.

Mitigations

- No mitigation required.
- Workforce monitoring will help identify any unintended gender-related impacts.

Level of impact	Major	Minor	None
POSITIVE		X	

Details of the likely policy impacts on **Disability**:

- Assessment: Major positive impact.

Rationale

- The policy directly aims to improve access to services, information, buildings and employment for people with disabilities.
- Actions include reasonable adjustments, accessible formats, inclusive recruitment practices, and disability awareness.
- The plan promotes participation in public life and positive attitudes towards people with disabilities.

Mitigations

- Not required, as the policy is enabling and inclusive by design.
- Ongoing monitoring and consultation will ensure actions remain effective and responsive.

Level of impact	Major	Minor	None
POSITIVE	X		

Details of the likely policy impacts on **Dependants**:

- Details of the likely policy impacts on equality of opportunity
- The Disability Action Plan is expected to have a **positive impact** on people with dependants, particularly carers of disabled individuals.

- Assessment: Positive impact.

Rationale

- Flexible engagement and employment practices support those with caring responsibilities.
- Consideration of reasonable adjustments benefits carers as well as disabled dependants.

Mitigations

- No mitigation required.
- Continued monitoring will ensure carers are not disadvantaged.

Level of impact	Major	Minor	None
POSITIVE		X	

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories? Yes

The implementation of the Disability Action Plan provides opportunities to further promote equality of opportunity for people across the Section 75 categories, particularly where disability intersects with other identities or circumstances.

Detail opportunities of how this policy could promote equality of opportunity for people within each of the Section 75 Categories below:

Religious belief Ensuring engagement and consultation activities are accessible and respectful of religious practices.

Neutral and inclusive service delivery that supports participation across all religious communities.

Use of trauma-informed practice to promote trust and engagement.

Political opinion Providing accessible and impartial engagement opportunities for all communities.

Ensuring participation is not constrained by background, affiliation, or historical mistrust.

Transparent communication to support confidence in inclusive processes.

Racial group

Targeted outreach to minority ethnic communities to improve awareness of accessible services.

Use of culturally sensitive and accessible communication methods.

Addressing compounded barriers where disability intersects with ethnicity or language.

Age

Tailored engagement approaches for older people, including non-digital options.

Improved physical accessibility and clear signage in public spaces.

Simplified, plain-language information to support accessibility across age groups.

Marital status

Continued assurance that access to services, engagement and employment opportunities is unaffected by marital or civil partnership status.

Universal application of reasonable adjustments and inclusive practices.

Sexual orientation

Reinforcement of inclusive and respectful workplace and service environments.

Clear messaging on dignity, respect and confidentiality to support disabled LGBTQ+ individuals.

Ensuring engagement and employment processes enable safe disclosure where appropriate.

Men and women generally

Promotion of flexible working and reasonable adjustments that support disabled people across all genders.

Monitoring workforce data to identify gender-related trends in disability declaration or progression.

Ensuring engagement methods are sensitive to the different ways men and women may experience disability and trauma.

Disability

Co-design and consultation with disabled people and disability organisations to shape services and engagement.

Proactive use of accessible formats (e.g. Easy Read, BSL interpretation, assistive technology).

Strengthened awareness and confidence among staff through disability and trauma-informed training.

Monitoring uptake of reasonable adjustments to identify gaps or unmet need.

Dependants

Flexible engagement and working arrangements to support carers.

Recognition of the additional pressures on those caring for disabled dependants.

Clear information on available supports and adjustments.

3. **To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?**

Please provide details of the likely policy impact and determine the level of impact for each of the categories below i.e. either minor, major or none.

Overall, the Disability Action Plan is expected to have a **neutral to minor positive impact** on good relations. The policy promotes inclusive, accessible and trauma-informed engagement, which helps support respectful interaction and participation across communities.

Religious Belief

Likely policy impact:

The Disability Action Plan may have a **minor positive impact** on good relations between people of different religious beliefs.

Level of Impact: Minor

Details:

- The policy promotes inclusive and accessible engagement that applies equally to all religious communities.
- Trauma-informed and dignity-based approaches support respectful participation, particularly in a context where religious identity may intersect with historical experiences of conflict.
- By reducing barriers to participation, the policy can encourage broader engagement across communities without favouring any particular belief.

Political Opinion

Likely policy impact:

The policy is expected to have a **minor positive impact** on good relations between people of different political opinions.

Level of Impact: Minor

Details:

- The Disability Action Plan supports impartial, inclusive and accessible engagement with all individuals, regardless of political background.
- Improved accessibility and participation may help foster trust and confidence among individuals from different political traditions when interacting with the organisation.
- The policy does not introduce any differential treatment based on political opinion.

Racial Group

Likely policy impact:

The Disability Action Plan may have a **minor positive impact** on good relations between people of different racial groups.

Level of Impact: Minor

Details:

- The emphasis on accessible communication and inclusive engagement helps reduce barriers that may disproportionately affect disabled people from minority ethnic backgrounds.
- By promoting equitable access to services and participation, the policy supports inclusion and mutual understanding across racial groups.
- No negative or adverse impacts on race relations are identified.

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Detail opportunities of how this policy could better promote good relations for people within each of the Section 75 Categories below:

Yes

Although the Disability Action Plan is not primarily focused on good relations, its inclusive and trauma-informed approach provides opportunities to further promote good relations by supporting respectful participation, trust and understanding across communities.

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

The policy is likely to have **positive reinforcing effects** for people who fall into more than one Section 75 category, including:

- **Disabled older people**, who may face combined barriers related to mobility, health, and digital access, and who are likely to benefit from accessible formats and flexible engagement.

- **Disabled people from minority ethnic backgrounds**, who may experience compounded barriers linked to disability, language, culture, or trust in public institutions; inclusive and accessible engagement helps reduce exclusion.
- **Disabled women**, who may experience disability alongside caring responsibilities or gender-related disadvantages in employment; flexible working and reasonable adjustments can have enhanced benefits.
- **Disabled carers or people with dependants**, who may face time constraints and stress; adaptable engagement and workplace flexibility provide additional support.
- **Disabled people affected by trauma**, where disability intersects with political opinion, religious belief, or legacy-related harm; trauma-informed practice supports dignity and participation.

Part 3. Screening decision

Screening outcome:

Decision: Screened out

Mitigation

None

Approval and authorisation

Screened by:

Senior HR Business Partner

Approved by:

Director of People and Culture

Date: 27 April 2026