



Circle Anglia Disability Equality Scheme and Action Plan 2007



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Circle Anglia Disability Equality Scheme and Action Plan

1. Introduction

Circle Anglia is committed to ensuring all people, including disabled people, are treated in a way that enables them to access our services and play their full roles as customer, employee or board member. We are publishing this Disability Equality Scheme and Action Plan as a commitment to taking the steps necessary to ensure that this happens in every case. We believe that this is important to our business and is fundamental to our values of People, Partnership, Brand and Belief. We have listened to the views of our customers and employees to develop this plan and intend to continue this dialogue. We recognise that this work is ongoing and we intend to continue to move in a positive direction.

Information about the legal and regulatory context for this scheme is contained in Appendix 1.

The legal definition of disability under the Disability Discrimination Act is contained in Appendix 2. Circle Anglia's approach is to ask customers, employees and board members whether they "consider themselves to have a disability".

Circle Anglia has adopted the Social Model of Disability in our approach to

the Disability Equality Scheme which means that we see disability as being a product of the physical, organisational and attitudinal barriers present in society, rather than being seen as the 'fault' of an individual disabled person and we are committed to removing or reducing barriers wherever possible. Further information about this model is contained in Appendix 2.

1.1. Statistics

The statistics set out below demonstrate that disability affects a large and growing proportion of the population and our customer base.

There are over ten million disabled people in Britain; of which, 4.6 million are over state pension age and 700,000 are children.

Disability increases with age: only 10% of adults aged 16-24 are disabled, while over 30% of people between the age of 50 and retirement age are disabled.

By 2020, 58% of people over the age of 50 will have a long-term health condition.

The World Health Organisation predicts that depression will be the leading cause of disability by 2020.

In the 2001 census, one in six people in the UK (10.3 million) living in a private household reported having a limiting long-term illness (LLTI).

Disabled people are less likely to own their own homes and are twice as likely to be social housing tenants, according to the Disability Rights Commission (Changing Britain for Good).

2. How the scheme and action plan have been developed

The Disability Equality Scheme and action plan have been put together based on suggestions made during customer and staff consultation, along with good practice recommendations from the “Housing Association Guide to Disability Equality Schemes and Action Plans” published by the Housing Corporation in October 2007.

2.1. Customer consultation

A questionnaire was sent out to 149 residents from across the group in August 2007 who had indicated that they were interested in being consulted on disability matters. These residents were identified from the Have Your Say database and most had defined themselves as having a disability or living with a household member with a disability. They were asked to identify ways in which Circle Anglia could better meet the need of customers with disabilities.

42 residents responded, as set out in the table below. This is a response rate of 28%, which is towards the lower end of what we would expect.

Of these, 24 indicated that they wished to comment on this draft document and of these 7 have provided comment.

Regional focus groups were also held and the comments incorporated at the early stages of developing this document.

The draft document was also circulated to the Involvement Steering Group and Diversity Champions from each group partner board.

Group partner	Sent out	Responded
Circle 33 general needs	34	10
Circle 33 supported	30	4
Old Ford general needs	17	3
Old Ford supported	1	0
South Anglia general needs	15	8
South Anglia supported	5	3
Wherry general needs	35	9
Wherry supported	12	5

2.2. Staff consultation

Circle Anglia had previously consulted staff with disabilities on how they would like to be involved. Comments from that exercise were reviewed along with the results of a questionnaire that was published on Cirano (the intranet) in September 2007. Although only three questionnaire responses were received the feedback was very informative. This was then followed up with face-to-face meetings to discuss the matters further, which provided extremely useful information and ideas.

2.3. Approval

The draft document was reviewed by the Diversity Senior Manager Group on 15th October. The final version was reviewed by this group in November. Sign-off was by the Group Board in December 2007.

2.4. Publication

This document will be published on Cirano (Circle Anglia's intranet), and on the Circle Anglia corporate and residents websites. A summary of the action plan will be publicised through resident newsletters, with the full document available for interested residents on request.

2.5. Ongoing consultation

The feedback we have received during the process of developing this document has been extremely valuable. By being able to demonstrate to customers and employees that their views had a powerful impact on shaping this document we aim to build on these foundations to ensure we continue to engage effectively with them on disability matters. Where appropriate, we will seek the advice of disability user groups and organisations.

3. What do we already do?

3.1. Actions

It is worth noting that Circle Anglia has shown its commitment in a number of ways to meeting the needs of customers and staff with disabilities, although we recognise that there is a lot more to do. Some key areas include:

- A well established adaptations programme in Circle 33, which we are now rolling out to the other group partners.
- Customer monitoring that asks for details of disability and what service adjustments are needed, such as particular communications requirements, (rather than a simple yes/no question).
- A translation, transcriptions and interpretation policy that has been in place group-wide since October 2006 giving clear guidance to staff on providing alternative formats to customers.
- Ensuring the tenant handbook is produced in Plain English, with the Crystal Mark accreditation.
- Carrying out Equality Impact Assessments (which include disability) for all relevant policies when they are reviewed and for new corporate projects.
- Customer and staff surveys that measure the satisfaction of disabled people.
- A range of specialist training for staff in EPIC (a Circle Anglia group partner that provides care and support services).
- A range of diversity training that incorporates disability matters, although it is recognised that the approach needs to be reviewed to ensure the required impact is achieved.
- Work in EPIC on alternative communication formats such as Makaton and pictures.
- EPIC using audio and audio-visual information for and by service users – e.g. audio recordings of minutes of meetings, Scheme Welcome DVD produced by learning disabilities service users.
- EPIC Service User Forums for people with mental health issues and people with learning disabilities provide a focus for customer consultation on access and disability.
- Building wheelchair and lifetime homes in new developments to meet local housing need identified by local authorities.

Where good practice is identified within Circle Anglia we aim to ensure it is rolled out to other partners in the group.

3.2. Current performance

Of residents for whom we have data 56% consider themselves to have a disability. Around half of these have some degree of co-ordination or mobility difficulties, with the next largest group being people with mental health problems, who make up 12% of our residents with a disability.

9.7% of board members are disabled.

3% of our homes are wheelchair standard and 14% have some adaptation for disability.

4. Key themes of the action plan

4.1. Homes

The majority of customer responses made reference either to adaptations or to other aspects of the physical design of people's homes or environments. This is therefore a major theme of the action plan.

4.2. Services

A number of responses indicated that staff needed to be more aware of "hidden" disabilities, such as mental health problems. Others highlighted a need for additional services for people with mobility impairments, such as decorating or gardening.

4.3. People

Again a key issue highlighted related to awareness of disability matters. We need to make sure that Circle Anglia provides a safe environment for employees to disclose their disability and be confident that they will be treated appropriately when they do so. We intend to start this process without delay but recognise that embedding a change in the work environment is difficult to achieve in a short timescale, so this work will be ongoing at least for the three year lifespan of this scheme and action plan. We believe that by removing barriers to employing people with disabilities we will be better able to tap into the full talent pool available to us and our staff would better reflect the profile of our customers.

5. Monitoring and review

This scheme and action plan will run for three years from December 2007 to December 2010 and an annual review will be carried out to measure progress and impacts against our intended outcomes and to make any necessary revisions.

Headline goals are to:

- ensure that there is no significant difference in satisfaction levels between disabled and non-disabled customers
- increase the proportion of staff with a declared disability
- ensure that there is no significant difference in satisfaction levels between disabled and non-disabled employees

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Publish Adaptations Strategy based on Value for Money review	Adaptations Strategy approved and published on Cirano	Consistent investment and high standards agreed group-wide	September 2007 (Complete)	SHD - Property Programmes Manager
Publish Adaptations Policy in line with the strategy	Adaptations Policy approved and published on Cirano	Consistent delivery of adaptations service group-wide	October 2007 (Complete)	Policy Team
Report performance against target timescales for Adaptations	Performance reported to Senior Management Teams	Making sure customers get their adaptations done in agreed timescales	October 2007 (in place)	Managing Directors
Ensure customer satisfaction with Adaptations is reported to all RSL Senior Management Teams	Performance reported to Senior Management Teams	Making sure customers are satisfied with the adaptations service and making any necessary changes	December 2007	Managing Directors

6. Disability Equality Action Plan

Homes

Action	Measure	Intended outcomes	Timescale	Who
Investigate amending specifications for Decent Homes programmes to incorporate Inclusive Design principles	Report to Service Excellence Team	Using the opportunity of Decent Homes works to make sure homes meet customers' current and future needs	December 2007	Group Director of Asset Management
Ensure customer feedback regarding disability issues is fed back into the Design Brief for new-build properties	Development Department can demonstrate the outcomes of feedback	Making sure we learn from experiences to apply to future homes	December 2007	Development Department
Seek customer involvement in the design of specific schemes to ensure disability matters are taken into account	Records of customer involvement in new schemes	New tenants are satisfied that the design of new homes meet disability needs	December 2007	Development Department

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Review current Adaptations budget in light of customer information and set appropriate budget for 2008/09	Budget agreed	Making sure the budget meets customer needs	During budget-setting period – completion March 2008 and annually thereafter	Managing Directors
Incorporate customer satisfaction with Adaptations into the standard corporate reporting software (Questback)	Performance reported to Senior Management Teams	Having satisfaction information more readily available and therefore easier to act on	March 2008	Policy Team to implement the software
Carry out further Value for Money review and amend Adaptations Strategy in the light of the findings	Updated Adaptations Strategy and Policy approved and published on Cirano	Making sure the adaptations strategy meets customer needs	September 2008	SHD - Property Programmes Manager
Update Adaptations Policy in line with the strategy, including information on Disabled Facilities Grants	Updated Adaptations Policy approved and published on Cirano		October 2008	Policy Team

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Review whether target timescales for Adaptations should be improved		A quicker adaptations service for customers	October 2008	SHD - Property Programmes Manager
Review corporate position on Lifetime Homes to take into account the outcomes of DCLG consultation	Report to Diversity Senior Manager Group	Provision of homes that continue to meet the needs of all residents	December 2008	Development Department

6. Disability Equality Action Plan

Services

Action	Measure	Intended outcomes	Timescale	Who
Ensure Harassment and Anti-social Behaviour policies incorporate disability as a trigger / cause / motive	Updated policies	Staff and customers are aware that disabled people may be targeted due to their disability and respond appropriately	September 2007 (Completed)	Policy Team
Incorporate implications of the Disability Discrimination Act regarding perpetrators with a disability into Harassment and Anti-social Behaviour policies	Updated policies	Staff and customers are aware that harassment or anti-social behaviour may be as a result of mental ill health and respond appropriately	September 2007 (Completed)	Policy Team
Ensure the Lettings Policy deals with the need to ensure accessible / adapted properties are let to suitable tenants	Updated policy	Disabled tenants and housing applicants are housed in homes suitable for their needs	December 2007	Policy Team

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Launch new Circle Anglia corporate and resident websites taking into account accessibility matters	Readspeaker implemented Lighthouse International standards on colour contrast met W3C standards met	Websites are accessible to customers with disabilities	Customer October 2007 (Completed) Corporate December 2007	Marketing and Communications Team
Research signing up to RNIB seeitright standard in consultation with residents. This would include an audit of all websites	Research completed	Websites are accessible to customers with disabilities	Decision made on whether to implement by March 2008	Marketing and Communications Team
Review the outcomes of customer satisfaction surveys to check for disparity between disabled and non-disabled customers	Information reported to Senior Management Teams and customers	Disabled tenants are equally satisfied with the service and actions taken if they are not	From March 2008	Senior Management Teams

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Raise staff awareness of the Translations, Transcriptions and Interpretation policy	Checked through mystery shopping	Staff can arrange appropriate communications quickly and confidently	March 2008	Policy Team (in conjunction with Heads of Continuous Improvement)
Raise staff awareness of other agencies and their roles e.g. Community Mental Health Teams		Staff understand and are able to access appropriate local agencies	March 2008	Heads of Continuous Improvement (in conjunction with EPIC)
Investigate the idea of a Welcome DVD for new customers, including a signer	Proposal to be reviewed by Services Excellence Team July 2008	New customers have an alternative to the written format of the Tenant Handbook	July 2008	Policy Team
Develop Easy Read versions of key documents, such as tenancy agreements and standard letters	Easy Read versions are in place	Key documents are more accessible to people with learning difficulties or literacy problems	July 2008	Policy Team (in conjunction with EPIC)

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Investigate developing specific involvement groups such as residents with mental health problems as currently run in some EPIC divisions		Specific groups in place where an interest is found	July 2008	Resident / Service User Involvement Lead Officers
Review outcomes of pilot decorating and gardening services at Roddons and Mole Valley with a view to group-wide roll-out from April 2009	Initial outcomes of pilots. Discussion at Services Excellence Team October 2008		During 2008 for potential group-wide roll-out from April 2009	Managing Directors
Review links with Supporting People Commissioners and review internal usage of Supporting People funding	Approach agreed and implemented.	Better quality of service to tenants with a disability, particularly general needs tenants experiencing mental ill health	March 2009	Managing Director EPIC Trust

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Ensure managing agents and private sector leasing landlords meet their obligations under the DDA	System in place to check and influence agents and landlords	Agency managed and privately leased homes meet tenant needs	March 2009	CSCA Teams

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Decide how we can best produce a strategy on raising awareness, being positive about disability and dealing with inappropriate or offensive language regarding disability. To specifically include hidden disability. Incorporate customer and employee views into this work.	Proposal on developing a strategy to the Diversity Senior Manager Group	A culture where disability is viewed positively and staff members behave accordingly.	July 2008	Head of Policy and Planning

6. Disability Equality Action Plan

People

Action	Measure	Intended outcomes	Timescale	Who
As part of the strategy, review how Learning and Development provision can contribute most effectively to achieving the required changes in both managers and staff generally	Proposal on developing a strategy to the Diversity Senior Manager Group	Improved staff awareness, knowledge and skills in disability matters	July 2008	Head of Learning and Development
Establish 'virtual' staff disability group for consultation on relevant issues / input into equality impact assessments	Group established and first discussion held	Views of staff with disabilities or an interest in disability are specifically sought and taken into account	October 2007	HR
Report disability staffing statistics in annual diversity review.	Report includes statistics	Staff group can be analysed according to disability and actions taken to deal with any issues arising	Annually each December (already in place)	HR

6. Disability Equality Action Plan

People

Action	Measure	Intended outcomes	Timescale	Who
Report disability governance statistics in annual diversity review	Report includes statistics	Information about board member disability	Annually from December 2007	Company Secretariat
Where members of the disability group are in agreement publicise their role on Cirano	Information published on Cirano	Wider staff group can feed views into the disability group through members	January 2008	HR
Develop in-house knowledge of Access to Work	HR able to provide advice and information on this	Access to Work can be utilised	January 2008	HR
Publicise specific advice and support available to managers from HR when managing staff with disabilities	Publicised as part of launch of new HR structure	Managers are confident in accessing advice and support	January 2008	HR

6. Disability Equality Action Plan

Action	Measure	Intended outcomes	Timescale	Who
Review and implement policy on employment of staff with disabilities, including publicising the process for making reasonable adjustments.	Policy approved and published	Raised awareness and skills in employing staff with disabilities.	March 2008	HR

Appendix 1 – The legal and regulatory context

The Disability Discrimination Act 2005 amended the Disability Discrimination Act 1995 (the Act) to place a duty on public sector bodies to promote disability equality. The ‘general duty’ on public authorities, in carrying out their ‘functions’, is to have due regard to the need to:

- promote equality of opportunity between disabled persons and other persons;
- eliminate discrimination that is unlawful under the Act;
- eliminate harassment of disabled persons that is related to their disabilities;
- promote positive attitudes towards disabled persons;
- encourage participation by disabled persons in public life; and
- take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons.

The requirement to produce a Disability Equality Scheme (DES) is also introduced in the Act, and forms part of the ‘specific duty’ placed on certain public sector organisations named in the Disability Discrimination (Public Authorities) (Statutory Duties) Regulations 2005 (the Regulations). A DES “is a means of meeting the various elements of the general duty” (Disability Rights Commission “The Duty to Promote Disability Equality: Statutory Code of Practice”).

The development of Disability Equality Schemes is a new requirement in relation to disability, although public authorities have had to develop Race Equality Schemes since 2001, as a result of the requirements of the Race Relations (Amendment) Act 2000. The requirements for a DES are broadly similar to those for Race Equality Schemes, but there is a very important difference – the requirement to **involve** disabled people in the development of the DES.

It is worth noting that Circle Anglia is not a public authority but the Housing Corporation is, and it has decided to pass on the duty, including the requirement to produce a Disability Equality Scheme, to housing associations through regulation.

Appendix 2 - Disability definitions

The legal definition

The Disability Discrimination Act defines a disabled person as someone who has a physical or mental **impairment** that has a **substantial and long-term adverse effect** on his or her ability to carry out normal day-to-day activities.

Impairment covers physical or mental impairments – this includes sensory impairments, such as those affecting sight or hearing. The term ‘mental impairment’ is intended to cover a wide range of impairments relating to mental functioning, including what are often known as learning disabilities.

A **substantial adverse effect** is something which is more than a minor or trivial effect. The requirement that an effect must be substantial reflects the general understanding of disability as a limitation going beyond the normal differences in ability which might exist among people.

A **long-term effect** of an impairment is one:

- which has lasted at least 12 months;
- where the total period for which it lasts is likely to be at least 12 months; or
- which is likely to last for the rest of the life of the person affected.

Effects which are not long-term would therefore include loss of mobility due to a broken limb which is likely to heal within 12 months and the effects of temporary infections, from which a person would be likely to recover within 12 months.

The Social Model of disability

The social model has been developed by disabled people in response to the medical model and the effect it has had on their lives. Under the social model, disability is caused by the society in which we live and is not the ‘fault’ of an individual disabled person, or an inevitable consequence of their limitations. Disability is the product of the physical, organisational and attitudinal barriers present in society, which lead to discrimination. The removal of discrimination requires a change of approach and thinking in the way in which society is organised.

The social model takes account of disabled people as part of our economic, environmental and cultural society. The barriers that prevent any individual from playing a part in society are the problem, not the individual. Barriers still exist in education, information and communication systems, working environments, health and social support services, transport, housing, public buildings and amenities. The devaluing of disabled people through negative images in the media – films, television and newspapers – also acts as a barrier. The social model has been developed to remove such barriers, so that disabled people have the same opportunity as anyone else to determine their own lifestyles.

A simple example is that of a wheelchair user who has a mobility impairment. He or she would not actually be disabled in an environment where it was possible to use public transport and have full access to buildings and their facilities in the same way as someone without an impairment would do.

[Source: Equality and Human Rights Commission]