



Equal Status Policy Guidelines and Template



THE EQUALITY AUTHORITY
AN tÚDARÁS COMHIONANNAIS



This document was developed by the Local Government Management Services Board (LGMSB) Equal Status Working Group comprising representatives from local authorities, the Equality Authority and the Local Government Management Services Board (LGMSB):

Mr Michael Malone (Chairperson)	Kildare County Council
Ms Mary Mallon	Dún Laoghaire-Rathdown County Council
Ms Mairead O'Donovan	Clare County Council
Mr Ger O'Brien	Kerry County Council
Mr Tony Nolan	Wexford County Council
Mr Michael McCabe	Louth County Council
Ms Siobhan Brazil	Dublin City Council
Ms Maggie O'Brien	LGMSB
Ms Jane Brophy	LGMSB
Ms Carol Baxter	The Equality Authority

The document was piloted in Carlow Local Authorities, Dublin City Council (Housing Section), Fingal County Council (Planning Department) and North Tipperary County Council (Community and Enterprise Department). The process was facilitated by Philip Mudge of; *wayoveryonder trainingfacilitationdevelopment*.

Preface

This “*Local Authority Equal Status Policy*” seeks to stimulate and support a focus on equality for members of the community that use local authority services. This policy document provides a tool to protect local authorities and enable them to plan effectively and meet their obligations under the Equal Status Acts.

The Equal Status Acts 2000 to 2008 prohibit discrimination in the provision of goods and services, accommodation and educational establishments. They cover the nine grounds of age, disability, family status, gender, marital status, membership of the Traveller community, race, religion and sexual orientation.

The process of developing an equal status policy is an important and necessary starting point for each local authority to address its responsibilities under the Equal Status Acts. The policy is also a key element in a planned and systematic approach to workplace equality that encompasses both employees and members of the public. It is recognised that in the current economic and financial climate, this process will be challenging. This policy is intended to support local authorities to use existing resources more effectively to meet their obligations. The development and implementation of this policy is an ongoing process. The policy is designed so that local authorities can implement it in a manner that best suits the needs of the local authorities and service users.

This equal status policy reflects the commitment of this local authority to members of the public from across the nine grounds. It shows our commitment to equality and diversity training for staff that develops the knowledge, skills and understanding necessary for the effective implementation of equality policies and commits us to the development of an Equal Status Action Plan that sets out the steps to be

taken to achieve equality objectives in relation to customers and employees and that creates a context for staff to effectively deploy new skills, knowledge and understanding in promoting equality, combating discrimination and taking account of diversity.

The process of developing this equal status policy was supported by the *National Framework Committee for Equal Opportunities at the Level of the Enterprise* and was formulated using *Guidelines for Equal Status Policies in Enterprises* (The Equality Authority: 2005), and other relevant equality resources.

The work on developing and piloting these Equal Status Policy Guidelines was co-funded by the European Social Fund in 2008 through support from the Equality Mainstreaming Unit in the Equality Authority.

The cost of publication and launch in 2009 was supported by the European Commission's Directorate-General for Employment, Social Affairs and Equal Opportunities. The funding for this was provided under the European Community Programme for Employment and Social Solidarity, PROGRESS (2007–2013).

Table of contents

Introduction	02
Background	02
Purpose of the Equal Status Policy	02
Discrimination	02
Sexual Harassment and Harassment	03
Victimisation	03
Reasonable Accommodation	03
Positive Action	03
Exemptions	03
Consultation process	03
Further information	03
Why have an Equal Status Policy	04
What is an Equal Status Policy?	04
Benefits for this local authority of developing and implementing an equal status policy	04
Planned and Systematic Approaches to Equality for Customers	04
Statement of Commitment	06
Other Policies	06
Complaints	06
Making Equality Happen: Specific Actions that address Equal Status Issues	07
Specific actions that address equality	07
Equal Status Audit	07
Equal Status Action Plan	07
Accommodating Diversity	07
Communication with members of the public	08
Access to premises	09
Consultation with representative organisations	09
Business Contracts	10
Making Equality Happen: Implementing the Equal Status Policy	11
Responsibility for Implementing Equality: The Equality Infrastructure	11
Communicating this Policy	11
Monitoring	12
Making Equality Happen: Equality Review	13

Introduction

Background

This document was developed with the support of the Local Government Management Services Board (LGMSB) Equal Status Working Group as a resource to local authorities to enable them to improve the level of service that they provide to all members of the community by:

- Meeting their obligations under equality legislation including the Equality Act 2004 and the Equal Status Acts 2000-2008;
- Ensuring that while providing services to the public, this local authority does not discriminate against anybody under any of the 9 grounds;
- Becoming models of good practice in equality in cities, towns and communities.

Purpose of the Equal Status Policy

The purpose of this equal status policy is to:

- Identify the commitment of this local authority to address discrimination, accommodate diversity and promote equality;
- Outline the implications of this commitment for this local authority;
- Detail how it is planned to implement the policy.

The Equal Status Acts 2000-2008 promote equality of opportunity and prohibits discrimination in the provision of goods and services, accommodation and educational establishments. The Acts also include specific provisions in relation to registered clubs. This publication is designed to address equality in relation to the local authority sector and the services that they provide.

The legislation covers both the private sector and public sector. This publication provides a template for

delivering equality to local authority service users. It should be read in conjunction with the accompanying document Step by Step Guide to Developing an Equal Status Policy in a Local Authority.

The Equal Status Acts 2000 to 2008:

- Promote equality and prohibit discrimination (with some exemptions) across nine grounds;
- Prohibit sexual harassment, harassment and victimisation;
- Require reasonable accommodation of people with disabilities;
- Allow a broad range of positive action.

The Equal Status Acts apply to people who:

- Buy and sell a wide variety of goods;
- Use or provide a wide range of services;
- Obtain or dispose of accommodation;
- Attend or are in charge of educational establishments.

Discrimination

Discrimination is defined as the treatment of a person in a less favourable way than another person is, has been, or would be treated in a comparable situation on any of the nine grounds which exists, existed, may exist in the future or is imputed to the person concerned. There are different types of discrimination covered including indirect discrimination, discrimination by imputation and by association. Discrimination is particularly prohibited in relation to the area of advertising and publicity materials.

The nine discriminatory grounds are:

- Age
- Disability
- Family status
- Gender
- Marital status
- Membership of the Traveller community
- Race including nationality
- Religion
- Sexual orientation

Sexual Harassment and Harassment

Sexual harassment and harassment in the provision of goods and services is prohibited. A person who is responsible for a place where goods, facilities, or services are offered to the public or a person who provides accommodation must ensure that any person who has a right to be there is not sexually harassed or harassed. The 'responsible person' will be liable for the sexual harassment or harassment unless they took reasonably practicable steps to prevent it.

Harassment is any form of unwanted conduct related to any of the discriminatory grounds. Sexual harassment is any form of unwanted conduct of a sexual nature. In both cases it is conduct which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

Victimisation

Victimisation is prohibited. Victimisation occurs where adverse treatment by a provider of goods and services, is made:

- As a reaction to a complaint of discrimination being made under the Equal Status Acts;
- To a person being a witness in any proceedings under the Acts;
- To a person having opposed by lawful means an action which is unlawful under the Acts.

Reasonable Accommodation

A person selling goods or providing services must do all that is reasonable to accommodate the needs of a person with a disability unless this costs more than what is called a nominal cost. This involves providing special treatment or facilities where without these it would be impossible or unduly difficult to avail of the goods, services, accommodation etc.

Positive Action

The Acts allow preferential treatment or positive action intended to promote equality of opportunity for disadvantaged persons or to cater for the special needs of persons or a category of person who because of their circumstances may require facilities, arrangements, services or assistance.

Exemptions

The prohibition on discrimination is subject to a number of general and specific exemptions.

Consultation process

The policy has been developed in consultation with staff through the workplace partnership process, with national representative organisations of groups that experience inequality and locally through the structures of the City/ County Development Board and Social Inclusion Measures Group. This equal status policy was adopted by this local authority on [insert date].

Further information

Details on the Equal Status Acts 2000 to 2008 including exemptions are available in an information booklet on the Acts published by the Equality Authority. www.equality.ie

Why have an equal status policy

What is an Equal Status Policy?

This equal status policy is a statement of this local authority's commitment to equality, diversity and non discrimination for members of the public from across the nine grounds covered by the equality legislation. It identifies areas of activity to be developed to prevent discrimination, to accommodate diversity and to promote equality in the provision of goods and services. It addresses the following issues:

- Preventing discrimination against members of the public from across the nine grounds, (including sexual harassment and harassment, victimisation and failure to make reasonable accommodation for the needs of customers with disabilities);
- Accommodation of the needs of members of the public across the nine grounds, including making reasonable accommodation for customers with disabilities;
- Promoting equality including taking positive action to promote equality of opportunity for disadvantaged people or to provide facilities, arrangements, services or assistance required to cater for the special needs of customers;
- Introduction of an equality infrastructure to support a planned and systematic approach to equality for customers from across the nine grounds.

Benefits for this local authority of developing and implementing an equal status policy

- Quality Service to the public- equality and accessibility are central to high quality customer service. This equal status policy will contribute to delivering the high standard of service that all members of the public expect from a local authority. Its emphasis is on meeting the needs of all our customers and acknowledging that addressing the diverse needs of the public is both a challenge and a privilege. The challenges associated with addressing these needs will be met

through the creativity and insight that flow from a concern for and a knowledge of the diversity in our community and society;

- Ireland is a diverse society and different groups within society have diverse needs. It is a core function of this local authority to meet the needs of all members of the public, so delivering on our commitment to equality is a key part of what we do. An equal status policy within a local authority provides a stimulus and strategy for the identification of the needs of all members of the public. By listening to views and feedback from a broad diversity of members of the public we can also anticipate future trends as well as meeting existing needs more effectively;
- Staff Benefits - developing and implementing an equal status policy will improve relations between staff and members of the public. This in turn contributes to enhanced staff morale and engagement with the organisation;
- Compliance - an equal status policy will assist this local authority in our compliance with the Equal Status Acts. It will stimulate a staff focus on the legislation and on good practice. It will contribute to addressing the employer's liability under the Acts. Under the Equal Status Acts an employer engaged in the supply of goods or services is liable for the actions of staff during the course of employment. The liability exists even if the actions took place without the employer's knowledge or approval;

This equal status policy and our commitment to implementing the actions contained within show that this local authority is committed to equality and to addressing and removing discrimination.

Planned and Systematic Approaches to Equality for Customers

This equal status policy has a specific focus on customers and is an important element of a planned and systematic approach to equality within a local

authority which also includes our equality responsibilities to our employees.

Planned and systematic approaches to equality ensure that a focus on equality is integral to programme planning, processes and systems. They do not solely depend on individual staff goodwill and commitment but are based on formal equality policies and plans. They focus on achieving agreed equality objectives rather than merely reacting to incidents of discrimination or instances of inequality. These approaches are sustained and long term rather than being limited to short term actions.

Planned and systematic approaches to equality within a local authority require an equality infrastructure. This infrastructure includes:

- i) Equality policies such as this that establish the commitment of this local authority to equality, diversity and non discrimination;
- ii) Equality and diversity training for staff that develops the skills, knowledge and awareness necessary to put equality policies into practice;
- iii) An Equal Status Action Plan based on a review of a local authority's policies, practices and procedures for their impact on equality for employees and customers;
- iv) Implementing the actions and commitments in the Equal Status Action Plan;
- v) Review and evaluation of the Equal Status Action Plans and the impact of the actions undertaken.

This local authority aspires towards delivering the

Statement of Commitment

best service for members of the public using our services and facilities. We are aware of our obligations under the Equal Status Acts but we strive to exceed legal compliance by delivering an excellent service to all members of the public.

This local authority seeks to ensure that the service provided:

- Is free from discrimination, sexual harassment, harassment or victimisation;
- Accommodates diversity across the nine grounds covered by the equality legislation and meets needs that are specific to particular groups of customers;
- Makes reasonable accommodation for customers with disabilities;
- Seeks to benefit all customers from across the nine grounds by promoting equality and implementing positive action where necessary.

This local authority will not tolerate discrimination, sexual harassment, harassment or victimisation of customers by employees and non employees, such as other customers and business contacts. The procedures for addressing equality issues will be those detailed in the 'Local Authority Dignity at Work: Revised Policies and Procedures' published by the LGMSB.

Other Policies

This policy should be read and is operated in conjunction with this local authority's:

- Employment equality policy
- Policies on sexual harassment and harassment (in relation to staff and members of the public)
- Customer Service Charters
- Dignity at Work policy
- Health and Safety policies

- Building and Services Accessibility policies

- Accessible Information policy

- Accessibility re procurement of goods and services policy and any other policies and standards related to supporting and maintaining the dignity of all while communicating, dealing or engaging with this local authority.

Complaints

A complaints procedure is established under this Equal Status Policy. This complaints procedure will be in line with general complaints procedures operating within this local authority, but will specifically address complaints and issues that the public have in relation to equality when they use our services. This local authority will treat all complaints by members of the public with fairness and sensitivity and in a manner as confidential as possible.

Making equality happen: Specific actions that address equal status issues

Specific actions that address equality

This local authority will ensure that the needs, identities, experiences and situations of members of the public from the groups covered by the equality legislation are taken into account in programme planning, service design and corporate development strategies. Examples of actions implemented in the local authorities in which this policy was piloted are outlined in the accompanying step by step guide to Developing an Equal Status Policy in a Local Authority.

Equal Status Audit

This local authority will undertake a full equal status audit of its activities, policies and procedures. An equal status audit is an examination of the level of equality for service users and members of the public, and includes examination of policies, practices and procedures. The equal status audit includes collecting data¹ and consultation with service users and members of the public and staff to ascertain their perceptions of our achievement in meeting our obligations under the equal status legislation. The equal status audit will build on the initial equal status assessment undertaken prior to the development of the action plan.

Equal Status Action Plan

This local authority will prepare an Equal Status Action Plan that implements the actions identified in the review.

This will include actions to:

- Prevent discrimination (including sexual harassment and harassment, victimisation) against customers;
- Provide reasonable accommodation of customers with disabilities;
- Accommodate the diversity of customers;
- Promote equality for customers including taking

positive action to target particular groups of customers;

- A template to be used to develop the Equal Status Action Plan is included in the accompanying document Ten Step Guide To Developing An Equal Status Policy In A Local Authority.

Accommodating Diversity

This local authority will accommodate the diversity of customers from across the nine grounds by:

- Actively identifying and addressing customer needs across the nine grounds;
- Providing reasonable accommodation for customers with disabilities;
- Ensuring a flexibility in the operation of systems and services that allow for the diversity within the customer base to be accommodated;
- Taking positive action measures to promote equality of opportunity for disadvantaged persons and / or by providing facilities, arrangements, services and assistance required to cater for the special needs of customers.

Reasonable Accommodation of People with Disabilities

This local authority is committed to meeting its obligations to make reasonable accommodation of people with disabilities as outlined in equality legislation and to the principle of 'Universal Access for All'². This equal status policy is consistent with our obligations under disability legislation. We will ensure that our commitment to accommodating the needs of people with disabilities is reflected at systematic level including:

- That the principle of universal access is included in our customer charter;

- That the customer charter is prominently displayed in every public office;
- That a user friendly version of our customer charter is developed in consultation with providers of services to people with intellectual disabilities.

This local authority seeks to anticipate the requirements of customers with disabilities (including those with physical, intellectual and sensory disabilities and mental health issues) and to ensure that customers with disabilities are not excluded by physical, systemic, attitudinal or communication barriers. This local authority takes steps to assess the needs of individual customers with disabilities and to identify how best to meet these needs.

The access officer is the first point of contact within this local authority with responsibility for ensuring that these needs are identified and addressed.

This local authority seeks to provide an environment where a person with a disability can identify what their needs are and how these might best be met through dialogue with staff.

Reasonable Accommodation of Diversity

This local authority seeks to ensure a reasonable accommodation of diversity among customers from across all nine grounds covered by the equality legislation. This local authority seeks to anticipate the requirements of customers from across the nine grounds covered by the Equal Status Acts and to ensure that these customers are not excluded by physical, systemic, attitudinal or communication barriers.

Steps taken to accommodate this diversity and enable a diversity of customers to avail of the services of the organisation include:

- Facilitating a process with individual members of the public to assess their needs and how these might best be met. The equality action team/committee will develop procedures to ensure that these needs are identified and addressed;

- Creating a physical environment that is welcoming to a diversity of customers through initiatives such as use of art or posters on the walls;
- Assessing programme plans, services design and corporate development strategies for their impact on equality for a diversity of customers from across the nine grounds. Such assessment will be integral to the process of developing these plans, services and strategies and will include a dialogue with a diversity of customers.

Communication with Members of the Public

Access to information

Information will be made available through a wide range of media including traditional and multi-media forms. We will use information and communications technology in order to make information more accessible. We will ensure that use of technology is sympathetic to the needs of customers with disabilities and older persons.

Direct Contact

In its direct contact with customers this local authority seeks to ensure that:

- Customers are dealt with in a considerate, courteous and open manner that is straight forward and consistent and professional;
- Customers are dealt with in a harassment free environment;
- Language barriers are effectively addressed including use of interpreters;
- Reasonable accommodation is made for customers with disabilities and for the wider diversity of customers.

We will endeavour where possible to provide a sign language service for communication with members of the public. We will endeavour to provide training in Irish Sign Language to appropriate staff and

provide opportunities for trained staff to maintain their competencies in the use of Irish Sign Language³.

Materials

Information, promotional and other materials produced by this local authority will be provided where possible or practicable in a relevant and accessible manner to customers from across the nine grounds upon request. This may include using:

- Different media such as video, printed materials and electronic media;
- Different formats such as: audio, large print and Braille and accessible electronic formats such as: HTML, Microsoft Word and plain text email;
- Accessible website which includes procedures for changing font size and colour for service users with visual impairment or learning disabilities such as dyslexia; and is in line with Web Content Accessibility Guidelines (WCAG) 2.0;⁴
- Different languages.

We will provide signage in all local authority buildings, to show the locations of lifts, escape routes, sanitary facilities, dining rooms, leisure facilities, etc. These will all be clearly signalled to show the route to and the location of these services and facilities. Signage will be in simple fonts and style to ensure that it is easy to read.⁵

Information booklets on equality legislation are issued and made available to all staff and members of the public.

Advertising and Marketing

Advertising and marketing strategies will be non discriminatory in terms of obligations under the Equal Status Acts.

Advertising and marketing materials will communicate the commitment of the organisation to equality for all customers and will reflect and affirm the diversity of the customer base of the organisation.

Advertising and marketing strategies will identify and make use of channels of communication that are availed of by groups from across the nine grounds.

Customer Feedback

This local authority welcomes feedback from users of our services and the general public and encourages the participation of members of the public from across the nine grounds and organisations representing groups that experience inequality in our feedback systems.

Proofing procedures

This local authority will endeavour to develop suitable mechanisms to ensure that policies and published documents do not inadvertently discriminate on any of the nine grounds.⁶

Access to premises

This local authority is fully committed to delivering our responsibilities under the Disability Act and all requirements identified through the reasonable accommodation provisions of the Equal Status Acts.⁷

Consultation with representative organisations

This local authority will meet with organisations representing groups experiencing inequality to explore barriers to access and participation and to identify the needs of members of the public and how best to meet them.

We will consult with the relevant and appropriate organisations identified through the Community and Voluntary Forum, City/ County Development Board and Social Inclusion Measures working group structures. National organisations are consulted by this local authority through nationally developed structures in co-operation with other local authorities and the LGMSB.

Business Contracts

This local authority should be seen as a model for good practice in the community in both public service and commercial sectors. This local authority will seek to ensure those businesses and other companies from whom it has contracted to receive goods and services are aware of their obligations under the Equal Status Acts.

We expect all contractors providing services on behalf of this local authority to fully comply with the Equal Status Acts.

This equal status policy will be brought to the attention of all contractors engaged by this local authority. This local authority will encourage and inform all companies with which it has established such contracts to develop and implement equality policies.

Making equality happen: Implementing the equal status policy

Responsibility for Implementing Equality: The Equality Infrastructure

Equality is the responsibility of all. Senior management in this local authority will endeavour so far as is reasonably practicable to facilitate the implementation of this policy. Line managers and others in positions of authority will seek to ensure that customers do not experience discrimination, that diversity is accommodated and that equality is promoted for customers.

All staff employed will cooperate with the development and implementation of policies, procedures and practices to eliminate discrimination, accommodate diversity and promote equality for customers. This requirement should be included in contracts of employment for all staff and in staff handbooks.

A nominated officer is accorded responsibility for promoting the effective implementation of this policy.

This nominated officer has responsibility to:

- Ensure that customers with disabilities have their needs assessed and are reasonably accommodated;
- Ensure that the needs of customers from across all nine grounds are assessed and are reasonably accommodated;
- Manage and implement a complaints procedure in relation to allegations of discrimination or allegations of failure to make reasonable accommodation or issues raised in relation to the implementing of this policy;
- Attends equality action team meetings.

The Equality Committee/ Equality Action Team

An equality action team will be established, if not already in existence, to support the implementation of this policy. Its terms of reference include to:

- Sustain a focus on the equal status policy in all sections and at all levels of this local authority;
- Stimulate and support the implementation of commitments made in the equal status policy;
- Support the development and implementation of Equal Status Action Plans;
- Regularly review the equal status policy;
- Report to senior management on progress made in implementing the equal status policy and the Equal Status Action Plans.

Members of the equality action team/committee, if possible, will be drawn from various departments and grades and will where possible include members from groups identified within the nine grounds.

Communicating this Policy

This local authority is committed to the effective communication of this policy to:

- All staff
- Councillors/ public representatives
- Members of the public
- Contracted service providers
- Trade unions
- Local organisations representing groups experiencing inequality

This will be done through:

- Publication and dissemination of the policy
- Availability of the policy through this local authority's website
- Display of a summary of this policy in all public areas of the organisation
- Reference to the policy in all business contracts
- Reference to the policy in information materials
- Inclusion of relevant equality provision and information in staff handbooks

Equal Status Training

A structured equal status training strategy will be developed in order to meet the information and skills needs of our staff.

Complaints

This local authority will maintain an accessible, easy to use system for dealing with any complaints from customers under this policy. Complaints in relation to this equal status policy will be dealt with following normal customer complaints procedures. This system will be fair and sensitive and as confidential as possible. Complaints should be made in the first instance to the nominated officer or follow normal complaints procedures.⁸

This complaints procedure will not affect the right of a person to initiate a complaint under the Equal Status Acts 2000 to 2008.⁹

Monitoring

This local authority will actively seek feedback on this policy and its implementation from staff and members of the public.

The collection of data on members of the public will assist in identifying if this policy is successfully promoting equality for all. Any data collected will be for the purpose of analysing trends in service usage

and therefore will be treated in confidence and will comply with all data protection legislation.

The operation of the policy will be evaluated on a regular basis. The policy will be updated in response to issues identified through this evaluation.

This local authority will report on implementation of this policy and of the Equal Status Action Plan as appropriate to enable and promote full access by the public.

Making equality happen: Equality Review

This local authority will endeavour to review the equal status policy at five yearly intervals.

This review process will be undertaken in association with the LGMSB through agreed national and local structures including City/County Development Board, Community and Voluntary Forum and Social Inclusion Measures Group structures and using the information gathered through feedback processes.

Funded by the Equality Mainstreaming Unit which is jointly funded by the European Social Fund 2007-2013 and by the Equality Authority



Investing in your future

This template is supported by the Directorate-General for Employment, Social Affairs and Equal Opportunities of the European Commission.

Its funding is provided under the European Community Programme for Employment and Social Solidarity, PROGRESS (2007–2013). This programme was established to financially support the implementation of the objectives of the European Union in the employment and social affairs area, as set out in the Social Agenda, and thereby contribute to the achievement of the Lisbon Strategy goals in these fields.

The seven-year programme targets all stakeholders who can help shape the development of appropriate and effective employment and social legislation and policies across the EU–27, EFTA–EEA and EU candidate and pre-candidate countries.

PROGRESS mission is to strengthen the EU contribution in support of Member States' commitments and efforts to create more and better jobs and to build a more cohesive society. To that effect, PROGRESS will be instrumental in:

- providing analysis and policy advice on PROGRESS policy areas;
- monitoring and reporting on the implementation of EU legislation and policies in PROGRESS policy areas;
- promoting policy transfer, learning and support among Member States on EU objectives and priorities; and
- relaying the views of the stakeholders and the society at large.

For more information see: http://ec.europa.eu/employment_social/progress

The information contained in this publication does not necessarily reflect the position or opinion of the European Commission.

REFERENCES

1. The process of data collection from customers is a complex and difficult issue. The data collected required in relation to equal status policy is anonymous rather than personal data relating to individuals. This type of data collection which provides information on trends is more useful as a tool for assessing compliance with equal status legislation.
2. Taken from Towards Universal Access For All; Carlow Local Authorities Implementation Plan 2008-2015
3. Irish Sign Language (ISL) is the indigenous language of the deaf community and is the first or preferred language of approximately 5,000 deaf people in Ireland. Approximately 40,000 deaf and hearing people use ISL on a daily basis in Ireland. It is a recognised language in Northern Ireland and is referenced in the 1998 Education Act as the normal language used in Ireland by the deaf community.
4. Web content accessibility guidelines may be accessed at <http://www.w3.org/TR/WCAG20/>
5. The provisions of good signage can reduce the need for members of the public with communication difficulties to ask for directions. The effectiveness of signage should be tested by travelling along all the possible routes, and back, while assuming a complete lack of familiarity with the building.
6. This local authority will co-operate with the LGMSB and other appropriate authorities in developing and implementing procedures that assess the impact of our service provision (including plans, application forms and other documents) on the quality of service experienced by members of the public from across the nine grounds. Any nationally agreed structures or procedures will be utilised in the development of mechanisms used in this local authority.
7. See Code of Practice on Accessibility Of Public Services and Information Provided by Public Bodies: NDA 2006.
8. Local Government Customer Services Group: Customer Complaints- Guidelines For Local Authorities <http://www.environ.ie/en/Publications/LocalGovernment/Administration/FileDownload,2046,en.pdf>
9. The normal procedures for making a complaint about discrimination under the Equality Acts is that the person making the complaint notify the person against whom the claim is being made, in writing, within two months of the most recent occurrence of the discrimination. This notice must identify the nature of the claim and the intent to seek redress. The claimant can pose questions to seek further information in this written notification. If there is no reply or if the reply is unsatisfactory to the claimant the complaint could be referred to the Equality Tribunal. This must occur within six months of the discrimination. The Equality Tribunal may draw such inferences, if any, as seem appropriate from the failure to reply to such notification or from the provision of false or misleading information or from information supplied in response to a question from the claimant which was not such as would assist the complainant in deciding whether to refer the case to The Equality Tribunal.