



DISABILITY EQUALITY POLICY



December 2007

DISABILITY EQUALITY SCHEME

1 Introduction

- 1.1 Cosmopolitan Housing Group is committed to members of the diverse communities who are employed, who receive services and who are otherwise impacted upon by our activities.
- 1.2 These commitments are set out in general terms within the Group's Equality and Diversity Strategy. It is within this Strategy that the Group acknowledges its moral and service-led obligations to respond to and meet the social diversity that exists within our society. The Group has a duty to promote a culture of community cohesion and celebrate difference. In addition, we have a legal and regulatory responsibility to promote equality of opportunity in all our activities.
- 1.3 The document has been produced, in consultation with customers and stakeholders, to set out the Group's approach to achieving disability equality across the full range of the Group's activities. This includes customers, employees, governance and contractors. It sits within the Group's overall Equality and Diversity Strategy.

2 Approach to Disability Equality

- 2.1 This is the Group's first Disability Equality Policy. It is situated within the Group's overall Equality and Diversity Strategy and incorporates a more detailed Disability Equality Action Plan. It is intended to set out how the Group will structure and co-ordinate its activities in order to achieve disability equality.
- 2.2 The scheme will be a "live" one. It will be monitored by the Group's Continuous Improvement Group (CIG) on a quarterly basis and reported to the Group's Parent Board of Management after 6 months initially, and then annually thereafter. It will also be subject to regular review and engagement with disabled persons in accordance with best practice principles which highlight how an equality scheme needs to be developed with disabled persons engaged in the process.
- 2.3 A further crucial element of the new Disability Equality Scheme is an acknowledgement of the need to treat disabled people *more* favourably when this will achieve a more equal outcome. It is therefore essential that this scheme is owned by its customers and its staff. It is part of the Group's wider commitment to Equality and Diversity, and to drive forward these commitments it is acknowledged that an Equality Working Group is required to promote engagement with this agenda and drive through the Group's commitment to positive change.
- 2.4 Whilst much has been achieved by the Group in the arena of Equality and Diversity more generally, the Group welcomes the requirements to produce a Disability

Equality Scheme as an opportunity to focus attention on meeting the needs of disabled persons and engaging them in future developments.

2.5 This Disability Equality Scheme will therefore focus on four key areas, as follows:

- *Customer Services* – This relates to the services provided by all aspects of the Group’s activities to its customers / persons external to the Group.
- *Asset Management* – This relates to the development of new properties, from project inception to completion, as well as to repairs, maintenance and improvements.
- *Employment* – This relates to how the Group caters for the needs of its disabled staff and how we engage with disabled persons to ensure they are fully equipped and supported to undertake their duties.
- *Governance* – This relates to how the Group caters for the needs of its disabled Board Members and ensures that there is strong governance arrangements in place to assess the Group’s consideration of disability related issues.

2.6 Finally, it should be noted that the Group’s approach to Disability Equality is not just concerned with meeting the needs of particular individuals. Whilst this is a given, the discourse has moved beyond this, and the Group has recognised that it must provide services that promote equality of experience for all disabled persons, be they employees or customers, and that the Group must adopt a proactive approach to achieving this goal.

2.7 A key shift in the Group’s approach to Disability Equality specifically, and to Equality and Diversity more generally, is that it recognises that the agenda is not about meeting the needs of minority groups. When taking account of the plethora of groups that are affected by the agenda, including race, culture, age, gender, disability, and sexual orientation, there are few people who do not fall into one of these groups. As a consequence, this is a discourse that is concerned with meeting the needs of the “majority”, and when viewed in these terms, there are also strong business imperatives for embracing this agenda, in addition to the moral, social and legal obligations that exist.

3 Policy Statement

3.1 Cosmopolitan Housing Group is committed to promoting and upholding the principles of disability equality in all the business activities in which it engages, including customer services, asset management, employment, and governance practice in order to bring about an equal housing experience for disabled persons in everything that the Group does.

4 Policy Aims

4.1 Through the implementation of this Disability Equality Scheme, the Group aims for the following:

- Ensure that the needs of disabled persons are integrated into the decision-making processes of the Group, including the development and delivery of the commitments set out in this Disability Equality Scheme.
- Set out through this policy and an Action Plan, specifically how the Group will proactively meet the needs of the disabled persons it serves or employs and improve the experience they have when they have contact with the Group in whatever capacity that may be.
- Ensure that the Group complies with its legal and regulatory obligations.

5 Policy Objectives

5.1 There are four objectives that the Group intends this Disability Equality Scheme to achieve. They are set out as follows:

- Improve the services and / or employment experience for all disabled persons to ensure that they receive an equal or better experience when they have contact with the Group.
- Raise awareness of the needs of disabled persons and promote services that meet their needs, even where this may require more favourable treatment in order to achieve a more equal outcome.
- Seek to actively discourage and eliminate discrimination and harassment of disabled persons.
- Provide opportunities for disabled persons to actively engage in and influence decision-making so that they may shape the type and standards of services delivered by the Group.

6 Defining Disability

6.1 The definition of ‘disability’ is enshrined in legislation. The Disability Discrimination Act (DDA) defines someone as disabled if they have a

‘disability or long term health condition that has an impact on their day to day lives’.

- 6.2 The DDA has adopted a broad definition of disability. It covers people who have diabetes, multiple sclerosis, people living with HIV and AIDS, learning disabled people, survivors of the mental health system; people with heart conditions; people who are deaf or have a hearing impairment.
- 6.3 Whilst this definition has been criticised by some as being overly focused upon medical definitions of disability, the Group considers this definition to be a useful baseline. It challenges traditional perceptions of disability and enshrines basic rights for a much broader range group of persons. Indeed, it provides protection to persons who may not themselves consider themselves to be disabled.

7 Social Model of Disability

7.1 Whilst the legal definition of disability provides a useful baseline, the Group has adopted an interpretation of disability that accords with the social model of disability.

7.2 The rationale for this approach is highlighted by the Disability Rights Commission's Code of Practice in which they state how:

'At present disabled people do not have the same opportunities or choices as non-disabled people. Nor do they enjoy equal respect or full inclusion in society on an equal basis. The poverty, disadvantage and social exclusion experienced by many disabled people are not the inevitable result of their impairments or medical conditions, but rather stem from attitudinal and environmental barriers. This is known as 'the social model of disability', and provides a basis for the successful implementation of the duty to promote disability equality.' (Para 1.6)

7.3 In essence, this approach recognises that the social exclusion or disadvantage experienced by a person with a disability is not a natural consequence of their impairment or medical condition, but that they are impaired by the barriers created within society which prevents them from full participation in cultural, social or economic activities.

7.4 Through proactively working to remove these barriers, either through physical alterations or challenging perceptions and approaches, the Group intends to bring about increased equality of outcomes for disabled people.

8 Legal and Regulatory Context

8.1 The Disability Discrimination Act 2005 amended the Disability Discrimination Act 1995 (the Act) to place a duty on public sector bodies to promote disability

equality. In the ‘general duty’ public authorities, in carrying out their ‘functions’, are required to have due regard to the need to:

- 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.

8.2 The requirement to produce a Disability Equality Scheme (DES) is also introduced in the Act, and forms part of the ‘specific duty’ placed on certain public sector organisations named in the Disability Discrimination (Public Authorities) (Statutory Duties) Regulations 2005 (the Regulations). According to the Disability Rights Commission, the ‘specific duty’ placed upon public authorities is a means of these bodies meeting the various elements of the general duty.

8.3 Whilst housing associations do not directly fall within the definition of a public authority, the Housing Corporation as principal regulators do fall within the scope of a public authority and they are seeking to pass these obligations on to the associations that they regulate. This is made explicit by the Housing Corporation within its *Disability Equality Scheme and Action Plan 2006 –09* in which they state that housing associations should develop appropriate outcome-based disability equality action plans of their own for publication by December 2007.

8.4 Further guidance has been produced for housing associations by the Disability Rights Commission to assist with developing disability equality action plans. This states that:

‘The action plan should be aimed at making practical improvements to equality for disabled people and will be informed by the involvement of disabled people in its production. It is recommended that housing organisations set specific targets in key employment or service delivery areas on which it can readily measure its performance.’

8.5 The requirements for a DES are broadly similar to those placed on local authorities for Race Equality Schemes. However, there is an important difference in that there is an explicit requirement to involve disabled people in the development of the DES.

8.6 In addition to the above requirements, housing associations are also expected to comply with the standards set out in the Audit Commission’s *Key Lines of Enquiry* (KLOE). This contains standards in relation to the broader diversity agenda. Whilst it is also a cross-cutting theme, there is particular application of KLOE 31 on Diversity. This has underpinned the development of the Group’s Equality and Diversity Strategy. A self-assessment against this KLOE has been undertaken and discussed with tenants prior to the adoption of related Diversity Action Plans. The

Group has already therefore adopted the core principle of working towards ensuring that it offers services and employment that is equal and diverse to all.

9 Developing Disability Equality Scheme

9.1 The production of this Disability Equality Scheme is within the Group's broader Equality and Diversity Strategy and Action Plan Framework. Indeed, the production of this scheme was a specific action identified within the broader Action Plan.

9.2 As a consequence, this Scheme is an extension of the Group's strategic stance and activities already undertaken within this agenda. The Group acknowledges that it is only possible to develop priorities for action through engagement with disabled staff and service users. This is already part of the Group's on-going activities in this area and a wealth of information has already been collated. However, it is acknowledged that further and continuous feedback is required in order for the Scheme to operate effectively and remain relevant and in line with the needs and aspirations of the disabled people that the Group serves.

9.3 Examples of information and exercises undertaken to collate relevant information include the following:

- Discussions in relation to Disability Equality with the Association's Tenants Forum.
- Disability Equality Survey to obtain a broader range of feedback in relation to the needs of disabled customers, staff, Board Members and other stakeholders. This is an open survey that is available on the CHG and CHA websites as well as the internal staff Intranet.
- A STATUS Survey was undertaken by the Association in 2006. Some key highlights from this survey include the following:
 - 43% of CHA tenants' households contain somebody who has a longstanding illness, disability or infirmity.
 - 87% of tenants who indicated that they had an illness or disability highlighted that this limited their activities in some way.
 - 6% of CHA households contain someone who uses a wheelchair.
 - 15% of CHA tenants' homes have been specially adapted for the needs of a person with a long term illness, disability or infirmity.

- A further 8% feel that their home needs adapting or adapting further to meet needs of a person with a long term illness, disability or infirmity.
- Tenants with a disability, illness or infirmity demonstrated no significant difference in overall satisfaction levels with Cosmopolitan Housing Association as a landlord compared to the sample as a whole (81% versus 81%)
- A Tenant Census has been undertaken to collate details about the needs of CHA's tenants. This includes details specific to persons with long term illness and disability. This information allows CHA to proactively identify the needs of disabled persons and provide services that meet these needs accordingly.
- Development based survey information to gather information on the design and layout of new properties.
- Feedback received from tenants who are awaiting or who have received Aids and Adaptations from CHA.
- Monitoring of complaints satisfaction levels with regards to disability.

10 Challenges

10.1 The Group has faced a number of challenges in the creation of its Disability Equality Scheme. This means that the level of engagement with disabled persons is not as extensive as the Group would have wished. Some challenges have included the following:

- Limited timescales for scheme completion.
- Limited number of staff and groups of disabled persons for the Group to engage with.
- Difficulties in engaging with groups with certain disabilities (e.g. mental illness; learning difficulties;).
- Complications with identifying disabled persons, including those persons who do not wish to classify themselves as disabled.

10.2 A key priority for action for the Group in moving forward is therefore to extend the scope and range of disabled persons that are engaged in influencing the Group's Disability Equality Scheme and shaping the services and activities undertaken by the Group.

11 Disability Equality Scheme – Focus Areas

Customer Services

The priority areas addressed within this Policy may be outlined as follows:

Overall Satisfaction

- Overall satisfaction levels of disabled persons are already addressed as part of the Group's STATUS surveys. These are carried out on a 3 yearly basis and are used to inform service reviews and improvement priorities. Existing results show that satisfaction levels amongst disabled persons is as high as that amongst non-disabled persons. However, this category shall remain as part of future STATUS surveys to ensure that satisfaction levels are maintained.
- Within Cosmopolitan Student Homes, an annual customer satisfaction survey will be introduced in 2008. This will allow for analysis of satisfaction levels amongst various diverse groups, including disabled persons.
- A range of service specific surveys are undertaken across CHA. These include the following surveys:
 - Anti-Social Behaviour Surveys
 - Resident Involvement Surveys
 - Repairs Satisfaction Surveys
 - New Homes Satisfaction Surveys
 - Complaints satisfaction monitoring

In each instance, CHA will ensure that the monitoring takes into account whether the individual has a longstanding illness or disability to allow for monitoring in terms of satisfaction amongst disabled persons and to ensure that satisfaction levels are at least comparable with those of non-disabled persons.

Accessibility

- All of the Group's offices and community facilities have been designed or adapted to be accessible for disabled persons and compatible with the requirements set down in the Disability Discrimination Acts (DDA).
- All of the standard literature produced by CHA carries appropriate language flags and translations and there is a commitment to making all literature available in alternative formats such as Braille, type talk, and translated on request. Where a need has been identified, information will be produced in the required format as a

matter of course. Otherwise, such information will be made available in the required form upon request.

- Hearing loops are available in the Group's offices, and portable hearing loops are available for home visits.
- The Group's websites have been designed with accessibility in mind. There are functions available that allow for translations to be made automatically, and for text size to be enlarged as required. Over the next 3 years, the Group will endeavour to ensure that all corporate websites within the Group accord with Level AA of the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines 1.0 (WCAG).
- All public meetings held across the Group are held in accessible locations to ensure accessibility for all sections of society.

Continuous Service Improvements

- The Group has a commitment to ensuring equal access to its services from the full range of diverse groups. Within CHA, a range of service specific surveys are undertaken (see above). These will all include assessments of satisfaction amongst disabled service users which will be factored into future KPI performance reporting arrangements to the Board from April 2008 as a "Disability Satisfaction Indicator".
- Through the customer profiling exercises that are undertaken as part of the Tenant Census, CHA will seek to ensure that disabled persons are at least invited to, and where possible represented on all key decision-making forums, including:
 - Tenants' Forum
 - Repairs Review Team
 - Service Review Groups
- Through the planned "mystery shopping" tenant auditor projects, the Group will seek to ensure that they assess the accessibility of the Group's offices, the information that is available for customers, and the ability of staff to adapt their behaviours to meet the needs of disabled persons.

Supported Housing

- The Group has a strong commitment to developing accommodation for vulnerable people with support needs. The model adopted within the Group is fairly straightforward. The Group has an expertise in developing and managing the

accommodation, and it works alongside specialist support agencies who provide the support required for vulnerable people to maintain their independence.

- The continued growth of supported housing, in many instances specially adapted to suit the needs of its supported clients, has been identified as a key organisational objective of CHA.
- As set out in the CHA Adaptations Policy, there is a commitment where feasible to provide an effective aids and adaptations service. This enables the recipients to maintain their tenancies.
- CHA maintains records of adapted properties. Where a vacancy arises, CHA allocates adapted properties in accordance with the needs of individuals that have been identified in advance. In areas such as Liverpool, CHA would also allocate its properties in partnership with Access Liverpool.
- CHA also provides information on the Adaptations services that are available to tenants. Service leaflets are published and awareness is also regularly raised within CHA's publications for residents. Full details of how this service operates are provided within CHA's Adaptations Policy.
- CHA will seek to maximise its resources for the provision of adaptations services through securing grant as match funding for the works the Association undertakes. In addition, staff within the CHA Allocations and Support team can provide additional information about available grants to support adaptations to its customers and provide assistance in making applications for grant where required.
- Through its relationships with support providers, CHA also ensures that floating support style services are available to tenants who require this service. This is the case at CHA's sheltered housing accommodation at Olive Mount.

Procurement

- All contractor tenders are also required to demonstrate their commitment to the Group's Equality and Diversity objectives and to operate their own Equal Opportunities policies.

Asset Management

In addition to the provision of services to meet customer needs, the Group also maintains a portfolio of accommodation to meet the needs of disabled persons.

Within the Group there are approximately 2,000 social housing units and 3,500 student accommodation units.

The ways in which the Group ensures its property assets meet the needs of disabled persons are set out below.

Stock Condition

- A stock condition survey is undertaken on an annual basis by the Group's consultants Taylor Hutchinson. This information is fed into a stock condition database. Details of stock condition, and whether properties have received adaptations are contained upon the housing management system – QL.

Planned Maintenance

- CHA undertakes an annual programme of planned maintenance works. Each year the programme is developed in light of the stock condition information and tenant consultation. Where a programme is initiated, tenant liaison will take place and where the needs of any disabled persons are identified, these will be taken into account subject to availability and resources.
- CHA seeks to maximise resources through accessing public grants and funding to match fund energy efficiency works. This improves thermal efficiency of the Group's stock, particularly relevant for vulnerable and disabled persons.

Development

- Development programmes across the Group are designed with the needs of vulnerable and disabled persons in mind.
- In addition to communal areas being DDA compliant, new student accommodation schemes would normally be built to include specially adapted accommodation units for disabled persons.
- All new properties developed by CHA are designed to *Scheme Development Standards* (2006-08), and to *Scheme Quality Standards* (2008-11) moving forward. These standards are contained within the CHA Design Brief. All new social housing is therefore constructed to accord with Lifetime Homes standards, which reflects the Group's recognition of how disabled persons form part of its mainstream service activities. Upon instruction, architects and consultants are required to design properties that are inclusive and meet the needs of disabled persons. All contractors and consultants are also required to demonstrate their commitment to equal opportunities before they can work with the Group.

- CHA also has an active supported housing programme. Through working with agency partners, CHA is able to either identify existing properties in need of refurbishment to add to its supported housing portfolio or develop bespoke housing products to meet this special need.
- CHA has recently established a Development Consultation Group. The purpose of this is to contribute to design features from project inception. This includes meeting the needs of disabled persons. Where scheme developments are sufficiently large, working groups will be established with communities to influence layout and design. An example of this was at the Olive Mount Supported Housing development in Liverpool.
- Following completion of new developments, satisfaction surveys are undertaken. Moving forward, feedback received from these surveys will be analysed in terms of disability. They are already used to receive qualitative feedback and use this to inform future design features.
- CHA is also aware of the aspirations of disabled persons and those with long term health issues who wish to own an equity stake in their home. CHA will therefore explore opportunities for the development of shared ownership models that enable people with support needs to access this form of tenure.

Offices

- DDA audits have been undertaken for all of the Group's office locations and all have been designed and/or adapted to accord with DDA standards.

Employment

Much of the commitments by the Group to its staff are enshrined within the terms and conditions of appointment, which are detailed further for staff within a Staff Handbook.

Recruitment and Selection

- The Group has a commitment to make reasonable adjustments for all persons who apply for employment within the Group.
- To reinforce the Group's commitment to attracting and retaining disabled persons and in recognition of the contribution such persons have the potential to make, the Group is to seek 'Positive About Disabled People' status through Jobcentre Plus.

This will give recognition to the actions already undertaken by the Group, which include the following:

- interview all disabled applicants who meet the minimum criteria for a job vacancy and consider them on their abilities
 - ensure there is a mechanism in place to discuss, at any time, but at least once a year, with disabled employees what can be done to make sure they can develop and use their abilities;
 - make every effort when employees become disabled to make sure they stay in employment;
 - take action to ensure that all employees develop the appropriate level of disability awareness needed to make these commitments work
 - each year review the five commitments and what has been achieved, plan ways to improve on them and let employees and Jobcentre Plus know about progress and future plans.
- All applicants are requested to provide information about a range of equality issues, including disability, to ensure these needs are met and also to collate monitoring information to identify any potential trends or discrimination to assist with continuous improvement.

Employment

- Reasonable adjustments are made by the Group for all staff to assist them with the undertaking of their duties.
- A staff survey programme is to be introduced from December 2007. This will allow for analysis by disability to assess overall satisfaction levels between disabled and non-disabled staff in relation to a broad range of staff issues.
- Staff are also encouraged to participate in the Disability Equality Survey which collates information specifically in relation to disability issues.
- It is intended that a culture that promotes and celebrates difference will be commonplace across the Group and that openly expressing any disability or long term health needs will result in positive support as opposed to being a hindrance to job security and development. Existing staff will be encouraged to declare a disability where this exists so that appropriate support can be provided.
- A Staff Disability Support Network is to be established to assist the Group to ensure that it is meeting the needs of disabled persons within the Group.

- Regular diversity training is undertaken for all staff and Board Members. The latest round of training was provided in 2006. This included raising awareness of the needs of a range of diverse groups, including those with disabilities. This will be undertaken again in 2009-10.
- The Group monitors self-declared disability levels across the organisation, setting targets for this to ensure a varied workforce, and reports upon this as part of the Group Key Performance Indicators (KPIs).

Governance

Strong governance in relation to disability issues is essential to ensure that there is appropriate leadership and controls in place to meet the commitments of the Group to the Equality and Diversity agenda. Actions include the following:

- All recruitment adverts for Board Members highlights the need for diverse membership and welcomes applications from disabled persons. The Group also seeks to ensure that it is able to cater for any special needs that applicants may have.
- The Group seeks to ensure that the constituency of its Boards are reflective of the communities that they serve. This means monitoring representation of disabled persons to seek to ensure that membership is reflective of communities served.
- Targets will be set for the representation of disabled persons at Board level with immediate effect and monitored thereafter.
- All Board Members will be contacted annually to assess whether there is anything that the Group can do to support any disability related needs.
- As part of the wider contribution to the Equality and Diversity agenda, an Equality and Diversity Champion is appointed at Board level.
- All Board papers are required to assess the implications of proposals in terms of Equality and Diversity issues.

12 Impact Assessments

12.1 The Group recognises the importance of assessing the impact of all new policies in terms of Equality and Diversity issues. Within this framework, disability issues is one of the areas that will require attention.

12.2 In addition, the Group recognises the specific obligations placed on disability related issues by the DDA, and how impact assessment activity will need to focus in particular on the needs of disabled persons with regards to the more favourable treatment that is required in order to produce more equitable outcomes.

13 Performance Monitoring

13.1 In order to monitor the delivery of the Group's commitments, a set of performance indicators will be developed and monitored upon on an annual basis.

13.2 The indicators will be as follows:

Performance Indicator	Target	Responsibility
Customer Services		
% satisfaction of disabled persons to be equal to non-disabled person in STATUS Survey	81%	Director of Corporate Services
% satisfaction of disabled students to be equal to that of non-disabled students in CSH Customer Survey	Tbc	Director of Student Services
% satisfaction of disabled persons to be equal to non-disabled person in service specific areas	Tbc	Director of Housing Services
% of disabled CHA tenants engaged in resident involvement activities equal to the proportion of disabled persons resident in CHA properties	43%	Director of Housing Services
% new policies subject to Equality Impact Assessment taking disability into account	100%	Director of Corporate Services
% new contractors committed to CHG's Equality and Diversity objectives and possess their own Equal Opportunities policy	100%	Director of Development / Director of Housing Services
Asset Management		
All social rented properties built to lifetime homes standards	100%	Director of Development

All new schemes to be built to be DDA compliant	100%	Director of Development
% satisfaction of disabled persons with new developments to be equal to that of non-disabled persons	Tbc	Director of Development
Employment		
% of staff workforce to meet targets	3%	Director of Human Resources
% staff satisfied with CHG as an employer to be equal to non disabled staff	tbc	Director of Human Resources
Meetings of the Staff Disability Support Network per annum	2	Director of Human Resources
All reasonable adjustment requests to be actioned	100%	Director of Human Resources
Governance		
Disabled Board Members represented on all Boards across the Group	100%	Director of Corporate Services
Contacts made with Board Members per annum to assess if any disability related needs exist	1	Director of Corporate Services

14 Implementation

- 14.1 Overall implementation of this Policy is as part of the Group's broader commitments to the Equality and Diversity agenda.
- 14.2 This Policy will be supported by a Disability Equality Action Plan. Following Board approval of these, progress against them will be reported to the Group Board of Management after 6 months, and annually thereafter.
- 14.3 A critical aspect of the development and success of the Disability Equality Scheme is the engagement and empowerment of disabled persons to influence the shape and monitor the delivery of the Group's commitments in this area. Further consultation with residents, staff and stakeholders will be undertaken, the results of which will be fed into the Action Plan.

- 14.4 A Staff Disability Support Network will be established to address any issues pertaining to disability of staff.
- 14.5 Mechanisms will be established to engage with disabled persons, taking into account their preferences for different forms of involvement suitable to their needs.

15 Responsibility

- 15.1 Overall responsibility for the Group's commitments to Disability Equality resides with the Parent Board of Management.
- 15.2 Responsibility at an Executive level for the overall implementation of this Policy and the Disability Equality Scheme resides with the Group Corporate Services Director.
- 15.3 Specific actions identified within the Disability Equality Action Plan attribute responsibility across the Senior Management Team of the Group.
- 15.4 Each Director within the Group is responsible for highlighting and promoting the importance of Disability Equality within their respective teams.
- 15.5 All staff within the Group have a responsibility for the implementation of this policy and ensuring that the needs of people with a long term illness or disability are met wherever possible, and that it is recognised that this may require providing such persons with more favourable treatment where such actions would lead to more equitable outcomes.

16 Consultation

- 16.1 Consultation is a critical aspect of the development and subsequent on-going implementation of a Disability Equality Scheme. To this extent, consultation has or will take place with the following Groups:
- Board of Management
 - Senior Management Team
 - All staff members
 - Association Tenants Forum
 - Residents and stakeholders across the Group's activities

17 Review

- 17.1 The Group will formally review this policy on a 3 year rolling basis, except in as far as an early review is required in order to respond to changes in legislation, regulation or good practice.
- 17.2 The action identified within the Disability Equality Action Plan will be revisited, initially after 6 months, and annually thereafter.

18 Training

- 18.1 Training on Equality and Diversity issues are provided to staff and Board Members on a regular basis.
- 18.2 It is the responsibility of the relevant departmental Director to ensure that staff are made aware of this policy as appropriate to their duties and that they act in accordance with this policy at all times.

19 Associated documents

- 19.1 Policy documents associated with this policy include the following:
- Group Equality and Diversity Strategy
 - Equality and Diversity Action Plan
 - Disability Equality Action Plan
 - CHA Vulnerable Tenants Policy
 - CHA Adaptations Policy
 - CSH Pastoral and Welfare Policy
 - CSH Equal Opportunities Policy
 - Equal Opportunities in Employment Policy
 - Staff Handbook
 - Recruitment and Retention Policy
 - Board Member Recruitment Policy

20 Policy Review Summary

Policy Title	Disability Equality Policy
Dated Created	4 th December 2007
Person Responsible	Group Corporate Services Director
Version	1.1
Date last amended	4 th December 2007
Authorised by	Board of Management
Review Period	3 Years
Review Committee	Board of Management
Date of last review	N/A
Date of next review	December 2010