

Disability Equality Scheme and action plan 2006-09



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Foreword

There are over ten million disabled people in the United Kingdom. The Housing Corporation's ambition is to contribute to creating and sustaining communities that are good to live in and good to work in – an environment that works for all people, not against them. We feel that we have an important contribution to ensuring a society that fully includes disabled people and one that facilitates their equal participation, fulfils an expectation of choice and control and enables independent living.

However, we recognise that we ourselves and others in the housing sector still have much to do in making our vision for disabled people and their housing a reality.

This is our first disability scheme and action plan. We regard it as a dynamic document that we expect to develop further. We will review it each year in the light of evidence of progress and experience. We will continue to involve disabled people in its development and implementation.

We have identified three broad outcomes for disabled people that we intend to achieve:

- making our own services more inclusive to disabled people;
- making housing more accessible to disabled people; and
- making sure we involve disabled people and that outcomes meet their needs and aspirations.

We aim to lead by example, provide support and guidance to the sector, and challenge our own performance.



Jon Rouse
Chief Executive

December 2006

The background to our scheme

The Housing Corporation is committed to equality and diversity for all people and constantly works to ensure that it treats people with respect and delivers services appropriate to individual need. This document will use the definition of disability set out under the provisions of the Disability Discrimination Act 1995.

Legal definition of disability

The Disability Discrimination Act 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.

Further clarification regarding the application and use of the above definition is contained within the annex, on page 14.

Our public duty

From December 2006, along with other public bodies, the Corporation has a statutory public duty to promote disability equality. This scheme sets out how we will fulfil our public duty under the Disability Discrimination Act 2005.

The Disability Discrimination Act requires us, as a public authority, to:

- eliminate discrimination unlawful under the Act;
- eliminate the harassment of disabled people related to their disabilities;

- promote positive attitudes towards disabled people;
- encourage participation by disabled people in public life; and
- take account of disabled people's disabilities, even where that involves treating disabled people more favourably than other people.

Our Disability Equality Scheme is required to set out:

- the way in which we have involved disabled people in its development;
- our methods for assessing the impact of policies and practices on equality for disabled people;
- our arrangements for gathering information about our performance in relation to disability equality and how we will put the information gathered to use; and
- the actions we will take to meet the duty.

This scheme covers our own services, the employment of our staff and our responsibilities as a regulator and investor.

Our own services and employment of our staff We will ensure that in the way we operate our own organisation makes the greatest practicable contribution towards disability equality. Our Disability Equality Scheme therefore covers:

- the services provided by us to those with whom we work, for example in housing

associations, government, voluntary sector and other organisations;

- the few services we provide directly to the public, for example, publications and complaint handling; and
- recruitment, employment and training of our own staff - and the services we provide to them.

In March 2006, 5% of the Corporation's staff said they were disabled. This compares to some 9% of the working population. Two percent of housing association staff say they are disabled, as reported in the 2005 regulatory and statistical return (RSR). Only 50% of disabled people of working age are in employment, compared to 81% of non-disabled people.

Implications for housing associations

Our scheme and action plan will have an impact on housing associations that we fund and regulate. It sets out how we will use our role and powers to influence the work of associations and encourage them to work towards continual improvement in their own performance on disability equality.

We will review our regulatory guidance and Good Practice Notes to make clear our expectation that associations should develop appropriate outcome-based disability equality action plans of their own during 2007, for publication by December 2007.

We will ensure that housing associations meet the needs of disabled communities by incorporating our focus on positive disability outcomes into our regulatory framework. This will require housing

associations to set out their arrangements for meeting the needs of disabled people within action plans and demonstrate how the needs of disabled people have been addressed.

Our role as regulator and investor

As regulator, we will ensure that the sector responds to, and is able to meet the needs of disabled people. We will revise and reissue the Housing Corporation's Good Practice Notes covering all aspects of equalities and diversity, and ensure that commitments to disabled people are overt. We will seek to ensure that housing association asset management strategies explicitly include access to housing for disabled people. We will work with the sector to identify practices that can be adopted to maximise access.

As investor, we will seek to influence regional housing strategies to ensure they consider equality issues, including the needs of disabled groups. And we will make sure that the data we collect through our investment management system enable us to understand better the extent to which the known demand for disabled people's housing is being met.

We are undertaking a review of our own development standards and will explore opportunities to incentivise a significant addition to uptake of homes built to the Lifetime Homes Standard.

Our approach to the scheme

This is our first disability scheme and action plan. It is a dynamic document that we will review each year in the light of progress and experience. We will continue to involve disabled people in its development and implementation. We will develop supporting action plans for all of our functions. We aim for steady, incremental and achievable improvements.

An outcome-based approach

We will concentrate on achieving three outcomes:

- making our own services more inclusive;
- making housing more accessible; and
- making sure that we involve disabled people and that outcomes meet their needs.

Making our own services more inclusive

- Develop a culture at the Housing Corporation that is inclusive and accessible to disabled people;
- Remove barriers to employment for disabled people in the Corporation;
- Aim to ensure that all Housing Corporation information is available and accessible for disabled people;
- Ensure that the Corporation's offices are accessible to disabled people; and
- Ensure that disability and associated action plans are mainstreamed into the Corporation's relevant functions.

Making housing more accessible

- Examine the demand for Lifetime Homes within the sector, assess cost and viability and work in partnership to promote the Lifetime Homes agenda;
- Seek to promote the effective use of housing stock within the sector for disabled people;
- Work with housing associations to consider the needs of disabled people when drawing up plans for the development, maintenance and improvement of stock; and
- Promote the inclusion of equality issues including disability into regional housing strategies.

Making sure we involve disabled people and outcomes meet their needs

- Ensure all major Housing Corporation policies involve disabled people in their development; and
- Involve disabled people in the development of other policy as proportionate and appropriate.

The social model of disability

The Corporation's approach to disability equality is primarily based on the social model of disability. The basis of the social model of disability is that the poverty, disadvantage and social exclusion experienced by many disabled people is not the inevitable result of their impairment or medical conditions, but rather, stems from attitudinal and environmental barriers. Our approach to disability equality aims to achieve the outcomes we want to see by working to dismantle the barriers that disabled people face.

Involvement

We have directly involved disabled people in developing our scheme this far. We will involve disabled people in developing our scheme and actions further.

We have worked closely with our own disabled staff group, which was represented on the management board for the project. We involved range of disabled people from around England in a series of focus groups managed by an external expert in disabled people's housing issues. We asked disabled people to get involved by taking part an e-forum and by completing a questionnaire through our website. Disabled people could take part by telephoning their comments to our external expert. We will review the effectiveness of all these approaches and continue to involve disabled people in the implementation of our scheme.

When we commission new research or good practice about disability issues, we will require contractors to directly involve disabled researchers on their team

Evidence

We will gather and use evidence to give us a clear picture of how we are performing on disability equality and delivering the outcomes in this scheme.

We will continue to gather information through surveys and research. We will work with other agencies where we think that joint data collection will help us to get the evidence we need. To inform and monitor outcomes, we will review the information we have gathered on a regular basis and reflect this back through our policy cycle to make sure that the priorities of disabled people are properly considered.

We will look to collect evidence on specific impairments along the lines proposed by the Disability Rights Commission. The Corporation recognises that, while barriers such as prejudiced attitudes, environmental issues and inflexible procedures will be common experiences for all disabled people, it is often the case that different attitudes or barriers are experienced by people with different impairments. We will therefore also use evidence to consider the experiences according to impairment type. We will work with other organisations to try and achieve some consistency in definitions.

Impact

We will assess the impact of our policies and practices on disabled people.

We have recently developed a new Equality Impact Assessment (EIA) methodology and toolkit to test our major policies. This includes disability impact assessment, alongside other diversity strands such as race, gender, religion, sexuality and age. We have involved disabled people in developing this approach and will continue to engage with them as we apply the methodology.

We expect to be in a position where we can carry out impact assessments as part of our mainstream policy development process.

We will also continue to collect information on the impact of our work on disabled people through research and surveys.

Existing initiatives

We already have a disability policy and strategy as a section of our overall equality and diversity policy.

We recognise equality and diversity issues are integral to our business. We seek to ensure that our policies and procedures take into account the impact they might have on different people and communities, across all strands of equality and diversity. Our current equality and diversity policy was published in June 2003. It contains strategies covering all the main areas of diversity including

disability. It covers all our activities – including not only our employment responsibilities but also our internal services and our investment and regulatory responsibilities.

In 2004, we launched a Disabled Staff Consultation Group – both to support and advise the Corporation and for disabled staff to have the opportunity to share experiences, provide mutual support and develop the potential of all disabled staff.

Also in 2004, we drew up an action plan and started action to bring our own premises, services and employment procedures into line with Disability Discrimination Act standards.

In 2005 we published a draft guide for staff and managers on our services for disabled staff.

From May 2006 all reports to senior management committees and our board have assessed the equality and diversity implications of what is proposed.

In June 2006, the Corporation joined the Employers Forum on Disability

Influencing the sector

There has been a range of achievements in relation to defining and addressing needs in providing support to disabled people and housing associations.

Investment

In 2004-06, 12% of all homes we approved within the National Affordable Housing Programme were wheelchair accessible (rent and sale units).

In 2006-08, we have allocated 9% of all homes within the National Affordable Housing Programme as wheelchair accessible (rent and sale units).

In 2004-06, 19% of all homes we approved within the National Affordable Housing Programme met the Lifetime Homes standard (rent and sale units).

In 2006-08, 24% of all homes within the National Affordable Housing Programme will meet the Lifetime Homes standard (rent and sale units).

Regulation

The Housing Corporation's expectations of housing associations are contained within our Regulatory Code, section 2.7. This states:

"Housing associations must demonstrate, when carrying out all their functions, their commitment to equal opportunity. They must work towards the elimination of discrimination and demonstrate an equitable approach to the rights and responsibilities of all individuals." Governing bodies are required to have "adopted an equalities and diversity policy that covers all aspects of equalities and includes ... disability".

The Housing Corporation publishes Housing Corporation Assessments (HCAs), regulatory

assessments of housing associations. These include statements about associations' equalities and diversity performance. In addition, the sector's performance is monitored by the collection of data in the Regulatory and Statistical Return (RSR) and CORE (data about association lettings).

In March 2004, the Housing Corporation published Good Practice Note 8, Equality and Diversity, setting out expectations of housing associations in this respect

Information, research and good practice
We collect information through the RSR and CORE returns which inform our regulatory planning and assessments.

We have supported a programme of research work on housing and disability issues and commissioned publications, through innovation and good practice funding.

Examples of recent publications which received funding from the Housing Corporation

Level Threshold: Towards Equality in Housing Services for Disabled People: Good Practice Guide, London (2005), National Housing Federation

Living with Physical and Sensory Impairment in Rural Areas: Challenges and Responses, (2005), North Harbour Consulting Ltd

Different Paths: Connecting Services: A Guide to Better Practice in Meeting the Housing Needs of Black and Minority Ethnic Disabled and Disabled

Deaf People, Jabeer Butt and Sukwant Dhaliwal of the Race Equality Unit; London,(2005), the Housing Corporation, Habinteg Housing Association and ASRA Greater London Housing Association. The guide was published together with Different Paths: Challenging Services (a study of the housing experiences of black and minority ethnic disabled and disabled deaf people).

Minor Adaptations Without Delay: A Practical Guide and Technical Specifications for Housing Associations, London (2006), College of Occupational Therapists and the Housing Corporation

The Housing and Support Needs of Adults Aged 18-55 with Impaired Vision, London (2005), Thomas Pocklington Trust, University College London and the Housing Corporation

Opening Doors to Independence (The Contribution of Extra Care Housing to the Care and Support of Older People with Dementia), London (2006), Housing 21 and the Housing Corporation

Statistical information

There are over ten million disabled people in Britain; of which, 4.6 million are over state pension age and 700,000 are children.

Disability increases with age: only 10% of adults aged 16-24 are disabled, while one third of people between the age of 50 and retirement age are disabled.

By 2020, 58% of people over the age of 50 will have a long-term health condition.

The World Health Organisation predicts that depression will be the leading cause of disability by 2020.

In the 2001 census, one in six people in the UK (10.3 million) living in a private household reported having a limiting long-term illness (LLTI).

There was a steady increase in rates of LLTI with age for both males and females. Below age 30, rates were less than 10% but were more than twice this for those aged 45 to 59. Rates virtually doubled again at ages 60 to 74, reaching 41% for men and 38% for women (National statistics census 2001, Focus on Health).

In each age group up to age 59 the differences in rates of LLTI between males and females were minimal, at around one percentage point. However differences between the sexes were greater among people aged 60 and over. In the 60 to 74 age group men had a higher prevalence of LLTI than women; the situation was reversed for those aged 75 and

over, with more women than men reporting an LLTI (National Statistics census 2001, Focus on Health) .

In the 2002-03 Family Resource Survey (ONS), the most common limitation reported by both men and women in Great Britain was mobility, followed by the ability to lift, carry or move objects, and then by manual dexterity. The most common condition was musculoskeletal disorders, followed by heart and circulatory problems and then respiratory diseases.

In 2004-05, 18% of housing associations' new tenancies (all types) in general needs housing was held by households where there was at least one member with a disability.

Wheelchair users in the household were recorded in 3% of new tenancies (Housing Corporation, CORE data 2004-05).

This CORE data covers new tenancies only, so a survey picture of all tenants is also needed from another source. This kind of survey was last carried out for the Corporation for 1999-2000. It showed that 42% of housing association properties housed at least one person with a long-term illness, health problem or disability. This may well include some people beyond the Disability Discrimination Act definition of disability but is indicative of the likely extent of disability among tenants.

The 2003-04 English Housing Survey found that 23% of disabled adults are living in unsuitable housing.

Disabled people are less likely to own their own homes and are twice as likely to be social housing tenants, according to the Disability Rights Commission (Changing Britain for Good).

The meaning of disability

When is a person disabled?

A person has a disability if he or she 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.

What does 'impairment' cover?

It covers physical or mental impairments – this includes sensory impairments, such as those affecting sight or hearing.

Are all mental impairments covered?

The term 'mental impairment' is intended to cover a wide range of impairments relating to mental functioning, including what are often known as learning disabilities.

What is a 'substantial' adverse effect?

A substantial adverse effect is something which is more than a minor or trivial effect. The requirement that an effect must be substantial reflects the general understanding of disability as a limitation going beyond the normal differences in ability which might exist among people.

What is a 'long-term' effect?

A long-term effect of an impairment is one:

- which has lasted at least 12 months;
- where the total period for which it lasts is likely to be at least 12 months; or
- which is likely to last for the rest of the life of the person affected.

Effects which are not long-term would therefore include loss of mobility due to a broken limb which is likely to heal within 12 months and the effects of temporary infections, from which a person would be likely to recover within 12 months.

Annex 1:

The Housing Corporation's disability equality action plan

Outcome area 1 Making our services more inclusive for disabled people					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
Developing a culture at the Housing Corporation that is inclusive and accessible to disabled people	Feedback from external stakeholders and Corporation employees.	Corporation has engaged with some disabled employees via a consultation group to oversee ongoing performance. Nationally, 9% of all employees have identified themselves as disabled.	Information Technology infrastructure.	Maximise the use of IT opportunities to ensure accessibility for disabled people.	March 2007
			Staff awareness of disability issues.	Incorporate disability questions into surveys for employees and external stakeholders.	May 2007
			Physically accessible facilities.	Include disability awareness into Learning and Development programme.	December 2007

Outcome area 1 Making our services more inclusive for disabled people					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
Removing barriers to employment for disabled people in the Corporation	Disability managed through the employment cycle from recruitment to retirement.	Five percent of employees of the Corporation have identified themselves as having a disability.	Employee and public engagement. Lack of knowledge of the Corporation's positive work with disabled people.	Promote disability issues positively at the Corporation and raise barriers some people face via internal communications.	Jan 2007
				Conduct new employee profile exercise.	December 2006
				Develop systems that monitor disability in regard to employment practices.	June 2007
				Work with strategic partners including disabled people to improve employment performance.	December 2009

Outcome area 1 Making our services more inclusive for disabled people					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
Aim to ensure that all Housing Corporation information is available and accessible for disabled people	Knowledge of the nature of communication and publications that are currently not accessible.	Key documents contain equality access strap lines. Majority of publications are available on the Corporation's website.	Costs and proportionality of provision of some services. Limitations of the Corporation's hardware and software.	Evaluate demand and resources required to provide information in accessible formats. Provide specific specialist training to key communication employees.	February 2007 December 2008
	Explore the facilities required to meet the needs of disabled people taking into account other equality strands.	Website meets recognised accessible standard. RNIB consulted during development of formats for website.	Budgetary provisions. Staff knowledge about accessibility issues.	Develop a benchmark for communication and publication material.	November 2007

Outcome area 1 Making our services more inclusive for disabled people					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
Ensuring that the Housing Corporation's Offices are accessible to disabled people	All offices are accessible and have been subject to appropriate disability access audits. Ensure that audits take specific account of hearing, visual, physical, cognitive and other similar impairment or disability.	Information concerning access audits. Building landlords required to ensure that facilities are accessible for disabled people.	Ability to influence current office landlords.	Explore contracts with owner of facilities.	September 2007
			Provisions of public access/transport outside Corporation offices are a barrier.	Develop prerequisite for future procurement of all offices to ensure maximum access for people.	June 2009
			Ability of staff to respond to utilise facilities provided that allow disabled access.	Develop and publish the Corporation's policy for disability access.	April 2007
				Explore gaining disability access standard for offices, such as 'Open for All'.	December 2009

Outcome area 1 Making our services more inclusive for disabled people					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
Ensure that disability and associated action plans are mainstreamed into the Corporation's relevant functions	Disability tasks integrated into operational plans.	Housing Corporation to maintain close links with disabled staff and bodies to raise the profile of its diversity programme.	Competing diversity strands and resources.	Positive promoting of equality and diversity as a business benefit rather than legislative compliance.	August 2007
	Systems that accurately records employment profiles.	Impact Assessment Toolkit can be used for disability issues.	Buy-in of disabled and non-disabled people to an expanding diversity agenda.	Develop a standard employment reporting template and systems.	September 2007
	Executive Management Team to routinely examine disability performance in key areas.		Resources for employees to conduct impact assessments and management of disability issues in employment.	Provide training to key personnel on disability issues for their disciplines.	December 2007
	Learning and Development evidence disability content of course and mainstreaming.		Ability of Executive Management Team and strategic management and personnel to interpret key outcomes in a task oriented manner.	Incorporate disability requirements into the Corporation's regulatory functions.	August 2007
	Communications strategy that overtly recognises barriers for disabled people and takes action to address.				

Outcome area 2 Making housing more accessible					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
Examine the demand for Lifetime Homes within the sector	Information concerning the numbers of building stock that meets Lifetime Homes standards.	New stock that meets Lifetime Homes standards are coded into the Corporation's investment management system as part of overall scheme costs.	Perception that Lifetime Homes are significantly more expensive to develop.	Conduct research working in partnership with key agencies to quantify the cost of producing Lifetime Homes.	December 2007
Work in partnership with key agencies to assess the cost and viability of developing new stock to Lifetime Homes standard.	Research that provides the costs and benefits of building Lifetime Homes.		Lack of accurate data on the cost of Lifetime Homes.	Develop systems that identify Lifetime Homes.	December 2007
To work in partnership with the sector and Government to promote the Lifetime Homes agenda.	Assess Social Housing Grant regime to determine viability for funding Lifetime Homes.		Conflict with the need to build the maximum number of homes for the least cost.	Corporation promotes the financial and moral benefits of Lifetime Homes.	September 2007
	Evidence to ascertain the demand for Lifetime Homes.		To date, no enforceable requirement for sector to produce Lifetime Homes.	Explore the opportunity to require the sector to respond to the Lifetime Homes agenda in the way that EcoHomes are mainstreamed.	December 2007

Outcome area 2 Making housing more accessible					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
The Corporation will seek to make effective use housing stock within the sector for disabled people	Demographic profile of where disabled people are most likely to live.	Limited information identifying location and ownership of stock with adaptations and built to wheelchair standards. No information on subsequent modifications recorded.	Lack of categorisation within the term 'disabled' making efficiency difficult.	Seek to improve the categorisation of disability within RSR, NROSH and other appropriate monitoring systems.	September 2007
	Lettings information for disabled people.	Disability information available from the Office for National Statistics.	Political resistance to developing a proscribed list of kinds of disability.	Consult with key stakeholders and disability groups about monitoring classifications	December 2006
	Stock information that's appropriate for disabled people – adapted property – Lifetime Homes.	Although the Corporation has information about lettings to disabled people the information is not sufficiently detailed.	Lack of systems that record nature of disability and limitations of Regulatory and Statistical Return and NROSH (Elton). No accurate information about the nature of adaptations in stock.	Work in partnership with the Audit Commission to ensure that the Diversity Key Lines of Enquiry (KLOE) requires registered social landlords to record the nature of adaptations.	April 2007

Outcome area 2 Making housing more accessible					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
Consideration is given to the needs of disabled people when drawing up plans for the development/maintenance and improvement of stock	Asset management strategies that identify and address needs of disabled people. Illustrating that disabled people and or specialists with disability knowledge have been engaged.	None to date.	Systems and engagement with suitable stakeholders or professionals as a mainstream function. Resources for the Corporation and the sector.	The Corporation to include disability and asset management within its regulatory functions as an aspect of the diversity programme.	February 2008

Outcome area 2 Making housing more accessible					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
The Corporation to promote the inclusion of equality issues including disability into Regional Housing Strategies	<p>The viability and demand required by current and future disabled people.</p> <p>Illustration that a strategic objective concerning equality has resulted in a task-oriented approach.</p>	Current Regional Housing Strategies includes some detail and signposting of existing evidence.	<p>Conflicting priorities and resources between the Corporation and Government.</p> <p>The Corporation's ability to influence Regional Assemblies.</p> <p>Conflicting equalities agenda and legislative requirements make a specific disability provision unlikely.</p> <p>Lack of understanding by key decision makers about the importance of disability being included into the Regional Housing Strategies.</p>	Corporation to work with Government agencies and departments to promote the inclusion of diversity considerations to Regional Housing Strategies.	December 2009

Outcome area 2 Making housing more accessible					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
The Corporation to promote the inclusion of equality issues including disability into Regional Housing strategies.	The viability and demand required by current and future disabled people.	Current Regional Housing Strategies includes some detail and signposting of existing evidence.	Value for money considerations may make acceptance of disability by Regional Housing Strategies less attractive. Because no equality indicators are overtly contained within Regional Housing Strategies assessing impact is difficult.	Identify and develop an ongoing evaluation of the impact of Regional Housing Strategies for disabled people.	February 2009
	Illustration that a strategic objective concerning equality has resulted in a task-oriented approach. Equality indicators to evaluate impact of strategy on disabled people.			Housing Corporation to use its influence with Regional Assemblies and regional housing providers to mainstream disability.	September 2009

Outcome area 3 Making sure we involve disabled people and that our outcomes meet their needs					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
All major Housing Corporation policies will be produced with the involvement of disabled people	Completed Impact Assessment Performa. A programme of future and retrospective policy assessment determined by relevance and resources.	Research and skills of policy writers determine likely policy impact. However, Equality Impact Assessments will formally detail how this is done and mainstream disability considerations.	Skills and knowledge of policy writers to complete impact assessments.	Roll out training and guidance to staff on Equality Impact Assessments.	March 2007
			Cultural change requiring impact assessments to be conducted.	Insert a requirement in all policies that a sign off is needed on an Equality Impact Assessment having been conducted for disability.	April 2007
			In some cases there will be data gaps that prevent comprehensive assessment of impact in the first instance.	Identify and remedy disability data gaps to enable the evaluation of performance.	June 2007

Outcome area 3 Making sure we involve disabled people and that our outcomes meet their needs					
	Evidence required	Evidence owned	Barriers	Tasks	Timing
The Housing Corporation will involve disabled people in the development of policy as proportionate and appropriate	Involvement will be contained within the impact assessment toolkit.	Research illustrating the barriers, needs and aspirations of disabled people.	Policy development timescales will become more protracted due to the requirement to consult formally with disabled people.	Work with other agencies to create useful consultation boards or processes with disabled people.	August 2007
	The assessment of proportionality will generally require all major strategic policy to involve disabled people.	The ongoing assessment of the impact of policy for disabled people will provide and increased evidence base.	Relationships with external disabled people may take time to establish.	Communicate positive impact of engagement to disabled people to maintain interest.	August 2007
	In some cases those with differing disabilities will be engaged as deemed appropriate.		Disabled people may become fatigued by consultation exercises.	Ensure systems for collection are consistent and necessary.	December 2007
			Changing data collection methods and systems may be problematic and difficult to mainstream.		
			Developing a culture of impact assessment.		

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We can provide copies in large print, Braille and audio cassette, on request. Other language versions may also be available.

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This is the Housing Corporation's first disability scheme and action plan. It sets out what we will do to make our own services more inclusive to disabled people and how we will work to make housing more accessible to disabled people. It also sets out how we will involve disabled people in our work.

