



Somer Housing Group

Disability Equality Scheme

December 2007



Contents

1. Introduction
 2. The Legal Context
 3. The Regulatory Context
 4. The Business Case
 5. The Social Model of Disability
 6. Definition of Disability
 7. Our approach to the Scheme
 8. Information gathering and performance monitoring
 9. How we developed this Scheme
 10. Challenges
 11. The Results
 12. Developing the action plan
 13. Monitoring and review
 14. Conclusion
- Appendix 1 – The Disability Equality Scheme Action Plan

1. Introduction

This Disability Equality Scheme describes how Somer Housing Group is proactively improving services to disabled people and promoting disability equality.

The Scheme exists within the context of the Group's over-arching Equality and Diversity Strategy, which describes our approach to achieve equality of opportunity for an increasingly diverse customer and employee population and to provide excellent services that meet the needs and preferences of the individual.

The Group's Disability Equality Scheme sets out the ways by which we will promote positive attitudes to disabled people, and the steps we will take to meet the needs of disabled people, even if this requires more favourable treatment. We will actively seek to involve disabled people who have an interest in the way the Group carries out its functions in implementing the Scheme, and in monitoring its' success. All staff, customers and stakeholders of the Group are encouraged to come forward with suggestions and feedback to help us to deliver improvements across the full range of our activities.

As a service provider, this Disability Equality Scheme sets out the further actions we will take to ensure the services we provide take account of the needs of disabled people.

As an employer, this Scheme describes our arrangements for recruiting, developing and retaining disabled employees, and ensuring that there is open access to the full range of employment opportunities.

Across all relevant aspects of the Group's operations, we will seek to identify our performance on disability equality and use a range of mechanisms for collecting information and feedback to inform this process.

The key message of our DES is that we want to lose the label or stigma attached to "disability", and focus on how we can support and respond to the individual needs of staff and customers.

Somer Housing Group's Boards and management are committed to overseeing the implementation of the Disability Equality Scheme, ensuring that equality and diversity remains at the heart of who we are and what we do.



Steve Watson
Chief Executive, Somer Housing Group

2. The Legal 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. In the 'general duty' public authorities, in carrying out their 'functions', 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
- 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.

3. The Regulatory Context

As a registered social landlord we are not considered a public sector organisation. However, the Housing Corporation is subject to the Disability Equality Duty and has transferred the essence and theme of the duty to housing associations.

The Housing Corporation expects housing associations as a minimum requirement to produce an action plan by December 2007. However, it recognises that the most effective way of demonstrating how disabled people have shaped the association's approach is by developing a Disability Equality Scheme and action plan together. Somer Housing Group has chosen to develop a Scheme and action plan.

4. The Business Case

The trigger for developing a DES goes beyond legal and regulatory requirements. Somer Housing Group recognises the business benefits of an inclusive approach to disabled customers and employees. Substantial evidence supports the view that disability is not just one of the diversity strands but an important strategic business priority.

It reflects a compelling business case that recognises that “getting it right” for disabled staff and customers leads to “getting it right” for everyone. Indeed in our drive for three stars, achieving excellent customer care and access, equates with the provision of excellent services for disabled people.

There is no doubt that overcoming discrimination and improving disability equality will deliver outcomes that will help improve the performance of the whole organisation.

5. The Social Model of Disability

The Group has adopted the social model of disability. The social model was developed by disabled people in opposition to what became known as the medical model of disability. The key difference between these two models is the location of the “problem”. In the individualistic medical model, disabled people are unable to participate in society as a direct result of their impairment. This model explains the difficulties faced by disabled people in their daily lives as individually based functional limitations.

A social model approach states that people with impairments are disabled by physical and social barriers. The “problem” of disability results from social structures and attitudes, rather than from a person’s impairment or medical condition. This approach has influenced a rights-based view of equality for disabled people and represents the key to understanding and addressing disability equality, the aim of which is to understand and dismantle the barriers which exclude and limit the life chances of disabled people.

6. Definition of Disability

The Disability Discrimination Act (DDA) 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.

For the purposes of the Act:

- Substantial means neither minor nor trivial.

- Long term means that the effect of the impairment has lasted or is likely to last for at least 12 months (there are special rules covering recurring or fluctuating conditions).
- Normal day-to-day activities include everyday things like eating, washing, walking and going shopping.
- A normal day-to-day activity must affect one of the 'capacities' listed in the Act which include mobility, manual dexterity, speech, hearing, seeing and memory.

People who have had a disability in the past that meets this definition are also covered by the scope of the Act. There are additional provisions relating to people with progressive conditions.

The DDA 2005 amended the definition of disability. It removed the requirement that a mental illness should be 'clinically well-recognised'.

It also ensured that people with HIV, cancer and multiple sclerosis are deemed to be covered by the DDA effectively from the point of diagnosis, rather than from the point when the condition has some adverse effect on their ability to carry out normal day-to-day activities.

7. Our Approach to the Scheme

Somer Housing Group reviewed its Group-wide Equality & Diversity Strategy in the early part of 2007. One of the objectives of the review was to consider the Group's approach to and performance in disability equality.

The review produced a series of recommendations which have been incorporated into the new strategy. The first priority of the new strategy was to produce the Group's disability equality scheme. It is noted that the relevant elements of the new strategy have been drawn into the DES.

To take forward the DES we established a disability equality working group, co-ordinated by the Quality & Performance Manager and comprising:

- Directors of Customer Service (Property & Housing/Support), SCHAT
- Head of Customer Service, Redland
- Community Investment Manager, SCHAT
- Human Resources Manager, SHG
- Communications Manager, SHG
- Supported Housing Team Manager, BSH

This is our first Disability Equality Scheme and action plan and is intended to be a document that co-ordinates the work of the Group in relation to disability. As noted above, it sits within the Group's over-arching Equality & Diversity Framework and the resulting action plan will be delivered within each member organisation.

Critical to the success of the scheme is our commitment to regularly review progress against the objectives established in the action plan and to plan for further improvements. The Quality & Performance Manager will be responsible for reporting progress on a quarterly basis to the Group Executive via the existing quarterly equality and diversity progress report.

Progress will be published to customers and employees on our website and through newsletters. There will be an initial review after six months where we will have completed a number of actions and developed further actions.

We will also develop an overall impact assessment framework which will help us identify how well we are doing in meeting the needs of people with disabilities.

Some of the things we already do as a Group discharge our duties under the DDA. E.g. in accessible communication, providing aids & adaptations, providing support for disabled people to be involved.

As part of our drive to achieve service excellence, we have developed a number of action plans from the base of self assessment of the Audit Commission's Key Lines of Enquiry (KLOEs). With particular reference to KLOE 31 on Diversity, we are already focusing on improving our approach to ensuring our organisation offers a service that is equal and diverse to all.

8. Information gathering and performance monitoring

Somer Housing Group provides:

- **Affordable rented homes** – we own, manage and develop homes for people on low incomes.
- **Supported accommodation** – we provide a range of services and supported housing options for young people, homeless people, and a number of other client groups.
- **Older people's homes and services** – homes for older people in sheltered and 'extra care' housing, with a range of community-based support services.
- **Key worker homes** – working in partnership with NHS trusts and other employers, we provide homes for rent and sale to their staff.
- **Homes for sale** – a range of home ownership tenures, including shared ownership, leasehold schemes for the elderly and outright market sales.
- **Community development** – we support local neighbourhoods and communities through the development of initiatives to help regenerate, and sustain local people.
- **Property services** – we provide high-quality repairs, maintenance and property management services.

In 2006/07 The Trust and Redland conducted a resident profiling exercise to better understand the make up and diversity of our resident population.

Combined with the results of the STATUS surveys in 2007, we can identify that over 50% of our residents consider themselves to have a disability. This should change the way we view our disabled customers. They should no longer be seen as a minority group, but as forming the largest section of our customer base, receiving our services.

As a supported housing provider, Bath Self Help residents have individual needs assessments and therefore, the organisation can tailor services very specifically to residents' requirements.

There are a range of mechanisms that the Group currently uses to collect information and monitor performance. We will continue to expand these to ensure that we are gathering the right information, and using this to inform service improvement including:

- Appointment of a Customer Information Officer within the Trust
- Resident and staff consultation forums
- Complaints monitoring
- Resident and staff satisfaction surveys

We are also developing our approach to performance monitoring, both in terms of our own key performance indicators, and also our methodology for tracking the performance of our contractors and consultants. We will further develop our use of performance indicators to assess the impact of the Group's activities on disability equality, and improving these when necessary.

9. How we developed this Scheme

The review of equality & diversity invited involvement from a wide range of stakeholders and consulted them on all six equality strands, including disability.

We have *directly* involved disabled people in developing the scheme in the following ways:

Staff

An article in our staff newsletter asked for interested people to come forward to get involved with developing the DES.

A questionnaire was sent out to all staff asking what their impressions of our service were both from an employee point of view and how they perceive our services in connection with disabled customers. The questionnaire also focused on the disclosure of disability as an employee.

Of our 350 staff, 91 people responded to the survey - a response rate of 26%. Of these, 5 respondents considered themselves disabled under the definition (5.5% of respondents)

19 respondents considered themselves to have an impairment or long term condition which has an impact on their life. (20.9% of respondents)

Disabled staff who did not remain anonymous, will be encouraged to form a staff consultative forum to monitor, develop and review the DES.

Customers

STATUS Survey

In 2007 Redland and the Trust conducted the three yearly STATUS satisfaction survey. We broke down key areas of the survey to examine if there were any variations in satisfaction levels between disabled and non-disabled residents. Two indicators are shown below.

Indicator	Non-disabled		Disabled	
	Redland	Trust	Redland	Trust
Overall satisfaction with services	81%	81%	88%	77%
Have made a complaint within the last 12 months	23%	17%	32%	26%

Disabled residents of the Trust have a slightly *lower* satisfaction level with the overall services provided than non-disabled residents. Redland's disabled residents are *7% more* satisfied than their non-disabled counterparts.

An area for concern however is the number of disabled residents who have made a complaint within the last 12 months. This is significantly higher for disabled residents in both organisations.

Newsletters

An article was published in our resident newsletter asking for feedback on our services for disabled people. Residents were asked:

- What do we do well?
- What should we do differently or improve?
- What should we stop doing?
- What should we start doing?

The response to the article was fairly limited, given the size of the disabled resident population. However useful feedback was received, followed up and has shaped the DES. These residents will also be contacted again to encourage the development of a consultative forum of disabled customers.

Board members

All Somer Housing Group Board members (including resident/tenant board members) were invited to get involved in developing the DES and give their views of us as a service provider and employer.

10. Challenges

There were a number of challenges which meant this initial DES would not create the anticipated level of involvement from disabled people. Some issues encountered were:

- The late release of guidance from the Housing Corporation.
- The timescale for the project.
- The limited number of existing groups of disabled customers and staff to link into.
- A lack of engagement from disabled stakeholders when invited to come forward.
- Corporate understanding of the importance of Disability Equality

Therefore one of the key points on the action plan is to consider how we can widen the future involvement of staff, customers and Board members with a disability.

11. The Results

One of the clearest messages that came through from our consultation was that we need to do more. Both staff and residents identified that **consultation** and **communication** with disabled people should be the priority of our DES. This was followed by:

- Improving services to disabled people
- Improving the physical environment
- Adaptations
- Staff development and training
- Policy Review/Governance

So, actions around these themes form the basis of our first action plan.

12. Developing the action plan

The working group identified a number of issues that would underpin the development of the action plan. These were:

- Being realistic about what Somer Housing Group chooses to focus on – i.e. the action plan has clear priorities.
- Disabled people must include all disabled people, including people with sensory impairments, mental health conditions and learning difficulties.
- The need to understand disability in social terms, including social isolation and issues surrounding mental health.
- A comprehensive staff training programme to be undertaken to ensure all staff are aware of disability issues, particularly mental health.
- An equality impact assessment framework for key policies.

- Making sure our services are accessible and promoted.
- Involving disabled people how services are delivered.
- Monitoring and reporting.

13. Monitoring and review

Once implemented, the DES will be reviewed twice a year (in addition to the quarterly progress reports). The review stage will use innovative approaches including, involving members of the disability focus groups and the use of specialist disability agencies to further develop our scheme and action plan. We have committed to work with external agencies as part of our scheme with the primary focus of building up expertise and improving our service delivery to people with disabilities.

The most effective way of monitoring service provision is through feedback from customers, including complaints. In order to achieve this, a wide range of feedback methods needs to be available and for the feedback to be monitored where it comes from disabled customers. The implementation of a satisfaction framework is a priority for the action plan.

14. Conclusion

We would like to thank our customers, staff, Board members and other stakeholders who helped develop Somer Housing Group's first DES. We hope that it goes some way to demonstrate how important we regard disability equality and what our role is in achieving it.

15. Further information

If you have any comments or questions about Somer Housing Group's Disability Equality Scheme, please contact Juliette Brown, Quality & Performance Manager on 01225 366022 or email juliette_brown@somer.org.uk

If you would like this document in an alternative format, please contact Rebecca Wright, Communications Administrator on 01225 366040 or email rebecca_wright@somer.org.uk

Useful websites:

www.equalityhumanrights.com – Equality and Human Rights Commission

www.wecil.co.uk – West of England Centre for Inclusive Living

www.equalitysouthwest.org.uk – Equality South West