



**General Teaching Council
for Northern Ireland**

Promoting Teacher Professionalism

DISABILITY ACTION PLAN

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Review: Every 5 Years

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1. INTRODUCTION

GTCNI wants to fulfil its obligations arising under [Sections 49A and 49B of the Disability Discrimination Act 1995](#), (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006).

Section 49A of the Disability Discrimination Act 1995 says that GTCNI should have regard to:

- promoting positive attitudes towards disabled people, and
- encourage participation by disabled people in public life, ('the disability duties').

Section 49B says that we must prepare a Disability Action Plan setting out how we will meet our responsibilities (under Section 49A) and that we must send this Action Plan to the Equality Commission for Northern Ireland ("the Equality Commission").

A Disability Action Plan covers people with all types of disabilities; for example, physical disabilities, learning disabilities, sensory disabilities, mental health disabilities, and other hidden disabilities, including neurodivergent conditions which may fall within the definition of disability, as set out in the DDA.

We will also undertake to publish our Disability Action Plans on our website.

Our actions in relation to Disability are further informed by our Diversity and Inclusion Policy and Action Plans as we believe that diversity and inclusion for all is not only the right thing to do but that it also delivers better outcomes. Diverse teams and diverse leadership styles lead to creativity, innovation and better decision-making.

All colleagues should feel included and able to contribute to the success of this organisation as their authentic selves. We firmly believe that diversity and inclusion of neuro-divergent conditions and disability therefore should be the norm and embedded into all aspects of our organisation; it should not be an activity or event that happens every so often.

With this Disability Action Plan (DAP), GTCNI wishes to actively implement colleague-focused measures to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life.

Our aim is to create a working environment that is inclusive, respectful and representative. We are fully committed to creating an inclusive working environment where everyone is valued, where everyone can be free to be themselves and where everyone has the same opportunity to reach their full potential. We can all make a difference by playing our part.

Supporting and promoting disability and inclusion in our workplace is about good people management and line managers have a key role to play in delivering GTCNI's disability and inclusion agenda every day in the workplace.

Equally, all colleagues have a responsibility and role to play in creating an inclusive workplace culture and there are opportunities for you to participate in delivering the DAP actions.

2. WHAT DO WE MEAN BY DISABILITY?

The [Disability Discrimination Act 1995](#) ("DDA") sets out when someone is considered to be disabled and protected from discrimination.

The definition is set out in section 1 of the DDA:

1. A person has a disability if:

- a) a person has a physical or mental impairment, and
- b) the impairment has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

In Disability Discrimination Law in Northern Ireland - A Short Guide (ECNI. 2011) there are additional clarifications:

- physical impairments affecting the senses such as sight and hearing, heart disease, diabetes, epilepsy;
- mental impairments including learning disabilities and mental ill health;
- substantial - put simply, this means that the effect of the physical or mental impairment on ability to carry out normal day-to-day activities is more than minor or trivial. It does not have to be a severe effect;
- long-term adverse effect - the effect has to have lasted, or be likely to last, overall for at least twelve months and the effect must be a detrimental one;
- people who are diagnosed with cancer, HIV and multiple sclerosis are deemed to be disabled from the point of diagnosis rather than from the point when the condition has some adverse effect on their ability to carry out normal day-to-day activities; and
- a normal day-to-day activity is something which is carried out by most people on a fairly regular and frequent basis, such as washing, eating, catching a bus or turning on a television.

2. A reference to a disabled person is a reference to a person who has a disability.

3. In relation to the protected characteristic of disability—

- a) a reference to a person who has a particular protected characteristic is a reference to a person who has a particular disability;
- b) a reference to persons who share a protected characteristic is a reference to persons who have the same disability.

Some impairments are automatically treated as a disability.

3. OUR PEOPLE STRATEGY

GTCNI's HR Strategy aims to have a well-led, high-performing and outcomes-focused GTCNI, which is a great place to work, where everyone can reach their full potential, and has an inclusive diverse workplace that does not discriminate against disability.

Our ambition is long-term, but to achieve the outcomes we want we have identified priorities (goals and work-streams) which we will act on now.



A well-led GTCNI	A high-performing GTCNI	An Outcomes-focused GTCNI	An inclusive GTCNI in which diversity is truly valued – a great place to work
<ul style="list-style-type: none"> • Improve how we engage and communicate with people across the organisation about issues that affect them • Build the capacity of supervisors, line managers and leaders across the organisation • Provide effective tools for supervisors, line managers and leaders, including streamlined and practical people policies, processes, guidance and training 	<ul style="list-style-type: none"> • Improve how we manage performance through regular and timely feedback mechanisms and appropriate guidance • Deliver a GTCNI-wide approach to strategic workforce planning and improve recruitment and vacancy management • Increase the use of new and flexible ways of working 	<ul style="list-style-type: none"> • Build career progression that develops breadth of experience and depth of expertise • Improve how we engage with staff and communicate with them about their contribution to delivery of outcomes 	<ul style="list-style-type: none"> • Deliver evidence-based interventions and targeted action to drive balance and inclusion in terms of gender, LGB&T, minority ethnic and disability • Ensure our people have working environments that are conducive to them performing at their best

We want GTCNI to be a great place to work, with a diverse and inclusive workplace culture that is respectful of and does not discriminate against disability.

To help achieve this, we are committed to:

- Deliver evidence-based interventions and targeted action to drive balance and inclusion in terms of gender, disability, LGBTQ+, and race and ethnicity.
- Make it easier for colleagues to record their disability information and encourage them to do so.
- Promote and better communicate the positive behaviours we expect of all our people in an inclusive culture which is intolerant of discrimination, bullying and harassment on any grounds, including disability.
- Deliver a health and wellbeing framework with a focus on mental health and support for colleagues facing challenging life events with the assistance of our specialist service provider: Lena by Inspire.
- Establish a process to measure progress on inclusion of and adaption or disability and periodically publish a data dashboard on progress and measures.
- Ensure our people have working environments that are conducive to them performing at their best.

4. OUR PROPOSED MEASURES (ACTIONS)

Historically, the focus was on discrimination and fairness with the moral imperative being equal opportunities – a compliance focus if you will.

With an increasing recognition in the public sector and beyond of the potential for managing diversity to yield positive benefits for our colleagues themselves and all other stakeholders and customers with whom we engage, GTCNI is committed to internalising diversity as a core value and part of our culture, programs and product.

We know however that our small workforce is not reflective of the economically active NI population, and that we have more to do in terms of diversity regarding disability.

How will we continue on our acceptance and inclusion of Disability journey?

4.1. DISABILITY COMMUNICATIONS, EVENTS, AND TRAINING

- We will actively support / promote staff suggestions in relation to recognising and celebrating diverse and inclusive events including:
 - International Men's Day.
 - International Women's Day.
 - Belfast Mela.
 - Pride.
 - Black History Month.
 - International Job Shadow Day.
 - **International Day of Persons with Disabilities.**
- We will ensure high-quality, tailored learning that supports the development of talent, knowledge, and inclusive and respectful behaviours.

How it will be done:

We will engage with colleagues to support their and our engagement in:

- Cultural Competence webinars.
 - Disability Awareness sessions.
 - Safe Place Training (NICSHR: LInKS).
 - Introduction to Diversity and Inclusion (NICSHR: LInKS).
 - Equality and Diversity Essentials (NICSHR: LInKS).
 - DDO, DDA, Section 75 and Disability Awareness Training (NICSHR: LInKS).
 - Ensure Staff Induction features information on the Disability Discrimination Act 1995 and reasonable adjustments.
 - Ensure we have a trained mental health staff resource in-house.
 - Assess how opportunities/working conditions can be improved for disabled people in GTCNI.
- We will create greater awareness of the Mental Health Charter and that many of its commitments relate equally to those with other disabilities including physical, sensory, learning and hidden disabilities.

How it will be done:

We will engage with our external support provider Lena by Inspire to ensure all staff have access to their Mental Health and Well-Being hub and provide regular updates of new resources and updates.

- We will continue to address accessibility and content on our website in accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

How it will be done:

In so far as we can with our current website, we will work with our provider to embed the provisions of the Web Content Accessibility Guidelines (WCAG 2.1).

Any future procurement of website development will firmly encompass the regulations.

We will quality assure documents with organisations representing the interests of disabled people and undertake greater engagement with disability/groups representing the interests of disabled people.

How will we measure our progress?

Our performance indicators/intended outcome will be:

- the effectiveness of learning products has been reviewed and evaluated as meeting learning objectives of recognising and challenging inappropriate behaviours;
- the effectiveness of learning products has been reviewed and evaluated as meeting learning objectives of understanding role-relevant statutory obligations;
- analysis of annual employee experience surveys will show an improved willingness to challenge and report inappropriate behaviour, and disabled colleagues will report feelings of inclusion (that we can be authentic, have a voice and feel we belong);
- annual reporting on levels of reported bullying, harassment, discrimination and victimisation of disabled colleagues will decrease by the end of the reporting period;
- workforce diversity data shows increased representation of disabled colleagues that more closely reflects the proportion of disabled people in the working age population of Northern Ireland;
- disabled colleagues requiring reasonable adjustments and their managers receive timely support and provide positive feedback about their experience via annual data capture.

We will capture and share this information using feedback from staff at staff meetings, performance appraisals and staff surveys..

4.2. INTERRELATIONSHIP WITH REVIEW AND IMPROVEMENT OF OTHER POLICIES

As an inclusive and diverse organisation accepting of disability in the workplace, we must integrate equal opportunity principles and practices and ensure that equality

considerations are mainstreamed and built into the policy development process from the outset rather than considering at the end.

We will strive to ensure our policies continue to be family friendly and are regularly reviewed and updated to ensure inclusivity:

- Finalise and introduce our new Menopause Policy;
- Introduce a new Domestic and Sexual Abuse Policy in support of existing Dignity at Work policy areas;
- Review and update our new Hybrid Home Working Policy as needed;
- Continue to keep our Flexible Working Hours Policy under review and give consideration to genuine exceptions to its rigid implementation for neuro-divergent conditions and disabilities;
- Review and update reasonable adjustments for neuro-divergent conditions where relevant.

4.3. PROCESS AND SYSTEM IMPROVEMENT

- GTCNI will improve its processes and systems to ensure they are fair, accessible to and inclusive of all colleagues.

How will we achieve this?

- We will continue to use both quantitative data on colleague diversity, and qualitative insight gathered from neuro-divergent and disabled colleagues to review, evaluate and revise our policies, processes and systems. This will also allow us to examine how they are implemented in practice to identify, eliminate, justify or mitigate any disparities in opportunity, usage or outcome for disabled colleagues.
- We will involve any disabled colleagues in designing solutions to identified issues, to ensure processes are fair and systems are accessible.

Our performance indicators/intended outcome will be that:

- annual analysis of process outcomes by protected characteristics shows elimination or ongoing reduction of unjustifiable disparities for neuro-divergent and disabled colleagues, as an example: that, on aggregate, the proportion of disabled candidates is the same at each stage of any undertaken recruitment process;
- analysis of annual employee experience surveys show no, or ongoing reduction of, unjustifiable disparities for disabled colleagues;
- that feedback from colleagues is positive;
- that disabled colleagues requiring reasonable adjustments and their managers receive timely support and provide positive feedback about their experience via annual data capture audits of the accessibility of key services, involving Assistive Technology (AT) users completed and services, support resources and equipment and systems have been maintained or improved.

4.4. ACCOUNTABILITY AND GOVERNANCE WITHIN GTCNI

- We will develop frameworks to embed consideration of disability equality throughout GTCNI.

How it will be done:

- reviewing our frameworks and strengthening structures to support relevant accountability and assurance of disability equality;
- embedding systematic consideration of equality impact and the involvement of disabled people into our decision-making processes;
- strengthening the accountability frameworks that support our staff;
- increasing the quality and transparency of our equality information, to encourage top-down and bottom-up accountability and support evidence-based actions and impact measures for disability equality;
- monitoring our diversity data to identify any under-representation in the vertical and horizontal representation and distribution of our disabled colleagues;
- auditing our diversity data sets to identify aggregate disparities between disabled and non-disabled colleagues.

Our performance indicators/intended outcome will be:

- consideration of equality impact on disabled colleagues has become a regular feature of decision making and assuring decisions;
- periodic analysis of process outcomes by protected characteristics shows elimination or ongoing reduction of unjustifiable disparities for disabled colleagues, e.g. on aggregate, the proportion of disabled candidates is the same at each stage of the recruitment process, disabled colleagues are not over-represented in the grievance process;
- analysis of staff surveys show no, or ongoing reduction of, unjustifiable disparities for disabled colleagues.

5. COMMUNICATING OUR INCLUSIVE CULTURE

- Raise awareness of our vision, where we need to improve, and our expectations of all GTCNI colleagues to contribute to making GTCNI a great place to work.

How it will be done:

- using weekly staff meetings to build inclusion, raise awareness of our challenges, and celebrate our equal treatment of all;
- creating opportunities for the organisation to listen to and understand the personal impact of inequalities on disabled people and to reduce barriers. For example, through disabled colleagues sharing their personal experiences through staff meetings or other groups.

- ensure up to date and accurate disability equality information is available to all colleagues.

Our performance indicators/intended outcome will be:

- disabled colleagues are involved in any communication campaigns (i.e. not just during disability awareness week) for example by sharing personal stories;
- equality analysis of staff surveys evidence that disabled colleagues report feeling included (can be authentic, have a voice and feel we belong), are aware how to challenge discriminatory behaviour and language and how to access support.

6. MEMBER-FOCUSED MEASURES

Member-focused measures will promote positive attitudes towards disabled people and encourage the participation of disabled people in public life.

6.1. OUR PROPOSED MEASURES (ACTIONS)

Build services that meet the needs of customer members

To help promote positive attitudes we will target awareness and training at areas that need improvement.

How it will be done:

- we will ensure that our colleagues have the training they need to identify what support they can offer our members with different needs and be aware of the support available to facilitate their interaction with members, our customers;
- we will treat all customer members fairly and respectfully and in line with our values of respect, professionalism and integrity;
- we will be mindful of our customer members' personal situation and will give extra support when required;
- develop a greater understanding of how different disabilities, including mental health, may impact a member's interaction with GTCNI. Through this, we will be able to build or source a package of awareness and training material which will draw on the specific difficulties disabled customers may face when interacting with GTCNI;
- further develop an education programme to raise awareness of equality impacting and Equality Impact Assessments.

Our performance indicators/intended outcome will be:

- to be measured through staff surveys and customer complaints analysis:
 - colleagues will have increased awareness of the services and adjustment they can offer to support members through an investigation;
 - members who need extra support are referred to extra support teams in a timely manner.

- we will continue to ensure policy measures are impacted and appropriate mitigations are considered to reduce the impact on disabled members at the earliest stages of policy and service change development;

6.2 ACCOUNTABILITY AND GOVERNANCE FOR MEMBERS

To encourage participation we will ensure that the service we offer to our disabled members is accessible and we have appropriate governance structures to improve them if they fail to meet expectations.

How will it be done?

- providing support for members who have difficulties accessing online services or are digitally excluded;
- ensure we deliver relevant training to front line staff to raise awareness of extra support indicators;
- reviewing our member communications to make sure they are clear and easy to understand, meeting the needs of all members, and work towards making them available in other languages and alternative formats;
- review and evaluate current communication channels available for disabled members, drawing on member insight and consider other potential channels to improve engagement;
- action any improvements needed which have been identified through member feedback and complaints;
- continue to analyse equality related member complaints to identify emerging trends which will allow for targeted intervention to improve the service and support we provide our disabled members;
- we will learn from monitoring and analysing members' feedback, and complaints from member groups who access extra support;
- ensuring future new member digital services meet Public Sector Accessibility Regulations 2018;
- ensure all mobile applications comply with Public Sector Accessibility Regulations 2018;
- continue accessibility testing using in- house and automated processes to ensure compliance with WCAG 2.1;
- monitoring the number of online forms that meet website accessibility standards.

Our performance indicators/intended outcome will be:

- working to sustain satisfaction rates over 95%;
- in the longer term, through clearer signposting and training there will be a measured reduction in disability related complaints;
- we will expect a year on year decrease in the numbers of online digital services that do not meet the required standards.