



Disability and Equality Strategy

Summary of Document	To confirm the Action Plan developed for compliance with the Disability Discrimination Act and regulatory requirement to publish our plan
Who Does It Apply To?	Bromford Living (plus Bromford Living stock managed by Fosseway Living) Fosseway Living HomeZone Living Bromford Support – BCHA Bromford Support – Fosseway Bromford Support – HomeZone Bromford Maintain Bromford Homes Group Home Ownership Services Group Services – BCHA Group Services – Fosseway Group Services – HomeZone
Effective Date	22 January 2008
Strategy Author(s)	Philippa Jones
Reference Documents	Bromford Group Disability Action Plan
Approved by	Bromford Group Board
Date of Approval	22 January 2008

Our Space / SharePoint Documents / Strategies

Table of contents

1.	Key Issues and Questions	3
2.	Relevant Strategic Objectives	3
3.	Background Information and Context	3
4.	Options and Proposals	4
5.	Risks	4
6.	Financial and Value for Money Implications	4
7.	Equality and Diversity Implications.....	5
8.	Customer and Stakeholder Implications	5
9.	Human Resources Implications	5
10.	Legal and Regulatory Issues.....	5
11.	Appendices.....	5

1. Key Issues and Questions

The good practice approach to employing and delivering services to people with disabilities represents a move away from an "individual rights" focus to a social model of disability – what disables people is the barriers we erect, so how can we dismantle these? This approach is reflected in our Disability Equality Plan with an emphasis on gathering and monitoring data to help us identify the barriers so we can change our practices. The Action Plan will therefore be dynamic, with further actions being added as we identify more areas requiring change.

2. Relevant Strategic Objectives

"Ensure robust Diversity plan in place at group and member business level, and quarterly targets achieved and reported to Group Board."

3. Background Information and Context

A summary of our obligations under the Disability Discrimination Act is at Appendix 1.

In addition, all public bodies, including the Housing Corporation, are required to publish Disability Equality action plans and the HC has passed on this duty to RSLs. In order to encourage RSLs to improve their practices the Housing Corporation will measure the RSL baseline from March 07 returns and track progress.

The Act and regulatory requirements cover **employment** and **provision of services**.

The wider context for BHG is:

- We want to develop communities where everyone can participate fully.
- We will aim for an equal housing experience for disabled people, in everything we do. We should **integrate** people with special needs rather than provide special services or just offer Supported Housing. An excellent example of this approach is our HOLD scheme which offers people with learning or other disabilities the same wide choice of shared ownership home as anyone else.
- It is acceptable to discriminate positively if a more intensive level of service is necessary in order to ensure real equity of service received.
- Because of the high proportion of our customers, particularly within Fosseway and HomeZone, who are older

people, more than half of our customers groupwide define themselves as having a disability.

- Nationally 4/10 families with disabled children live in homes in poor repair/damp/cold/.

Nationally 25% of families living in non Decent Home have a long-term ill or disabled member.

4. Options and Proposals

The attached plan covers the approach for the whole Group. Each RSL is taking a more specific action plan to its own Board incorporating the specific issues identified in their part of the business.

5. Risks

Risk	Probability H/M/L	Impact H/M/L	Mitigating Action/ Comment
Failure to comply with regulatory requirement to publish Disability Action Plan would affect HCA traffic lights	L	H	Publish plan
Fail to meet needs of customers with disabilities	M	H	Plan will prioritise the collection of better data to enable us to identify and meet needs effectively
Legal action by an individual customer or colleague under DDA	L	H	Plan will ensure we comply with law

6. Financial and Value for Money Implications

We have sought to minimise the cost of administering the plans by focussing on disaggregating general data and PIs we already collect and report on. Any additional costs required for specific items such as more adaptations to existing homes or more new homes being built to disability or adaptable standards will be identified in relevant financial plans and specific bids for funding from internal or external sources.

7. Equality and Diversity Implications

Disability equality is a major strand of our diversity plan.

8. Customer and Stakeholder Implications

Local authority partners are also required to produce action plans and will expect RSLs to support their delivery.

9. Human Resources Implications

The Plan has significant implications for our recruitment and colleague development practice. We have now begun to disaggregate HR performance indicators to identify potential barriers to the employment and development of colleagues with disabilities. We have recently asked all existing colleagues to tell us if they consider that they have a disability as this information has not been routinely collected and job applicants may not always give such details if they believe it could adversely affect their chances.

10. Legal and Regulatory Issues

The plan will enable us to comply with the DDA 2005 (amended DDA 1995) and DRC Statutory Code of Practice and to meet the Housing Corporation's regulatory requirements in relation to this.

11. Appendices

Appendix 1	Summary of legal and regulatory requirements
Appendix 2	Summary Group Disability Equality Action Plan

Appendix 1

Summary of RSL Obligations Under the Disability Discrimination Act

- **DDA 2005 (amended DDA 1995) and DRC Statutory Code of Practice**
- **Housing Corporation Disability Equality Scheme and Action Plan** – to encourage RSLs to improve HC will measure RSL baseline in March 07 returns and track improvements against Plan.

UNLAWFUL Discrimination occurs when a disabled person is treated less favourably than other people because of their disability, unless there is a justifiable reason. The main justifiable reason is on health and safety grounds.

Covers **employment** and **provision of services**.

Landlord Duty to make reasonable adjustments, adjust policies and practices that make it impossible/ unreasonably difficult for a disabled person to take a letting or enjoy residing in their dwelling. Includes disposals of any premises – (so includes commercial and sales).

3 main duties:

- **Providing auxiliary aids and services** – if these enable/make it easier for a disabled person to take a letting or enjoy an existing letting, or if not provided it would be impossible to take /enjoy the letting:
 - Accessible formats for info e.g. large font, sign language.
 - Furniture, materials, equipment.
 - Signs, notices
 - Taps, door handles
 - Door entry systems or door bells
 - Changes to wall or door surfaces
- **Changing practices policies and procedures** which make it impossible or unreasonably difficult for a disabled person to enjoy premises/take a letting, make use of a benefit/ facility, and this would not have that effect if the person was not disabled. E.g: Routinely sends letters re arrears/breach of tenancy – when tenant has informed RSL that they cannot read; Parking policies that routinely refuse to designate spaces for tenants, even when a tenant in a wheelchair needs a space next to her home.
- **Changing the term of a letting** which make it impossible or unreasonably difficult for a disabled person to enjoy premises/take a letting, or make use of a benefit or facility, e.g. change no pets policy – to allow assistance dogs.