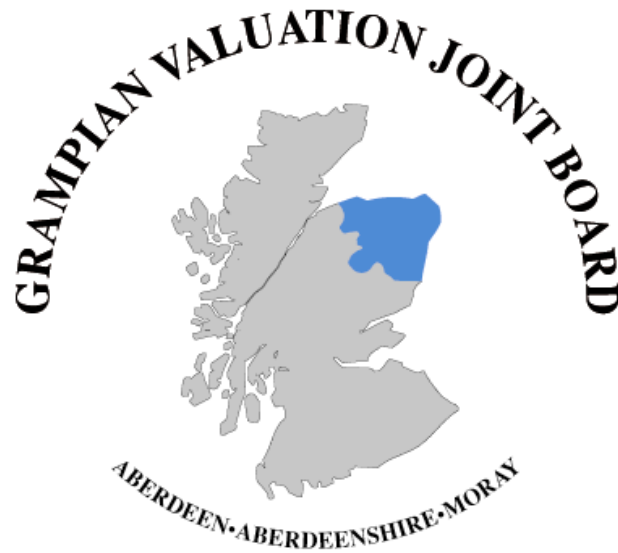


# Grampian Valuation Joint Board



## Disability Equality Scheme

This document is printed in 14pt Arial, using 1.5 line spacing and left aligned to improve readability for those with sight difficulties.

## **Preamble**

The GVJB is an organisation of modest size providing limited public services in relation to Lands Valuation, Council Tax Banding and Electoral Registration but believes it can make a significant contribution towards removing any barriers (both environmental and attitudinal) to equal opportunities for disabled people in relation to these services. GVJB can do this by addressing the way in which we run our services and employ people.

The understanding that to deliver true equality of opportunity for disabled people (1) requires more than treating them the same as everyone else, (2) underpins the requirements to combat discrimination (notably the Act's requirement to make reasonable adjustments) and (3) to promote equality of opportunity.

The Grampian Valuation Joint Board is not a local authority. It exists to provide the local taxation service to the three local authorities within the Grampian area (Aberdeen City, Aberdeenshire and Moray councils). It employs the Assessor and his staff in terms of the Valuation Joint Boards (Scotland) Order 1995. The Assessor compiles the Valuation Roll for Non-Domestic Rating in terms of the Lands Valuation (Scotland) Acts and the Council Tax Valuation List in terms of the Local Government Finance Act 1992. Through local arrangements the Assessor is appointed as Electoral Registration Officer to each council and compiles the Electoral Register in terms of the Representation of the People Acts.

Members of the Board are appointed by the three councils of which they are elected members with Aberdeen City and Aberdeenshire each appointing six members and Moray appointing three.

Contact with the public (disabled or otherwise) is limited. There are few personal callers to any of the Board's offices, a greater number by telephone, some by e-mail and more by written correspondence. The greatest contact, however, is through Electoral Registration, particularly the annual canvass which involves contacting some 250,000 households each year.

## **Background**

The Disability Discrimination Act 1995 has been amended by the Disability Discrimination Act 2005 so that it now places a general duty on all public authorities, when carrying out their functions, 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.

“Due regard” means that authorities should give due weight to the need to promote disability equality in proportion to its relevance.

This Disability Equality Scheme sets out how the Grampian Valuation Joint Board (GVJB) intends to address the strands contained in the new Disability Equality Duty which must be supported by an action plan.

The Act prohibits discrimination against disabled people broadly in relation to the following areas:

- Employment and occupation
- Trade associations and qualification bodies
- Education
- General qualifications bodies
- Housing
- The provision of goods, facilities and services
- The exercise of a public function

Of these Housing is not relevant to GVJB since it has no locus in this matter and Education is relevant only in so far as it affects members of staff in relation to job related training.

Part of the Disability Discrimination Act 1995 imposes a duty on service providers to make reasonable adjustments. This means removing or altering any physical barrier which makes it impossible, or unreasonably difficult, for disabled persons to make use of a service, or to provide some alternative means of making the service accessible to disabled persons.

In relation to employment and occupation and qualifications bodies, however, the duty to make adjustments is not an anticipatory one. In these circumstances, the duty arises only where the employer or qualifications body knows or could reasonably be expected to know that the person requires particular adjustments.

The Duty came into force on 4 December 2006. This contained a specific duty for public authorities to publish a Disability Equality Scheme no later than 4 December 2006. It is recognised that GVJB has not complied with this requirement.

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. This includes people who have long term medical conditions such as cancer and HIV. (Disability Rights Commission, Statutory Code of Practice:2006).

Disability equality is about offering full opportunity and choices for disabled people to improve their quality of life and be respected and included as equal members of society.

Whilst not wishing to appear to minimise in any way the provisions of the legislation or the requirements on the Board as a public body, there is a requirement to recognise that in relation to any test of “reasonableness” the sphere of influence of the Board is limited. Geographically it covers a large area (covered by 3 local authorities) but the range and nature of the services it provides though the Assessor and Electoral Registration Officer are limited and have a minimal direct impact on citizens except perhaps in relation to the provision of printed material covering 25,000 non-domestic properties, 250,000 households and 400,000 electors.

## **Aims/Objectives**

The GVJB believes in, and is committed to, the principle of equality of opportunity. The Board recognises the diversity in the community and that all groups do not have the same resources, situations and needs.

Therefore the Board must ensure that these issues are reflected in the planning, designing and improving of our services.

The GVJB aims to meet the general duty, to:

- Promote equality of opportunity for disabled people
- Eliminate discrimination
- Eliminate harassment of disabled people that is related to their disability
- Take steps to meet disabled peoples' needs, even if this requires more favourable treatment (within the limits of the law affecting the statutory functions of the Assessor and Electoral Registration Officer).

The objects will be to:

- Ensure that the promotion of equal opportunities is included in all policies, plans and working practice
- Be a model employer and equip our workforce to promote equal opportunities
- Report performance on disability equality in the annual Public Performance Report
- Ensure that we are enabling people to fully participate in consultations

## **Impact Assessments**

GVJB must outline its methods for assessing the impact of its policies and functions on equality for disabled people. The purpose of impact assessment is both to ensure that decisions and activities do not disadvantage

disabled people, and also to identify where they might better promote equality of opportunity.

All Board policies and functions must be prioritised for their relevance and importance in relation to the general duties, and arrangements will be in place to investigate their impact.

Policies and functions will be impact assessed according to priority. If evidence suggests that it is likely to be discriminatory or otherwise inhibit progress towards equality of opportunity, then the assessment process will enable the Board to consider whether the policy can be modified to reduce any adverse impact or whether an alternative policy that better promotes equality could be adopted.

The Board will require to rely heavily on the Moray Council support services it already receives in order to obtain the necessary expertise it will need to carry out these duties.

### **Gathering and Using Information**

Information and outcomes from impact assessments will be used for consultation purposes, training staff and for preparing future action plans.

Performance indicators will be built into service plans. This will operate as the measuring process to indicate what has been done against what was planned to be done. This will indicate where improvements can be made.

In addition to quantitative measures for example:

- buildings adapted
- recruitment and retention of disabled employees

We will aim to collect qualitative information for example:

- staff/customer surveys
- complaints

This will help the Board identify disabled individuals' concerns, highlight their requirements and increase involvement.

## **Consultation**

The legislation places a duty on local authorities to involve disabled people in producing the Disability Equality Scheme including the action plan. Their involvement helps in identifying the barriers faced by disabled people and, setting priorities for action plans.

As noted above however, the Board is an organisation of modest size. It employs 84 staff including both part-time and job-share employees and currently (April 2007) has a number of posts vacant. It does not employ any specialist staff in relation to Personnel issues but receives a support service from the Moray Council.

Although the Board has adopted a number of "stand alone" policies, these are largely modelled on those of the Moray Council on which the Board is reliant for all specialist advice.

The Council recently (late 2006) undertook a consultation with disabled people through the Moray Resource Centre to inform the research project

“Equality in Moray”. As a result, when adverts were placed seeking involvement there was no response. Given this, it was agreed to use the comments obtained from the “Public and Voluntary Sector Provided in Equal Terms” research to inform their own disability discrimination document. Nonetheless, the draft document was given to the Moray Resource Centre for their comments before it was finalised.

To further develop their provision for children and young people, comprehensive consultation took place with pupils in Moray schools, their parents and the staff who work with them. Through consultation and in line with the Disability Equality Duty, the Council, working with a focus group, is developing an action plan to ensure that provision fully meets the needs of its users. This aspect of the work by the council is not directly relevant to the services provided by the Board but in general terms is capable of informing the Board’s approach to disability discrimination.

Problems that were highlighted at the Moray Resource Centre consultation included:

### ***Parking***

*Parking was a major problem for many people as there were simply insufficient spaces provided. Some people felt that disabled parking bays needed to be time restricted.*

The Board operate in three separate locations only one of which is in the Board’s direct control, at 41 Whinhill Road, Banff. This office is served by a car park of adequate size to cope with disabled visitors and ramped access is provided to the building. This building is, however, due to be replaced by July 2008 and plans for the new site are at a planning/warrant stage.

Suitable provision for disabled service users (and staff) will be “designed in” to the whole development. In the other locations the position is that the car park at Woodhill House in Aberdeen is provided by Aberdeenshire Council and no allocated spaces are provided to the Board. There is, however, provision of disabled car parking adjacent to the main public entrance where there is a ramp and automatic doors. In Elgin the Board’s offices are in the ownership of Moray Council and do not have allocated parking. The building is, however, adjacent to a public car park where Moray Council provide allocated disabled parking.

Moray Council advise that all of their public parking provides levels of disabled provision which at least match or generally exceed recommended levels of provision.

### ***Information and Advocacy***

*Participants reported difficulty of access to the full range of services available. They find it necessary to be very proactive and go and look for information and this may be very difficult for some people because of ill-health, lack of mobility or the need for communication support.*

The Council part funded The Moray Access Guide. This provides information on accessibility for people with a disability, living in or visiting Moray. The Council also part funded The Moray Guide to Mental Health Services. This seeks to offer people who have, or are recovering from, Mental Health Problems, their family, friends and carers, information on the services and support that is available both locally and nationally. Any guidance and advice provided in the Moray area will assist the services which the Board provides from its Elgin office although it should be noted

that the range of services provided by the Board is limited and directed by statute.

One area where the Board can assist is in the provision of statutory and other forms which are accessible to disabled people. All forms and correspondence are issued in Arial point 12 print style and large font documents are available on request. All correspondence invites contact by telephone for people with sight impairment. Some forms in relation to Electoral Registration are available in Braille (but see later – Involvement).

### ***Translation & Interpretation Communication Support Services***

*Access to mainstream services for Deaf people was felt to be wholly inadequate and participants cited lack of awareness and limited services as key issues. Participants reported a lack of consistency within services and it was widely felt that quality of service within larger organisations, such as the council, was largely dependent on the individual worker.*

The launch of the Happy to Translate initiative by the Council in April 2006 offered interpretation and translation services to those who require them. Information can be provided in Braille (as supplied by the Electoral Commission) and in large print (in house). The availability of this service by Moray Council however extends the facility which the Board can offer through the support services provided to the Board by the council.

Moray also provide British Sign Language interpreters and this facility will also be available to the Board as required.

## **Employment**

*Participants reported a range of problems relating to employment in Moray, including low wages, lack of access and training and low levels of awareness among employers.*

The Board's recruitment policy guarantees disabled applicants who meet the essential requirements of the Person Specification an interview for the post. Candidates will be selected entirely on merit and this can be demonstrated in relation to previous appointments. In relation to low wages, this is recognised as a general position within Moray (at least at a hearsay level) but the Board has adopted a national scheme of conditions of service and job evaluation procedure which would not support such a suggestion. Training is provided to all staff related to the jobs which they do and bearing in mind the specialised nature of the statutory duties carried out.

## **Awareness Training**

*There seems to be a huge need for disability training. Participant comments included "there is a lack of awareness training". During 2006 a number of frontline staff at Moray Council attended a Deaf awareness and basic British Sign Language training course. The research project "Equality in Moray" and an associated seminar to highlight the issues and offer advice for improvement was undertaken. The research aimed to explore current equalities policy and practice in Moray, identify good practice and help public, voluntary and private sector organisations address equalities issues as employers and service providers. During 2007/2008 the main emphasis will be on disability awareness training for frontline staff. Partnership working will be looked into in order to reduce costs.*

The Board can benefit from these activities in light of the support services provided to the Board by the council.

## **Involvement**

Lest it should be considered that the Board has adopted a “short-cut” approach to development of this scheme, the Assessor has dealt with this matter personally and has involved the services of the Aberdeen Disability Consortium. This is an umbrella organisation which describes itself as “An independent community of groups and individuals with an interest in the rights and needs of people of all ages with any form of disability”. Given the nature of the services provided by the Board it became clear in discussion with the ADC that the primary area of concern lay with the issue of printed materials and in respect of individuals with sight problems. For the majority of residents within the Board’s geographic area the principal issue related to Electoral Registration material (canvass forms, individual registration forms and the Electoral Register itself). Since the Board has no way of identifying those recipients of its printed material who might have difficulty and in light of the fact that the DDA requires “reasonable adjustment” it was agreed that wholesale issue of large print forms was not a solution. Large format materials are however available and are supplied on request.

## **Grampian Society for the Blind**

Arising from the involvement of the ADC contact was also made with the Grampian Society for the Blind.

Within the Board's area there are between 2,500 – 3,000 blind or partially sighted people. Exact numbers are not available because the Grampian Society no longer provides a full Social Work service in the area, Aberdeenshire Council having made other arrangements. The Society's view is that the majority of people with sight problems who are eligible to vote are registered. This may be due to the fact that causes of blindness such as macular degeneration affect older people who tend to maintain registration. The facilities of the Society in relation to Transcription Services will be further explored as will an offer to participate in their talking newspaper "Bon-a-Talk" and "Insight" magazine. The provision of a copy of the Electoral Register as a public display copy will also be investigated.

## **Summary**

Although some of the concerns addressed above relate solely to consultation carried out in the area of the Moray Council, it is not believed that the general position found is likely to be significantly better in the geographic area covered by the Board (which includes the Moray area). There may of course be individual locations (eg Woodhill House) where the nature of the property makes it more accessible to disabled service users and equally where problems are more acute (eg 234 High Street, Elgin). In relation to the non property related matters referred to above the same will be true.

The further involvement however with the Aberdeen Disability Consortium and Grampian Society for the Blind is considered to be more relevant to the work of the Board given the particular nature of the services which it provides through the Assessor and Electoral Registration Officer. The services provided are largely paper based and there are particular statutory

provisions (not to say restrictions) on how those services are to be provided.

### **Impact Assessment**

The existing policies of the Board will require to be impact assessed and where necessary they will require to be reviewed and revised. This is a job for which no member of the Board's staff has been trained nor has relevant experience. Accordingly this particular exercise will depend heavily on the support service provided by the Moray Council.

## **Action Plan**

No completion dates are provided in the Action Plan. This is deliberate to ensure that all of these matters are kept under review. The target however is to ensure that all initial enquiry and consultation is completed within the 2007/08 financial year. If any particular costs are identified in relation to meeting the Board's Disability Duty these should be available for consideration in the Budget setting process for 2008/09.

## **ACTION PLAN – Summary**

<b><u>Action</u></b>	<b><u>Responsible Officer</u></b>	<b><u>Timescale</u></b>
Parking	HQ – Assessor Banff – Assistant Assessor Elgin – Assistant Assessor	Ongoing Ongoing Ongoing
Information & Advocacy	Assessor	Ongoing
Translation & Interpretation	Depute Assessor	Ongoing
Employment & Training	Depute Assessor (Aberdeenshire)	Ongoing

### **Action Plan – Detail**

#### **Parking**

HQ            Parking provision is the responsibility of Aberdeenshire Council. Checks should be made to confirm that existing provision, both for staff and visitors is adequate and satisfies current regulations.

Banff        In both the current and proposed locations provision and supervision of the Car Park rests with the Board. Arrangements should be put in place to ensure the recommended level of disabled parking is maintained and staff advised not to utilise disabled bays. In the proposed location disabled provision is to be “designed-in”.

Elgin As for HQ but with Moray Council responsible.

### **Information & Advocacy**

There should be a complete review of all forms and correspondence to ensure that any barriers to disabled service users are removed.

Consideration should be given to provision of the Electoral Register where disabled groups can provide the statutory level of supervision required.

### **Translation & Interpretation**

Arrangements should be put in place to ensure that services are available when required. In relation to “reasonableness” immediate provision is not considered necessary but as need is identified it should be capable of being met.

### **Employment & Training**

Existing practice in relation to employment of disabled people should be confirmed and reinforced including sourcing adequate training arrangements. Training of existing staff in relation to disability awareness, signing etc should be examined.

## **Thanks**

Thanks are due to Dave McDonald of the Aberdeen Disability Consortium, Aileen Barr of Grampian Diabetes and Maureen Strachan and Andrew Douglas of the Grampian Society for the Blind as well as colleagues from Moray Council.

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