



# Proposed Disability Action Plan

for Northern Ireland

Consultation

Publication date: 29 September 2016

Closing Date for Responses: 22 December 2016

## About this document

This proposed Disability Action Plan for Northern Ireland shows how Ofcom proposes to fulfil its duties under Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by article 5 of the Disability Discrimination (Northern Ireland) Order 2006), to have regard, when carrying out its functions, for the need to:

- Promote positive attitudes towards disabled people; and
- Encourage participation by disabled people in public life.

Ofcom seeks stakeholders' views on the proposed Plan.

Under Section 49B of the DDA 1995, Ofcom is required to submit the final Disability Action Plan for Northern Ireland to the Equality Commission.

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## Section 1

# Introduction

- 1.1 Under Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by article 5 of the Disability Discrimination (Northern Ireland) Order 2006), Ofcom is required when carrying out its functions to have due regard for the need to:
- Promote positive attitudes towards disabled people; and
  - Encourage participation by disabled people in public life ('the disability duties').
- 1.2 Under Section 49B of the DDA 1995, Ofcom is also required to submit to the Equality Commission a disability action plan for Northern Ireland showing how it proposes to fulfil these duties in relation to its functions.
- 1.3 The Chairman and Chief Executive of Ofcom are committed to implementing effectively the disability duties and this disability action plan for Northern Ireland. Ofcom will allocate the necessary resources required to implement effectively this plan and, where appropriate, build objectives and targets relating to the disability duties into corporate and annual operating plans.
- 1.4 Ofcom will put appropriate internal arrangements in place to ensure both compliance with the disability duties and that this disability action plan for Northern Ireland is effectively implemented. Ofcom will ensure the effective communication of the plan to staff and provide the necessary training and guidance for staff on the disability duties and the implementation of the plan.
- 1.5 Responsibility for implementing, reviewing and evaluating this disability action plan for Northern Ireland (and the point of contact within Ofcom) is:
- Jonathan Rose  
Director, Northern Ireland  
Ofcom  
Landmark House  
5 Cromac Quay  
Belfast  
BT7 2JD
- 1.6 Ofcom will consult with disabled people in implementing and reviewing this plan, approaching such bodies as Disability Action and Ofcom's Advisory Committee on Older and Disabled People (see paragraph 3.4).
- 1.7 If this plan is required in an alternative format (such as large print, in Braille, on audio cassette, easy read or on computer disc) and/or language, please contact the above to discuss your requirements.
- 1.8 Ofcom will submit to the Equality Commission an annual progress report on the implementation of this plan and carry out a five-year review of it, which will also be submitted to the Commission. A copy of this plan, each annual progress report and the five-year review will be made available on Ofcom's website ([www.ofcom.org.uk](http://www.ofcom.org.uk)).

## Section 2

# Ofcom's functions

- 2.1 As the communications regulator in the UK, Ofcom regulates the TV, radio and video on demand sectors, fixed line telecoms, mobiles, postal services, and the airwaves over which wireless devices operate, making sure that people in the UK get the best from their communications services and are protected from scams and sharp practices, while ensuring that competition can thrive.
- 2.2 Ofcom operates under a number of Acts of Parliament, including, in particular, the Communications Act 2003. Ofcom must act within the powers and duties set for it by Parliament in legislation. This Act says that Ofcom's principal duty is to further the interests of citizens and of consumers, where appropriate by promoting competition.
- 2.3 Accountable to Parliament, Ofcom sets and enforces regulatory rules for the sectors over which we have responsibility. We also have powers to enforce competition law in those sectors, alongside the Competition and Markets Authority.
- 2.4 Ofcom is funded by fees from industry for regulating broadcasting and communications networks.
- 2.5 Ofcom's main legal duties are to ensure:
  - the UK has a wide range of electronic communications services, including high-speed services, such as broadband;
  - a wide range of high-quality television and radio programmes are provided, appealing to a range of tastes and interests;
  - television and radio services are provided by a range of different organisations;
  - people who watch television and listen to the radio are protected from harmful or offensive material;
  - people are protected from being treated unfairly in television and radio programmes, and from having their privacy invaded;
  - viewers of video on demand services are protected from harmful content;
  - a universal postal service is provided in the UK – i.e. a six days a week, universally priced delivery and collection service across the country; and
  - the radio spectrum (i.e. the airwaves used by everyone from taxi firms and boat owners, to mobile-phone companies and broadcasters) is used in the most effective way.
- 2.6 Further, under the Communications Act 2003, Ofcom has the following legal obligations to promote equality of opportunity, which refer explicitly to the needs of disabled citizens and consumers:

Section	Detail
3(4)(i)	<u>General duties of Ofcom</u> Ofcom must have regard, in the performance of its duties, to the needs of people with disabilities, insofar as they are relevant to the circumstances
10	<u>Easily usable equipment</u> Ofcom shall take steps and make arrangements in order to encourage others to secure the development of domestic electronic communications equipment which is capable of being used with ease, and without modification, by the widest possible range of individuals (including those with disabilities)
21	<u>Advisory Committee for Older and Disabled People</u> Ofcom must establish and maintain a committee to provide advice on the interests of disabled and older citizens in relation to communication matters
27	<u>Employment in broadcasting</u> Ofcom should take steps as considered appropriate for promoting the equalisation of opportunities in the employment and training for disabled people in television and radio
303	<u>Television services for the deaf and visually impaired</u> Ofcom has a duty to draw up and from time to time revise and review a code giving guidance to the extent to which television services promote understanding and enjoyment by people who are deaf or hard of hearing; people who are blind or partially sighted; and people with a dual sensory impairment
308	<u>Assistance for the visually impaired with the teletext service</u> In the regulation of the public teletext service, Ofcom should include appropriate conditions to ensure the inclusion of particular features of this service, so that people with disabilities affecting their sight are able to make use of the service
310	<u>Code of practice for electronic programme guides</u> Ofcom has a duty to draw up and from time to time review and revise a code giving guidance as to the practices to be followed in the provision of electronic programme guides. The practices required by the code must also include the incorporation of appropriate features so that people with disabilities affecting their sight or hearing or both are able to make use of such guides and are informed of and are able to use any assistance provided
337	<u>Equal opportunities and training</u> Ofcom shall include appropriate conditions requiring broadcast licence holders to make arrangements for promoting, in relation to employment, the equalisation of opportunities for disabled people

## Section 3

# Public life positions

3.1 Ofcom has responsibility for a range of public life positions.

### **Ofcom Board**

3.2 Providing strategic direction for Ofcom, the Board currently consists of up to 10 members, including the Chairperson and other non-executive members, who are appointed by the Secretary of State; the Chief Executive and other executive members are appointed from Ofcom's employees. During the term of this Plan, we expect to appoint a member of the Board to represent the interests of Northern Ireland (alongside similar Board member appointments for Scotland and Wales).

### **Communications Consumer Panel and Advisory Committee on Older and Disabled People**

3.3 The Communications Consumer Panel consists of eight independent experts, including a member from each nation, who work to protect and promote people's interests in the communications sector. It carries out research, provides advice and encourages Ofcom, Government, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro-businesses. The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro-businesses, which face many of the same problems as individual consumers. There are four members of the Panel who represent the interests of consumers in Northern Ireland, Scotland, England and Wales.

3.4 As the Advisory Committee on Older and Disabled People, Panel members have a direct reporting line to the Ofcom Board, seek to identify issues of interest to older and disabled people that affect the communications and postal sectors, and advise Ofcom both about specific issues concerning the communications and postal sectors relating to older and disabled people, and on Ofcom's internal policies and procedures.

### **Advisory Committees for the Nations**

3.5 Ofcom has separate committees for Northern Ireland, Scotland, England and Wales. Each comprises seven independent expert members and can advise Ofcom on issues covering its entire communications remit. These committee meetings are also attended by the respective nation's member of the Communications Consumer Panel (see above).

## Section 4

# Previous measures

- 4.1 The measures Ofcom takes to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life are ongoing. Outlined below are examples of such measures that Ofcom has already taken.

### **Disability duty: Promoting positive attitudes towards disabled people**

- 4.2 Disability Working Group (DWG): As part of Ofcom's Corporate Responsibility Steering Group, the DWG consists of colleagues from across Ofcom and was established to assist, and has assisted, in managing the organisation's approach to being disability smart.
- 4.3 Business Disability Forum (BDF): The BDF is focused on disability as it affects business. The aim of the forum is to make it easier to recruit and retain disabled employees and to serve disabled customers. Ofcom has been a member of the forum since 2004 and has joined its Disability Standard, enabling Ofcom to measure its current performance on disability and what needs to be done to make progress. The standard has allowed Ofcom to compare its performance against organisations within the communications industry and other employers.
- 4.4 Single Equality Scheme (SES): In addition to our duties under the Communications Act 2003, Ofcom, as a public authority, has general duties to promote equal opportunities under the Equality Act 2010, having a responsibility to have due regard to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Such groups include disability groups, concerning which we are committed to: promote the availability of easy to use equipment by publishing and maintaining web resources about usability, and working with others to increase knowledge and good practice; and encourage services for disabled people to be well-publicised as well as provided, carry out monitoring, including periodic mystery shopping.
- 4.5 Northern Ireland Equality Scheme for Ofcom: Under section 75 of the Northern Ireland Act 1998 (NIA), Ofcom is required to produce an Equality Scheme in relation to its functions in Northern Ireland. Section 75 of the NIA includes an obligation to promote disability equality. On 3 January 2014, Ofcom published its Revised Northern Ireland Equality Scheme for Ofcom<sup>1</sup>, which sets out how the organisation proposes to fulfil its duty to promote equality of opportunity, including for disabled people, over the next five years.
- 4.6 Disabled consumers' use of communications services<sup>2</sup>: In October 2015 Ofcom published a consumer experience report, which provides a detailed analysis of research conducted among a robust sample of 4,004 disabled consumers aged 15 or over, with hearing, visual, mobility or multiple impairments or learning disabilities, making comparisons by type of disability and by demographic group, drawing out differences between disability groups, and making comparisons with non-disabled

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<sup>1</sup> <http://stakeholders.ofcom.org.uk/consultations/northern-ireland-equality/revised-ni-equality-scheme/>

<sup>2</sup> <http://stakeholders.ofcom.org.uk/market-data-research/other/cross-media/disabled-consumers-ownership-comms-services/Disabled-consumers-use-of-communications-services/>

consumers. This has helped inform all areas of Ofcom's work relating to the needs of disabled consumers and has complemented other research concerning, more broadly, service affordability and media literacy in the UK population.

- 4.7 Broadcasters: Ofcom has a legal duty to ensure that the regulatory regime requires licence holders to encourage the promotion of equality of opportunity for disabled people in employment and training and Ofcom encourages broadcasters to monitor their workforces and access to training by disability, gender and race. Working closely with the Equality and Human Rights Commission, the Creative Diversity Network and Pact, we launched a brochure entitled 'Thinking outside the box' at the Edinburgh Festival in 2015. It provides legal guidance for the television broadcasting sector on what action can lawfully be taken to increase diversity in the industry. It also aims to tackle some of the misunderstandings industry told us it had about what equality law prohibits and permits. This has helped promote positive attitudes towards disabled people, among others, by clarifying to broadcasters how diversity in the industry can be increased.

### **Disability duty: Encouraging the participation of disabled people in public life**

- 4.8 Television access services: In May 2015 Ofcom published an amended Code on Television Access Services, which sets out requirements on subtitling, sign language and audio description that apply to television services licensed in accordance with the Communications Act 2003, the Broadcasting Act 1996, or the Broadcasting Act 1990. The code sets targets, against which Ofcom reports on licensees' performance annually and subsequent sampling has shown, among other things, increased accuracy in subtitling.
- 4.9 Good practice guide for call centres: Produced in June 2010, this guide contains practical tips for communicating with disabled customers, based on advice received from disabled people, and organisations representing them, following issues they have experienced with call centres. Ofcom wrote to major telecoms providers, financial institutions, insurance and utility companies, to encourage them to consider using the good practice guide. In Northern Ireland, Ofcom brought the guide to the attention of organisations such as Disability Action, Mencap and the Northern Ireland Assembly's All Party Groups on Disability and Learning Disability, which helped promote awareness of it.
- 4.10 Text relay services<sup>3</sup>: Research commissioned with members of the hearing impaired communities, helped develop Ofcom's understanding about the usage and perceived benefits of, and attitudes towards, text phone services. Service users found that callers were frustrated by their inability to interrupt and hold 'real time' conversations, and also reported that the speeds of conversations were generally slow, as callers had to take turns to speak or type. Ofcom worked closely with disability stakeholders and industry to ensure that a 'next generation' text relay service delivered an improved experience to its users. The main improvements (in 2014) have allowed for: parallel speech, hearing and text, with the ability to interject; easier access to the service on the move, on devices such as smartphones, tablet computers and laptops; and new phone numbers that automatically route calls via the service. Allowing for these has enabled the hearing impaired community improved use of text phone services.

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<sup>3</sup> A text relay service allows text phone users to call phone users (and vice versa) via a third party operator, who translates text to speech.

- 4.11 Support for the vulnerable: Covering such services as gas, electricity, water, phones and public transport, Ofcom took the lead in drawing up the UK Regulator’s Network (UKRN)<sup>4</sup> leaflet, ‘Essential Services: getting extra help’.<sup>5</sup> Published in March 2016 for vulnerable consumers seeking support services, the leaflet provides information concerning the additional support available for the elderly, the ill or those with a disability or who suddenly find themselves in vulnerable circumstances and may therefore require extra support when engaging with these services. The information assists easier engagement for disabled people, among others, with providers of essential services.
- 4.12 Access to services: Ofcom is committed to ensuring that all the services it regulates are fully accessible to everyone in the community across the Section 75 categories. Ofcom also adheres to the relevant provisions of current anti-discrimination legislation. An ongoing programme of media relations makes sure that Ofcom’s consultations and policy announcements are communicated appropriately to the public.
- 4.13 Public events: Ofcom holds two keynote public events in Northern Ireland every year – an Annual Plan stakeholder consultation and the launch of the latest Communications Market Report. A wide range of stakeholders are invited to these events, including equality and diversity organisations. In order to accommodate disabled guests, we have provided sign language interpreters at these events, when required.
- 4.14 General access to Ofcom: Ongoing development of Ofcom’s website meets current accessibility standards. Colleagues who manage the website attend relevant accessibility seminars and advise Ofcom on improvements it needs to make. Ofcom’s Belfast office has a loop induction system, to enable participation in meetings and seminars of those with impaired hearing.
- 4.15 Disability discrimination: One of the most notable features of disability discrimination legislation is that, in prescribed circumstances, it imposes a duty on employers, service providers and public authorities to take such steps as are reasonable to remove or reduce particular access barriers experienced by disabled people in those circumstances – i.e. to make reasonable adjustments. Ofcom is committed to ensuring:
- colleagues’ awareness of Ofcom’s commitment to making reasonable adjustments;
  - a working environment in which colleagues feel able to ask for a reasonable adjustment;
  - relevant feedback from colleague surveys is monitored; and
  - disabled citizens feel that Ofcom is a place where they could work,
- so the participation of disabled people at Ofcom is encouraged.

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<sup>4</sup> The UK’s economic regulators – CAA, FCA, LSB, Ofcom, Ofgem, Ofwat, ORR, PSR, Utility Regulator, Monitor and WICS – have joined together in the UKRN to ensure effective co-operation between sectors.

<sup>5</sup> <http://www.ukrn.org.uk/?p=904>

## Section 5

# Action measures

5.1 Outlined below are measures Ofcom proposes to take over the period, 1 January 2017 to 31 December 2021, together with related performance indicators or targets.

Measure	Timescale	Performance indicator/target
<b>Disability duty: Encourage participation by disabled people in public life</b>		
Promote ACNI <sup>6</sup> posts through disabled stakeholder groups, such as Disability Action, and note in advertisements for members of all Ofcom's Advisory Committees that we guarantee an interview to disabled candidates who meet all the essential criteria of the job description	Ongoing	Disabled people become more aware that Ofcom is keen to ensure the committee is informed by representatives from across the community, including disabled people, and Ofcom increases the number of applications it receives from disabled people
Ask applicants for posts in Ofcom and its advisory committees where they found out about the vacancies	Ongoing	Any increase in applicants from disabled people is reflected in source declarations
Conduct quantitative and qualitative research, designed to capture the views of disabled citizens and consumers	Ongoing	Ofcom gains in-depth knowledge about issues of concern to disabled people, enabling regulatory resources to be directed where they can have the most impact, leading to improved communications services for those with disabilities <sup>7</sup>
Conduct stakeholder engagement with organisations representing the interests of disabled people	Ongoing	
Monitor Ofcom complaints data to identify disability issues relevant to complaints	Ongoing	

<sup>6</sup> Ofcom's Advisory Committee for Northern Ireland

<sup>7</sup> Examples of outcomes to date that have led to improved communications services for those with disabilities can be found under 'Previous measures' (Section 4).

Lead on the production and distribution of a bespoke UKRN 'Essential Services: getting extra help' leaflet for Northern Ireland, taking into account that regulatory oversight of transport and utilities is different from that in GB <sup>8</sup>	Completed in 2017	Disabled people (among others) in Northern Ireland become aware of the free support available to them when engaging with utility, post, phone and transport services
<b>Disability duty: Promote positive attitudes towards disabled people</b>		
Roll out unconscious bias training to Ofcom's people managers and encourage disability awareness training upon its completion	Ongoing	Improved staff awareness of the equality duties in relation to disability and their relevance to the workplace
Roll out both Disability Action Plan and disability awareness training to Ofcom staff based in Northern Ireland	Completed in 2017	All Ofcom staff based in Northern Ireland are aware of the equality duties in relation to disability and their relevance to the workplace
Develop the Ofcom website to ensure it meets current accessibility standards	Ongoing	Ofcom's website remains accessible to disabled people (among others)
Reflect the diversity of society in Ofcom's communications and make diversity groups aware when a project or policy may impact on them	Ongoing	Production of inclusive communications and disabled people (among others) become aware of Ofcom's work concerning, in particular, matters of specific relevance to them

5.2 Ofcom's annual progress report on the implementation of this plan will detail the relevant outcomes associated with the above actions and will be submitted to the Equality Commission and made more widely available, as detailed in paragraph 1.8, above.

## Next Steps

5.3 Ofcom seeks stakeholders' views on Ofcom's proposed disability action plan for Northern Ireland, which should be received by no later than 5pm on Thursday 22 December 2016.

<sup>8</sup> Ofcom has already led on a similar leaflet for GB – see paragraph 4.11, 'Support for the vulnerable'.

5.4 Ofcom will then make amendments, as required, and outline them in a statement, which will also announce implementation of a final disability action plan for Northern Ireland.

Signatories [post-consultation] of this disability action plan for Northern Ireland:

\_\_\_\_\_ [ \_\_\_\_\_, Chairman] \_\_/\_\_/\_\_

\_\_\_\_\_ [ \_\_\_\_\_, Chief Executive] \_\_/\_\_/\_\_

## Annex 1

# Responding to this consultation

## How to respond

- A1.1 Ofcom invites written views and comments on the issues raised in this document, to be made **by 5pm on Thursday 22 December 2016**.
- A1.2 Ofcom strongly prefers to receive responses using the online web form at <http://stakeholders.ofcom.org.uk/consultations/proposed-disability-action-plan-for-northern-ireland/> as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 3), to indicate whether or not there are confidentiality issues. This response coversheet is incorporated into the online web form questionnaire.
- A1.3 Responses may alternatively be posted to the address below, marked with the title of the consultation.
- Jonathan Rose  
Director, Northern Ireland  
Ofcom  
Landmark House  
5 Cromac Quay  
Belfast  
BT7 2JD
- A1.4 Note that we do not need a hard copy in addition to an electronic version. Ofcom will acknowledge receipt of responses if they are submitted using the online web form but not otherwise.
- A1.5 It would be helpful if your response comprised a direct answer to the question asked in this document, which can be found at Annex 4. It would also help if you can explain why you hold your views and how Ofcom's proposals would impact on you.

## Further information

- A1.6 If you want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Jonathan Rose on 028 9041 7500.

## Confidentiality

- A1.7 We believe it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, [www.ofcom.org.uk](http://www.ofcom.org.uk), ideally on receipt. If you think your response should be kept confidential, can you please specify what part or whether all of your response should be kept confidential, and specify why. Please also place such parts in a separate annex.
- A1.8 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and will try to respect this. But sometimes we will need to publish

all responses, including those that are marked as confidential, in order to meet legal obligations.

- A1.9 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's approach on intellectual property rights is explained further on its website at <http://www.ofcom.org.uk/terms-of-use/>

## Next steps

- A1.10 Following the end of the consultation period, Ofcom intends to publish a statement in February 2017.
- A1.11 Please note that you can register to receive free mail Updates alerting you to the publications of relevant Ofcom documents. For more details please see: <http://www.ofcom.org.uk/email-updates/>

## Ofcom's consultation processes

- A1.12 Ofcom seeks to ensure that responding to a consultation is easy as possible. For more information please see our consultation principles in Annex 2.
- A1.13 If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at [consult@ofcom.org.uk](mailto:consult@ofcom.org.uk) . We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.14 If you would like to discuss these issues or Ofcom's consultation processes more generally you can alternatively contact Steve Gettings, Secretary to the Corporation, who is Ofcom's consultation champion:

Steve Gettings  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

Tel: 020 7981 3601

Email [steve.gettings@ofcom.org.uk](mailto:steve.gettings@ofcom.org.uk)

## Annex 2

# Ofcom's consultation principles

A2.1 Ofcom has published the following seven principles that it will follow for each public written consultation:

### Before the consultation

A2.2 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

### During the consultation

A2.3 We will be clear about who we are consulting, why, on what questions and for how long.

A2.4 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened Plain English Guide for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A2.5 We will consult for up to 10 weeks depending on the potential impact of our proposals.

A2.6 A person within Ofcom will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. Ofcom's 'Consultation Champion' will also be the main person to contact with views on the way we run our consultations.

A2.7 If we are not able to follow one of these principles, we will explain why.

### After the consultation

A2.8 We think it is important for everyone interested in an issue to see the views of others during a consultation. We would usually publish all the responses we have received on our website. In our statement, we will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

## Annex 3

# Consultation response cover sheet

- A3.1 In the interests of transparency and good regulatory practice, we will publish all consultation responses in full on our website, [www.ofcom.org.uk](http://www.ofcom.org.uk).
- A3.2 We have produced a coversheet for responses (see below) and would be very grateful if you could send one with your response (this is incorporated into the online web form if you respond in this way). This will speed up our processing of responses, and help to maintain confidentiality where appropriate.
- A3.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their coversheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A3.4 We strongly prefer to receive responses via the online web form which incorporates the coversheet. If you are responding via email, post or fax you can download an electronic copy of this coversheet in Word or RTF format from the 'Consultations' section of our website at <http://stakeholders.ofcom.org.uk/consultations/consultation-response-coversheet/>.
- A3.5 Please put any parts of your response you consider should be kept confidential in a separate annex to your response and include your reasons why this part of your response should not be published. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only, so that we don't have to edit your response.

## Cover sheet for response to an Ofcom consultation

### BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

### CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

### DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

## Annex 4

# Consultation question

A4.1 What is your view on Ofcom's proposed disability action plan for Northern Ireland?