

Wessex Housing Partnership

Disability Equality Scheme & Action Plan

2007 – 2010

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Foreword

Wessex Housing Partnership's Disability Equality Scheme (DES) outlines our commitment to improving our policies and services for disabled people and builds on current good practice and Disability Policy (Appendix 4). We are committed to adopting the social model of disability. This will require us to address the barriers faced by disabled people. We intend to work towards real outcomes and support practical improvements in the day-to-day life and experiences of disabled people. We will involve disabled people in the process through consultation and communication and through identifying and progressing our priorities for action. In particular the Disability Equality Scheme has already been through a robust challenge process at draft stage with a local disability group.

The Scheme will assist in developing more effective and focused services and employment opportunities. It will also promote the 3 key themes to equality and diversity, which are:

- respecting people
- valuing differences
- meeting the needs of individuals

Our commitment, and the actions identified within the Scheme will be incorporated within our Business Plan and service improvement plans.

We will monitor progress and publicise what we find to enable us to learn from, and act on, any shortcomings.

Wessex Housing Partnership, as a provider of public services has a Disability Equality Duty under the 2005 Disability Discrimination Act. However, our key drivers for this Disability Equality Scheme are that responding to the needs of disabled people:

- are an important strategic business priority

- and that “getting it right” for disabled staff and disabled customers leads to “getting it right” for everyone

We have a flexible and “can do” attitude to achieving these objectives and are working to embed these attitudes in the mainstream work of the organisation.

Group Chief Executive: Brian Hutchison

Wessex Chairman: Mike Thompson

Glossary of terms

DAP	Disability Action Plan
DED	Disability Equality Duty
DDA	Disability Discrimination Act
DES	Disability Equality Scheme
DRC	Disability Rights Commission
HA	Housing Association
HC	Housing Corporation
OT	Occupational Therapist
PDM	Performance Development Management
PACT	Placing Assessment and Counselling Teams

1. Introduction: Our Vision and Commitment

Our vision is to be an organisation that is completely accessible to all and that is recognised for its commitment to promoting positive attitudes and support to all people with a disability including residents and staff. As a company we will be seen as recognising the abilities of people rather than their disabilities.

We will have achieved this through promoting fair access to all the services and opportunities that we provide. This will have included identifying the additional needs of disabled people and providing extra services and support where required.

We will have involved disabled people throughout our work and devised an action plan that has been reviewed and monitored. Meeting the needs of disabled people will be seen as part of the cultural heart of the organisation. It will be:

- a key part of our customer care focus
- delivered through everyday services
- core to enhancing the quality of life for all stakeholders through the recognition of diverse needs and the delivery of a service that is tailored to individuals

2. Background

2.1 Guiding principles

Our approach to equality and diversity is to focus on the people who access our services by looking at their whole identity. Our focus will be on ability rather than disability. We recognise that currently many people do not experience fair access to services or a fair quality of life. This can have an adverse impact on the opportunities available to them as they progress through their lives.

Research shows that far more disabled people live in social housing than any other tenure. 40% of housing association households in England contain a member with a long-term illness or disability and of those people one in seven use a wheelchair. Despite the fact that disabled people represent a significant customer base, disability has traditionally been seen as a “special needs” issue rather than as a mainstream customer needs issue.

The Disability Equality Duty (DED) requires organisations to move away from this approach and to work to deliver an equal housing experience for disabled people within everything that an organisation does. Wessex Housing Partnership in developing this statement with its customers, employees and partners aims to take action to ensure its compliance with the duty and to create a culture where its disabled customers are in the mainstream of its policy development and service delivery.

To build on our disability good practice and make a commitment to improving the accessibility to services and the quality of life to our disabled customers, we will publish this Disability Equality Scheme (DES) and Disability Action Plan (DAP).

The Disability Equality Scheme takes account of the following areas:

- asset management
- repairs services
- communicating with residents and customers
- resident and customer involvement
- harassment policies
- lettings and allocations
- employment and governance

The above apply specifically to housing associations and within each area, our DES considered:

- what the duty states
- our current position
- achieving excellence

2.2 The law and its implications

All public authorities under the Disability Discrimination Act 2005 (DDA) now have a specific duty imposed upon them to produce a Disability Equality Scheme detailing how they are going to ensure that through the carrying out of their functions, the Government will achieve its vision of disability equality.

Disability Discrimination Act 1995

On 2 December 1996, the DDA 1995 brought in measures to prevent discrimination against disabled people. Part 3 of the DDA, which deals with services and premises, was amended most recently by the DDA 2005.

Disability Discrimination Act 2005

The DDA 2005 general duty came into force on 5th December 2005. The new Act amends the DDA 1995, and strengthens its application to public authorities in several ways:

- it extends the scope of the 1995 Act to cover areas that were previously excluded, and makes it unlawful for public authorities to discriminate on the grounds of disability in carrying out any of its functions
- it places both general and specific duties on a wide range of public authorities and providers of public services to promote equality of opportunity and prevent unlawful disability discrimination

General Duties

The general duties are binding on providers of public services such as Wessex Housing Partnership and the specific duties are binding on listed organisations, for example the Housing Corporation rather than Wessex Housing Partnership.

However, the organisation wishes to build on its good practice and make a commitment to improving the accessibility to services and the quality of life to our disabled customers, by developing a DES to ensure that we:

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

Specific duties

We have a specific duty to publish a DES demonstrating how the organisation intends to fulfil its general and specific duties. The scheme should include:

- a statement of the way in which disabled people were involved in the development of the scheme;
- our methods for impact assessment;
- an action plan detailing how we will meet the general duties;
- arrangements for gathering information relating to employment and the delivery of functions, and how the information will be used

We have produced a Disability Equality Action Plan (appended to this document) detailing how we intend to fulfil our duties under the DDA 2005.

3. Our assessment of our current performance

3.1 Background

As a Group we recognise our strengths in meeting the needs of people with physical needs, sensory impairments, and mental health difficulties although there are still many areas in need of improvement. In particular in meeting the needs of people with learning difficulties.

3.2 Our key successes so far

We have achieved a number of successes around disability issues that we wish to build on:

Meeting housing needs

- our new design brief is based on lifetime homes and is responsive to the needs of disabled people
- we have a flexible adaptations policy which has become more responsive to residents which is supported by a clear adaptations budget and an officer to coordinate aids and adaptations. We will continue to monitor the cost, quality and timeliness of the adaptations service
- we provide accessible communications such as through a portable hearing loop, large print and Braille, which are available at Area meetings, Board meetings, Federation and Forum meetings
- we signpost access to welfare benefits and make referrals to support agencies
- we have a vulnerable persons protocol
- we provide effective needs and risk assessments around supporting people agreeing and monitoring support plans

- we provide tenancy training – to support new tenants experiencing difficulties maintaining their new tenancies for a number of reasons including disability
- We work with our statutory service partners to provide appropriate housing, care and support for people with mental health problems

Offices

- we have where possible taken account of the needs and accessibility issues for disabled people in the design of our new headquarters

Employment

- we provide equality and diversity training for all staff
- we have a supportive and empowering culture for disabled employees
- we have recruitment selection panels that are skilled in disability issues
- we provide counselling for staff experiencing stress and mental health difficulties
- we provide individual adaptations for staff, including staff with sensory impairments

Governance

- we provide transport for residents for meetings
- we have appointed a number of disabled people as Board members across the Group in accordance with the skills required of the Group
- we provide equality and diversity training for all board members

Partnership and review

- we have set up a Challenge Group whose remit includes equality and diversity
- we have developed closer partnership working around disability issues for example with the Citizens Advice Bureau

3.3 Our key areas for improvement

Meeting housing needs

- we need to make smarter use of information technology to ensure our work with disabled people is excellent, for example:
 - consulting service users, recording their individual needs and generating letters that respond to residents' specific needs
 - making better use of the service user register for visual impairment that we have developed
 - matching disabled residents with new properties at design stage
- we need to improve our “follow up” to check that we are meeting residents' needs
- we need to improve our collection of feedback on new schemes and the way that this influences future design briefs. For example we will look at the effect of different colour schemes on visually impaired residents
- some housing stock has accessibility problems and new build properties are not currently all built to “lifetime homes” standard
- a central database is needed to identify properties with adaptations to allow them to be let efficiently and in a timely manner. We will identify where a property has been held void for a disabled resident
- we need to work with the local authority to ensure a more joined up approach for allocating properties to disabled people's needs. This will include involvement with Disability Forums such as the Basingstoke and Deane Borough Council Disability Forum in feeding back existing barriers to the local authority
- we need a clearer policy on maintaining adaptations made to properties and recycling adaptations where they are removed

- we need to review the corporate presentation style, the accessibility of organisational literature, the use of plain English, our information – leaflets, documents etc and the corporate website. For example, we need to make the organisation more Dyslexia friendly and may seek to provide audio for dyslexic residents
- we need procedures and a co-ordinated approach to meeting the needs of people with mental health difficulties
- we need to be able to provide some services as well as signpost them, this includes looking at redecoration and gardening services
- we need to business plan the budgetary requirements for meeting the needs of disabled people
- we need to further review whether our sheltered housing stock is fit for purpose, including considering the availability of providing storage facilities for mobility scooters
- we need training, awareness raising, a more co-ordinated approach and education for people with learning difficulties
- there is a scope for more multi agency work

Offices

Our offices could generally be more disability friendly, in particular there is scope for improvement for people with sensory impairment, for example:

- improve the signage for our offices
- improve lift signage
- the provision of induction loops
- provide definite colour changes on doors and floor

Employment

- more staff training is needed on specific disability issues and targeted on individual learning needs such as the language of disability and the dangers of stereotyping.

Governance

- we need to increase understanding, awareness and profile of disability issues within the business

3.4 How disabled customers have been involved in developing our Disability Equality Scheme

Wessex Housing Partnership has always sought to engage disabled residents within its involvement structures and has developed a number of mechanisms to facilitate consultation with customers, key stakeholders and other housing providers.

In the development of this statement, there has been direct involvement with:

- Basingstoke and Deane Borough Council Disability Forum
- Disabled people that have been involved in residents' groups
- Disabled people who are Board Members and staff

In particular, the Disability Equality Scheme has been through a robust challenge process at draft stage with a local disability group.

3.5 Working in partnership to meet the needs of disabled people

Wessex Housing Partnership continues to strengthen and extend its partnership working, with its local authority partners, the Local Strategic Partnership, voluntary organisations and community groups.

With its general service, provision and development Wessex Housing Partnership can evidence a wide range of partnerships particularly concerned with enhancing access to housing and tenancy support for more vulnerable customers.

Wessex Housing Partnership recognises that in order to meet the wider requirements under this duty we need to work with others. For example, those who have strategic responsibilities within the context of Local Area Agreement and Sustainable Community Plan objectives, or who have specific skills and knowledge of the needs and aspirations of the wide range of disabilities represented within our customer base.

4. Training

4.1 Background

For the DED to be effective, staff will need to be trained. Basic disability equality training should form part of any training on the Duty. Staff will need to be aware of what the DED is, why it is necessary and how it relates to their job. Training should also focus on the necessary skills needed to give due regard to disability equality when carrying out day-to-day activities at all levels within a housing organisation.

4.2 Current Position

Staff and Board members are routinely trained on equality and diversity issues, but not specifically on disability issues.

4.3 Achieving excellence

We will provide disability training for all staff. Specifically:

- disability training will be included as part of staff induction
- we will review our generic equality and diversity training to ensure that it is providing sufficient guidance on meeting the duties of the Disability Discrimination Act for staff and Board members
- we will also review the need for specialist training on disability issues including around mental health and learning difficulties. For example, this can be targeted on assisting customer(s) to sustain and maintain their tenancies and to understand triggers that can affect a customer's mental health. This will include disabled people speaking directly to staff about disabilities and we will

- seek to employ suitably qualified disabled people as trainers where possible
- we will also link our equality, diversity and disability training with our resident involvement strategy to ensure that residents can play a part in tackling discrimination and involving disabled residents in residents associations and other forums

5. Governance

5.1 Background

Through actively seeking more representation of disabled people on housing boards and advisory committees, housing organisations will be working towards the aspect of the duty to encourage the participation of disabled people in public life.

Therefore, we should gather evidence about how many disabled board members we have and what their experiences are of being board members.

Disabled people should be positively encouraged to join management committees and boards. We will need to anticipate that reasonable adjustments will need to be made in a similar manner to adjustments for employees or service users. More strategically we should consider if our policies and practices around appointing housing board members and the running of boards are creating barriers for disabled people who may want to be board members. We will consider things such as:

- venues where meetings are held and whether they are accessible
- if there is there accessible transport or disabled parking available at the meeting venue
- the timing and length of meetings

5.2 Current Position

The Chairman of Wessex Housing Partnership (Mike Thompson) is the Equality and Diversity Champion and has been actively involved in the development of this

Disability Equality Scheme.

The percentage of Board members with a disability will be reported to Board.

60% of members on the Residents' Federation/Panel have a disability and therefore reflect the population that we are serving.

Regular panel meetings that include residents always include a member with a disability, eg, Maintenance Planning, Design & Maintenance, Rents & Customer Services. We provide support for disabled people to attend a meeting eg transport, large print, hearing loop and will advertise the availability of these adaptations and support.

5.3 Achieving excellence

We will produce a clear Disability Strategy to include the recruitment of staff and Board members. We will ensure an appropriate balance of skills, knowledge and experience to ensure effective direction and governance.

We will ensure that the involvement of disabled people on Wessex Housing Partnership Board and Committees is promoted, including the residents' forum and residents' panel. We will also more generally involve more Board members in Equality & Diversity and disability issues.

For Wessex and KHA there has been an improvement in venue selection, but more sensitivity is still needed. In particular HVHS meeting locations have not been easily accessible for people with a physical disability and this will be remedied. We will ensure that the transport to support people attending meetings, is equipped for wheelchair users.

We will ensure that all reports and policies address equality and diversity issues. This will be underpinned by the development of an equality impact assessment process and business planning the budgetary requirements for meeting the needs of disabled people.

6. Employment

6.1 Background

Much of the focus of previous disability discrimination legislation was to provide 'reasonable adjustments' for individual disabled employees.

The Disability Equality Duty adds to this by establishing a clear responsibility for public bodies to promote equality for disabled people through a public body's employment practices and policies. This requires an anticipatory approach reviewing the full range of employment areas including:

- recruitment
- retention
- training
- appraisals
- flexible working policies
- harassment / bullying
- grievance procedures

6.2 Current Position

Recruitment and selection panels are trained in disability issues. However we do not currently have a clear written policy on the provision of reasonable adjustments, although there is evidence that the organisation reacts sympathetically and responsively to individual requests for adjustments. In particular there is a supportive and empowering culture for disabled employees.

Examples of this are that some staff with visual impairment have been provided with larger monitors, additional desk lamps and some staff have moved to desks with natural light.

There is a mechanism in place across the group that monitors how many disabled staff are employed. This needs to be expanded to include, their issues of disability, how they progress through the organisation and length of service.

Counselling is provided for staff experiencing stress and mental health difficulties, although there is a lack of general awareness of agencies such as “access to work”.

6.3 Achieving excellence

We will produce a clear procedure across the Group for requests for reasonable adjustments. This will include:

- induction training on disability awareness
- how staff can make a request
- what is “reasonable”
- timescales
- information on grants available
- physical adjustments
- management adjustments
- assessment of needs
- staff awareness – need to know basis
- review fire safety procedure

We will produce a clear policy/procedure across the group for recording / monitoring personal data. This will include:

- data protection/confidentiality
- obtaining information (how & when)
- how information is used
- data to monitor staff progress through organisation

We will carry out a review of the recruitment and selection process to ensure that it is disability friendly including examining whether it responds to the needs of dyslexics in requests for written information. An assessment is currently being carried out on the Group in order that we can achieve the “two tick” Disability Scheme for employment. The scheme consists of 5 statements:

Commitment 1 - to interview all disabled applicants who meet the minimum criteria for a job vacancy and consider them on their abilities.

Commitment 2 - To ensure there is a mechanism in place to discuss with disabled employees, what you and they can do to make sure they can develop and use their abilities.

Commitment 3 - To make every effort when employees become disabled to make sure they stay in employment.

Commitment 4 - To take action to ensure that all employees develop the appropriate level of disability awareness needed to make your commitments work.

Commitment 5 - Each year, to review the five commitments and what has been achieved, to plan ways to improve on them and let employees and Jobcentre Plus know about progress and future plans.

7. Asset Management

7.1 Background

Landlords and managers of rented premises do not currently have to take any steps that involve the removal or alteration of physical features to properties for an individual resident, although there is now a driver within the Disability Discrimination Act 2005 for housing associations to generally increase the accessibility of their stock. However, regulations have set out features that are not to count as “physical features” and so would need to be adjusted for a disabled tenant or occupant by the landlord where that is reasonable. These are:

- the replacement or provision of any signs or notices
- the replacement of any taps or door handles
- the replacement, provision or adaptation of any door bell or door entry system
- changes to the colour of any surface (such as, for example, a wall or door)
 - Any necessary adjustments are carried out using the KHA adaptations budget (where budget permits). Changes of colours to surfaces are carried out by the sensory impairment team using money from the adaptations budget.

In addition, the new obligations contained in the DDA reinforce existing housing legislation, which states that a landlord cannot unreasonably withhold consent from disabled customers who need to make physical adjustments to their homes for disability-related reasons. The customer must pay for the alterations and must ask permission. This right of individual customers to make adjustments will not apply to the “common parts” of properties such as stairs or hallways to communal blocks of flats.

As noted above, the Duty also states that to meet the DED, asset management

strategies and policies should take active steps to improve access standards and remove barriers for disabled people within homes and external environments. This applies to existing and new developments. When working towards the Decent Homes Standards we should ensure our investments deliver demonstrable improvements in relation to disability equality.

7.2 Current Position

During our major capital investment programme, delivering improvements to ensure our homes we fit lever taps to all kitchen and bathroom refurbishments and refer any specialist requirements to Social Services

We have a flexible adaptations policy that has become more responsive to residents with a clear adaptations budget and an officer to co-ordinate aids and adaptations. We use the services of an Occupational Therapist, in order to ensure that kitchens and bathrooms meet the requirements of disabled residents. We monitor the cost, quality and timeliness of the adaptations service.

7.3 Achieving excellence

Wessex Housing Partnership Asset Management and Development strategies detail our approach to improving accessibility standards and removing barriers for disabled people within homes and external environments.

The Strategy has specific sections covering:

- meeting the specific needs of individuals
- facilitating independent living property
- adapting people's homes

- minor adaptation
- Disabled Facilities Grant
- our adapted properties
- new build properties
- Decent Homes Standard

We will:

- introduce a specific aids and adaptations policy and train our staff in order that they are confident in dealing with requests for adaptations, including working with the disabled customer to achieve the best outcome
- review our procedure that records aids and adaptations that are supplied to our general needs homes to ensure we have an accurate record of properties that have adaptations, even where the property is not fully adapted
- record the person who is disabled on our electronic database where a person is provided with an aid or adaptation
- ensure that all reasonable efforts are made to find a person or household that would benefit from an adapted property. Reducing our adapted housing stock will always be a last resort
- review our asset management strategy and development strategy in order to ensure that they comply with the Duty
- provide feedback on new schemes and influence future design briefs
- adopt a clearer policy on maintaining adaptations made to properties and recycling them where they are removed
- further review whether our sheltered housing stock is fit for purpose
- add disability issues as a regular agenda item for the Property/Contracts Forum that is held on a six weekly basis.

8. The Development Strategy

8.1 Background

Part M of the Building Regulations ensures that all new properties are built to a good mobility standard. Issues covered in the regulations include access to the property that is not too steep and is wide enough for a wheelchair; entrance door thresholds a maximum of 15mm; doors and corridors wide enough for wheelchair access; entrance level WC; and switches and sockets at accessible heights.

We are encouraged by the DED guidance to work with the Local Authority for early preapplication discussions with developers and housing associations on Section 106 agreements to ensure that all the housing within a development incorporates inclusive design standards. These discussions need to include disabled people whether through an access group or housing board members.

Housing organisations are expected to ensure that professionals involved within the construction and design process are suitably experienced and qualified with regard to disability equality and inclusive design. It is also important for housing organisations to ensure that their procurement processes and contracts build in appropriate specifications to deliver developments which meet inclusive design principles. Those tendering for contracts should be required to demonstrate expertise in this area supported by the involvement of disabled people.

We should establish targets for the completion of accessible housing using recognised standards such as Lifetime Homes and homes developed to the standard within the Wheelchair Housing Design Guide.

We are expected to extend our awareness of disability issues to low cost home ownership schemes. In particular:

- are services advertised in a way which reaches disabled people?
- do we ensure that accessible properties and properties built to lifetime home standards are included in affordable housing stock?
- do we ensure that flexible policies are put in place to enable disabled people to have more time to find accessible and appropriate properties within affordable housing schemes?

8.2 Current Position

The Wessex Housing Partnership Development Strategy states a commitment to increasing the amount of stock for the benefit of the communities we serve – both currently and in the future.

Wherever possible and feasible, our new homes will meet Lifetime Homes standards and have space standards in line with the design brief, which will use the Housing Corporation's standards as a minimum.

8.3 Achieving excellence

We will review:

- the appropriateness of developing access statements or accessibility standards for inclusion in project criteria for each new development with a review of the completed development to evaluate success
- the design brief and ensure that appropriate professionals/consultants understand inclusive design principles
- our position regarding the inclusion of a percentage of wheelchair standard units in new development and/or joint ventures

- the inclusion of design to Lifetime Homes standard as a requirement of new development
- the promotion of our adaptations service via:
 - newsletters
 - home visits
 - Residents' Federation
 - consultation events
 - AGM
- the means of funding major adaptations
- information from Stock Condition Survey and other records, staff knowledge will be fed into the new repairs system to identify a robust knowledge of which properties have been adapted
- how we can more effectively identify the housing needs of residents at an early stage of development
- how we can more generally involve disabled people in assessing the accessibility of design

9. Procurement and Supplier Diversity

9.1 Background

Where building developments or housing services are being procured it will be important to include specifications in the contract to ensure that the needs of disabled people for inclusive design, accessible communications, etc, are addressed.

9.2 Current Position

We have not previously made specific disability features a key focus of our procurement and supplier diversity work.

9.3 Achieving excellence

We will review our invitation to tender and contract documents to ensure that equality and diversity and more specifically disability considerations are a core part of contract documentation and specifications.

In particular the documents will make tenderers:

- aware of Wessex Housing Partnership's equality and diversity policies and its requirement to promote equality for disabled people
- supply a copy of their own equality and diversity policies and/or accept Wessex Housing Partnership's equality and diversity policies including the duty to promote equality and diversity

We will evaluate tender submissions against equality and diversity considerations as part of our assessment of value for money.

We will require contractors, consultants and suppliers to attend WHP's equality and diversity training and specify how the training will be rolled out to all of their staff including sub-contractors.

We will consider the introduction of CRB checks for contractors/consultants working in vulnerable residents' homes. This will require us to improve our database on the vulnerability of residents.

We will develop a supplier diversity policy that focuses on extending contract opportunities to firms owned by disabled people at the same time as working in Partnership with local Chambers of Commerce to promote businesses run by disabled people.

10. Lettings and allocations

10.1 Background

We are expected through the Disability Equality Duty, to seek to identify where our letting policies may be making it difficult to match properties to disabled people. Some barriers may exist because of the way properties are advertised and the accessibility of information. Other difficulties will relate to rules such as time limits for filling vacant properties.

We need to explore methods of help to maximise housing choice for disabled people.

A key area to be considered is Choice Based Lettings in particular:

- Is advertising accessible?
- Are a property's accessible features advertised?
- Does a mechanism exist to identify the requirements of disabled applicants?
- Is there a mechanism to allow extra time for disabled applicants if they need it?
- Is there a mechanism for providing support in making applications?

We are also expected to start gathering evidence about disabled people's experiences when applying to be part of low cost home ownership schemes.

10.2 Current Position

We have significant areas for improvement in this area of work. Disabled groups are not sufficiently aware of the services we provide and housing application forms are not easy to understand.

There are some beneficial features with a large text version of the application form available and the identification of applicants with ongoing support needs at home visit stage.

There are areas for improvement in matching the specific needs of residents with the properties that we have available. Properties are not currently labelled to indicate the level of accessibility, although data collection is in hand for HVHS and KHA. In addition, we do not currently monitor access to our homes from disabled customers, although there are anecdotal concerns that too many accessible/adapted properties are let to non-disabled tenants/occupants. There is a need to improve relationships with local authorities around disability issues to increase the appropriateness of nominations made to adapted properties.

However, our staff awareness of resources available to people with mental health and learning disabilities is high and there is effective signposting to specialist organisations.

10.3 Achieving excellence

We need to work with local authorities to ensure that they provide us with more information on applicants' specific requirements.

We need to increase residents' awareness of the services that we provide and KHA needs to increase its understanding of its disabled customers' needs. This will mean improving our database of information on the accessibility of the properties that we hold and introducing a range of monitoring, reporting and performance improvement reports on lettings to different forums. These reports will be produced quarterly and reported to Boards through the KPI's.

11.1 Background

We will need to routinely anticipate the needs and diversity of their customers and be able to meet their requirements as part of the DED. This should lead to improvements for all customers not just disabled people. For example, the provision of Easy Read documents, produced initially for customers with a learning disability, have often proved to be the most popular and accessible format used by all customers.

We will be expected to:

- hold information on the differing needs of our customers, including communication preferences
- have accessible offices
- have staff with a wide range of knowledge about how the service can be adjusted to meet the needs of disabled people
- have front-line staff trained to understand the needs of disabled customers, including language and etiquette
- have information about services and service standards provided in formats which are appropriate to service users' needs such as large print, Braille or audio versions
- have an accessible website
- have communicated effectively and clearly how the service can be adjusted to meet the needs of disabled customers
- monitor complaints, harassment and anti-social behavior reported with regard to disabled people

11.2 Current Position

A survey is being conducted on the differing needs of our customers including communication preferences.

Our offices are accessible apart from the HVHS office, which is not fully accessible because of existing building constraints.

We do not currently have formal policy and practice to increase the priority of a repair to respond to disability or vulnerability or to warn a resident that a contractor is on the way. However, we do have a vulnerable person's protocol and make referrals to support agencies. New tenants experiencing difficulties maintaining their new tenancies for a number of reasons including disability are supported through tenancy training.

Monitoring of complaints, harassment and anti-social behaviour is not currently reported with regard to disabled people.

Information is available in different formats, but there is a danger that residents have to know that they should ask for different formats. We need to make sure that all staff are aware of residents' requirements and respond to them.

Some partnership links are working well with the Citizens Advice Bureau and social services although there is still room for improvement. We are generally good at signposting access to welfare benefits.

11.3 Achieving excellence

We will produce a database of customer needs. We will use this to determine

how we can become more responsive to the needs of disabled customers, including through communications.

We will work to ensure that we are far more proactive around disability issues to ensure that we provide an excellent customer service to disabled people. At present we are too reliant on disabled customers understanding how the service can be adjusted to meet their needs. Therefore, we will work with disabled residents to identify their specific service needs and will contact residents on an annual basis to systematically update our records, whilst encouraging residents to notify us on an ongoing basis of any changes to their circumstances.

We will review our responsive repairs, rechargeable repairs, gas services policies and procedures in light of the Duty. In particular, we will review our repairs' script to investigate how we can more easily identify disabled customers. We will upgrade a job to an emergency where the job request, if not dealt with before the next period of normal working hours, would create unreasonable risk, suffering, discomfort or difficulties to the tenant. For example, for groups that might be classified as being vulnerable or at risk e.g. elderly, disabled. More generally we will contact residents on the appointment day to confirm that the contractor is en route and then for their time of arrival at the property.

We will develop a protocol to work with people with mental health issues and learning disabilities and in particular, to ensure access for repair and maintenance workers to individuals in supported accommodation. This may include requests for an advocate to act as a third party. More generally we need to increase the extent of our work with advocates and agencies *for* and *of* disabled people.

We already work with some of our contractors to identify the specific needs of residents and we will formalise this approach to ensure that we work as a team to

identify and respond to disabled residents' needs.

Because we believe that two way communication with our customers is important and not just the giving of information, we offer a wide range of contact opportunities including, telephone, personal visit, home visits, via the web site, and in writing and we have the use of induction loops in offices. We will inform staff of the procedure to use type talk.

We will develop written disability friendly communications' standards and train relevant staff. These standards will set minimum font sizes, styles, and readability targets that go some way to reflecting the needs of disabled residents. We will also review the accessibility of our website.

We will conclude the review of all our standard letters to ensure that they are jargon free and easy to understand. We will review opportunities to increase use of pictorial information to support more effective communication.

We will offer some of our key information in other formats to improve the accessibility of information that we produce for those of our customers with visual, hearing or literacy issues. We will emphasise home visits for older and disabled customers facilitating access of our tenancy and estate management services for these groups.

Awareness of the availability of alternative formats needs to be improved. We will produce more promotion, marketing, information on entitlements, access to services and information.

In our performance reporting, we will compare the level of satisfaction of disabled customers against our wider customer base, including our post inspection of

repairs. We will also monitor complaints, harassment and anti-social behaviour with regard to disability.

We work closely with third parties, e.g. voluntary agencies and social services to ensure clear lines of communication and a holistic approach to the customers' needs.

A key part of our asset management strategy is ensuring that we are able to offer a responsive service for disabled people from HVHS' offices in the future.

12. Harassment Policies and Practices

12.1 Background

The Disability Equality Duty notes that there is evidence to suggest that disabled people are frequent victims of harassment and other forms of anti-social behaviour. Harassment on the basis of disability should be subject to the same degree of rigour as racial harassment cases, with policies and procedures developed to support victims, investigate reports of harassment and establish clear guidelines for dealing with harassment.

12.2 Current Position

We are committed to ensuring that all residents can exercise their right to the quiet enjoyment of their homes. We will record all reports of anti social behaviour, investigate all reported incidents objectively and monitor/review performance at regular intervals. We will take prompt and effective action against all forms of anti social behaviour.

We regard any form of hate crime, as an affront to Human Rights and as an aggravated breach of the Tenancy Agreement. We implement a proactive, problem solving approach in partnership with residents and other relevant agencies to deliver responses most likely to deliver a sustainable resolution.

We are sensitive to the views and needs, including housing needs, of victims and this is demonstrated by treating victims sensitively, courteously, respectfully and in confidence. We support witnesses throughout, support perpetrators willing to change their behaviour, publicise our performance and make use of the media to communicate with residents, promote confidence in communities and deter anti social behaviour.

12.3 Achieving excellence

We will review our anti social behaviour strategy, policy and procedures in light of the Duty.

We will work with support workers and other stakeholders to develop an understanding of the local area to assist disabled people settle into the community. Our Tenancy Support Officers will be able to help in this process. We will review the need for community development work to make people more accepting of difference, for example around mental health and disability.

We will record victims and perpetrators of anti social behaviour in terms of disability and introduce measures to improve the under-reporting of harassment that is common amongst disabled people, for example increasing the confidence of residents to complain about harassment. We will work in partnership with the police to resolve these issues.

We will monitor the level of satisfaction amongst disabled customers in terms of our response to harassment.

13. Customer Involvement

13.1 Background

The Duty states that we should involve those disabled people who appear to have an interest in the way in which we carry out our functions. This may include former, current and potential service users, staff and the wider community.

The Disability Rights Commission DRC guide to the DED and DDA 2005 for the social housing sector states that involvement should be used to:

- identify the barriers and unsatisfactory outcomes faced by disabled people
- set priorities for action plans
- assist in planning and reviewing activity

13.2 Current position

We already involve a significant number of people with physical and sensory disabilities and people with mental health and learning disabilities within our involvement structures.

We aim to ensure that in the promotion of involvement opportunities to disabled groups we are mindful of how the other areas of diversity for example race, faith, gender, sexuality and age can impact on the perception of disabled people.

13.3 Achieving excellence

We will use support arrangements to facilitate further involvement, for example by extensive use of home-based survey, monitoring and reader projects.

We will develop a specific strategy on involving “Hard to Reach”/frequently ignored groups including disabled groups who are currently under represented within our involvement structure.

We will develop a disabled person’s forum whose membership is balanced across the spectrum of diversity, as far as possible and that includes customers and representatives from community groups and partner agencies. This will act as a critical friend to the service we provide.

We will develop mechanisms through which the disabled person’s forum informs and shapes the development of policy and services. In the development of a disabled person’s forum we will use the information that we have collected from our demographic customer profile exercise to contact customers that have a disability and have expressed an interest in becoming involved to develop our services.

We will encourage residents’ groups to take positive steps to include disabled people who live within their communities in their membership.

We will promote the use of disabled people as mystery shoppers and additionally train them as disability auditors to ensure that the offices that we offer services from are accessible to the widest range of disabilities.

14. Appendix One - Disability Action Plan

Attached.

16. Appendix Two - Definition of Disability

The Disability Discrimination Act is influenced by the social model of disability. It sees the person as disabled by society. The impairment in itself is not a problem, even though it may produce a need for a different set of living requirements. It sees society's insistence on segregation in services, and the inaccessibility of things such as transport and buildings as a general prejudice against an integrated community life for disabled people.

The DDA uses a complex text to determine whether someone is disabled or not, namely: a person has a disability if he/she has a:

- (i) physical, sensory or mental impairment

Where a person has a progressive condition they will be covered by the DDA from the moment the condition leads to an impairment which has some effect on the ability to carry out normal day-to-day activities, even though it may not have a substantial effect if that impairment is likely eventually to have a substantial adverse effect on such ability.

Certain conditions are not regarded as impairments for the purpose of the DDA, they are:

- addiction to or dependency to alcohol, nicotine or any other substance (other than what is medically prescribed)
- seasonal allergic rhinitis (hay fever), except where it aggravates the effect

of another condition

- tendency to set fires
- tendency to steal
- tendency to physically or sexually abuse others
- exhibitionism
- voyeurism
- disfigurements such as tattoos and non-medical body piercing

(ii) which has an adverse effect on their ability to carry out normal day-to-day activities

- mobility
- manual dexterity
- physical co-ordination
- continence
- ability to lift, carry or otherwise move everyday objects
- speech, hearing or eyesight
- memory or ability to concentrate, learn or understand, or perception of the risk of physical danger

(iii) that is substantial i.e. more than minor or trivial

(iv) long term i.e. it has lasted or is likely to last for at least 12 months or for the rest of the life of the person affected. If an effect has had a substantial adverse effect on normal day-to-day activities but that effect ceases, the substantial effect is treated as continuing if it is more probable than not that it is likely to recur.