

# **NEW CHARTER HOUSING TRUST LIMITED DISABILITY EQUALITY SCHEME (DES)**

Approved by 13<sup>th</sup> December 2007  
Boards:

## **EXECUTIVE SUMMARY**

The New Charter Group (Aksa and New Charter) needs to publish a Disability Equality Scheme by December 2007. The DES is a regulatory requirement. This report highlights the regulation and legislative background; explains what a DES is; provides detail of the issue of disability for our tenants; reviews existing activity; and proposes an action plan for the next three years. The Boards agreed this as our published Disability Equality Scheme and Action Plan.

## **1 INTRODUCTION**

The Disability Discrimination Act (DDA) 2005 placed several duties on public bodies to eliminate discrimination and promote equality for disabled people. Part of this is the Disability Equality Duty. This defines the expectations in the Act and what strategies are to be prepared and published.

The New Charter Group has to devise and publish a Disability Equality Scheme by December 2007. Over recent years we have been very active with the disability agenda but there is always more that can be done. This report provides a draft Disability Equality Scheme for comment and refinement. It details the scale of the issue for our stock/tenants, what we currently do, and how we could improve in the future.

## **2 WHAT IS A DISABILITY EQUALITY SCHEME (DES)?**

New Charter/Aksa is not a public body and does not have a Disability Equality Duty. However, it could be argued that we have a moral duty to consider such issues whatever the legal status. We do have a duty with regard to access to public buildings. Further, the duty to produce a DES is being placed on all RSLs through the regulation process.

Public bodies had to publish their DESs by December 2006. The Housing Corporation duly published their DES and Action Plan for 2006-09. In that the Corporation expects RSLs to "develop

appropriate outcome based disability action plans of their own during 2007, for publication by December 2007." Clearly the intention is to use regulation to achieve this.

The emphasis in all the documentation is about actions rather than simply about policy. A good DES needs to be well researched, has involved disabled people in its formulation, and leads to an action plan for the organisation. Specifically a DES should:

Promote equal opportunities for disabled people.

Eliminate discrimination which is unlawful under the Act.

Eliminate harassment of disabled people.

Promote positive attitudes.

Encourage participation in public life.

Take steps to meet needs, even if this gives more favourable treatment to disabled people.

A good DES is much more than a policy for ramps and stairlifts. Physical adaptations are clearly important for housing bodies but we also need to consider service and employment issues. What are the barriers in how we provide services that result in disabled people not being treated equally? Do we involve disabled people in our decision making or do we just do what we think disabled people want?

For housing bodies there are four key areas that need investigation in a DES:

**Asset Management.** Are designs for new build and refurbishment inclusive? Do we involve disabled tenants in design? Do we monitor post completion whether the designs/improvement actually work well for the inhabitants? How does our housing for disabled people link into wider local authority policies? Is there a need to positively discriminate for disabled people with repairs? (eg priority for fast heating repairs)

**Customer Services.** Are all communications delivered in a way that is easily accessible to disabled people? Do we gather evidence from surveys that communications are reaching all disabled people? Do we assess the impact of policies/procedures on disabled people where comprehension is limited (eg complex arrears letters to people with learning disabilities)? What are our policies for dealing with harassment of disabled people?

**Employment and Governance.** How do we involve both disabled staff and tenants? How do we deal with recruitment, career progression and retention? Do we have disabled people involved at the Board level?

**Enabling Role.** How does we contribute to the wider local Housing Strategy in relation to disabled people?

A good DES needs to set priorities, have of involvement of disabled people, monitor evidence of activities, set clear outcomes and timescales.

### **3 WHAT IS A DISABILITY?**

Housing providers tend to concentrate on physical disability and how the use of the home becomes limited. This is very important but not the whole story.

A preferred way of looking at disability is a social model of disability. This argues that people with impairments are disabled by barriers that exist in society. If people with impairments are to be enabled to participate fully in mainstream society, the way society is organised has to be changed. Barriers include the physical environment, organisational procedures, discrimination, stereotypes, inaccessible information and inaccessible transport.

This approach in many ways sound obvious but is a good model for an organisation to consider how all its activities impacts on all people. It prevents the approach of treating disability in the small pigeon hole of "special needs". As an example, we could just level provide thresholds on our new doors for people with "special needs". By fitting them to all doors allows people in wheelchairs to visit neighbours and makes life easier for all (eg. to wheel in a heavy child buggy).

### **4 WHAT DO WE KNOW ABOUT OUR DISABLED TENANTS?**

Tenants and Homes

There are two main influences on New Charter that make the issue of disability more important in our stock than in the wider population.

Social housing has a higher percentage of disabled households than the wider population. LSVT stock tends to have less "disabled friendly" housing than other RSLs.

In Tameside the 2001 Census reports that 21% of the population say they have a long term limiting illness. Most cite mobility as the

main problem. We have measured disability in our population for the last seven years through the tenants' satisfaction survey. In 2001 48% of our tenants said that they had a disability (includes 6% who were wheelchair users).

The fact that we have over double the level of disability compared to the local population is not surprising. Disability relates strongly to income and wealth, and most disabled people very limited choices of tenure. Disability also has a strong correlation to age. We house proportionately more elderly people than the wider population. Our figures are not surprising when compared nationally. RSLs have 42% of tenants saying they are disabled (again 6% wheelchair use).

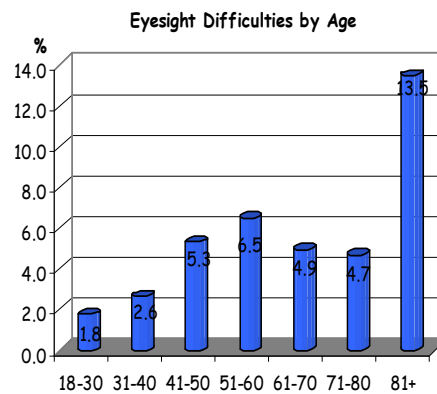
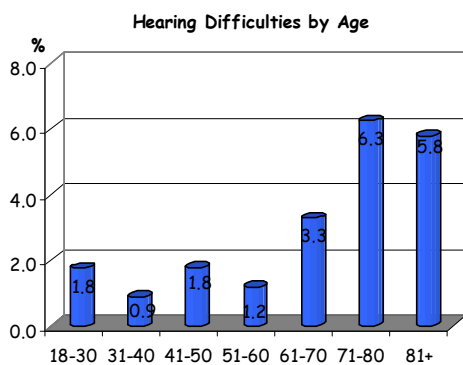
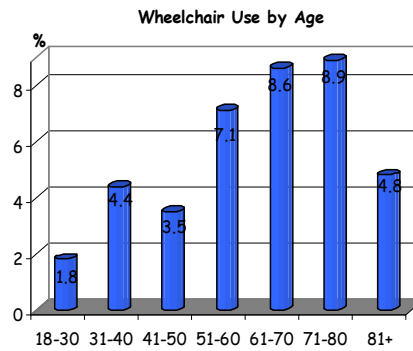
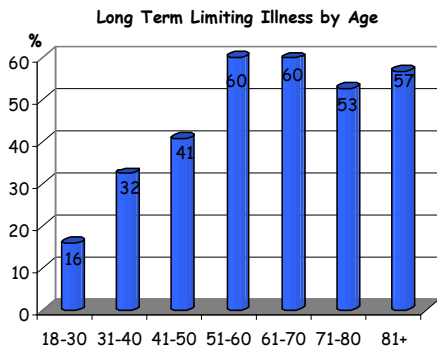
What is of further concern is that year on year our figures are rising. By the time of our 2007 survey 51% of our tenants say they have a disability (wheelchair use now at 7%). There has been a corresponding rise in the 60+ years old population, increasing from 47% of households in 2001 to 51% now.

The stock was developed at a time when physical disability was given little consideration in design. Much of our stock built for elderly has reasonable access standards (particularly sheltered housing). However, this amounts to no more than 1200 units. About 7000 of our households are elderly. We have built some "wheelchair accessible" housing recently but even at a best guess we have less than 100 units in the whole stock. At 7% of tenants as wheelchair uses, this means we have over 1000 households in wheelchairs.

This is not unusual in a LSVT stock where most homes are over fifty years old. Other RSLs have more recently built homes where mixes included more disabled housing. The point is that for our developments new build mixes have to have greater than 7% of wheelchair units if we are to catch up.

The other disability issue particularly around an older population is that of communications. We have higher levels of tenants with hearing and sight difficulties than the general population.

These characteristics in our tenant population are shown below (Source: 2007 New Charter Tenants Survey):



For Aksa's housing stock is position is slightly different. On the whole the stock is newer, has often been Housing Corporation grant funded, and because of this has been built to a standard that better copes with disability. The most recent stock has been built to Lifetime Homes standard allowing for easy adaptation. However, some of the stock are terraced house rehabs and these are particularly difficult to adapt.

Despite a younger age profile the Akxa tenant population still has a relatively high level of disability. From the 2007 survey 48% of tenants said that they had some disability which limited the full use of their home. Of these 6% said that they were wheelchair users. The case for more wheelchair and Lifetime Home housing for Akxa tenants remains strong.

#### Staff and Board Members

Less than 1% of New Charter/Akxa staff report that they have a disability. The national average for RSLs is 2%. For the whole national working population 9% say they have a disability. Clearly disabled people are under represented in New Charter's workforce.

The same situation exists at the Board level. The Housing Corporation is looking to RSLs about how they are going to address this issue.

The surveys and data above provide just an overview. Much more information gathering is needed for a robust DES. A major gap in our knowledge is the mismatch between disabled households and adapted housing. How many of our homes fail to meet the needs of the current disabled people living in them?

## 5 WHAT WE DO NOW

There is much variety in the relationships between Councils and RSLs in the administration of adaptations. Much of the activity listed below relates to New Charter. There are strong similarities with Aska's working but the detail does vary Borough by Borough. However, issues of employment, governance, and customer service are common across the Group. Additional detail about Aksa's activities are listed in the Action Plan.

### 5a ASSET MANAGEMENT

**Investment Programme:** Providing full wheelchair access in existing property is often extremely difficult. However, we do provide choice and minor modifications in our refurbishment programme which help to make our homes more disabled friendly. These have been well researched and agreed with the Council's Disability Service. For bathrooms we offer lever tap choices which are easier to use. Bath designs allow for the easy fitting of bath seats. If the tenant is currently on the Council's list for bathroom adaptations (ie mostly for a level access shower) and we about to fit a new bathroom, we transfer the money we would have spent to the Council. A good system of liaison works here. It prevents baths being fitted that cannot be used and helps the Council financially for adaptations.

For kitchens lever taps are again offered. A wide choice of cupboard handles is offered, which allow for easy grip. For our doors and windows we also seek to make them easy for all. Consideration is given to how window openers are hung to give lower level access to the opening handles and make them easy to clean from the inside. For front doors larger, easier to open handles can be fitted, Identislots and lower level spyholes provided. Level or very low thresholds are fitted wherever possible.

Environmental works make a very positive contribution to improving access for disabled people to their homes. Many of our blocks of

flats have predominantly elderly people. If an adaptation is required for an individual, Social Services can undertake works internally but under grant rules are not allowed to provide external ramping (because the ramps benefit several households). In these cases New Charter has been ramping blocks to provide level access for all.

**New Build:** For all our newbuild we employ Lifetime Home standards. This includes all the above features but also several others which make a home more friendly for all disabled people and easy to adapt for wheelchair use. (eg all electrical sockets are higher and switches lower; a downstairs toilet with provision for a shower; space to allow for the easy installation of a vertical lift; wider hallways and door sets; level access inside and outside, etc). New Charter to date has built about 50 such units.

The next standard is fully **wheelchair accessible** housing. As New Charter we have now completed 10 of these units. A further 25 are currently under construction. This standard allows for a wheelchair user to fully access all the home. Effectively this means good design, generous space standards, level access throughout, a large bathroom with level access shower, wiring layouts to allow for extra medical equipment, etc.

For recent new developments about 20% of the mixes have on average been for wheelchair use. This exceeds average requirement of the population, but is needed to help build up our wheelchair stock. We are still very short of wheelchair homes and there is absolutely no danger of supply exceeding demand.

**Disabled Facilities Grants (DFG):** Many adaptations on our stock are undertaken via DFGs. New Charter has a close and practical working relationship with the local Council's Occupational Therapists (OT) and specialist DFG building surveyors. For minor adaptations (eg grab rails, key safes, ramps, etc) work is undertaken directly by the Council and billed to New Charter. These do not qualify for DFGs and New Charter pays. This provides a simple, easy to use service for New Charter tenants.

Larger adaptations (eg stairlifts, level access showers, extensions, etc) are funded by DFGs. The financial limit of DFGs is currently £25k. Where a large extension is needed costs often exceed this limit. New Charter has sought to work with the Council to overcome this obstacle. Firstly, such DFGs have been switched to "landlord applications". This means New Charter has to top up any grant shortfall but more importantly has more say in the final product. For example, the needs of a disabled person could be met with a vertical lift, but an extension would be much more desirable

long term. A DFG will only pay for a lift, topping up a DFG can provide a better result for the tenant, and for the stock long term.

We have used DFGs to build extensions, part fund newbuild solutions and help redevelop old prefabs. In several cases we have identified void property with the potential of making good disabled housing by adding extensions. Five families have been helped in this way by moving them from property which could never be adapted sufficiently well and into nearby property specifically extended/adapted for their needs.

**Sheltered Housing:** The improvement of sheltered housing has been a priority within our improvement programme. Lifts have been installed in all schemes; level or low threshold showers have been installed in all locations where possible; sensory impairment improvements (contrasting colours, induction loops, etc) have been made. Communal areas within schemes still probably need further improvement to meet DDA requirements. DDA audits are ongoing for all our public areas of our buildings.

## 5b CUSTOMER SERVICES

**Customer Contact:** About 80% of customer transactions take place on the telephone, the remainder via our network of shops/offices. Mini-com is available for telephone communication, and the most common communication (repairs requests) can be conducted on-line or via email. Induction loops are installed in most of our shops and signing staff are available. All the shops can be accessed by people with wheelchairs, but some locations have limitations for disabled staff. We also have several small neighbourhood premises converted from flats and houses. Due to their construction full wheelchair access is extremely difficult to achieve.

We have a rent and council tax collection service for housebound and/or elderly tenants. We also offer this service if someone has a temporary disability (broken leg/illness).

**Lettings:** A database has now been created of all properties where significant adaptations exist (eg level access showers, lifts, extensions). This allows them to be matched to future disabled tenants who need them most. Such property are excluded from choice based lettings and offered to the Council's Occupational Therapists for potential customers.

**Tenancy Information:** A sound knowledge of individual tenants attributes is essential if all needs can be met when tenants contact us. A database of needs/attributes is gradually being developed. This includes language needs, hearing/sight difficulties, wheelchair

use, etc. Such data are currently being collected for new tenants and in time will be gathered for existing tenants. This will allow staff to better target general communications (eg audio newsletters) and be aware of any special requirements before visiting a tenant. Audio newsletters are currently produced employing a local blind person and volunteer staff readers. Braille versions and large text letters and documents are produced on request.

#### 5c EMPLOYMENT AND GOVERNANCE

The Group has devised and implemented an Equal Opportunities Policy providing access to work opportunities from all groups on an equal basis. This policy is monitored on a regular frequency and adjustments to practice are instigated in line with continuing developments in legislation.

From a governance perspective the board has, as part of its adherence to regulatory requirements and the NHF Code of Governance, implemented targets to achieve appropriate representation from community groups at all levels of input into governance activity. This is an ongoing process and, again, is monitored regularly.

#### 5d ENABLING ROLE

At the policy level regular disability liaison meetings are held between New Charter and the Council's Housing Strategy Team. These allow accurate mapping of the scale and distribution of problems. This information informs policy via the various subject based arms of the Local Strategic Partnership. Over the years several initiatives have emerged via this relationship: landlord DFGs, voids identified for adaptation; register of major adaptations; coordination of New Charter improvement works with adaptations.

At the practical level there are long standing arrangements between New Charter and Council adaptations staff. This allows for smaller works to be organised swiftly without inconveniencing tenants.

### 6 WHAT NEEDS TO BE DONE IN THE FUTURE

Whilst we already do much in this field it is clear that more can be done. These activities will form the basis of our three year action plan which is attached.

**Increase Supply:** From the above supply/demand analysis it is obvious that there remains a shortage of disabled units in our stock. All newbuild mixes need to include an above average level of homes for wheelchair use. All newbuild should be to Lifetime homes standard. Where we are undertaking major scheme remodelling (eg

sheltered schemes) disabled access needs to be included. The joint funding of large extensions between the Council and New Charter remains an issue. A new funding formula needs to be found to complete more major adaptations.

**Consultation:** More needs to be done to consult with and involve disabled people. This applies to general policy, surveying attitudes of tenants in existing newbuild and adapted housing, and to assessing the impact of our services on disabled people.

It is intended that this report is a starting point for discussions with disabled tenants and disability groups. Consultations need to be held with Aksa and New Charter tenants. The DES and Action Plan will evolve and change as a result of this consultation.

**Review:** We need to review all our forms of communication with tenants and test if they are fully inclusive. DDA audits are required for all our building with public access and a longer term programme of improvements prepared.

## 7 ACTION PLAN

Theme	Action	Lead Officer	Target Date	Progress
Asset Man	All newbuild to Lifetime Homes standard	KM	2007	Done
Asset Man	Achieve 10% of newbuild mixes to wheelchair standard	KM	2007	Done
Asset Man	Review resources level for minor adaptation works	SN	2008	Linked to wider review of DDA compliance and role of NCHT & the partnership with TMBC
Asset Man	Explore new method to find extensions >£25k DFG limit	KM	2007	Agreement reached with Tameside Council to joint fund costs over £25k.

Asset Man	Review product range used on improvement schemes for disability friendliness	DJ	2008	This will be a continual process (undertaken on an ad-hoc basis previously). Will initiate annual review from 2008 which will be formally recorded and documented.
Customer Service	DDA audits for all sheltered schemes	DG	2007	Currently in progress. Will be completed by Paul Crosbie (Health & Safety) by end of December.
Customer Service	DDA audits for all shops and offices	SP	2008	<p>Shop refurbishments under way with a completion date of March 2008.</p> <p>All possible DDA improvements have been considered and implemented and a full audit will take place in March 2008.</p> <p>The customer service team are working closely with all other stream to ensure we have consistency with regard to DDA .</p>
Customer Service	Impact assessment of financial inclusion policies on disabled people	JV		<p>W Welfare Benefit Advisor in post. Caseload to be analysed.</p> <p>Working partnership with MiNT established. Access to Hardship Funds to be assessed.</p> <p>FI residents group to</p>

				be established
Customer Service	Expand customer profile data collection to include existing tenants	SC	2007	Equality & diversity employee forum established, NMOs to help identify existing tenants for database.
Customer Service	All customer satisfaction surveys to include assessment of disability	KM	2007	Done
Customer Service	Instigate consultation process with disabled groups	LH	2007	Partnership in Tameside Disability group established. Annual disability conference held at NCHT in Sept 2007. Partners included TMBC, T3SC, Tameside PCT, GMPTE, Social Services, Connexions
Customer Service	Establish Disability Focus Group	LH	2008	Focus group opportunity to be advertised via next New Charter Newsletter, to provide opportunity for all to be involved.
Customer Service	Accessibility functions for NCHT web site similar to BBC site. ie large text, variable display settings, audio content.	AC	2008	Whole site to be rewritten DDA compliant and then tested by external validator to confirm compliance
Customer	Review all printed and published output	DAR	2008	Commenced with language review

Service	for availability in Braille, audio and large text. Further review for use of plain English, quality and clarity.			completed Nov 07. Braille and audip supplier already in place. Large text to commence with reprints and new material Dec 07. All corporate customer literature already reviewed. Lower key material eg letters to be covered.
Customer Service	Review repair reporting access arrangements and priorities for disabled people.	SN	2008	Working group established to review 'Customer Profile Data' and how it should be used, under the leadership of Tony Powell
Customer Service	Impact assessment of ASB and harassment policies for disabled people	SH	2008	
Customer Service	Review of accessibility for choice based lettings. ie weekly adverts available in all formats.	LS	2008	
Customer Service	Assess availability of services through mystery shopping with disabled people.	LH	2009	To be developed once wider trails in mystery shopping completed.
Employment	Evaluate extent that current disabled employees represent local community.	GS	2007	Tameside has very high number of disabled people at nearly 8%. 2.65% of the New Charter workforce have a

				disability known to the HR Team.
Employment	Examine current recruitment processes to ensure accessibility by disabled people.	GS	2007	Review has commenced. Needs to include views of focus group.
Employment	Monitor internal processes for equality & diversity in respect of disabled – e.g. numbers applied/ successful, significantly higher / exceptional ratings, flexible working requests, access to training opportunities.	GS	2007	Robust monitoring processes in place.
Employment	Examine reasonable adjustments already put in place for disabled employees and review effectiveness.	GS	2007	Review is currently underway led by HR and line manager.
Employment	Consider positive action approach on recruitment to encourage greater self declaration.  Consider advertising in specialist disability press.	GS GS	2008  2007/08	Will form part of HR focus on disability in the 2008 operational plan.  Advertising in Remploy handbook Jan 08
Employment	Set up focus group on disability (part of a wider Equality & Diversity Group)	GS	2007/08	Will form part of the HR focus on disability in the 2008 operational plan.

Employment	Consult and liaise with trade unions and employee consultation forum on disability issues	GS	2007/08	Will form part of the HR focus on disability in the 2008 operational plan.
Employment	Take part in national "Positive Action for Disability" advisory group funded by the Housing Corporation / co-ordinated by Consult CIH	GS	2007	Commenced June 21 <sup>st</sup> . Feedback provided on web based survey of Housing employers prior to launch. The outcome of the survey revealed preference for a CIH trainee/apprenticeship.
Employment	Review current Equality & Diversity training program.	JB	2007	Under review
Governance		LD		
Aksa	Develop register of all adapted social housing in Oldham	SH	2008	Joint project via OHIP to make better use of existing adapted property.