

Inclusion London's response to the consultation on the Mayor's vision for a diverse and inclusive city

September 2017

More information about the consultation is available at:

<https://www.london.gov.uk/get-involved/talk-london/all-consultations/consultation-mayors-vision-diverse-and-inclusive-city>

For more information, contact:

Email: Policy@inclusionlondon.org.uk

Telephone: 020 7237 3181

1. Introduction

Inclusion London

Inclusion London is a London-wide user-led organisation which promotes equality for London's Deaf and Disabled people and provides capacity-building support for over 70 Deaf and Disabled People's Organisations (DDPOs) in London and through these organisations our reach extends to over 70,000 Disabled Londoners.

Disabled people

- In 2012/13 there were approximately 12.2 million Disabled adults and children in the UK, a rise from 10.8 million in 2002/03. The estimated percentage of the population who were disabled remained relatively constant over time at around 19 per cent.¹
- There are approximately 1.2 million Disabled people living in London.²

Inclusion London welcomes the opportunity to respond to the consultation on the Mayor's vision for a diverse and inclusive city. We also welcome the direction of travel in the strategy as a whole.

¹ Family Resources survey United Kingdom 2012/13:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/325491/family-resources-survey-statistics-2012-2013.pdf (page 61)

²https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/325491/family-resources-survey-statistics-2012-2013.pdf (page 64) See also 'Disability data tables' at: <https://www.gov.uk/government/statistics/family-resources-survey-financial-year-201516>

2. Inclusion London's response

In our response, we set out overarching recommendations to ensure that London is an inclusive city for Deaf and Disabled people. Following this we mention the areas of the Mayor's vision we support and then provide recommendations to improve the strategy from the perspective of Deaf and Disabled people. We have used the format of the consultation document but have only addressed the areas in the strategy that have a strong impact on Deaf and Disabled people.

Our response has been informed by Deaf and Disabled people's views and experience gathered at the event facilitated by GLA staff on 5 September.

Intersectionality and multiple discrimination

Deaf and Disabled people are members of all other communities such as the BAME community, the Muslim or Jewish community and the LGBT community, so barriers and issues that impact on other communities also impact on us. As a result we can experience multiple discrimination, for instance research shows that Disabled women are more likely to experience serious sexual assault than non-Disabled women.³ Black people with mental health support needs are less likely to receive non-coercive treatments such as psychotherapy and counselling than other groups, and more likely to receive higher doses of medication.⁴

³ Smith, D.L. (2008) Disability, Gender and Intimate Partner Violence: Relationships from the Behavioral Risk Factor Surveillance System. *Sexuality and Disability* 26(1), pp.15-28.

European Parliament (2007), Committee on Women's rights and gender equality, *Report on the Situation of Women with Disabilities in the European Union (2006/2277/(INI))*. Finney A (2006) *Domestic violence, sexual assault and stalking: findings from the 2004/05 British Crime Survey*. Home Office Report 12/06.

³ Casteel, C., Martin, S.L., Smith, J.B. (2008) National Study of Physical and Sexual Assault Among Women with Disabilities. *Injury Prevention* 14, pp.87-90.

⁴ http://www.rota.org.uk/webfm_send/4

Over-arching recommendations

Inequality increasing

Since 2010 there has been retrogression of Deaf and Disabled people's rights in the UK with widening inequality and discrimination. At the end of 2016 the United Nations published an inquiry report which found evidence of 'grave and systematic violations' of Disabled people's rights by the UK government due to welfare reform.⁵ In the recent UN session in Geneva, which was part of the periodic review of the UK's implementation of the UN Convention on the Rights of Persons with Disabilities (UN CRPD), the UN Disability Committee Chair, Theresia Degener, in her closing questions to UK government representatives stated:

“Evidence before us now and in our inquiry procedure as published in 2016 report reveals that social cut policies has led to human catastrophe in your country, totally neglecting the vulnerable situation people with disabilities find themselves in.”

Committee members were clear that no longer consider the UK to be a “world leader” in disability, with one commenting on a desire to see the UK government “back as a world leader”. He went on to say “which at the moment, I’m afraid you are not, but DPOs [Disabled People’s Organisations] I congratulate. (They) are in fact, the world leaders in your country.”

➤ Recommendation

We urge the Mayor Sadiq Khan, to stand firmly in support Deaf and Disabled People and our organisations to ensure our rights under the UN CRPD as well as our rights under domestic law are upheld.

⁵ <https://www.inclusionlondon.org.uk/campaigns-and-policy/facts-and-information/equality-and-human-rights/grave-systematic-violations-un-inquiry-briefing-responses/>

Disability Equality in London

Inclusion London was pleased to be asked to produce the Disability Inequality Issues MAP report for the GLA. We hope that the Mayor and the GLA follow through by implementing the report recommendations in the report. Key recommendations include:

- To establish a clear policy position that endorses and commits the GLA to the Social Model of Disability (and Cultural Model of Deafness) and Disabled Londoners rights under the UN Convention of the Rights of People with Disabilities (UNCRPD); an endorsement of the UNCRPD by the Mayor would send a clear message to Disabled Londoners of the Mayor's commitment to our human rights.
- To carry out a cumulative impact assessment on how policies and measures carried out through welfare reform have affected Disabled Londoners
- To create a Senior Disability Advisor post (for a Disabled person) within the GLA.
- To set up a resourced Disability Equality Strategic Advisory Board/ group consisting of representatives from DDPOs, Strategic Access Panel (SAP) and Independent Disability Advisory Group (IDAG) – that will provide expertise and oversight of the GLA's work on disability equality.
- To hold a resourced, independently facilitated 6 monthly DDPO Stakeholder forum between the Mayor, senior GLA representatives and DDPOs.
- To commit to a GLA wide programme of Disability Equality training from a Social Model perspective designed and delivered by Disabled people.

See other recommendations in the Disability Equality Issues report.

Mitigate the impact of austerity

We welcome the Mayor's intention to mitigate against the negative impact of welfare changes. This is particularly relevant to Disabled people who have

experienced a disproportionate impact of welfare benefit cuts and changes⁶ The cumulative impact of government welfare reforms have led to a severe regression in Disabled people's standard of living, the use of food banks has increased and so has the risk of evictions. The removal of benefits has been linked to deaths and suicides including in coroners' reports and by academic research assessing the rise in mental ill health associated with the Work Capability Assessment. Changes to ESA (Employment and Support Allowance) have reduced the benefit for new claimants in the work-related activity group by £30 a week from April 2017 despite evidence that this will move Disabled people further from the labour market while causing greater poverty and hardship. Benefit sanctions leave Disabled people struggling to cover daily living costs while having a destructive impact on mental and physical health. The assessment for Personal Independent Payment (PIP) assessment is disastrously inaccurate and has resulted in thousands of Disabled people being forced to return their Motability vehicles leading to isolation at home. A more detailed description on the impacts of austerity can be found in ROFA's submission to UN CRPD Committee.⁷ Action by the Mayor to mitigate the impact of austerity is urgently needed.

➤ Recommendations

- We ask the Mayor to mitigate the impact of government's cuts and changes to welfare benefits mentioned in brief above and detailed in the ROFA shadow report to the UN CRPD Committee.⁸
- We ask the Mayor to consult with Inclusion London on how to mitigate the impact of austerity on Deaf and Disabled Londoners.

⁶ <https://www.equalityhumanrights.com/sites/default/files/research-report-94-cumulative-impact-assessment.pdf>

⁷ This is one in a number of detailed submissions to the UN Disability Committee including written evidence to the UN inquiry which focused on the impacts of welfare reform. We can provide further links and information as required.

<https://www.inclusionlondon.org.uk/campaigns-and-policy/act-now/disabled-peoples-shadow-report-uk-governments-account-un/>

⁸ <https://www.inclusionlondon.org.uk/campaigns-and-policy/act-now/disabled-peoples-shadow-report-uk-governments-account-un/>

Independent living

Independent living means having the same opportunities as non-disabled people, including an education, a career, a social and family life and to participate in political and cultural activities on an equal basis as others.

According to Article 19 of the UN CRPD⁹ the state should provide support and personal assistance to ensure that disabled people have ‘choices on an equal basis with others’ and ‘full inclusion and participation in the community’.¹⁰ Independent Living also means choice and control over care and support.¹¹

Another area of austerity that has hit Disabled people is the impact of the £4.6 billion cut in funding for social care over 5 years by central government.¹² In many areas care and support is being cut to the bone so a ‘clean and feed’ model of care is increasingly common, leaving Disabled people isolated at home, unable to participate in activities in the community including employment, and forced to follow strict regimes in their own homes without choice or control over basic human needs such as when to eat, drink, use the toilet or go to bed. Disabled people cannot afford the increases in the financial contributions so their only choice is to have their care cut further. There is also concern that CCGs are setting maximum caps on funding so Disabled people may be forced to go into residential homes if the cost for care in the home is higher. Also, as a result of low wages together with Britain’s prospective exit from the EU, Disabled people are finding it increasingly difficult to recruit and retain carers and personal assistants. The situation is bleak.

⁹<http://www.ohchr.org/EN/HRBodies/CRPD/Pages/ConventionRightsPersonsWithDisabilities.aspx#19>

¹⁰ The UN Disability Committee has just produced a General Comment on Article 19 which clarifies the scope and meaning of the right to independent living:
<http://www.ohchr.org/EN/HRBodies/CRPD/Pages/CRPDIndex.aspx>

¹¹<http://webarchive.nationalarchives.gov.uk/20130703133720/http://odi.dwp.gov.uk/docs/wor/ind/ilr-executive-report.pdf>
<https://www.disabilityrightsuk.org/news/2016/may/independent-living-strategy-group-survey-2016>

¹² <https://www.adass.org.uk/full-report-adass-budget-survey-2015>

The crisis in funding care and support urgently needs to be solved. Inclusion London believes that care and support should be free at the point of delivery funded from general taxation, we see this as the most sustainable way forward.

➤ Recommendation

Cuts to social care support are part of the Government austerity measures causing a human catastrophe and we ask the Mayor to put pressure on the government to ensure that independent living support is sustainably funding through general taxation.

However, in some areas such as the London borough of Hammersmith and Fulham, social care budgets are being protected and care is free for those that are eligible.

➤ Recommendation

Other London boroughs should follow this good example and we ask the Mayor to use his influence to promote areas of good practice.

We were pleased to be informed that the Mayor intends to respond to the consultation on the government's green paper on social care. Once the paper is published we will send a briefing paper to the Mayor to inform his response. It is critical that the green paper addresses issues concerning Disabled people's right to independent living and is not solely focused on the costs of care in old age.

Public Sector Equality Duty & Reasonable adjustments

The Mayor needs to use his influence to counteract the impact of the Government's red tape challenge and the suggestion that the measures in the Equality Act 2010 placed 'unnecessary or disproportionate burdens on business.' The Public Sector Equality Duty has an extremely important role in protecting the rights of Disabled people, however we know that too often it is not implemented, for example inaccessible consultations on important issues that affect Deaf and Disabled people. There are many areas where reasonable

adjustments are not made, for example buildings that are inaccessible to Disabled people.¹³

➤ Recommendation

The Mayor encourages all public bodies to implement the Public Sector Equality Duty and to make reasonable adjustments.

DDPOs – a gateway to equality and inclusion under threat

Many Deaf and Disabled people are not aware of their rights – for instance many Deaf and Disabled people are not aware of the legal obligation to make reasonable adjustments under the Equality Act 2010, what constitutes a hate crime or how to challenge harmful decisions such as cuts to their social care package or benefits.

Many Community Law Centres have closed due to the impact of the Legal Aid, Sentencing and Punishing Offenders Act¹⁴ so advice can be hard to obtain. DDPOs play an essential role in informing Deaf and Disabled people about their rights, keeping up-to-date with relevant policy changes and explaining these in accessible ways to our members. DDPOs also provide specialist services that are not accessible in the mainstream, for example domestic abuse. However, DDPOs are struggling to maintain our services and there are now a number of boroughs without a local DDPO. Funding for DDPOs is becoming increasingly difficult to find and it can be short term or tokenistic. Alongside this, need is dramatically increasing. As a second tier organisation, Inclusion London does not work directly with individuals, however we now receive daily contacts from Deaf and Disabled people in utter despair with no-where to turn for support and advice. Often the only place we can signpost to is to their MP. There is literally no-where else.

¹³ <https://www.disabilitynewsservice.com/university-faces-claims-from-second-student-over-reasonable-adjustments/>

¹⁴ <http://www.legislation.gov.uk/ukpga/2012/10/contents/enacted>

➤ Recommendation

- To work with London's voluntary sector and London Councils to map provision of information, advice and advocacy provision across the City in order to understand and evidence the need for these services by excluded communities including Disabled people.
- For the Mayor to champion the DDPO sector and explore use of procurement powers including use (while still possible) of Article 19 of the EU Procurement Directives to actively support the sector.¹⁵

Data collection

Comprehensive data is needed on Deaf and Disabled people in London borough by borough across all aspects of life and made available on the London.gov website.

➤ Recommendation

- Comprehensive data on Deaf and Disabled people is collated and made available.

¹⁵ This Article provides for public sector contracts to be reserved for supported businesses.

'1 - A great place to live'

1.1 Affordable, accessible decent homes

We welcome the Mayor's acknowledgments that high costs and poor housing affect the wellbeing of Disabled people, that many Disabled Londoners live in inaccessible poor quality homes, and that almost half of rough sleepers have mental health issues. We also welcome the Mayor's proposal that his London plan and Housing Strategy will include plans for 'specialist and affordable housing' and that he will use his influence on others to build more 'genuinely affordable, accessible and adaptable homes...'

Only 6% of homes in England provide basic accessibility features.¹⁶ Many Disabled people are unable to pay for their homes to be adapted so are forced to wash at the kitchen sink or sleep in the lounge¹⁷. Other Disabled people experience thousands of pounds debt because of the high costs of adaptations.¹⁸ Freedom of Information requests by the MS society show that 'over a third of Local Authorities have awarded no discretionary payments for DFGs, and many had a policy not to offer discretionary payments at all.'¹⁹ Particularly in London where housing costs are high it is vital that London borough Councils make DFGs available.

Disabled people have been disproportionately hit by the 'spare bedroom subsidy removal', also known as the bedroom tax. The Government cites the existence of "Discretionary Housing Payments" as a mitigating measure for Disabled people who require an extra bedroom for impairment-related reasons, however these are short term and place a significant additional barrier on Disabled people who need to continually re-apply for their DHP.

¹⁶ <https://www.habinteg.org.uk/latest-news/habinteg-campaign-demands-action-to-increase-number-of-accessible-homes-1037>

¹⁷ <https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

¹⁸ <http://www.muscular dystrophyuk.org/news/news/breaking-point-the-crisis-in-accessible-housing-and-adaptations/>

¹⁹ <http://www.muscular dystrophyuk.org/app/uploads/2015/09/POL5-C-Housing-briefing-final.pdf>

Many Deaf and Disabled people are on low incomes and need the genuinely affordable housing with secure tenancies that social housing can provide. The private rented sector is often inappropriate for Disabled people due to discrimination and an increasing unwillingness to rent to benefit claimants.²⁰

The draft Diversity and Inclusion (D & I) strategy highlights the Mayor's intention to support councils and housing associations to build homes for 'London Living Rent', but this policy is aimed firmly at those on middle incomes. The Diversity and Inclusion strategy should give similar emphasise to the Mayor's commitment that '60% of the affordable housing provision should be for social and affordable rent...' ²¹

The definition of affordable rented housing is still "no more than 80% of the local market rents..." which is unaffordable to many Disabled people who are more likely to be on low incomes. The commitment to build more social housing is one we whole heartedly support, but we would welcome more detail on the actual percentage of social housing to which the Mayor is committing. If the Mayor has the power to change the definition of what an affordable housing rent is in London this needs to be done urgently so it is set much lower to enable Deaf and Disabled people and others on low incomes can continue to live in London and the Mayor's vision of diverse and inclusive city can become a reality.²²

Inclusion London recently facilitated focus group for London DDPOs with the Equality and Human Rights Commission for the EHRC disability housing inquiry.

²⁰ Experiences with Universal Credit have increased the percentage of landlords now saying they will not rent to people on benefits. Research carried out by Residential Landlords Association (RLA) in 2016 found that 25 per cent of landlords with tenants in receipt of Universal Credit said that they had tenants in rent arrears and research published by RLA in July 2017 into the impact of welfare reform on access to homes for under 35's found a decline in numbers of landlords prepared to rent to people on benefits. Two-thirds were not willing to let to Housing Benefit/Universal Credit (HB/UC) claimants.

²¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-3/policy-311-affordable>

²² 'Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). In practice....'
<https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-3/policy-310-definition>

We were delighted that a representative from the GLA was able to attend and to feed into the inquiry. We are currently awaiting the follow up consultation on the inquiry findings and recommendations.

➤ Recommendations

- ‘No Nights Sleeping Rough’ project is implemented in a supportive way, with long term assistance available to enable people to move off the street into long term accommodation.
- The Mayor’s commitment that 60% of the affordable housing provision should be for social and affordable rent is highlighted in the final Diversity and Inclusion Strategy.
- The Mayor adopt a definition of “affordable rent” that is lower than 80%.
- The Mayor stipulates clearly the percentage of social housing to be built.
- The Mayor support the findings of the forthcoming EHRC disability housing inquiry and implement recommendations that fall within his powers.

1.3 An inclusive city

We appreciate the Mayor’s recognition that accessible and safe neighbourhoods will improve the wellbeing of Disabled people and make journeys to all destinations easier. We support all the Mayor’s proposals to create an inclusive environment and to ensure there is a better supply of accessible and adaptable homes. We are particularly pleased that the Mayor acknowledges that ‘Disabled people are experts in the barriers they face’ and welcome the intention to consult with ‘the Inclusive Design and Access Panel (IDaAP) during the planning process.

Local consultation

Consultation with Deaf and Disabled People’s Organisations and Disabled people is also vital at local level. Local access forums composed of Deaf and Disabled people and professionals and local Access Officers provided a valuable means of involving the Deaf and Disabled people in decision making.

However, many forums have folded and the numbers of Access Officers have reduced due to cuts in local authority funding.

➤ Recommendation

The Mayor uses his influence to encourage London boroughs to establish or maintain local access forums and local Access Officers.

Ongoing access issues

There are several ongoing access issues which need to be addressed in order to achieve an accessible environment, these include:

- The implementation of shared surface initiatives needs to be stopped as they are dangerous for Disabled people, particularly for visually impaired people.
- The need for accessible car parks so all buildings can be accessed by wheelchair users.
- Lack of adequate Blue Badge parking, across London but especially in Central London where the national scheme does not apply. Some Disabled people can only travel in their own vehicle.
- Lack of accessible public toilets
- Street furniture / clutter continues to be a problem for Disabled people.

Regulations

We are pleased that London is one of the few areas of the UK to require 10% of all new homes to be built to wheelchair accessible standards. We promoted London as an example of good practice in this area when we gave evidence to the Women and Equalities Committee Disability and the Built Environment inquiry and support the House of Lords Select Committee recommendation on disability and equality that this target should be extended to all local authorities.

Until the introduction of M4(2) the optional requirements regarding accessible and adaptable dwellings, all new homes in London were built to Lifetimes Homes standards. Under the M4(2) regulations some vital regulations have been weakened for instance the minimum stair widths have been reduced and provision to ensure that hoists can be installed are no longer required and 'Future shower provision' is no longer required in 1 and 2 bed houses with

smaller WCs²³ so in some respects new housing will be built to lower accessibility standards. The Mayor intends to 'continue to contribute to the development of national technical access standards' so we urge him to put forward the following recommendation:

➤ Recommendations

- All M4(2) building regulations are brought up to Lifetime homes standards and all compulsory building regulations under Part M have the same or improved level of accessible standards as Lifetime Homes Standards.
- Until this is achieved we recommend that:
- M4 (2) standards are only used in London when they have the same or improved level of accessible standards as Lifetime Homes Standards.

1.4 Strong, connected communities

We welcome the Mayor's acknowledgement that Disabled people (as well as young people and BAME Londoners) are less likely to take part in public and political life than their peers.

➤ Recommendation

The Mayor uses his influence to encourage the government to reinstate the Access to Elected Office Fund.²⁴

²³ Habinteg have produced a useful document which compares Lifetime Homes Standards with the M4(2) regulations, which is available at:

<http://www.lifetimehomes.org.uk/pages/lifetime-homes-and-part-m.html>

<file:///C:/Users/Henrietta.Doyle/Downloads/Accessible-Housing-Standards-2015-edition-2-June-2016.pdf>

²⁴ <https://www.gov.uk/access-to-elected-office-fund/overview>

2 ‘A great place to grow up’

2.1 Child poverty reduction

We welcome the Mayor’s acknowledgement that over half of families with a Disabled child live at the margins of poverty and that it costs three times more to raise a Disabled child.

We support all the Mayor’s proposals to reduce child poverty. We are particularly interested in the proposal ‘to work with others to monitor and mitigate against negative impacts of welfare changes’.

➤ Recommendation

The Mayor consults with Inclusion London regarding measures to mitigate the impact of welfare changes.²⁵

2.2 Inclusive and accessible education

Please see below the Alliance for Inclusive Educations (ALLFIE) comments on the Mayor’s strategy regarding an inclusive education and inclusive apprenticeships:

Inclusive education

Whilst we are pleased to read that promoting inclusive education is part of the Mayor of London’s Vision for a Diverse and Inclusive City, nevertheless the focus is of a very narrow nature. The Mayor’s focus on Disabled children and young people’s educational outcomes appears to solely focus on academic achievement and reporting of gaps in GCSE attainments. Whilst we recognise that academic attainment is an important measure, nevertheless we believe that a key principle of mainstream education is to promote inclusivity. It is only when pupils play, learn, work and relate together that we will be able to develop a world-class city that welcomes all regardless of ability and

²⁵ <https://www.equalityhumanrights.com/en/publication-download/research-report-94-cumulative-impact-assessment>

background. Inclusive education across the capital is a must if the Mayor of London wants to develop a world class inclusive capital city.

In order to achieve an inclusive education system, it is necessary that the Mayor, the London Assembly and the London Authority considers measures and targets which are far-more reaching than whether individual Disabled pupils will or will not achieve academic targets which are informed by non-Disabled pupils cognitive norms. For many Disabled pupils such as those with profound learning difficulties, they will not attain academic standards set for non-Disabled pupils. However, regardless of ability, all Disabled pupils have an unqualified human right to be taught alongside their non-Disabled peer group in mainstream schools as set out in the UNCRPD Article 24.

➤ Recommendation

The Mayor to consult with the Alliance for Inclusive Education regarding education targets that are accessible to all.

2.3 A skilled future workforce

Inclusive apprenticeships

With the Government setting a public sector equality duty to deliver a specified percentage of apprenticeships under the Enterprise Act,²⁶ we were surprised that apprenticeships were not mentioned in any significant manner; apprenticeships enable young people to be better prepared for the workforce. Apprenticeships provide a practical route for Disabled young people to learn a trade.

Paul Maynard's Independent investigation into the inclusivity of apprenticeships for people with learning disabilities and learning difficulties²⁷ found that the apprenticeship offer could be more inclusive of Disabled people with learning difficulties. Currently the Government's approved

²⁶ <https://www.legislation.gov.uk/ukpga/2016/12/contents/enacted>

²⁷ <https://www.gov.uk/government/publications/apprenticeships-improving-access-for-people-with-learning-disabilities>

apprenticeship frameworks, standards and funding structures are not as flexible as they could be to accommodate any reasonable adjustments that Disabled young people may require in order to successfully complete an apprenticeship. Various barriers include the time given to complete an apprenticeship, finding paid employment, job roles and competency standards embedded within the apprenticeship standards, GCSE level Maths and English attainments and college's entry criteria.

➤ Recommendation

The Mayor and the GLA in consultation with the Alliance for Inclusive Education innovate and design a fully inclusive apprenticeship scheme that will be inclusive of everyone, including those who are Deaf and Disabled.

2.4 Healthy childhoods

We welcome the Mayor's aim to improve the mental health of all Londoners including children and young people. We agree the discrimination and stigma associated with mental health support needs, needs to be addressed.

Mental health support needs – co-production of services

A successful project in Lambeth was developed with a 'Collaborative' of service users, GPs, providers and commissioners so that people with lived experience of mental health support needs work on an equal footing with professionals to commission and co-produce new services and practice based on a foundation of people's experience.

There has been no new or additional budget for the Collaborative. All of the work that has taken place is funded through existing commissioning budgets. Funding has been redirected away from crisis led secondary care to providing support in community.

As a result there has been:

- a 32% reduction in referrals to secondary care since the introduction of the Living Well Hub

- 75% reduction in waiting times for support in secondary care – down from 1 month to 1 week.
- 400 supported each month, many of whom would not previously had any support at all

With co-production Disabled people are recognised as ‘experts by experience’ and their expertise is used to design the services. Inclusion London support services and initiatives with are co-produced with Deaf and Disabled people.

➤ Recommendation

The Mayor supports the roll out of co-produced services for people with mental health needs.

3 – ‘A great place to work and do business’

3.1 A skilled workforce

Disabled students are still experiencing discrimination in higher education due to a failure to make reasonable adjustments at a number of universities in London. This has led to Disabled students being unable to access lectures or libraries, being told that they cannot continue with their studies or choosing to leave before they have finished their course due to the strain.²⁸

➤ Recommendation

- The Mayor commissions a piece of research looking at the accessibility of London’s higher education institutes.
- Disabled people are represented on the Skills for Londoners Taskforce.

²⁸ <https://www.disabilitynewsservice.com/university-faces-claims-from-second-student-over-reasonable-adjustments/>

3.2 Decent jobs

We support the Mayor's aim to address the employment gaps that exist for Deaf and Disabled people and other communities. 49% of Disabled people aged 16–64 were in work, compared with 81% of non-Disabled people so there is a disability employment gap of 32 percentage points.²⁹ Employment rates for some groups of Disabled people are particularly low and employment rates for people with learning difficulties and people in contact with secondary mental health services are continuing to drop year on year.³⁰

Into work support

We agree with the Mayor's aim to provide 'evidence-based employment support programmes targeted at certain groups'. Deaf and Disabled People's organisations have learnt by experience that specialist, tailored support is essential needed in order for Deaf and Disabled people to obtain and maintain employment. Key elements of this support include:

- The support is peer led i.e. it is provided by a Deaf and Disabled people's user led organisation.
- Support adopts an intensive, one to one personalised approach which looks holistically at Deaf and Disabled people's needs and barriers to employment.
- Employment support is voluntary rather than punitive, i.e. sanctions are never used.
- Employment support must be distinct from health treatment and not involve engagement in coercive treatment.
- The organisation providing support has a good understanding of:

²⁹ <https://publications.parliament.uk/pa/cm201617/cmselect/cmworpen/56/56.pdf>

³⁰ The latest figures from 2015-16, showed that 5.8% of adults with learning difficulties aged 18-64 and known to Councils with Adult Social Services Responsibilities were in paid employment. This figure has been steadily dropping since a high point of 7.1% in 2011-12. In 2015-16, 6.7% of adults aged 18-69 in contact with secondary mental health services were known to be in paid employment at the time of their assessment or latest review. This is down from 9.5% in 2010 – 11. <https://www.base-uk.org/key-facts-and-data>

- ✓ The barriers Deaf and Disabled people experience in obtaining and maintain employment and how the barriers varies according to the impairment
- ✓ The Access to Work scheme³¹
- ✓ Employer's duties to under the Equality Act 2010, particularly those under reasonable adjustments.³²

➤ Recommendation

The Mayor supports employment programmes provided by Deaf and Disabled People's Organisations (DDPOs). Inclusion London would be happy to be a point of contact regarding Into Work support for Deaf and Disabled people.

Rollout of the Work and Health Programme in London

Inclusion London has a number of very serious concerns regarding the Government's work, health and disability proposals associated with the roll out of the Work and Health Programme. These threaten even greater violations of Deaf and Disabled People's rights than has hitherto occurred under a welfare reform regime already found to have caused grave and systematic violations of Disabled people's rights. We welcome the devolution of greater employment powers to the Mayor but would urge that the Mayor and GLA familiarise themselves with the implications of the Work and Health programme proposals and the reality of the impacts of welfare reform as distinct from Government rhetoric on supporting disability employment and reducing the disability employment gap, in order to ensure the Mayor does not unwittingly become associated with policies that are actively causing harm to Disabled Londoners.³³

³¹ <https://www.gov.uk/access-to-work/overview>

³² http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpgaen_20100015_en.pdf
<http://www.legislation.gov.uk/ukpga/2010/15/section/20>

³³ Inclusion London's response to the green paper consultation can be read here: <https://www.inclusionlondon.org.uk/campaigns-and-policy/facts-and-information/employment/improving-lives-work-health-disability-green-paper-inclusion-londons-response/>. This also links to a number of other consultation responses expressing

Mandatory activities/sanctions

The Government's Work, Health and Disability green paper³⁴ raised the possibility of mandatory activities for Disabled people in the Employment Allowance support group. Disabled people in the support group who have been found 'Not fit for Work' by the stringent Work Capability Assessment, have not been subject to sanctions previously. These proposals will therefore extend conditionality before any evaluation of sanctions recommended by the National Audit Office has been conducted.³⁵ The imposition of compulsory activities and sanctions will be hugely damaging for Disabled people in the support group. The Public Accounts Select Committee found: "Suspending people's benefit payments can lead them into debt, rent arrears and homelessness..."³⁶ all of which are likely to push people further away from taking steps towards employment, further more sanctions are damaging to a person's health and wellbeing - research has shown that, '...sanctions had severely detrimental impacts financially, materially, emotionally and on health'.³⁷

Due to the concerns detailed above we have reservations about promoting involvement in the Work and Health programme amongst our network of DDPOs, although they are best place to provide effective into work support for Deaf and Disabled People.

concern from, among others, the professional bodies representing British psychologists and counsellors.

³⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/564038/work-and-health-green-paper-improving-lives.pdf

³⁵ The NAO report published in November 2016 called on the Government to undertake an evaluation of the impact of sanctions on Disabled people. The NAO's own initial analysis suggested that sanctions have the impact of moving Disabled people further from employment. They found that the Government does have sufficient data on which to base a full evaluation, however they have failed to act. <https://www.nao.org.uk/report/benefit-sanctions/>

³⁶ <https://www.parliament.uk/business/committees/committees-a-z/commons-select/public-accounts-committee/news-parliament-2015/benefit-sanctions-report-published-16-17/>

³⁷ <https://www.york.ac.uk/news-and-events/news/2016/research/welfare-conditionality/>

Blurring of ethical lines between employment and health care

Under the Work and Health programme staff from JobCentre Plus are placed in GP's surgeries or the venues for therapy. Disabled people have not welcomed this initiative because many have experienced the hugely destructive benefit sanctions initiated by JobCentre Plus staff. People with mental health support needs have told us they would prefer to miss a doctor's appointment than come into contact with JobCentre Plus staff at their GP's surgery.

Also clear lines between therapeutic interventions and into work support initiatives are being breached as indicated by G4S job advertisements for Cognitive Behavioural therapists, (see footnotes for details).³⁸ It is unethical for therapists to apply any pressure on those with mental health support needs to obtain employment during therapy sessions.

Lack of funding

The Work and Health Programme has far less funding than previous employment support programmes. Several organisations have raised concerns about the low levels of funding including the Local Government Association.³⁹

The DWP launched two new initiatives aimed at supporting Disabled people into employment: Journey to Employment Job Clubs and Community Partners. Whilst we welcomed the DWP's direct engagement with Deaf and Disabled People's Organisations (DDPOs) in relation to these initiatives, we are aware that of a number of DDPOs, including some with extensive experience of providing employment support, decided not to apply for the funding for the Journey to Employment because of a number of problems which included:

- short application timeframe;

³⁸ A G4S Role description for CBT therapists ask them to 'Focus on practical techniques' that enable their patients 'to manage their conditions to enter and sustain employment'.: <http://careers.g4s.com/jobs/job/Cognitive-Behavioural-Therapist/58526>

³⁹For instance the Local Government Association said: 'The LGA is concerned that low levels of funding as compared to its predecessor could result in either too few claimants benefitting from support or inadequate interventions.'
<http://www.local.gov.uk/documents/10180/11527/Background+note+-+WHP+roundtable+25012016+for+web.pdf/6cd37204-a84b-4673-bfee-22584b2b78b1>

- insufficient budget;
- single year funding;
- concern over status of the job clubs regarding the claimant commitments
- and the use of sanctions.

We have similar concerns regarding the Community Partners initiative.

➤ Recommendations

- The Mayor and relevant GLA representatives meet as a matter of urgency with Deaf and Disabled People's Organisations to discuss the roll out of the Work and Health Programme in London.
- The Mayor does not support any into work initiatives which involve or are linked to the extension of conditionality and sanctions.
- The Mayor does not support forms of therapy that involve employment targets.
- The Mayor does not support the placing of work coaches in GP surgeries or in venues where therapy takes place.

3.3 Inclusive employers

We welcome the Mayor's acknowledgment that career progression of Deaf and Disabled people and other equality groups is still limited by discrimination.

We support all the Mayor's proposals to promote inclusive employment practices, particularly the advantages of flexible and part time work, which are vital for Deaf and Disabled people but can be needed by all employees. Below are other recommendations regarding employers and Deaf and Disabled people.

The Access to Work scheme provides essential support that used to enable Deaf and Disabled employees to fulfil their potential and enter the employment market on an equal footing with non-Disabled employees. Access to Work has also been found to make a return on investment for the Treasury without even taking into account the wider savings made through the beneficial impacts on health and well-being of employment and reducing reliance on social care support and NHS admissions. A number of changes

including the introduction of an Access to Work cap have reduced the effectiveness of the scheme, reducing employment opportunities and in some cases ending careers that individuals have spent their entire working lives building up⁴⁰.

➤ Recommendations

- The Mayor promotes awareness of the following amongst employers:
 - The Access to work scheme⁴¹
 - Knowledge of the duty to make reasonable adjustments as stated in Equality Act 2010⁴²
 - Disability leave: Deaf and Disabled people are not penalised for time off from work due to their impairments such as attending hospital appointments.
 - Disability Equality training.
- The Mayor support Deaf and Disabled People's Organisations lobbying for the reversal of negative changes to Access to Work.

We also recommend that the Mayor encourages employers to promote an inclusive culture amongst all employees, particularly management to ensure that Disabled people have an equal opportunity to progress in work and gain promotion.

3.4 Thriving businesses

Accessible services

Businesses need to ensure their services are accessible to Deaf and Disabled people. For example, accessible information such as Easy Read needs to be provided by banks so that people with learning difficulties and Deaf people can

⁴⁰ Inclusion London is about to publish research and recommendations on Access to Work. For more information meanwhile please contact ellen.clifford@inclusionlondon.org.uk.

⁴¹ <https://www.gov.uk/access-to-work>

⁴² <http://www.legislation.gov.uk/ukpga/2010/15/section/20>

understand what the terms and conditions of a current/savings account/loans are, particularly regarding the penalties for going overdrawn. Lack of accessible information results in financial exclusion.

Another issue is that customers have to shop around online to get good deals and can be penalised with higher rates by staying with the same provider unless you contact them and negotiate a lower rate, for example gas and electricity providers. This puts many Deaf and Disabled people at a disadvantage:

- Deaf and Disabled people have less access to the internet
- Not all Deaf and Disabled people are able to do the price comparison work needed or negotiate a better deal with the current provider.
- Deaf and Disabled people experience considerable additional barriers in day to day life which places greater strain on, for example time capacity and emotional well-being. This makes it far less likely that we will be able to undertake active roles as consumers.

4 - Getting around

Inclusion London supports Transport for All's response regarding the need for accessible transport for Deaf and Disabled people. Below are key points from their response:

4.1 Affordable transport

➤ Recommendations

- Work with national rail services to extend Freedom Pass usage hours to ensure Disabled people are able to use it to travel to work.
- Allow Personal Assistants to travel for free on a Freedom Pass to ensure people who require assistance are not financially penalised for it.
- Extend Taxi-card eligibility to ensure that people with invisible impairments are able to access Door to Door transport.

4.2 Inclusive transport network

Inclusive design

Inclusive design is essential to creating a truly accessible transport network. It is positive that TfL are setting targets for step free access, although these could be bolder. However, accessibility is about far more than just lifts. Hearing loops, seating, audio-visual announcements, tactile paving, liveable spaces and assistance points are all essential to making our transport network accessible.

➤ Recommendations

- Work with Disabled people to revise TfL's step-free definition of accessible bus stops to ensure that people with sensory and invisible impairments can also use or transport network freely and independently.
- Stop funding projects which include shared space schemes pending CIHT guidance as recommended by the Woman and Equalities Select Committee.
- Stop funding projects including bus stop borders and bus stop bypasses until clear accessibility standards can be agreed in consultation with Disabled people.
- Set a timeline for the introduction of platform level tactiles, access points, hearing loops. Access is not just about being step free.

Information

Navigating the transport network in London is particularly complex for Disabled and older people, station access features vary significantly and even online information to help with planning your journey is difficult to access.

➤ Recommendations

- Evaluate the impact of cuts to tube station staff on access for Disabled and older passengers.
- Create assistance points at the entrance to stations so that Disabled people are able to find staff when they need them.

- Install physical assistance points at the entrance to stations and on platforms.
- Announce lift closures on all trains and at stations to allow people the time they need to respond to disruption.
- Urgently review procedures to provide reliable data on lift closures to ensure that travel information apps are able to provide step free options.

Training

Disability Equality Training, led by Disabled people has proved to be a significant success for many TfL staff. However, bus drivers who frequently have to advocate for and support Disabled passenger currently only receive a very small amount of Disability Awareness training.

➤ Recommendation

TfL ensures that all bus drivers receive Disability Equality Training.

4.3 Healthy Streets

Many of the measures TfL could introduce to improve the accessibility of our pavements and public spaces for Disabled and older people would also help to make them more appealing to everyone. This includes:

- Level, well maintained walkways.
- The removal of street furniture.
- Safe, controlled crossings that follow pedestrian desire lines.
- Delineation between pedestrians, cyclists and vehicles.

However, some cycle infra-structure can make areas less accessible to Disabled people.

➤ Recommendations

To ensure that new cycle infra-structure does not deter Disabled pedestrians, TfL should:

- Stop funding projects which include shared space schemes pending CIHT guidance as recommended by the Woman and Equalities Select Committee.
- Stop funding projects including bus stop borders and bus stop bypasses until clear accessibility standards can be agreed in consultation with Disabled people.

4.4 Safer Journeys

Public transport is amongst the most common places where Disabled people experience hate crime. We support the Diversity and Inclusion vision's focus on ensuring that everyone feels safe on our transport system. Unfortunately, sometimes the nature of our transport system can bring Disabled transport users into conflict with other passengers.

➤ Recommendations

- Separate wheelchair and buggy spaces to avoid bringing passengers into conflict with one another
- Clearly marked priority seating to avoid bringing passengers into conflict with one another

5.3 A safer city

Accessible reporting of crime

Disabled people were more likely than non-Disabled people to be victims of crime according to the Equality and Human Rights Commission, based on Crime survey England and Wales.⁴³ Research by Mind found that 71% of those with mental health issues had been a victim of crime in the preceding two years and 22% had been physically assaulted.⁴⁴ The means of reporting crime to the police must be accessible to all, particularly regarding the Mayor's

⁴³ <https://www.equalityhumanrights.com/en/publication-download/research-report-103-crime-and-Disabled-people>

⁴⁴ http://www.mind.org.uk/campaigns_and_issues/report_and_resources/894_another_assault

proposal to close all but one of the police stations in each borough. So for the proposed 'Community Contact Sessions' the police need to be aware of the need for BSL, Palantypists and for Easy Read information as well as wheelchair accessible venues. Particularly as online methods are not accessible to all Deaf and Disabled people.

Abuse of children and young people

We wish to raise awareness of the extra risk Deaf and Disabled children and young people face regarding abuse, which can lead to serious mental health support needs. According to the NSPCC, Disabled children are at significantly greater risk of physical, sexual and emotional abuse and neglect than non-Disabled children. High-risk groups include children with learning difficulties, children with speech and language difficulties and Deaf children.⁴⁵ Disabled children are more likely to be abused by someone in their family compared to non-Disabled children. Research indicates that Disabled children are more likely to experience the negative aspects of social networking sites than non-Disabled children.⁴⁶ Young people may not understand that they are being sexually exploited and therefore do not seek support.⁴⁷ Also not all support services are accessible for example services need to be accessible Deaf children and children with learning difficulties.

➤ Recommendations

- We recommend that special schools and units are targeted for awareness training.
- All safe places and venues providing support to children are accessible to Deaf and Disabled children.

Hate crime

Hate crime is an ongoing problem for Deaf and Disabled people. There is a continued need for the police to improve their response, identification,

⁴⁵ <https://www.nspcc.org.uk/globalassets/documents/research-reports/right-safe-Disabled-children-abuse-report.pdf>

⁴⁶ <https://www.nspcc.org.uk/globalassets/documents/research-reports/right-safe-Disabled-children-abuse-report.pdf>

⁴⁷ http://www.barnardos.org.uk/cse_learning_and_disability_report_2015a.pdf

recording and investigation of disability hate crime, which is being addressed by the Disability Hate Crime MATTERS (DHCM) project. The MPS and MOPAC's continued support for this project is crucial. We have made some recommendations below:

➤ Recommendations

- We recommend that DHCM is a key element of the job description of the MPS officer leading the project (currently Sergeant Liz Symmonds, Adult Safeguarding, Adults MASH Co-ordinator) rather than an additional extra that has to be squeezed in after other responsibilities.
- There is also the need for the MPS in all boroughs to commit to, and resource, the roll out and on-going implementation of the Disability Hate Crime Matters initiative and to ensure that Disability Equality Training is available for police at local level.
- Funding for DDPOs to provide support to report and to raise awareness of what a disability hate crime is.
- Funding for Inclusion London to build the capacity of DDPOs re disability hate crime.
- All funding from MOPAC needs to be ring-fenced.

Risk of fires

➤ Recommendations

All housing, especially high rise flats need to have adequate safety measures in place for Deaf and Disabled occupants regarding the risk of fires.

5.4 Inclusive arts, culture and sports

The Into Sport is a three-year programme, funded by Sport England, to increase the number of Disabled people regularly participating in sport and physical activity (SPA). Inclusion London works in partnership with five Deaf and Disabled People's Organisations (DDPOs) in Barnet, Greenwich, Lambeth, Richmond and Southwark, and with London Sport. The project has successfully supported 901 inactive Deaf and Disabled people, many with high support

needs, to take up SPA. The total number of engagements with the Into Sport coordinators and in SPA during the project is 42,343.

A key finding of the programme are the negative impacts that austerity measures such as welfare reform and social care cuts have had on Disabled people's participation in SPA. The latest Sport England survey found that the number of Disabled people regularly engaging in SPA has dropped despite the considerable sums of money invested in this area as the legacy of the Paralympics.⁴⁸

Summary of findings of the Into Sport project

- Some SPA venues are still not full accessible and do not have appropriate facilities and equipment for Disabled people.
- Sometimes SPA providers lack understanding of disability equality which can lead to poor customer service.
- Many Disabled people that seek the support of a DDPO face multiple socio-economic challenges in their lives, such as problems related to their benefits, financial difficulties and inadequate housing. This means that engaging in SPA is simply not on their agenda.
- Some Disabled people are living in poverty and the costs associated with participating in SPA (eg. accessible taxis, sports centre membership fees, etc.) are prohibitive.
- In some cases our Into Sport staff have successfully tackled the issue of cost by setting up free SPA activities. However, continued provision depends on DDPOs having the staff to provide participants with ongoing encouragement and support and finding ways to fund the costs of a coach and a venue. When this funding expires, the activity ceases.
- It has been necessary for Into Sport staff to negotiate reduced or no fees for some Disabled people in order to enable their engagement in SPA. A notable exception is the London borough of Southwark where a free gym/swim policy for Disabled people has been introduced across all leisure centres. This has led to increased engagement.

⁴⁸ <https://www.sportengland.org/research/about-our-research/active-people-survey/>

- Some Disabled people still cannot access or afford the cost of transport to get to SPA activities.
- Many Disabled people need encouragement and motivation to engage in SPA because they lack confidence and do not believe SPA is for them.
- Some Disabled people with high support needs cannot travel alone and need personal assistance to engage in SPA. Cuts to adult social care mean that many Disabled people's care packages do not include support to engage in SPA. Into Sport piloted an 'access fund' which enabled some Disabled people with high support needs to pay support workers to support them to engage in SPA. This was very successful but the funding has ended and now these people can no longer engage in SPA and are once again inactive.

➤ Recommendations

- The GLA undertakes an evaluation of the reasons behind decreasing engagement by Disabled people in SPA to explore the impact of austerity measures.
- All SPA funding programmes and grants should require applicants to demonstrate what they are doing / plan to do to ensure their activities are accessible for Disabled people and inclusive. Application forms should include a budget heading for 'Access costs' and applicants should be able to demonstrate that they work in partnership with local disability organisations.
- Funded SPA venues should either be accessible or required to develop action plans to make their buildings and equipment accessible. Venues need to also review whether their activities are accessible and inclusive for Disabled people.
- SPA providers need Disability Equality Training (DET) so they can provide a more welcoming and inclusive environment for Disabled customers. (NB DET for the sport workforce has been identified as a priority in London Sport's disability strategy, 'An Active Inclusive Capital'.)
- SPA providers should implement a 'free swim and gym' policy for Disabled people across London, following the example of Southwark.

This would eliminate cost as a key barrier to engagement for some people.

- DDPOs have a strong track record of developing innovative solutions to a range of barriers that exclude them. Investing in DDPOs to support Disabled people to engage in SPA is an effective use of resources because DDPOs understand the barriers faced and can provide accessible information and advice. They also have the skills to encourage and motivate Disabled people to get involved in SPA and sustain their engagement. DDPOs can also build relationships with local SPA providers and work in partnership with them to address inaccessible SPA provision.
- Peer support is one of the most effective ways of supporting inactive people to get engaged. DDPOs are skilled at providing peer support and supporting the development of peer support groups.
- Disabled people should be represented at all levels of the sport workforce (i.e. as volunteers, as coaches, as staff and at a governance level) so that it is more diverse. More accessible development and training opportunities need to be available for Disabled people. It is also important to involve Disabled people in the development of SPA policy by regularly consulting with their organisations.

NB: Inclusion London is supportive of the goals and objectives in London Sport's recently launched disability strategy, 'An Active Inclusive Capital'⁴⁹ and was a key partner in developing the strategy.

We welcome the Mayor's intention to work with Deaf and Disabled people to ensure that London's cultural institutions are accessible. Local cultural facilities also need to be accessible because not all Deaf and Disabled Londoners can travel to the large institutions and events. Attitude is Everything is a DDPO which works to ensure live music is accessible to Deaf and Disabled people.⁵⁰

⁴⁹ <https://londonport.org/news/active-inclusive-capital/>

⁵⁰ <http://www.attitudeiseverything.org.uk/>

5.5 Digital inclusion

A quarter of Disabled adults have never used the internet⁵¹ and the lack of access results in Deaf and Disabled people paying more for essential services. The Mayor's intention to target Disabled people who wish to be online by 2020 as part of the Digital Inclusion Charter promise is much needed and one we support. However, in order for this to be effective, solutions will need to be found in response to a lack of support for Disabled people to go online resulting from cuts to social care packages and frontline community support services. Social care packages are often limited to a "clean and feed" model that does not include time to support Disabled people to use a computer (also to engage in correspondence, read or reply to mail, fill in forms and take care of personal and financial affairs).

6.1 An inclusive employer

We are pleased that the Mayor will create a diverse workforce across the GLA.

➤ Recommendations

- That approximately 19% of GLA employees are Deaf or Disabled to reflect the population in London.
- Data on the number of Deaf and Disabled people employed in the GLA is published, including and the number of people in management positions and the number in consultation and engagement teams and Diversity and Equality teams.
- As mentioned previously - a Senior Disability Advisor post (for a Disabled person) is created within the GLA.

6.2 A responsible procurer

We welcome all the Mayor's proposals but particularly regarding removing the barriers which prevent local Deaf and Disabled People's from competing for contracts at a London wide and local level.

⁵¹ <https://www.gov.uk/government/publications/transforming-our-justice-system-joint-statement>

The Public Service (Social Value Act) 2012⁵²

We believe one of the solutions is to ensure that the Social Value Act is implemented. The Act requires ‘public authorities to have regard to economic, social and environmental well-being in connection with public services contracts’.⁵³ A government ‘Information Note’⁵⁴ Social Value Act stated that Commissioners and procurers (of public services): ‘..should be taking a value for money approach - not lowest cost - to assessing contracts and the Act complements that approach’.⁵⁵

DDPOs provide a range of valuable services which include into work support, care and support and support for disabled victims of hate crime. DDPOs’ services meet needs because they designed by Disabled people who are ‘experts by experience’. The services are accessible and provide a local response to local needs. Also DDPOs employ Deaf and Disabled people.

However, many DDPOs are not able to compete with large national organisations in the bidding process for contracts funding by public bodies. In some cases the quality of the services provided by DDPOs has been recognised but the contract has still been awarded to a national organisation. The Mayor’s influence on public bodies to adhere to the Social Value Act is much needed.

- Short term funding – which doesn’t allow for the service to be fully developed and maintained.
- Insufficient funding – funding is not sufficient to cover the costs of providing the range of activities demanded by the contract
- Contracts are too large, beyond the capacity of small providers.
- Difficulty competing with large organisations.

⁵² <http://www.legislation.gov.uk/ukpga/2012/3/enacted>

⁵³ <http://www.legislation.gov.uk/ukpga/2012/3/enacted>

⁵⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/79273/Public_Services_Social_Value_Act_2012_PPN.pdf

⁵⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/79273/Public_Services_Social_Value_Act_2012_PPN.pdf

- The time frames for tendering a bid are too short to enable a partnership or consortia to be formed so a joint bid can be made.
- Contracts can be over prescriptive
- Contracts can be in ‘bundles’ of different types of service, while DDPOs may only provide one relevant type of service
- Lack of publicity of tendering opportunities.

➤ Recommendations

- We recommend the Mayor uses his influence to ensure the Social Value Act is implemented to ensure that local DDPOs are able to compete for local contracts.
- The Mayor to promote use of Article 19 of the EU Procurement Directives which provides for public sector contracts to be reserved for supported businesses.

6.3 An open and engaged organisation

Inclusion London welcomes the efforts that have taken place to reach out into the community and hold events for DDPOs as part of their consultation process for the policing and crime plan and this Diversity and Inclusion strategy.

DDPOs provide a collective voice Deaf and Disabled views and experiences to inform the Mayor’s strategies, it is vital that local and London wide DDPOs are funding on a sustainable basis to allow this to happen. Inclusion London often provides a pan-London response to consultations but we have had all our London Council funding cut along with other organisations in the same category. Without funding to engage with the GLA, our capacity to do so is restricted and we are frustrated at the resulting limitation on the role we are able to play in supporting direct engagement between London Deaf and Disabled people and the GLA.

➤ Recommendation

- The Mayor to explore funding for sustainable and meaningful engagement with Deaf and Disabled Londoners and our organisations.

It is important that all consultations are accessible to Deaf and Disabled people, this includes the provision of Easy Read information and offline alternatives to online surveys, which many Deaf and Disabled people cannot access.

➤ **Recommendation:**

The Mayor ensures that all consultations are accessible.

This concludes our response.

For more information, contact:

Inclusion London

336 Brixton Road

London, SW9 7AA

policy@inclusionlondon.org.uk

Telephone: 020 7237 3181

SMS: 0771 839 4687

www.inclusionlondon.org.uk

Registered Charity number: 1157376

Company registration number: 6729420

