

DISABILITY EQUALITY SCHEME
under the
Disability Discrimination Act 2005

**Disability Discrimination Act 2005 and
Disability Equality Schemes**

This Act, which amends both the Disability Discrimination Act 1995 and the Special Educational Needs and Disability Act 2001, contains a new concept, one to which we as ‘public sector employers’ and ‘public authorities’ must react, namely that of a Disability Equality Duty (DED). This duty is both general and specific and burdens higher education institutions in general, and their Governing Bodies in particular. (It is essential that, whilst you as bursar will take operational responsibility for your college’s response to this legislation, the resulting scheme has commitment at the highest level).

The general duty under the 2005 Act requires institutions to have regard to the active promotion of disability equality. This is likened to the duty to promote race equality under the Race Relations (Amendment) Act, where we have some measures in place. There is also a requirement to produce and publish a Disability Equality Scheme (DES) by 6 December 2006, to report on it annually and to republish it triennially thereafter.

In the process of producing a DES, Governing Bodies (i) will be expected to involve people with disabilities (ii) must consider how they will gather and analyze evidence to inform their actions and (iii) must consider how they will assess the impact of their activities on people with disabilities. The draft code of practice under the Act suggests that in dealing with people with disabilities (whether students, staff or visitors) institutions must have due regard to the need to:

- ↪ Encourage participation
- ↪ Promote equality of opportunity and positive attitudes
- ↪ Eliminate unlawful discrimination, victimisation and harassment
- ↪ Take steps to take account of disabled persons’ disabilities, even where that involves treating disabled persons more favourably than others

The legislation suggests that an institution’s **Disability Equality Scheme (DES)** is likely to include the following elements:

	Duty/Aim	Method/Process	Timetable
1.	Assess institution’s accessibility shortfall.	Conduct services-based access audit to include physical barriers, processes and	2003

		procedures and staff awareness/competence; identify remedial measures/recommendations	
2.	Prepare Access Plan.	Prioritise access audit recommendations ('hard' and 'soft' measures).	2003
3.	Review Access Plan.	Review of progress by House Committee.	Ongoing, at least annually.
4.	Review equality and participation.	Assemble data: seek disability disclosure from students, employment applicants and staff (review HR documentation). Review University statistics produced by Disability Services Team.	By 6 December 2006
5.	Promote equal opportunity and positive attitudes.	Review existing or adopt new equal opportunity policy; publish policy and introduce into processes including induction and other training.	By 6 December 2006
6.	Eliminate victimization, discrimination and harassment.	Introduce statement of policy (review harassment policy); publish policy and introduce processes including induction and other training.	By 6 December 2006
7.	Consult 'stakeholders' with disabilities.	<i>Informal approach:</i> request comment and proposals from staff, students and visitors with disabilities. <i>Structured approach:</i> form consultative group e.g. sub-committee	Michaelmas Term 2006
8.	Review DES.	This may be an independent services-based access audit review; if not undertaken sooner.	Michaelmas Term 2009

1 and 2. Services-based Access Audit and Access Plan

Christ Church completed a services-based Access Audit in January 2003. This was undertaken by a College Officer accredited by the National Register of Access Consultants (NRAC) and the Asst Clerk of Works. A total of 95 audit recommendations were made. These were formulated as an Access Plan by the then Treasurer and considered periodically by the House Committee. Major accessibility proposals were recommended to the Governing Body.

3. Access Audit Review

A large number of minor maintenance items were put in hand.

In response to illuminance recommendations a lighting strategy was commissioned with Sutton Vane Associates and demonstrations held in December 2004. It was decided to

improve exterior illuminance only (i) under Fell Arch and (ii) in Schools Quad. This has been budgeted but has not yet been implemented.

The structural measures recommended by the House Committee were:

- (a) access ramp at Tom 7/JCR
- (b) access ramp at Killcanon/Peckwater
- (c) lift to Ante Hall (platform lift proposed)
- (d) access ramp at steps in War Memorial garden
- (e) access ramp Tom Quad north side.

(a) and (e) were not approved by the Governing Body. (b) was deferred pending wider issues of Blue Boar accessibility and is not likely to proceed on account of better accessibility opportunities associated with a proposed new route to Blue Boar Quad. (c) was planned and budgeted for the financial year 2005/6 but postponed for two years to the financial year 2007/8 on account of an adverse electricity supply report requiring major electrical infrastructure works. (d) was completed in April 2006.

As a temporary and not wholly comprehensive access expedient, a stairclimber was introduced in 2004 to permit wheelchair user access to the services of the Buttery and Hall. This is a satisfactory short term measure which has extended practical accessibility to services.

A wheelchair user accessible toilet was introduced in Tom Quad beside the Law Library in 2003.

Visitor and conference literature includes accessibility information and is available in large print format. Christ Church's website (redesigned spring 2006) is to W3C standard.

Accessibility/Access Awareness training: a number of Steward's Department staff have attended Disability Awareness training: all Steward's departmental heads, the Deputy Hall Manager and three Lodge Porters. It is suggested that levels of staff training be established (e.g. heads of sub-department, deputies and assistants). A briefing for administrative staff was held on 16 July 2004. Equal opportunities training, which includes a description of the institution's access obligations, is part of induction training for all staff in the Steward's Department.

Accessibility proposals 2007-9 include the following substantive projects:

1 Platform lift to Hall: Governing Body approval and planning/Listed Building consent 2005. Installation postponed to 2007/8.

2 Blue Boar Quad: major renovation of 61-room student residence scheduled for 2007/8. Due for completion and occupation from October 2008. Will include two wheelchair user accessible rooms and accessible ancillary services, 130-seat auditorium with wheelchair user amenities and induction loop, accessible w.c. and level going access to ancillary services; lift to upper floors in Staircase 4; accessible wayfinding, signage and exterior illuminance; decor to inclusive design principles and escape alarm systems for users with sensory impairment. Muniment services relocated to the adjacent Brewhouse will be wheelchair user accessible. A project Access Plan has been produced.

3 Renovation of Undercroft: funding approved for surveyors' study of student bar services in Undercroft 2006/7. Study includes examination of level going access to bar services, adoption of inclusive design principles within scheme and evaluation of lift access to upper floors of the Lee Building.

4. Review equality and participation

In order to assess the present 'disability profile' among non-academic staff, a college-appropriate questionnaire has been provided to College Officers with employment responsibilities. The House Committee agreed that this be distributed on a payroll basis in Hilary Term 2007. The Steward's office will collate departmental responses which the House Committee will be asked to review to assess equality and participation. Recruitment documentation has been reviewed to ensure it includes a disability disclosure question for employment applicants A format, approved by Peninsula, has been circulated to College Officers.

Student disability data is provided annually to the Censors' Office by the University's Disability Services Team. This permits a comparative review to be undertaken.

5. Promote equal opportunities and positive attitudes

Christ Church's non-academic Equal Opportunities policy includes reference to people with disabilities. The policy statement is published in the support staff handbook and reinforced as part of (Steward's Department) staff induction training. Sub-departmental heads encourage disability awareness, and training in work-specific skills amongst team members.

6. Eliminate victimization, discrimination and harassment

Given the apparently low incidence of such cases the House Committee does not believe that significant time or resources need to be given to this issue. The Senior Censor will arrange for the harassment policy to be reviewed by the Academic Committee.

7. Consult 'stakeholders' with disabilities

In Trinity Term 2006 a statement was approved for inclusion in the Blue Book, Domestic Information for Senior Members, staff newsletter, cathedral newsletter and on the Christ Church website seeking comment on accessibility issues in respect of all components of the joint foundation. This has also been included in the Visitor Guide.

In July 2006 the Steward consulted the University's Senior Disability Officer on views expressed to the wider collegiate University by special interest disability groups and professionals. The major issues identified through that process, believed to have relevance in the wider collegiate environment, include critical comment on:

- General lack of awareness and assumptions about disability need
- Difficulty of obtaining information from multiple sources
- Disregard for unseen disabilities.

Inadequate signage

Lack of sound enhancement, especially in lecture rooms.

Meetings arranged without regard to accessibility of venues.

Insufficient access information available.

Equal Opportunities shortfall in employment/recruitment: perception of general inaccessibility.

Need for continued improvement in physical access to buildings and services.

The Steward has received critical comment and specific suggestions from the Oxfordshire Association for the Blind.

Suggestions/requests received as a direct response to the announcement about DES consultations are:

(i) an Emeritus Student expressing concern at postponed lift access to the services of the Hall [see 3 above]

(ii) a member of the cathedral congregation is concerned about the lack of handrail(s) from the lower to upper levels in Tom Quad. The Steward is considering this issue, also in the light of earlier comment from old members, and may bring forward a proposal.

(iii) a conference attendee expressed concern over low levels of illuminance in quads and areas adjacent to staircases and asked that it be improved [House Committee considered MT 2006 but decided to take no action].

This DES was considered in draft by the House Committee at its meeting on 30 January 2007 and, with amendments, approved for recommendation to the Governing Body at its meeting on 20th February 2007.

John Harris
24 January 2007