

DISABILITY EQUALITY SCHEME

INTRODUCTION

Welcome to BHT Disability Equality Scheme and Action Plan. Our scheme will run from 2008 to 2011, setting out our commitment and intended actions to ensure that disabled people receive high quality services and are not disadvantaged in terms of access and involvement. BHT has the opportunity to reduce the disadvantages that some people experience by making our services more responsive to individual needs. In valuing the diversity of all communities, BHT wishes its services, facilities and resources to be accessible to all.

Our scheme and action plan have been developed using guidance and support from our parent company, Affinity Sutton, and meets expectations from the Disability Rights Commission and the Housing Corporation to ensure that we meet our regulatory requirements and to deliver high performing customer services.

The Affinity Sutton Group has in place a Diversity and Equality Policy, which sets out the following commitments for the Group:

- 1 Work towards eliminating disadvantage and use positive action where appropriate.
- 2 Encourage diversity and ensure all groups and individuals have access to housing and related services, based on need. We will treat no applicants for housing or employment less favourably than any other. We will act on any failures to do so
- 3 Identify the needs of disadvantaged minority groups through establishing close relationships with these groups and to support these groups in accessing our housing services.
- 4 Recruit fairly and monitor our recruitment, encouraging applicants from under-represented groups.
- 5 Recognise our commitment to Equality and Diversity in the composition of our Board and in the recruitment of new Board Members.
- 6 All operating companies within the Group to collect and monitor records of the race, gender and disability of housing applicants, job applicants and potential suppliers and contractors and to report performance to senior staff and our Boards.

In addition to the above policy, one of our senior members of staff will sit on the Affinity Sutton Equality and Diversity Group. This Group includes

members from each housing association in the Group. The role of this group is to monitor the operating companies progress towards achieving actions and desired outcomes, whilst identifying good practice, encouraging group-wide working and co-ordinating our approach on diversity issues. The Group will also deliver an annual report to Board on diversity issues across the Group.

The Group requires that BHT has its own mechanisms and structures in place for meeting these diversity and equality objectives, and this may include specific policies to meet localised issues.

BHT has a commitment to be an organisation that:

- Will develop services that increase a quality and diversity in its activities;
- Has a workforce that generally reflects the population of Brighton and Hove;
- Through our understanding of the experiences of different people, will allow this to inform us in improving our ability to deliver better services.
- Actively consults with all users of our services to ensure the delivery of our objects;
- Actively consults with different individuals and communities to ensure that our services are responsive and reflect the diversity of need;
- Provides employees with the training and development they need in order to enable them to achieve our objectives regarding equality and diversity; and
- Provides a supportive, open environment where all employees have the opportunity to reach their full potential.

To ensure the successful delivery of these objectives, we have a range of structures in place including the

- Equality & Diversity Working Group – Paul Bolton, Nikki Homewood & Kate Watson
- Equality & Diversity Lead Officer – Kate Watson
- Equality & Diversity Action Plan
- Equality & Diversity staff KPI's – produced by HR
- Supporting People Quality Assessment Framework – includes Equality & Diversity
- Strong BHT / CMT commitment to managing Equality & Diversity

Senior management commitment to the scheme has been demonstrated by approval from our Senior Management Team, along with submission to our Board for approval and comment. Our Board consists of service users and independent members and their input and comments validates our aims and objectives of this scheme. Senior Management and the HR Manager will be responsible for monitoring and review of equalities policy and we will make it clear at all staff have a responsibility for ensuring it is delivered.

As part of our commitment to the Disability Equality duty we will be publishing this scheme and informing our service users and staff on the actions we intend to take to deliver continually improving services. Our scheme will be available on our global system / intranet and available to service users on our

external website at www.bht.org.uk. We will also publicise the scheme through relevant publications. We will also publicise the scheme and its future actions through resident forums and consultative bodies. We welcome feedback on the scheme and action plan from our service users, partners and staff, please get in contact with us if you have a comment to make.

THE LEGAL CONTEXT

The Disability Discrimination Act 2005 amended the Disability Discrimination Act 1995, and has placed a pro active duty on certain organisations to eliminate disability discrimination through issuing their own Disability Equality Duty and schemes. The Housing Corporation, our regulator was required by law to publish their scheme in December 2006 and in turn the Corporation have placed a requirement for Housing Associations to work towards and publish their own outcomes-based schemes by December 2007. Such schemes are advised to be pro-active in involving disabled people in the schemes development and also to ensure a commitment to their involvement as the scheme is delivered and reviewed.

The general requirements of the duty are as follows:

- 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 Housing Corporation also places expectations on housing associations through their regulatory code. We must be able to demonstrate a commitment to equal opportunities; working towards the elimination of discrimination and having in place an equalities and diversity policy. The Audit Commission, who inspect housing associations have issued guidance on what excellent and fair performing associations should be delivering in terms of diversity. This includes using the Disability Right Commission guidance to deliver a Disability Equality Scheme.

Legal definition of a disability

Our Disability Equality Scheme needs to cover all the groups of people legally defined in law as disabled. The Disability Discrimination Act 2005 defines a disabled person as someone who has:

"A physical or mental impairment, which has a substantial and long term adverse effect on his or her ability to carry out normal day to day activities"

There have been amendments to the Act, resulting in a broader definition. This has resulted in HIV, multiple sclerosis and cancer being classified as disabled from the point of diagnosis, rather than when a condition has an adverse effect on how a person can carry out normal day-to-day activities. The Act provides protection for people with progressive conditions.

INFORMATION GATHERING AND PERFORMANCE MONITORING

A core element of our approach is to establish 'where we are now' as an organisation in terms of delivering services that are used by disabled people and meeting resident and staff needs. By understanding where we currently are, we can plan more accurately and develop meaningful actions for improvement. We recognise the importance of robust evidence and information available to inform us on what we currently provide and we will undertake a GAP analysis exercise.

The GAP analysis process aims to compare actual performance with potential performance and where the organisation wishes to be with regards to disability. To do this we will identify data and performance information available.

We will also be able to identify under performing areas and gaps in current services, which will supply us with ideas and actions to feed into our action plan.

Performance information available

- Service user Referral and Start of Stay information on disability
- Number of staff with disability
- Number of candidates with disability who applied for and appointed to BHT roles
- Census data (e.g. 2001 census shows Brighton & Hove = 11.9% BME)
- Self assessment of Diversity performance
- Equality & Diversity Action Plan progress
- Quality Assessment Framework requirements (Grades A to D)
- Internal Audit process
- Service user surveys
- Complaints Records / Log
- Resident conference

Current KPI's include:

EQUALITY & DIVERSITY	Actual	Min BHT Target
% of BME staff employed	5.9%	10%
% of Female staff employed	54%	50%
% of Disabled staff employed	3.3%	5%
% of staff with Dependants employed	26.4%	25%
% LGBT staff employed	23.1%	15%
% of staff Aged 51-60 employed	11.2%	5%
% of staff Aged 61+ employed	1%	2%
% of women in management positions	50%	50%

Outcomes

BHT's action plan is attached which outlines the key areas of strength and opportunity for development and the actions BHT have decided to carry forward.

Changes need to be made to data collection processes for both service users and staff. This includes:

- Surveying all staff on Equality & Diversity data
- Standardising the categories surveyed, to ease reporting.
- Audit all open access services for accessibility
- Record access to non supporting People funded projects e.g Legal services & FBDC.
- To ask the question "do you consider yourself disabled" rather than "Are you disabled or registered disabled"
- Centralised record of which properties are adapted for disabled people
- Levels of Disabled service users involved in the BHT SUI consultancy
- Rates of disabled people in senior positions within the staff team

INVOLVEMENT

The pro-active involvement of disabled service users, service users and staff is a key requirement in the development of our scheme and action plan. We see it as highly important in identifying and consulting with relevant individuals, as it enables us to clearly understand priority areas, barriers faced by disabled people and to identify areas requiring improvements to take place.

BHT will be using the Service User Consultancy to assist with involving service users with the disability equality scheme. This will include:

- Creating a specific SUI Consultant role / Forum to consult on issues effected service users with disabilities.
- The existing SUI forum will also be asked to review the Disability Scheme
- The SU survey and events could also tailored to gain input from Service users on disability related issues.

DISABILITY IMPACT ASSESSMENTS

Following Affinity Sutton Group-wide guidance, BHT will develop and deliver a three year impact assessment timetable.

Impact assessments provide an in-depth evaluation of a policy, procedure, service of function and involve gathering information to assess whether there is a negative impact to one or more diversity groups. This will help BHT to identify and act upon practices that disadvantage minority groups, and ensure that services are delivered in as responsive and equitable way as possible.

We support the following core principles of Impact Assessments

- Clearly identifying peoples needs and requirements
- Finding ways to improve service performance and support continuous improvement
- Being innovative and considering new ways of working
- Ensuring that diversity issues are considered when developing new strategies and delivering services
- Ability to identify problems and to respond in an appropriate way

Our impact assessment timetable will be developed and initially focus on reviewing policies, procedures, services and functions which have a large impact or risk to disabled individuals. Over the three years, areas of low impact or risk will also be assessed.

Impact assessments may take place as independent stand alone activities or be part of a wider improvement framework to assess how a particular area of our organisation is performing (QUAF, KPI's, Internal Audits).

The Impact Assessment timetable will also be developed based on the findings from the GAP analysis and resident/staff involvement. To meet our customers concerns and needs we will aim to impact assess those areas highlighted as important or under-performing within the first year of the timetable.

We will use a template to record our key findings, and any areas identified for improvement will be fed into our Disability Equality Duty Action Plan. Our template has been designed with all Diversity and Equality issues in mind, to ensure we assess all these areas as appropriate.

The first 3 impact assessments are due to be carried out on the following areas:

- BHT Complaints procedure
- Referral Procedure for the Tenancy Access Project
- Service Charge Arrears Policy – for Phase 1, Resettlement & Addiction Services

ACTION PLAN, MONITORING AND REVIEW

Our Disability Equality Action Plan has been developed based on the GAP analysis, identifying where areas for improvement lie and priorities identified by disabled people through specific consultation and existing performance information. We are also developing actions that fit in with our strategic priorities and existing equalities strategies.

We decided that our action plan would focus on six core service areas, with specific actions in each. These areas covered:

1. Inclusive customer services
2. Asset management- BHT has a service level agreement with Downland HA to deliver maintenance services.
3. Communications and information systems
4. Employment and governance
5. Enabling and participation
6. Monitoring and assessing performance

Our action plan will:

- Clarify the current area that requires action
- Outline actions and key priorities based on evidence gained throughout developing our disability equality scheme
- Respond to the priorities that disabled people identified through involvement
- Establish desired outcomes and where we want to be in terms of improved performance
- Establish measurable indicators of progress towards those outcomes
- Provide timescales to deliver outcomes and who is responsible for delivering these
- Date for review to see if improvements and measures have been met

We will maintain and update our action plans, adding specific actions which arise from conducting impact assessments. We will also ensure that our action plans are reviewed on an annual basis with Senior Management and Board being informed of progress.

We will also inform our service users of the service improvements we have delivered in relation to the areas they highlighted as requiring improvements. We will do this through existing involvement and consultation approaches.

BHT - DISABILITY EQUALITY DUTY ACTION PLAN

Activity/ Action	Desired outcome/where we want to be	Why? Current weakness/negative impacts	Targets measures/measures for success	Times cale	Respons ibility	Barriers to achieving desired outcomes	Date for review	Progress and evidence of successes to date
Review recruitment practices to ensure they support the wide range of candidates	The recruitment and selection processes will meet the requirements of a wide range of candidates.	Recruitment and selection is the impression staff will have of BHT, so it is important they we are accessible to all.	Application processes in deferent formats.	April 09	KW	IT resources	April 08	Meeting with Sue Paffey to review BHT using AS (Barkers) recruitment processes. Nov 07
To ensure that employment practices and procedures to support and display equality and diversity	There are clear procedures in place for identifying breaches of the equal op's & anti-discrimination & harassment policies.	Communicating and training all staff on policies.	All staff to have attended training of Anti-Discrimination & EOP.	April 09	KW & PB	Resources required to free up staff to attend the course.	April 2008	All new staff have attended as part of induction for past 2 years.
Ensure that employment opportunities are accessible.	Meet targets for range of applicants, candidates and successful employees.	Currently application forms are paper based which is not user friendly, efficient or economical	Meet targets and KPI's set which are based on the relevant census data	Aug 08	KW	Can be difficult to attract wide range of candidates in the Brighton and Hove area	April 08	
BHT Employee disability rep to be appointed; trained & empowered.	To have a employee disability representative who can support and advice the organisation in meeting the needs of employees with disabilities	Risk that employee rep is tokenistic	To have an empowered rep in place	April 08	KW	Have previously advertised for a rep but had no response	Dec 07	
Review Board of management members	That the Board of management has a true and fair representation of disabled employees and service users.	No current BHT board members have notified BHT as having a disability	Board Review	April 2008	AW/KW	Finding suitable applicants	Nov 07	Equal opportunities to be requirement when next recruiting Board members.
To ensure that Service Users are not discriminated against on grounds of disability	Service users are involved in the periodic review of the ADP, EOP and harassment policies. Notes of involvement or consultation through meetings, focus groups, newsletters etc	Important to show BHT understand the requirements of the service users, and for them to be involved in the business.	To be reviewed annually	April 2008	EDWG	Skills of service users to review policies. Resources of SUI Consultancy to	Dec 07	

	<p>Service users are actively involved in reviewing allocations procedures.</p> <p>Staff, minutes, procedures, other notes and service users (if still using services) confirm.</p>					facilitate		
Service User Involvement Consultancy to have a Disability Representative	To have a employee disability representative who can support and advice the organisation in meeting the needs of employees with disabilities	Risk that employee rep is tokenistic	Article to go out in Express (SUI) magazine asking for representative.	April 08	AI	Willingness to engage in a formal role / process	Dec 07	Service users with disabilities do engage with the service, but not yet willing to be a representative.
To ensure that services are accessible to all	Key stakeholders are actively involved in reviewing eligibility criteria, application procedures and prioritisation. Correspondence, minutes, stakeholders themselves etc. confirm participation of referral agencies, funders / commissioners, organisations working with discriminated against groups etc	Possible damage to BHT services, service users & reputation if discrimination occurs	Continue to undertake impact assessments at project level on disabled access and awareness.	Aug 08	KW	Funders and commissioners unwilling to collect and share the data required	April 08	First 3 impact assessments in draft form
To ensure that service delivery does not discriminate against those with disabilities	<p>All services in development to have formal DDA assessments at the earliest stage.</p> <p>DDA Survey to be completed across all projects & then action plan prepared</p>	<p>Approach needs to be formalised and documented.</p> <p>To ensure compliance with DDA regulations</p> <p>This will ensure open door services are accessible by disabled groups</p>	<p>DDA assessments to be completed.</p> <p>Training session for all managers on DDA 2005.</p>	April 08	DHA / AS	<p>Resources and training required on impact assessments</p> <p>Affinity Sutton input required</p>	Aug 08	
Ensure complaints which relate to disability are investigated fully and action is taken against perpetrators.	To learn for the complaints and compliments to increase service quality.	To ensure discrimination is removed, or minimised	Training on dealing with complaints	April 09	EDWG	It is not always clear whether the underlying reason for the complaint is linked to a disability.	April 08	

Improve the data collection process, reporting and surveying on Equality & Diversity of service users	To ensure can show progress against KPI's and the QAF.	To be confident that practices and processes do not discriminate against service users	Implement OSKA system for collating and reporting information n Service users	April 09	JA	Resources and change management required to implement OSKA (Octavia)	April 08	OSKA implementation having started work and the system will be introduced from April 08
Improve the data collection process, reporting and surveying on Equality & Diversity of employees	To ensure BHT can show that recruitment and employments practices do not discriminate.	To be confident that practices and processes do not discriminate against candidates and employees	Staff questionnaire to build data held on Snowdrop system	Aug 08	KW	Affinity Sutton survey data could duplicate / assist with this. Staff unwilling to give out personal details	April 08	Snowdrop system now up and running.
BHT Statement of intent with regards to Equality	Statement of intent written, signed by CEO & published Up to date policies and procedures: <ul style="list-style-type: none"> ➤ Anti discrimination policies ➤ Harassment policies ➤ E&D Strategy & Action plan 	Policies in place but not signed.	Send out policy to all staff	Dec 07	KW	Written statement to be signed by CEO.	Nov 08	
Publicity	All BHT wide & service areas printed material to have a strap line stating availability in large print on request.	To ensure information and resources are accessible	To have strap line on all new material	Aug 08	KW	Centralisation of publication of materials.	April 08	KW & LE to meet to arrange implementation
Independent Internal Audit	Fair access is assured by independent internal audit. There are records of periodic independent audits of the assessment and allocation process. <i>("Independent" does not necessarily mean by somebody outside the provider organisation but refers to a person or people not involved in or responsible for service delivery.)</i>	To ensure BHT is meeting best practice standards	Could it be built into current internal audit arrangements from TIAA?	Aug 08	EDWG	Resources for internal audit	Dec 08	

WN: Will Nuckley – HR Manager

KW: Kate Watson - Director Corporate Affairs

PB: Paul Bolton, Director Supported Housing (Trainer of Anti-Discrimination and Equal Opportunity Practices)

AI: Anthony Irtelli, Service User Involvement Co-ordinator

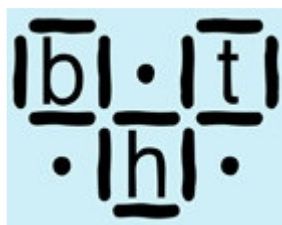
JA: Jim Aspdin, Senior Manager Supported Housing (OSKA implementation manager)

LE: Lucy Enever, Fundraising & Publicity Coordinator

EDWG: Equality & Diversity Working Group

AS: Affinity Sutton

DHA: Downland Housing Association



If you require more information on this scheme then please contact Kate Watson, Director Corporate Affairs, on 01273 645431 or kate.watson@bht.org.uk.

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