



Response to DRC Consultation on Draft Code of Practice: Public Duty on Disability.

Generally, the Forum's contact with people in the Highlands & Islands has highlighted that the positive duty towards disability is welcomed and that a code of practice is a useful guide to shareholders. Disappointment was voiced by many who felt that a public consultation event should have taken place in Inverness. Not everyone we contacted was able to commit the time to read the full document, so HIEF asked its members to consider three key questions regarding the DRC's draft code of practice. The following is a collation of the responses received. Some members are making independent responses directly to the DRC.

Q1: The code of practice requires public authorities to involve disabled people in the formation of their policies and practices. How can they do this? In particular, how can they ensure they are reaching groups and individuals beyond the established core of advisory groups?

- They should include representatives of the disabled community within the established core of advisory groups. They can consult with the various disabled groups who access their services.
- Senior managers could gain better understanding by committing to a series of meetings with people in their community who have a range of impairments. Real understanding at this level would bring the buy-in to feed down to the whole organisation
- Bring in disabled people to run staff awareness-training
- Place comments forms etc in various locations visited by a cross-section of the general public (educate public what 'disability' means) so that new voices might be heard
- Carry out awareness-raising in schools – kids will go home and tell disabled family members to speak up/get involved
- Consider 'phone-in' sessions – either directly or via local radio
- Consideration should also be given to the carers of disabled people – they should also be asked for their comments as they will have a wealth of hands-on knowledge that would help form policy

Q2: The code of practice requires public authorities to assess the impact of their services on disabled people. How can they do this? In particular, what areas do you think they should consider as the most important to impact assess?

- They should initially define the impacts required, identify which are more crucial to the progress, lifestyle, and needs of the individual and then follow up to chart achievement of success.
- Need to assess impact of geographical/rural barriers to ensure that public services work to overcome them. Find out if electronic communication would help to avoid transport problems. Clearly in the Highlands the large area and poor public transport already put disabled people at a disadvantage. The cost of public transport for those who have no other way of getting to where public authorities offer their services can be a real issue – thought should be given to alternative ways of delivering these services.
- Useful to learn about the range and diversity of impairments and the effects they have on people – are there, for instance inequalities of treatment within the range of disabilities? Are different age groups and those facing multiple discrimination having a harder time? Do those with mental health issues feel they get a poorer service than those with mobility problems?
- Useful for public bodies to use their contact with the public to create forums which give a place to air the real barriers faced by the populace. Anonymous/electronic ways of doing this would ensure that true messages are heard.
- Need to assess what formats should be used in dissemination of information – including signage in customer contact points – and then provide as a matter of course in every department

Q3: The code of practice requires public authorities to monitor and evaluate their policies and practices. How should they do this? What would it be useful to learn about? How can they get beyond a 'tick box' approach and what mechanisms would you advise them to consider using?

- To monitor their policies and practice means a continual review of service delivery and use of consultation/focus groups etc to listen to the experience of the users.
- Large organisations should collate departmental information that highlights specific needs. For example, barriers to education may be different to those seeking a house to rent.
- Learning from monitoring and evaluation should be fed back into training programmes and better awareness in all customer contact points.
- The Highlands & Islands would benefit from the use of Internet Technology to overcome the barriers of geography which seriously compound the difficulties for disabled people. One idea might be an online forum to take feedback that 'temperature checks' what the public feel about various services. Complaints could also be dealt with in this way with guaranteed

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rapid responses from a well-qualified moderator – (possible solutions being given likelihood scores) – to give some idea of timescales of solutions.

Finally, some general comments:

- Get rid of the wheelchair symbol or find some other way of getting across that disability is wider than mobility impairment.
- At the end of the day we all recognise that public bodies do not have an expanding wallet. They have to provide facilities for the whole of the population and the positive measures to improve service to people with disabilities cannot lead to a degeneration of standard of service to the whole. Would it not make sense, therefore, to maximise the benefits of new practice in a joined-up approach? This should be possible in the Highlands where the agencies do have good interaction with each other. Instead of each working separately to form their policy, could they work together and then share their feedback to improve things quicker and more effectively? Many members of the community will deal with several agencies over the one issue and it would be impressively forward thinking to put in place a way of working together.