

## Inclusion London’s response to the Fulfilling Potential: Making it Happen - Better Working with Disabled People consultation

October 2013

**1. Introduction**

## Inclusion London welcomes the opportunity to respond the Fulfilling Potential: Making it Happen - Better Working with Disabled People consultation.

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## The consultation documents are available at: <http://odi.dwp.gov.uk/fulfilling-potential/index.php>

**Inclusion London**

Inclusion London is a London-wide organisation which promotes equality for London’s Deaf and disabled people and provides capacity-building support for Deaf and disabled people’s organisations in London.

**Disabled People**

There are:

* 11.5 million people in the UK who are covered by the disability provisions set out in the Equality Act. This is 19 per cent of the population[[1]](#footnote-1).
* There are approximately 1.4 million deaf and disabled people in London[[2]](#footnote-2)
* Just under 1.3 million aged 16 to 64 years resident in the London in 2011[[3]](#footnote-3)

**2. Inclusion London’s response**

Inclusion London is concerned that Equality 2025 has been abolished without a replacement in place. The coalition government has pushed forward major policy changes since the election in 2010. The combined impact of these policies, which includes the Welfare Reform Act, will impact on disabled 9 times more than other citizens[[4]](#footnote-4), so it is crucial that disabled people are able to comment at an early stage on any more policy changes the government is beginning to consider.

The government abolished Equality 2025 only two months after the review, which gave no time to put an alternative in place before Equality 2025 closed. There will be a considerable time gap between the end of Equality 2025 and the new consultation mechanism. This gap seems all too convenient as radical policies can be pushed forward without due scrutiny or comment by disabled people at an early stage.This evokes a degree of scepticism about the coalition government’s commitment to involve disabled people in policy making and also whether government will provide the resources needed to make any future initiative effective.

**What is needed**

The challenge is to create a well-supported structure that ensures that disabled people are able to influence policies across all appropriate government departments.

Inclusion London suggests amendments to the proposals in the consultation document to facilitate disabled people’s timely and positive influence on government policy.

**2a Inclusion London’s recommendations**

**Engagement with disabled people**

**Policy Forum**

Inclusion London recommends engagement with disabled people through a Policy Forum composed of Deaf and disabled people and representatives of Deaf and disabled people’s organisations (DDPOs), i.e. those organisations run by disabled people.

There should also be regular formal contact between the Policy Forum and the Minister of disabled people and other appropriate Ministers.

Inclusion London’s recommendations regarding the membership of the Forum can be found below in the answer to the consultation Questions 4.

**Policy Advice Group members of Policy Forum**

Inclusion London recommends that this Policy Forum contains Deaf and disabled people who are experts on key policy areas, such as Independent Living, education, employment, transport and the environment and the UN Convention of Rights of People with Disabilities, these members will form the Policy Advice Group.

The Policy Advice Group could be called on to give policy advice directly to the government as and when required and also approach government departments when appropriate, as well as meeting as a group to discuss government proposals.

We believe it is crucial that the Policy Advice Group is able to proactively engage with appropriate government departments and Ministers on all policies impacting on disabled people, rather than just waiting to be approached by government. Clear lines of communication need to be put in place with regular, formal contact agreed with the Minister for Disabled People and Ministers from other appropriate departments on a more frequent basis than the full Policy Forum. A communication strategy needs to be put place to implement this.

If the Policy Advisors are also members of the larger Forum they will be well aware of issues that are impacting at grass roots level and will also be aware of the wider implications of the policy they are advising on.

To increase communication with local DDPO’s we suggest that the Policy Group members inform the Policy Forum of the policy areas government has requested advice on so local and regional Deaf and disabled people’s groups could give feedback on the likely impact of the policies on disabled people.

All communication with the government needs to be conducted with the minimal need for bureaucracy.

See more details about membership, experience and criteria for of the Policy Advice Group in the answers to the consultation Question 2 and 3 below.

**Ad hoc Advice Group**

The proposed one off or Ad hoc Policy Advice group of experts, which government can call on for advice on one particular policy will not be able to provide an overview of how one particular policy interacts with another one, therefore their advice will have a very narrow perspective.

Also Ad hoc/one off policy advisors cannot be proactive, as they are entirely dependent on government department for asking for their involvement. Ministers may be totally unaware of the impact of a policy on disabled people and therefore will not seek advice. Involvement of the Policy Advice Group at an early stage in policy making could have a positive impact and save work at a later stage.

We are also concerned that a separate Policy Advice Group is likely to have greater communication and influence on government policy, while the Policy Forum could become side lined with little contact with government departments and little influence on the policy. It could just become a talking shop amongst disabled people, especially if just has ‘free form discussions at an earlier stage’ which are not likely to be linked with any definite policies that the government intends to progress.

**Resources and remuneration**

Inclusion London recommends that both the expert advisors and members of the larger Policy Forum should be paid for their time. Members of the Policy Forum should not expected to ‘donate’ their time for free.

**2b. Inclusion London’s response to the consultation questions**

Inclusion had responded to the key questions only, we have not responded to Questions vi, vii, viii and ix.

**Principles**

**Question 1 – Have we included the right principles? Are there others we should apply?**

Inclusion London has recommended additional principles below:

**Principles recommended by Inclusion**

**Independence**

* The Policy Advisory Group and the Policy Forum should be independent.
* The Policy Advisory Group should be able to proactively engage with government departments.

**Membership**

See below under Question 2, 3 and 4

**Communication**

* Formal, accountable, clear lines of influence/communication across all appropriate government departments are put in place for both the Policy Advice Group and the Policy Forum.
* Formal, accountable lines of communication from the Policy Forum back to local and regional DDPOs are put in place.

**Accessible**

* The forum should be accessible in aspects of its work.

**Aim & Objectives**

* The remit and purpose of the Policy Forum is clearly defined.

The aims and objectives of the Policy Advice Group to include:

* To provide expert advice informed by lived experience of disabled people on policy ideas that are currently being considered by government

The aims and objectives Policy Advice Group and the Policy Forum to include:

* To influence government policy to improve the lives of disabled and further the aims of the Improving the Life chances of disabled people, the Independent Living Strategy as well as the Fulfilling Potential Making it Happen Action Plan.
* The influence should be wide, strategic and cross all appropriate government departments

**Work Plan**

* A clear, flexible, strategic work plan for both the Policy Advice Group and the Police Forum to be put in place, based on policy that is currently being considered by government. The work plan to be reviewed at regular intervals.

**Monitoring of co-production and partnership working**

* The Policy Advice Group and the Policy Forum’s work to be reviewed regularly with an annual report detailing the work of both, to ensure the initiative gives value for money.
* Government’s commitment to co-production and partnership working is monitored to ensure the initiative gives value for money.

This could involve a review of each relevant government department with an annual report detailing the level engagement with the Forum and the impact the Forum has had on the department’s policy.

**Resourcing**

The Policy Advice Group and the Policy Forum is to be appropriately resourced: The areas funding should be available for should include:

* Access: to ensure all aspects of the work of the Advisory Group and the Policy Forum are accessible
* Remuneration for members of the Policy Advice Group and the Policy Forum
* Administrative support needed.

**2d. Inclusion London’s comments on the proposed Principles are below:**

Where Inclusion London has not commented on a Principle, we are in agreement.

1. **build on EQ2025’s achievements**

1. **broaden the range and scope of input**

Inclusion London agrees with this principle, see the recommendations above and under Question 4.

1. **lived experience of disabled people and specific expertise**

Inclusion London agrees and recommends that the policy experts are Deaf and disabled people who are also members of the full Policy Forum, as mentioned above. Members of the Policy Forum to be Deaf and disabled people and representatives of organisations run by Deaf and disabled people.

1. **Expand co-production and partnership working:**

Government’s commitment to co-production and partnership working with the Policy Advice Group and the Policy Forum is key to the whole initiative working and therefore it should be monitored, as mentioned above.

1. **Open and transparent** and **confidential advice** where necessary

Openness and transparency regarding the advice given by the Policy Advice Group would be welcomed, so Deaf and disabled people can be made aware of policy areas government has received advice on and what has been recommended.

If advice given by the Policy Advice Group is always confidential a lack of the understanding and appreciation of the work of the Group can occur amongst disabled people. We understand that at times confidentiality is necessary and it can sometimes encourage an open discussion, but we suggest that confidentiality is kept as an exception rather than the rule.

1. **Flexibility**
2. **strategic discussions and horizon scanning**
3. **two-way flow of information and ideas**

It is essential that government is open to the recommendations of the Policy Advice Group and feedback from the Policy Forum

1. **Greater opportunity for regional input and greater representation form hard to reach groups**

**Policy Advice**

**Question 2– How should potential advisors be identified?**

Inclusion London recommends that membership of the Policy Advice Group is made through application only, so there is an ‘equal opportunity’ to be a member.

Also the application process should be is transparent with a well-publicised ‘job description’. All members should be chosen on merit, i.e. it should be similar to a usual job application process.

While the possibility of being able to nominate members initially sounds attractive, it could become fraught with accusations of favouritism at a later stage, as it will not be possible to act on all nominations.

**Question 3- What criteria should be applied to determine relevant expertise?**

Criteria should include a relevant proven track record or appropriate professional experience, coupled with lived experience of a disabled person.

Other criteria to include:

* A grounding the social model of disability is essential
* Expertise in a particular area relevant to disabled people, such as education, employment, Independent Living, Hate Crime, UN Convention of Rights of Disabled people etc

**Strategic Engagement**

**Question 4 – How do we make sure an engagement forum has the right membership?**

Inclusion London recommends that members:

* Have a grounding the social model of disability
* Are disabled person with expertise in a particular area such as education, employment, UN Convention of Rights of Disabled people, Independent Living etc

or

* A Deaf or disabled person with experience of leading a Deaf or disabled people’s organisation at a local or regional level.

It is essential that each region is represented and also local DDPOs that provide direct services to disabled people.

or

* A representative of a BAME disabled people’s organisation or are a disabled person that is a member of a BAME community.

or

* A Deaf or disabled people involved with a networks of Deaf or disabled people with a particular focus, such as Disabled People Against Cuts

The numbers of members of the full Policy Forum should be as small as practically possible, while ensuring that all the areas above are represented.

Inclusion London has not responded to Question 5 and 6.

**Question 5 – How do we best ensure that discussions are effective?**

**Question 6 – How should the new arrangements be administered?**

**Resources**

**Question 7 – How do we ensure we get value for money?** - Monitoring as suggested above, through an annual review and published report.

**3. Conclusion**

Inclusion London recommends that there are two groups; the Policy Forum and the Expert Advice Group.

Inclusion London recommends that the Policy Forum is composed of Deaf and disabled people and representatives of Deaf and disabled people’s organisations.

Members of the Expert Advice Group should be Deaf and disabled people with a particular area of expertise such as education, employment or Independent Living. Members of the Policy Advice Group should also sit on the Policy Forum. Membership of the Policy Advice Group should be by an interview process only. See the response above for full details.

Inclusion London recommends additional principles, which are listed above.

Inclusion London believes that it is crucial that clear lines of communication are put in place with government departments and a clear, flexible work plan is put in place.

That concludes inclusion London’s response.

**This response is supported by:**

Greenwich Association of Disabled People

Richmond AID

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1. Fulfilling Potential: Building Understanding report <http://odi.dwp.gov.uk/fulfilling-potential/index.php> [↑](#footnote-ref-1)
2. <http://www.inclusionlondon.co.uk/all-in-this-together> [↑](#footnote-ref-2)
3. <http://www.london.gov.uk/sites/default/files/assessment_gla_deaf_disabled_equality_2013.pdf> [↑](#footnote-ref-3)
4. <http://www.centreforwelfarereform.org/library/type/pdfs/a-fair-society1.html> [↑](#footnote-ref-4)