



*Special EU Programmes Body
Foras Um Chláir Speisialta An Ae
Boord O Owre Ocht UE Projects*

DRAFT

Disability Action Plan

May 2007

A copy of this action plan, our annual progress report to the Equality Commission and our five year review of this plan will be made available on our website www.seupb.eu

If you require any of these documents in an alternative format such as in large print, in Braille, on audio cassette, easy read or on computer disc please contact the person below to discuss your requirements.

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Foreword

This Disability Action Plan is an important document in that it is a statement of the Special EU Programmes Body's commitment to and proposals for fulfilling the statutory obligations in compliance with Section 49A of the Disability Discrimination Act 1995 (as amended by the Disability Discrimination (NI) Order 2006). This Act places new duties on public authorities, when carrying out their functions to have regard to the need:

- to promote positive attitudes towards disabled people; and
- to encourage participation by disabled people in public life.

The Plan is also important because it outlines how disability issues can be more effectively mainstreamed within the Special EU Programmes Body, thus ensuring that they are central to the whole range of policy decision-making within the Body.



Pat Colgan
Chief Executive

May 2007

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1. Introduction

1.1 Under Section 49A of the Disability Discrimination Act 1995 as amended by the Disability Discrimination (NI) Order 2006, the Special EU Programmes Body is required when carrying out its functions to have due regard to the need:

- to promote positive attitudes towards disabled people; and
- to encourage participation by disabled people in public life.

1.2 Under Section 49B of the Disability Discrimination Act 1995, the Special EU Programmes Body is also required to submit to the Equality Commission, a Disability Action Plan (the Plan) showing how it proposes to fulfil these duties in relation to its functions.

1.3 The Special EU Programmes Body is committed to effectively implementing the disability duties and this disability action plan. The Body will allocate all necessary resources (in terms of people, time and money) in order to effectively implementing this plan and where appropriate, build objectives and targets relating to the disability duties into corporate and annual operating plans.

The Body will also put appropriate internal arrangements in place to ensure that the disability duties are complied with and this disability action plan effectively implemented. The Body will ensure the effective communication of the plan and is committed to providing training and guidance on the disability duties for all staff.

2. Purpose of the disability action plan

2.1 This Plan sets out how the Body proposes to fulfil the disability duties in relation to its functions.

3. The Body – its role and functions

- 3.1 The Special EU Programmes Body is a North/South Body, established under the Agreement between the Government of Ireland and the Government of the United Kingdom of Great Britain and Northern Ireland (the Agreement) on 8 March 1999 and came into effect on 2 December 1999.

One of the Body's principal aims is to promote cross-border co-operation through the implementation of the European funding Programmes, the EU Programme for Peace and Reconciliation for Northern Ireland and the Border Region of Ireland 2000-2004 (Peace II), as well as the Programme's Extension (2005-2007) and the Interreg IIIA Programme. These Programmes are now beginning to commence a closure process and it is SEUPB's responsibility to oversee closure.

The Body will also manage and implement the new EU funding Programmes; EU Programme for Peace and Reconciliation for Northern Ireland and the Border Region of Ireland 2007-2013 (Peace III) and the Cross Border Territorial Co-operation Programme 2007-2013. The Body has been designated the role of Managing Authority and Certifying Authority for both these Programmes and will have a much more substantial role in the delivery of the funding directly to the projects on the ground.

With a view to enhancing co-operation and building on the existing historical, cultural and economic links between the UK and Ireland, Western Scotland has been included in the Cross Border Territorial Co-operation Programme 2007-2013. The inclusion of Scotland will require the SEUPB to form new partnerships and develop new working relationships with the political institutions, groups and sectors within the Western Counties of Scotland.

The new Cross Border Territorial Co-operation Programme will not only encourage and develop greater cross border working but also build transnational relationships, a key objective for the EU in the 2007-2013 funding round. The

SEUPB has been asked by the two governments to undertake a broad role to support North/South participation in transnational Programmes which are part of the European Territorial Co-operation objective. The above Programmes are, North West Europe Programme, Atlantic Area Programme and the Northern Periphery Programme.

The Mission of the Special EU Programmes Body is:

“To effectively manage and implement funding Programmes on behalf of the two governments and the European Union aimed at delivering social and economic improvements to the people in Northern Ireland and Ireland through cross border and transnational co-operation.”

We intend to achieve our Mission over the period 2008 to 2010 by:

- **Leading** co-operation and action between people and organisations in Ireland and Northern Ireland;
- **Delivering** a comprehensive approach to our statutory responsibilities through the continued implementation of the Peace II and Interreg IIIA Programmes, including an effective and successful closure of these Programmes, alongside oversight of the North/South elements of Leader+, Urban II, Equal and other EU Programmes.
- **Creating** a dynamic and productive framework within which co-operation can take place within the future EU Programmes, Peace III and Interreg IV.
- **Providing** a focus within and between Northern Ireland and Ireland (in particular the Border Region of Ireland), and the western coast of Scotland, for the encouragement and development of cross-border activities which lead to closer socio-economic co-operation; and
- **Developing** an environment that values participation, partnership, inclusive working, trust and transparency.

4. The Body's commitment to the effective implementation of the disability action plan

- 4.1 The Special EU Programmes Body is committed to the effective implementation of all aspects of the Plan in all parts of its organisation. Overall responsibility for determining policy on how this will be achieved lies with the Chief Executive. Day to day responsibility for carrying out the policy determined by the Chief Executive lies with the Director of Corporate Services and she will be responsible for the implementation of administrative arrangements to ensure that the disability duties are complied with by the Body in carrying out its functions.
- 4.2 Progress on meeting objectives, including those relating to the disability duties will be monitored and reported upon at the most senior level within the organisation on a regular basis.

5. Effective engagement

- 5.1 The Body is committed to engage effectively with disabled people in the drafting, implementation, monitoring and review of this Plan. Further information on how this will be done is outlined in Section 7 on Consultation.

6. Annual Report and 5 Year Review

- 6.1 The Body will prepare an annual report on the implementation of its Plan. The annual report will be included as part of the Body's annual report to the Equality Commission on the implementation of our equality scheme. The Body will carry out a five year review of its plan, in consultation with the Equality Commission for NI.

7. Consultation

- 7.1 The Special EU Programmes Body is committed to carrying out consultation in a meaningful manner in the development of its disability duties. In doing so the Body is keen to bring about change for disabled people and we are

therefore focussing on the issue of involvement and participation in preparing our Plan.

- 7.2 Public consultation on this paper will last until Tuesday 26 June 2007.
- 7.3 The Special EU Programmes Body welcomes any comments, enquiries and feedback, as well as requests for meetings to discuss this paper.
- 7.4 Specifically we are keen to seek the views of disabled people in relation to the development of the Plan. To do this the Special EU Programmes Body is committed to proactively engaging with disability groups. We will invite the following organisations to discuss their involvement in the development of our Disability Duties:

- Cedar Foundation
- Disability Action
- NI Association of Mental Health
- Mencap
- PHAB (NI)
- Royal National Institute for the Blind and the Blind Centre for Northern Ireland.
- Royal National Institute for the Deaf

Their involvement is designed to ensure that disabled people can assist the Body by:

- identifying barriers faced by disabled people in participating in public life in general and specifically any barriers they have encountered in relation to their dealings with the Body;
- identifying circumstances in the past in which the Body has not promoted positive attitudes towards disabled people and by identifying opportunities in the future for the Body to promote such attitudes;
- setting priorities and identifying solutions as regards the taking of remedial action;
- monitoring and reviewing the effectiveness of measures taken.

7.5 The Special EU Programmes Body seeks the views of consultees in relation to the Action Measures listed in Section 10 which the organisation intends to take in order to implement the disability duties.

7.6 Consultation will consist of:

- written request for responses to stakeholders and target groups;
- public press advertisement;
- one to one consultation meetings.

In addition this draft Plan will be placed on our website, seeking views from individuals and organisations.

7.7 We are happy to accept responses in a variety of formats including:

- in any written form, ie letters, papers, fax etc;
- by e-mail to Gina.McIntyre@seupb.eu
- by requesting a one-to-one meeting;
- any other method which can be reasonably accommodated.

7.8 As part of the consultation process, barriers to proper consultation will be removed by ensuring accessibility of documents in alternative formats. Information will be made available on request in accessible formats including Braille, large print, disc and audio cassette. Information will also be made available in accessible formats in a timely fashion. It will also be important to establish with disabled people the basis for dialogue and engagement during the life of the Plan. Consideration will also be given to how best to communicate information to young disabled people as well as considering additional dimensions of disabled peoples' lives such as ethnicity, age, gender, sexual orientation and religious belief.

7.9 Body believes it is important that disabled people are involved in the implementation, monitoring and review of the Plan. Section 10 of this document lays out the initiatives the Body wishes to implement. We would seek

views and comments on these actions and will consider amending them or including additional ones following the comments we receive.

- 7.10 On completion of this consultation the Special EU Programmes Body will review all feedback and update the Disability Action Plan as necessary.
- 7.11 The point of contact to seek further information on the Disability Action Plan is:

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- 7.12 The Special EU Programmes Body believes that hosting an annual consultation event as part of its Section 75 responsibilities will allow for a two-way discussion; giving disabled people an opportunity to provide feedback in a constructive manner, as to how we are implementing the disability duties. Prior to the annual meeting the Special EU Programmes Body will allow adequate time for groups and individuals to consult amongst themselves as part of the process of forming a view on the implementation of this scheme. We will therefore aim to provide information at least one month in advance of the meeting.

8. Public life positions over which the Body has responsibility

- 8.1 Although the Special EU Programmes Body has limited opportunity to directly encourage disabled people to apply for/participate public life positions, the Body will continue to clearly communicate our goal of encouraging the

participation of disabled people in public life via direct recruitment to the Body and when seeking volunteers for monitoring committees and steering panels for various projects/programmes, and will encourage other agencies who nominate these individuals, to consider and where possible implement their responsibility in this area.

9. Previous measures

- 9.1 The Body has already taken a number of measures to promote positive attitudes towards disabled people and encourage their participation in public life as a result of the duties under Section 75.

Work Placements

As an organisation working with stakeholders from the public, community and voluntary sectors, the SEUPB has promoted the organisation through contact with local organisations, community groups and schools.

Work experience placements are arranged with young people through contact programmes with local Special Needs Schools. These work experience programmes are developed to enable young people with disabilities to experience the full range of work tasks within the organisation. Staff within the Body are appointed as mentors to the young people during the work placement.

The SEUPB also offers six month work placements for disabled people which are arranged through contact with local Job Centres and New Deal Programmes.

Recruitment

The SEUPB, in formulating its recruitment policies, has tried to ensure that it maximises the opportunity to attract applicants with disabilities for jobs within the Body.

The Body has a written Equal Opportunities Policy which is included as part of its recruitment pack to applicants.

Additional training has been provided for staff who are involved in recruitment and selection panels.

In job advertisements the Body publicly states that all appointments are made on the basis of merit.

The organisation states in job advertisements that information is available in other formats. Information can be made available in different formats including large print, disk, tape or e-mail. Job details can also be downloaded from the SEUPB's website.

We also advise potential job applicants on how to find out about reasonable adjustments for the recruitment process. Applicants are also requested on their application form to inform us of any special provisions or facilities required at the interview.

Training

The SEUPB promotes awareness of disability issues amongst the workforce through incorporating awareness programmes within its induction training and through specific staff training courses.

Managers with specific responsibilities for Equal Opportunities have undertaken training through the Equality Commission to enable them to understand the needs and aspirations of staff with disabilities.

Disability awareness training has also been provided for all staff, e.g. RNID Deaf Awareness Training.

Staff with disabilities are actively encouraged to participate fully in all of the Body's training courses, staff away days and events. The staff are also included in career development opportunities within the organisation.

Equality

The Special EU Programmes Body was approved in 2003 as a designated body under Section 75 of the Northern Ireland Act 1998 and thus was required to prepare an

Equality Scheme in which it identified a range of policies which it would subject to an equality impact assessment to meet its statutory requirements. Section 75 of the Act requires all designated bodies, in carrying out all their functions, to have due regard to the need to promote equality of opportunity to a range of groups including persons with a disability and persons without.

The function of an Equality Impact Assessment is to determine the extent, if any, of the different impacts of a policy on different equality groups. If any adverse impact is identified, the impact assessment must consider alternatives or mitigating measures to promote equality.

The SEUPB has developed its Equality Scheme under Section 75 legislation. The Body regularly engages in consultation with organisations representing the disabled in relation to the Body's policies and practices.

The Body will provide, on request, its Equality Scheme and related documents in other formats such as Braille, disk, audio cassette.

All staff have received Equality Awareness training to enable mainstreaming of equality issues and the Body has also appointed a manager with responsibility for championing the Equality Scheme throughout the organisation.

Textphone

Each office has a central textphone, with all staff having received training in its use. The textphone number is widely publicised.

Website

The website is designed to assist persons with disabilities, e.g. accessible to the partially sighted, the colour blind and those using slower modems. The website is currently being reviewed to ensure the highest standard of accessibility for people with different disabilities for whom it may be difficult

to use conventional websites i.e. people with sensory and motor disabilities.

Buildings

Before moving to its new headquarters in the Gasworks Development in Belfast, staff responsible for facilities management undertook an audit of the building to assess its suitability for meeting the needs of staff with disabilities. Occupation to the new building was delayed to allow the building of additional facilities to support disabled workers. The organisation worked with architects and builders to provide a suitable environment for disabled workers. Additional disabled toilet facilities were provided on a number of floors and corridors widened to allow wheelchair access. New signage was provided to include colour definition and Braille. Kitchen facilities were specifically designed to include lowered work surface and space beneath surface and sink to allow easy wheelchair access. Accessibility issues have been extensively addressed throughout the building. Aspects of accessible design include level access, adequate clear opening widths to doors, lift and complementary stepped access and clear zones of visibility. A passenger lift is provided for access to the first, second and third floors. A loop system for the deaf has been provided in the Conference Room.

The Body is committed to ensuring its offices are in buildings which are accessible for disabled people (notably wheelchair users and people with other mobility disabilities) as well as people with sensory and learning disabilities. The office building is close to public transport, provides level access entrance and has accessible toilets. Arrangements are put in place to ensure the smooth evacuation of people with disabilities in the event of an emergency.

Following annual audits actions plans are drawn up and implemented. The Facilities Manager within the Body has been designated as the Access Officer. Relevant training is ongoing.

Providing Advice and Information

A range of alternative formats are available for people with sensory impairment on request. These include Braille, large print, disc, audio-tape, where reasonable video, the provision of a signer in the language used by the deaf person, and email.

The Body is also committed to providing all publications in such a way that they are easily legible type sizes and appropriate typefaces which use colour contrasts that best meet the needs of people with visual impairments.

The Special EU Programmes Body is also committed to using plain English – and providing clarifications to simplify meaning – in its publications to assist all learners and in particular those with learning disabilities. Personal calls and face-to-face meetings are also offered.

The Special EU Programmes Body believes that this combination of accessible premises, alternative formats and other reasonable adjustments remove or significantly reduce the adverse impact that might otherwise be faced by disabled people accessing the advice and information services provided by the Body. It is also considering how best to monitor access to these services to ensure that they best meet disabled users needs.

The Body does not consider that its policy on providing information and advice is discriminatory but rather is designed to remove disadvantage from the communication process. The suggestions made should further contribute to the promotion of equality of opportunity.

The Special EU Programmes Body provides information in a variety of formats, on request; which will make their information accessible to the user. On occasion specific needs may be met by technological alternatives: e.g. information being e-mailed, placed on the SEUPB website, provided on floppy disc or CD. The following alternative versions are also available on request, where this is reasonably practical.

- Large-print Word version
- Audio-tape
- Braille version
- Videos for deaf users of sign language

A statement to ensure that the Body's commitment to accessibility is clearly stated and understood appears on all principle publications.

The Body's commitment to its customer is that as far as practically possible all publications:

- Are in plain English;
- Are in easily legible type sizes and approved typefaces;
- Are short and simple;
- Use illustrations to clarify or simplify the meaning;
- Uses colours that meet the requirements of people with visual impairments.

The website includes electronic versions of all publications in both PDF and word versions.

10. Action Measures

10.1 The following are the measures which the Body intends to take in order to implement the disability duties:

Action Measure	Responsibility	Impact
<p><u>Mainstreaming</u></p> <p>An additional question on screening to assess the significance of the disability duties will be added to the S75 screening proforma</p>	<p>Director of Corporate Services</p>	<p>Better promotion of equality for disabled people.</p>
<p><u>Training and Guidance</u></p> <p>Provide further training on the disability duties to all staff members.</p> <p>Provide specialist training on the disability duties and all appropriate action arising from their implementation for all frontline staff including senior managers, and those involved in recruitment and selection panels.</p>	<p>Director of Corporate Services</p>	<p>Increased awareness of disability issues</p> <p>Promotion of positive attitudes towards disabled people</p>

Action Measure	Responsibility	Impact
<p data-bbox="236 271 679 342"><u>Encouraging participation in public life</u></p> <p data-bbox="236 383 767 853">Although SEUPB has limited opportunity to directly encourage disabled people to apply for/participate in public life positions other than becoming an employee of the Body, when seeking volunteers for monitoring committees and steering panels for various projects/programmes, the Body will clearly encourage other agencies who forward these individuals to promote the participation of disabled people in public life.</p> <p data-bbox="236 931 587 1003">Remove barriers to their selection/participation</p> <p data-bbox="236 1081 699 1189">Provide appropriate training and support to disabled people in a public life position</p> <p data-bbox="236 1267 711 1339">Create opportunities for involving disabled people</p> <p data-bbox="236 1417 759 1489">Provide measures to improve the confidence levels of disabled people</p> <p data-bbox="236 1563 687 1597">Include a welcoming statement</p> <p data-bbox="236 1675 759 1747">Remove barriers to the recruitment / selection process</p>	<p data-bbox="810 383 1038 416">Chief Executive</p>	<p data-bbox="1078 383 1321 495">Better promotion of equality for disabled people</p> <p data-bbox="1078 528 1345 674">Higher participation of disabled people in public life.</p>

Action Measure	Responsibility	Impact
<p><u>Communication</u></p> <p>Ongoing review of external and internal communication policies, practices and procedures</p> <p>Work with other organisations to promote positive attitudes towards disabled people.</p> <p>When hosting events (internal or external), managed by ourselves or our event management team the following procedures are and will continue to be followed</p> <ul style="list-style-type: none"> • Attendees are asked if they have special requirements via an equality checklist • Presentation and promotional materials are easily legible • Signage is clear • Handouts are in an accessible format • Venues are easy to reach and accessible • Delegates are aware of relevant fire evacuation policies and the location of toilets • Venues are chosen to ensure that they are welcoming and harmonious environments <p>Ongoing review of publicity materials to ensure the images of disabled people are positive</p>	<p>Director of Corporate Services</p>	<p>To display positive attitudes towards disabled persons through the Body's publications and by using them in appropriate displays of the organisation's activities and services, and on our premises.</p>

Action Measure	Responsibility	Impact
<p><u>Internal measures</u></p> <p>Appoint a Disability Champion to progress the disability duties</p> <p>Conduct an audit of existing policies, practices and procedures</p> <p>Conduct a confidential employee monitoring survey to determine the number of staff with a disability and whether adjustments are required.</p> <p>Development of a register to record reasonable adjustments proposed and/or requested</p>	<p>Director of Corporate Services</p>	<p>Increased awareness of disability issues</p> <p>Promotion of positive attitudes towards disabled people</p>

11. Timetable for the Implementation of the Action Measures

11.1 The timetable below outlines the timescales for the implementation of the action measures detailed in Section 10.

Year 1 July 2007 – June 2008	
Measure	Action
Mainstreaming	<ul style="list-style-type: none"> • Add disability screening to S75 screening proforma
Training and Guidance	<ul style="list-style-type: none"> • Provide awareness training for all staff • Provide specialist training for senior managers, recruitment and selection panels, HR Officers and front line staff.
Encouraging participation in public life	<ul style="list-style-type: none"> • Map existing positions in Body eg monitoring committees, steering groups • Introduce a welcoming statement in all publications • Monitor the Body's comments/ complaints procedure to ensure appropriate corrective action is taken in consultation with disabled people and to measure improvement over time
Communication	<ul style="list-style-type: none"> • Review communication policies and procedures • Host an event to encourage positive interaction between disabled and non-disabled people • Research the possibility of working with other organisations to promote positive attitudes towards disabled people
Internal measures	<ul style="list-style-type: none"> • Appoint Disability Champions • Conduct an employee monitoring survey • Review Induction material to identify and mitigate where possible any adverse impact on disabled people • Prepare an annual report on the implementation of the Plan

Year 2 July 2008 – March 2009	
Mainstreaming	<ul style="list-style-type: none"> • Ongoing screening of policies during development to ensure no adverse effect on disabled people and progress equality impact assessments as required • Ongoing review of publicity materials to ensure positive images of disabled people
Training and Guidance	<ul style="list-style-type: none"> • Ongoing roll-out of disability awareness training to all new staff • Ongoing provision of specialist training for senior managers, recruitment and selection panels, HR Officers and front line staff
Encouraging participation in public life	<ul style="list-style-type: none"> • Audit policies and procedures for appointing to groups/bodies • Identify opportunities through the organisations Programmes to encourage participation of disabled groups • Ongoing Monitoring of the Body's comments/ complaints procedure to ensure appropriate corrective action is taken in consultation with disabled people and to measure improvement over time
Communication	<ul style="list-style-type: none"> • Work with other organisations to promote positive attitudes towards disabled people • Host a Section 75 consultation event • Provide resources for signage and additional aids to ensure services are fully accessible to all.
Internal measures	<ul style="list-style-type: none"> • Prepare annual report on the implementation of the Plan

12. Performance Indicators/ Targets

- 12.1 The Body is committed to monitoring and reviewing policies and practices to ensure that disability equality duties are being met. Monitoring the progress of this Plan itself is a significant element.
- 12.2 As part of this process, the Annual Review of the Plan will provide a part of the monitoring and review process and assist in drafting appropriate targets and Performance Indicators (PIs) for the next period, whilst reporting on the achievement, or otherwise, of those set for the period of the Annual Review.
- 12.3 The Body has included PIs and targets as an integral part of this Plan. Some targets are very specific, whilst other are of a more general nature, thus ensuring the Plan is a realistic and proactive plan, not solely reactive. Some targets are not related to a specific time, as over the 5-year period, we want to ensure that the Body meets the practical needs of disabled persons and their carers on a timely basis.
- 12.4 The purpose of these PIs and targets is to provide a measure of how the Body is implementing their disability duties and to ensure we are focusing on their needs at a time when it is appropriate to have them addressed.
- 12.5 Some PIs will be measured against similar public bodies, whilst others are specific to the Special EU Programmes Body.

13. Proposed Performance Indicators / Targets

- 13.1 To monitor employees in post and job applicants through the selection procedure to ensure that the Special EU Programmes Body is aware of employees and potential employees' needs by identifying the percentage of employees who have a disability.
- 13.2 To ensure all employees who require additional assistance to carry out their duties are provide with adequate support.

- 13.3 To display positive attitudes towards disabled persons through SEUPB's publications and by using them in appropriate displays of the organisation's activities and services, and on our premises.
- 13.4 Identify individuals within the organisation who will assist employees on issues including accessibility auditing, identifying training needs and sourcing advice on specific needs.
- 13.5 Monitor comments/complaints procedure to ensure appropriate corrective action is taken, and to measure improvement over a specific period of time.
- 13.6 Train all staff in disability awareness within 3 months of taking up post. All staff in post who have not already received training will be trained within the first 6 months of the Plan.
- 13.7 Provide awareness training in the Disability Discrimination Act for all senior management within the organisation. This training must include the purpose and value of an Action Plan.
- 13.8 Screen all policies and practices in line with the Equality Scheme commitments and review all policies and practices where adverse or potential adverse impact is identified.
- 13.9 Provide signage and additional aids to ensure services are fully accessible to all.

14. How the disability action plan will be published

14.1 Following submission to the Equality Commission for Northern Ireland, this Plan will be available by contacting:

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Textphone number: *028 90 266678*

Email: Gina.Mcintyre@seupb.eu

Website: www.seupb.eu

14.2 The availability of the Draft Consultation Report and the Final Disability Action Plan will be advertised in the press, including disability specialist press, and can be accessed on the Body's website at:

www.seupb.eu

14.3 The Body will, through our ongoing work with people with disabilities and people with learning disabilities, find appropriate ways of communicating the Plan. The Plan will be produced in clear print and plain language, and will be available in alternative formats on request, including large print, Braille, audio cassette and computer disc.

- 14.4 The Plan will be highlighted through press releases, advertisement, mail shots and meeting directly with disability organisations and representative groups.
- 14.5 In accordance with the Body's Bi-Lingualism Policy, the Plan will be available in the Irish Language upon request. Consideration will also be given to requests to produce the Plan for people who speak a minority language.
- 14.6 In addition, all employees will be provided with copy of the full Plan.