

Regional Development Agencies: Performance on the Disability Equality Duty

There are nine Regional Development Agencies (RDA) in England. Under the Regional Development Agencies Act 1998, each Agency has five statutory purposes, which are:

- to further economic development and regeneration
- to promote business efficiency, investment and competitiveness
- to promote employment
- to enhance development and application of skill relevant to employment
- to contribute to sustainable development.

RDAs (along with most other public authorities) were required to produce Disability Equality Schemes by 4th December 2006.

The DRC reviewed all nine RDA Disability Equality Schemes in June 2007. Overall there were many strengths, particularly on the involvement of disabled people, generally with a commitment to on-going involvement as the Scheme is implemented. Overall there are an exciting number of initiatives across the country which are being undertaken by RDAs in relation to disability equality; we give further details of these below.

Three Schemes were very good, with few improvements required: London Development Agency (LDA), One North East and South East Development Agency (SEEDA). All three had impressive mechanisms for involving disabled people in the development of their Schemes and action plans which covered the full range of their functions with well thought out actions and ambitious targets.

We advised four RDAs East Midlands Regional Development Agency (EMDA), South West Regional Development Agency (SWRDA) Advantage West Midlands West Midlands and East of England Regional Development Agency (EEDA) that they need to

revise their Schemes with the involvement of disabled people to achieve compliance with their statutory duty. The key issue here was the very limited nature of their Action Plans. In some instances it was clear that strong foundations had been laid for the further development of the Schemes.

All RDAs have been written to with a detailed assessment of their Scheme. These assessments are on our website (together with responses as appropriate). Where there are clear omissions from the statutory requirements we have asked that these be remedied. All RDAs have responded in a positive way to our comments and agreed to build in improvements as they develop and implement their Schemes, and to revise them where necessary.

Even the weaker Schemes generally have some strong features from which others can learn.

Our assessments, nevertheless, revealed some common weaknesses responding to the Duty's requirements:

- failure to clearly and transparently indicate how involvement had influenced the scheme
- failure to develop actions across the full range of rda functions
- failure to show how they would use the information that they gathered. for example by adopting clear time based objectives across a range of relevant functions.

Compliance with particular aspects of the Duty

Involvement

What is required?

The Duty requires that the authority must involve disabled people who appear to that authority to have an interest in the way it carries out its functions in the development of the Disability Equality Scheme, and that the Scheme must include a statement of the way in which such disabled people have been involved in its development.

“Involvement” requires a more active engagement of disabled stakeholders than “consultation”. Large authorities need to

develop a range of methods of involving disabled people in the development of the Scheme. It is also important to ensure that the diversity of disability experience is addressed.

The involvement process legally needs to be both influential and transparent. People outside the organisation should be able to see how the involvement has affected the public authority's plans. This will also be essential in practical terms to maintain on-going commitment to involvement by disabled people, who need to know that it has been influential, not merely tokenistic.

Transparency requires reporting on the results of involvement. It does not mean that agencies can or should do everything that disabled stakeholders want. But Schemes need to indicate clearly what views and priorities for action were expressed by disabled people, indicating how these were acted upon, or alternatively giving reasons why they were not acted on.

Most RDAs had made substantial efforts to engage regional disabled stakeholders through meetings, steering groups, surveys and consultancies.

One Northeast wrote their Scheme in partnership with disabled people. Both Northwest Regional Development Agency (NWRDA) and LDA set up skilled, paid reference groups of disabled people to help produce their Scheme. All three supplemented this with other involvement mechanisms such as meetings and surveys.

In addition to formal consultation SEEDA held a development event with key organizations to establish strategic principles, and 4 sub regional events with disabled people and disability organizations. They had both internal and external reference groups of disabled people, a web based survey and employed a disabled consultant.

What was particularly encouraging is the fact that all the RDAs plan to set up mechanisms for the continuing involvement of disabled people. For example, in each of the 9 sections within One Northeast's Action Plan the need for disabled people to review the outcomes is expressed.

Where RDAs have been less successful is in reporting clearly how this involvement influenced the Scheme, and in particular the Action Plans. Many Schemes merely state that results have been used to inform the priorities for the Action Plan, but give no

information. In contrast, the feedback from SEEDA's consultation exercises has clearly influenced the content of the DES especially the Action Plan.

In some cases it was difficult to assess the numbers or diversity of participants in the involvement process.

Evidence gathering

The Duty requires Schemes to show what evidence the authority is collecting regarding disability equality in relation to employment (recruitment, development and retention) and whether any services and other functions take into account the needs of disabled people.

Without comprehensive and accurate disability data, it is extremely difficult to establish where inequalities exist, to identify what needs to be done to improve performance, and to monitor progress.

Most RDAs had access to statistical data on regional employment rates – which they made reference to. Some also referred to information regarding level of educational attainment. On other issues information is harder to find: the participation of disabled people as individual entrepreneurs, the accessibility of places and infrastructure for residents and tourist facilities for disabled visitors.

NWRDA had a wealth of evidence on the existing state of disabled people in the region, found in “Disability in the North West – Final Report,” but this evidence is not included in the DES (and is not available on the website except to members). Reference is also made to research on disability at the regional level, **Committed to Inclusion, Accepting the Challenge; the North West and Disability**.

Yorkshire Forward had commissioned the study **Diversity and the Economy** by the Smith Institute covering employment patterns in different parts of the region, occupational profiles, educational and qualification levels and income levels.

In many instances data only exists in a very crude form, based on a single, undifferentiated category of ‘disabled people’. This masks the very different needs and experiences of different groups of disabled people. Some RDAs did make references to particular sub-categories of disabled people in the discussion of evidence (for example in terms of gender and ethnicity, and in a few cases

in relation to type of impairment). However, these appear not to have been addressed in devising the Action Plan. This is disappointing, since addressing the particular needs of people is essential for achieving equality of opportunity.

Yorkshire Forward will explore the need to commission regional specific research into cross-cultural disability issues and barriers to inclusion.

It will be extremely difficult to understand the barriers which cause unequal access and to assess fully the actual extent and nature of discrimination, purely through statistical means. Qualitative research methods need to be used to fill these knowledge gaps and provide a reliable basis for action.

The RDA Schemes contained some impressive plans for future research:

- One North East has commissioned an impressive range of research projects. For example, a user led mapping report which will review the existing evidence basis to identify gaps and propose arrangements to address these gaps.
- LDA also has an impressive range of research projects planned to investigate the qualitative experience of disabled people, and to identify and address barriers to equality. In respect of most of these exercises there is also an explicit indication of how the evidence will be used. The INSPIRE project, for example, is mapping the needs of and barriers faced by disabled entrepreneurs in terms of accessing London's innovation, research and higher education resources. There is a clear commitment to review, disseminate and act on findings.
- EMDA will introduce beneficiary data clauses into funded projects, and review them. They also state the objective of ensuring that key partners are able to report on key equalities issues – although more information should be provided on this.
- Yorkshire Forward plans a mapping of the accessibility of job brokerage provision and - with councils- to support the mapping of existing accessible housing.
- NWDA plans to undertake research to establish the

prevalence and needs of disabled entrepreneurs, and to acquire information on disabled led businesses/suppliers the NWDA works with. We also note that a cost/benefit analysis of the exclusion of disabled people from employment, housing and transport will be done.

- SEEDA will research the needs of disabled business people in the region & the develop an action plan to improve the Business Link Service to Disabled People.

The Advantage West Midlands Scheme identifies gaps in information, for instance the participation of disabled people in business and as entrepreneurs, the type and range of disability organisations in the region and accessibility of premises and housing stock. The section on tourism identifies gaps in evidence and contains a series of recommendations, including the need for a directory of accessible venues, but the Action Plan contains no actions to implement them.

In addition many RDAs will collect evidence regarding the operation of their own employment and services functions including annual surveys of staff, audits of agency premises, consultation on equality of access to communication and monitoring of contracts for procurement of services.

Using evidence

Schemes are also required to set out how authorities are going to use the information which they gather to measure their performance on disability equality. Evidence gathering allows progress to be measured, and efforts to be prioritised.

Information needs to be used, for example, by setting realistic but stretching targets (and developing an Action Plan to meet these targets), as some agencies have done, and others plan to do once baseline evidence is collected.

SEEDA have a broad range of targets:

- An increase in the economic participation rate of disabled people in the South East from 61 per cent in 2006 to 75 per cent in 2016.
- A 10 per cent increase in the skills attainment levels of disabled people at all skills levels between 2006 and 2016.

- Reduce the number of disabled people living in poverty in the south east by 10 per cent by 2016.
- Increase the number of disabled people working for SEEDA from 4 per cent to 16 per cent, and target for senior management of 10 per cent by 2009.
- A further target around self-employment is to be developed.

Qualitative research allows actions to be devised to overcome barriers. Yorkshire Forward, for example, reference existing qualitative evidence on barriers to self-employment ('Barriers to self-employment for disabled people' commissioned by the Small Business Service in 2003). This identified a number of factors that limit or exclude disabled people from becoming entrepreneurs, including difficulties in obtaining start-up capital, unhelpful attitudes of business advisors and lack of access to appropriate training and support. These issues are then addressed in the Action Plan.

A number of other RDAs also make strong links between evidence gathered and actions. This was an area that required improvement in the weaker Schemes.

What was absent in most Schemes was any clear link between the statistical evidence that they present in their Schemes and where they focus activity. This is particularly noticeable in relation to evidence regarding particular sub-groups of disabled people – which is seldom acted upon.

A strong evidence base also provides the essential underpinning for effective equality impact assessment.

The Action Plan

Schemes must include a statement of the steps which the authority will take over the period of the Scheme towards the fulfilment of its general duty to give due regard to the need to:

- promote equality of opportunity for disabled people
- eliminate discrimination which is unlawful under the Act
- eliminate disability related harassment
- promote positive attitudes

- encourage participation by disabled people in public life
- take steps to take account of disabled people's disabilities even where that involves treating disabled people more favourably than others.

An Action Plan needs to address each of these dimensions of equality wherever relevant and to cover all relevant functions.

Some RDAs (LDA, One Northeast, SEEDA, NWRDA) had impressive Action Plans covering all or most functions and exploring the different dimensions of the Duty.

OneNortheast, for example, has 9 Action Plans covering all the main functions of the Agency and different aspects of the general Duty. Each deals with the monitoring and collection of information, accessibility of facilities, and the level of participation of disabled people in the relevant organisations. OneNortheast will work with organisations of disabled people to evaluate the outcomes of all action plans and to revise them.

Some Schemes combined strong actions on particular issues with weak or non-existent activity in others. In some the aspirations were good but actions require further specification.

We set out below some of the main actions taken by RDAs in relation to different functions and different aspects of the Duty.

This is not intended to be comprehensive, and in any event it should be noted that different RDAs may have slightly different functional responsibilities. For reasons of space we do not describe here the actions taken to strengthen the capacity of RDAs by addressing leadership, training etc, or the planned improvements in relation to employment and delivery of direct services (accessible websites, information and events etc). These are nevertheless clearly critical in ensuring successful delivery.

Promotion of disabled people's participation in public life

The promotion of disabled people's participation in public life was the subject of relatively few actions.

- One Northeast will not only use its influence with its partners to promote the participation of disabled people as Board

members (for example, to ensure that disabled people are represented on Boards of the regional science and industry council and the centres of excellence) and in other senior roles but will also run leadership and confidence workshops for disabled people.

It also plans case studies written by disabled people of success stories and user-led Disability Equality Training for other Board members to ensure equal criteria and recruitment of disabled people into public life.

- The LDA audited the membership of the LDA board to identify and address any barriers to the involvement of disabled people.
- EMDA has an action to work with partners to promote diversity of board memberships.
- Advantage West Midlands will audit of the board to identify and address any barriers to the involvement
- Advantage West Midlands plans to map regional disability organisations and, in collaboration with other agencies, to draw up a plan of support for these organisations.

Promoting positive attitudes

Many RDAs included actions on the promotion of positive attitudes, the most popular being awareness raising campaigns targeted at employers. For example NWRDA will influence NW Business Link to increase the effectiveness of SME employers in recruiting, retaining and developing disabled staff.

Four RDAs, SEEDA, NWRDA, One Northeast and LDA, also plan promotion of awareness of disabled people as customers.

The LDA sponsored the revision of the Employers Forum on Disability's 'Open for Business' guide which helps small businesses to make adjustments or design premises in a way that reflects good practice on access and complies with the DDA 1995. The guide is being sent to 30,000 SMEs and their advisers and distributed at a series of targeted events.

Through eBiz Centre, SEEDA promotes disabled access issues to SME sector.

NWRDA runs Diversity Awards and SEEDA runs sustainable business awards, with disability equality used as a criteria (as a minimum) in the selection process.

Other RDAs plan to use positive images in their general publications.

Promoting equality / countering discrimination

These two aspects of the duty go hand in hand. However some agencies have focused too exclusively on removing discrimination (which include ensuring that reasonable adjustments are made to services and employment). For example, SEEDA's work on skills focuses on training providers demonstrating that they have a disability statement – this is not a robust test of whether they are in practice providing a barrier free environment for disabled student. Will providers be set target percentages of disabled students achieving qualification? What about specific outreach to particularly exclude groups such as Deaf people?

The power of RDAs to influence other public bodies to promote disability equality is very strong. We valued the emphasis found in some agencies such as NWRDA, LDA and One Northeast to influence key partners in the region. Similarly, SEEDA will influence local authorities through the Local Area Agreement on issues relating to transport and physical accessibility/ local representation and leadership.

One Northeast

The Action Plan is noteworthy for the range and detail of its actions including on cultural and artistic activities and its recognition of the place of disabled artists in cultural life. A special strength of One North East is its work on innovation and design. We particularly welcomed the actions allowing disabled people to have input into product development, innovation and accessible features, and training sessions for designers and those involved in product design and packaging about the access needs of disabled people.

The benefits and features of accessible design will be promoted in public services.

LDA

The very important proactive work on tourism is set out below .
They also plan some far reaching influencing work:

- Use influence to push for evidence based changes in the benefit system to make work pay for disabled people, aligning this work to the government's worklessness agenda
- Commission research on the reasons behind the lack of BSL interpreters in London and create an action plan to address the issues identified
- Use influence to push for changes in the Access to Work Scheme, and raise awareness
- Use influence with other functional bodies in the GLA group to improve the blue badge parking in London

LDA includes rare examples of work to tackle multiple discrimination/disadvantage:

- Include measures to support disabled parents, children and employees in the LDA's childcare initiative
- Advice given to childcare providers on access and inclusive design
- Plans to deliver skills and employment projects which support disabled people who experience multiple barriers.

LDA, One Northeast, NWRDA, Advantage West Midlands all include a range of measures to map and strengthen disabled people's organisations. The LDA, for example, will work with learning providers to map the existence of recognised qualifications in access auditing, mystery shopping, disability equality training.

Employment

The chief actions relate to working to raise the awareness of employers and remove barriers to employment.

LDA

- Map the disability related skills and accessibility of mainstream job brokerage and intermediary agency provision and existence of specialist job brokerage and to produce and implement an action plan to ensure disabled Londoners have access to good job search support.
- Set up a London Wide Secondment initiative to facilitate secondment opportunities for disabled people.
- Positive Action Programme for disabled people built into recruitment and volunteering strategy for Olympics and Paralympics through the Olympic Local Employment and Training Programme.
- Work with LDA Opportunities Fund to shape the way this project supports disabled people to be able to access skills and employment provision both in and outside the workplace.
- Launch a campaign to promote flexible working to employers

One North East

- Commissioned a user-led research project on barriers to work will be used to identify success factors and risk and to form the basis for future actions.

Self employment

LDA

- Set up a network for disabled entrepreneurs in London, and build targeted start up support into this network.
- Develop a one stop shop website and run events which provide essential information for disabled entrepreneurs.
- Work with mainstream business support, SME finance, premises and finance readiness providers to build their

capacity and understanding of needs of disabled businesses.

- Review and evaluate this work to produce recommendations for future LDA actions.
- Establish the prevalence and needs of existing and potential disabled entrepreneurs.
- Carry out literature search to establish what evidence already available.
- Commission social model based research to establish barriers faced by disabled people running or wanting to run businesses in London; Review, disseminate and act on findings.

Yorkshire Forward

- Establish a standard for 'accessible services' and apply this to support services.
- Work with Job Centre to deliver a conference to promote self employment.
- Develop a scheme to qualify and establish local disabled people as Business Advisors.
- Support and deliver development of disability confidence for Business Advisors.
- Establish a regional Disabled Entrepreneurs Network Service.

Northwest RDA

- Research to establish the prevalence and needs of existing and potential disabled entrepreneurs.
- Acquire information on disabled led businesses / suppliers the NWDA works with.

One Northeast

- User-led research about disabled people's entry into, success and outcomes in business.
- Effective test measures, success factors and risks are identified by disabled people.
- Ensure business support from disabled business advisors and Mentoring from successful disabled business people.
- Duty devolved to business support, with disability equality training and toolkits to support it.
- Ensure financial start up packages take account of barriers disabled people face and start-up support meets every client's access requirements.
- Build confidence of potential entrepreneurs.

EMDA

- Work with Business Link provider to ensure that business support is suitable for disabled entrepreneurs.
- Commission specific business support pilot scheme to support disabled entrepreneurs.

SEEDA

- Research into needs of disabled business people in the region & the development of action plan to improve the Business Link Service to Disabled People.
- Business Link engagement with the disabled business sector will be measured through the Business Customer Satisfaction Survey Work with disabled people to understand and create suitable forms of business support for disabled people.

Skills

LDA

- Through Regional Skills Partnership agree common framework and action plan for auditing and providing information on accessibility of London's learning sector.
- Ensure disabled people with expertise in this sector are involved at all levels of this work.

SEEDA

Through their delivery body, Train to Gain, will

- Establish links with disability advisory services to ensure skills brokers are able to refer employers to the appropriate support services.
- Work towards Train to Gain website meeting best practice standards in terms of accessibility for those with limited sight.
- SEEDA to ensure that all sub-contracted training provision provides materials in appropriate and accessible formats, via contract agreements and monitoring.

NWRDA

- Develop plans to work with partners to increase the skill base of IB claimants. Work with Northern Way pilots to develop and test approaches

Yorkshire Forward

- Audit skills deliverers.
- Develop greater range of 'delivered learning' options for disabled people at risk of geographical isolation.
- Promote greater access to work experience and pre-employment activity for disabled people via targeted initiatives.
- Develop region wide mentoring and buddying scheme for disabled people.

One Northeast:

- Increase the number of disabled people qualified to level 3 to be proportionate to the levels of qualifications gained by non-disabled people.
- Ensure Train to Gain is accessible and equal provision for and uptake of disabled people.
- Ensure disabled graduates benefit from work based experience by promoting programme with disabled students, equality with employers and ensuring access requirements are met.
- Ensure barriers to access of further and higher education, including financial ones and access to information.
- Remove barriers to access to apprenticeships for disabled people who cannot meet Level 2 requirement but who can work well.
- Encourage disabled people into apprenticeships and promote their equality with learning providers and employers.

EEDA

- Work with EESCP to establish targets.
- Explore possibility of setting up a work experience scheme for disabled job seekers.

Inclusive Design

LDA

- Commit to meeting the principles of inclusive design in all its places and infrastructure projects.
- Establish mechanism for ensuring that inclusive design is built into LDA places and infrastructure projects from the start and reflect this in relevant tenders and contracts.
- Use connections and influence with the higher education sector in London to promote knowledge transfer on inclusive design to those designing courses future architects, planners and surveyors.

- Develop a training module on inclusive design for staff and partners.
- Ensure London 2012 Olympic Games and Paralympic Games and legacy are role models of inclusive design.
- Produce a practical toolkit for planners and developers to promote best practice in inclusive design.

SEEDA

- Establish performance standards for own development projects. These will incorporate mechanisms for addressing diversity, including commitment to inclusive design principles
- Establish a new framework panel offering expert advice on consultation approaches including equality and diversity issues.
- Provide appropriate training, guidance and access to advice on inclusive design for all relevant teams.
- Establish a new framework panel offering expert advice on inclusive design, including access statements
- Ensure that all physical development involving public consultation target consultation with disabled people through the use of the 'Planning by Design' process.
- Disability access audits of all major development sites of over £1million.
- Promote the inclusion of inclusive design into graduate construction, design, architecture courses across the region
- Influence partners when discussing strategic infrastructure and travel choice to incorporate appropriate disability guidelines eg those of disabled transport advisory committee (DPTAC).

NWRDA

- Access audits on all new proposals for new build projects.
- Production of an appropriate inclusive design guide to access.

One Northeast

- Disabled people from organisations around the region given skills and accessible toolkit to be involved in high quality, sustainable auditing.
- Work with disabled people to develop an Access Plan toolkit for public buildings.
- Training for regeneration teams.

EEDA

- With partners, set standards to ensure both accessibility and usability for all groups in any investment made by EEDA.

Yorkshire Forward

- Develop independent disability group to provide meaningful scrutiny of projects.

Lifetime homes

- One NorthEast Ensure lifetime homes are integral to all residential new and re-developments.
- Use strategy and influence partners to ensure disabled people are living in affordable, accessible housing that meets and exceeds Decent Homes standards.

SEEDA

- Adoption of lifetime homes standard for own developments.

LDA

- Ensure principles of inclusive design built into all LDA work on housing
- Work with GLA to support the mapping of the existence of

accessible housing

- With GLA group ensure Mayoral commitment to inclusive design, lifetime homes and 10 per cent wheelchair accessible homes is explicit in all relevant tenders and contracts

EEDA

- Work with partners to agree a Lifetime Homes standard in all new build projects

Yorkshire Forward

- Work with local councils to support mapping of the existence of accessible housing;
- go beyond working just to national housing standards

Tourism

One NorthEast:

- Map the accessibility of tourist facilities and find good practice in tourism destinations and promote these
- Disaggregate results of consumer perception surveys
- Subsidise user-led training access audits, toolkits for providers and access project grants for tourist partners and suppliers.
- Accessible print and web-based information from tourism team.
- Encourage training providers to bridge the gap in numbers of disabled people having the skills and experience to enter the sector.
- 10 per cent increase per year in disabled people citing features and benefits of attractions and accommodation in satisfaction surveys and evaluation, rather than accessibility alone.

LDA

- Work with Visit London to promote and develop the take up of the National Access Scheme.
- Increase the number of accessible hotels and tourism related facilities in London.
- Make access a prerequisite of bids for hotel operators to operate in the tender for major new tourism-related developments.
- The tourism business support program to look at ways of raising awareness of disability issues and also collecting feedback on the accessibility of London's tourism venues
- Use the London Visitor Survey to ask about accessibility issues
- Work with Society of London Theatres to improve the welcome of disabled visitors at London's theatres through relevant customer training with theatre staff and work to remove barriers.
- Develop a marketing and PR plan for assisted performances.
- Establish a tourism access advisory group and commission a mystery shopper audit of several London tourist attractions, feeding back findings to those businesses involved.

Yorkshire Forward

- Produce venue access toolkits and directory.

Advantage West Midlands

The Scheme highlights the importance of tourism to the region and the barriers faced by disabled people in availing themselves of the opportunities to participate in tourist activities. It recommends a series of measures needed to address the problems, although no timetable is set out for these to occur and indeed it is not clear whether these recommendations have been accepted.

NWRDA

- Tourism strategies produced by the RDA and Tourist Boards will encompass disability and diversity as mainstream priorities.

- Annual sub-regional events run by NW Regional Tourist Boards on DDA/DED good practice.
- 'Tourism for All' initiatives are developed within each sub region to increase awareness of disability and equality.

Transport

One Northeast

- Accessible transport promoted with North East Assembly partners.
- Disabled people actively encouraged to be part of Steering Groups for development and delivery of transport.
- Implement DPTAC standards.

SEEDA

- Ensure that all infrastructure developments follow the guidelines of DPTAC.

EMDA

- Consideration to disability issues is given when EMDA is directly involved in transport schemes.
- EMDA uses its influence to encourage organisations responsible for delivering transport, including redevelopment of key 'gateways' to consider disability and access issues.

EEDA

- Work with partners to encourage accessible transport in any master planning exercise/ sustainable communities planning.

Yorkshire Forward

- Work with transport agencies/partners to increase access to public transport for disabled people.
- Timetables to show disabled accessible routes.

LDA

- Commission research on the economic impact of

inaccessible transport for disabled people in London particularly focusing on blue badge parking.

Failed action plans

We asked four agencies (EMDA, EEDA, Advantage West Midlands and SWRDA) to revise their Action Plans involving disabled people.

EEDA, EMDA and SWRDA plans had failed to cover all relevant functions, focusing on internal access issues. We were also concerned that some of the planned actions failed to give due regard for disability equality. SWRDA focused almost exclusively on the elimination of discrimination rather than the broader remit of promote equality

EMDA's Action Plan does not cover the 3 years duration of the Scheme, as is required by the Regulations. However it is intended to be an evolving document and will be updated to cover the next two years. This will give the agency the opportunity to overcome any of the Scheme's deficiencies that are uncovered. The involvement of disabled people in completing the scheme will be essential.

EEDA's Action Plan only covers the first year of operation of the Scheme. It is being revised and extended.

The Advantage West Midlands Action Plan does not cover key Agency functions such as housing, transport, skills, employment. Whilst the Plan sets out to provide a framework for action to "build a positive and well informed disability culture" covering its partners, procurement activities and its internal directorates, a very positive approach this is not matched by the detail in the Scheme.

It would be remiss not to mention certain strong aspects of the present Action Plans of these agencies – highlighted above.

One area of influencing activity that few RDA's undertook is in relation to regeneration. Disability groups frequently get neglected in activities to engage with deprived communities and understanding their problems.

An exception was One Northeast. Amongst other activities, it plans to ensure that people administering and engaging with such groups are disabled people or at least have received user-led

disability equality training. It will also ensure engagement is accessible and physical, communication and transport barriers are removed.

Participative engagement processes will be developed and delivered with organisations of disabled people so that disabled people can advocate for themselves and begin to tackle worklessness themselves in their own communities.

Impact assessment

Schemes are required to set out the authority's arrangements for assessing the impact of proposed or current policies and practices on disability equality. Getting and acting on good disability equality impact assessments is key to the long term success of the Duty, and fits with broader Government goals.

This is possibly the aspect of the Duty that is most difficult to assess simply through reading a written document. The proof of an effective impact assessment process is in whether it has made any difference to outcomes.

In any event, in many cases we found little of the required information in the Schemes: about processes and the prioritisation of existing policies for impact assessment.

We were concerned in some instances that the impact assessment approach for race duty had not been broadened as required by the disability duty: they will assess only adverse impact, not failure to seize a positive opportunity to promote equality.