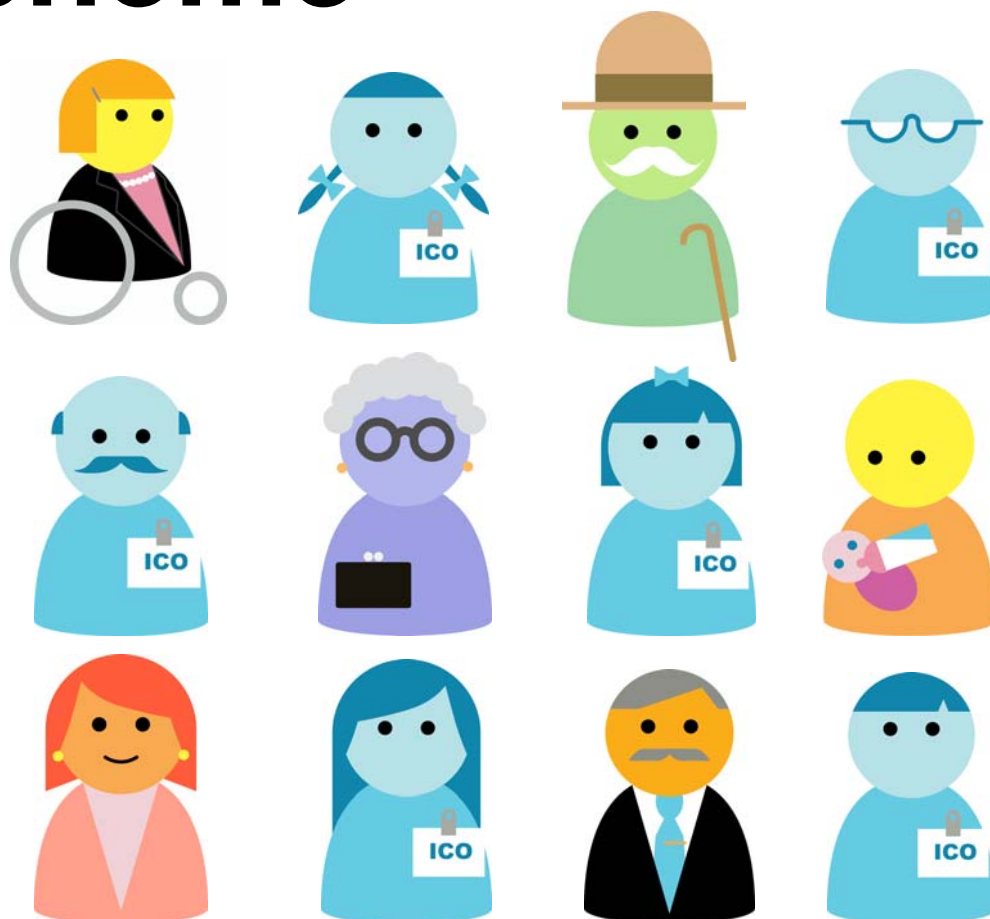


Disability Equality Scheme



2008 – 2011

This document is available to download from our website at www.ico.gov.uk.
You can order copies of the scheme in other formats by phoning our helpline on 08456 30 60 60 or 01625 545745.

Contents

Foreword by the Information Commissioner

- 1 About us
- 2 Our commitment to disability equality
- 3 Our arrangements for complying with the disability equality duty
- 4 Our disability equality action plan
- 5 Getting involved



Foreword by the Information Commissioner



Equality of access, opportunity and outcome is fundamental to a just and fair society, and to the wellbeing of individuals and communities.

We all want to live in communities where we can fully participate, and we want to be able to use public services and not be excluded or treated less favourably. We know that for many disabled people this hasn't yet happened.

The disability equality duty requires us to be proactive in our approach to achieving equality for disabled people. It is not just about changing our buildings or making adjustments for individuals, it is about embedding and weaving equality for disabled people into the fabric of what we do.

It includes involving disabled people and disability equality in our policies, procedures and practices, in our way of thinking, our decisions and the outcomes of what we do. It is about planning for equality at the beginning, not bolting it on at the end.

I am delighted to show our commitment to achieving equality for disabled people through this first Disability Equality Scheme. We are not pretending that it will not be a challenge for us, or that we will get it right first time. We acknowledge that we did not meet the original timescale required for publishing schemes; however, we have chosen to follow the guidance in full and to undertake proper consultation on our scheme rather than rushing it through. We are committed to doing this well, and to do so we shall work in partnership with our disabled staff and service users, their representatives, our partners and contracting organisations, and the wider community.

This document will show you what the ICO has achieved already, and what we are proposing to do. Above all else, it shows our first steps on the pathway to becoming a beacon of good practice in respect of achieving equality for disabled people.

A handwritten signature in black ink that reads "Richard Thomas". The signature is written in a cursive style with a horizontal line underneath the name.

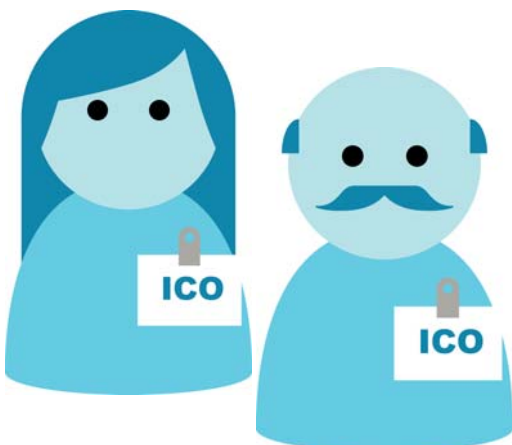
Richard Thomas

1 About us

- 1.1 The Information Commissioner's Office is the UK's independent public body set up to promote access to official information and protect personal information. We enforce the Data Protection Act, the Freedom of Information Act, the Privacy and Electronic Communications Regulations and the Environmental Information Regulations.
- 1.2 The Data Protection Act and the Privacy and Electronic Communications Regulations give you the right to know what information is held about you, and set rules to make sure information about you is handled properly. The Freedom of Information Act and the Environmental Information Regulations give you the right to obtain information held by public bodies unless there are good reasons to keep it confidential.
- 1.3 We have three functions:
- Educating and influencing: we promote good practice and give information and advice.
 - Resolving problems: we resolve eligible complaints from people who think their rights have been breached.
 - Enforcing: we use legal sanctions against those who ignore or refuse to accept their obligations, including prosecuting those who commit offences under the legislation.
- 1.4 We also help individuals and organisations to understand their rights and responsibilities through:
- raising awareness of the law and how it works;
 - influencing thinking on privacy and access issues;
 - providing an enquiry service;
 - maintaining the public register of data controllers;

- approving publication schemes; and
- auditing organisations' data protection practices.

1.5 Our Head Office is at Wilmslow in Cheshire. We also have regional offices in Edinburgh, Cardiff and Belfast and a small base in London; in total, we employ around 270 staff.



2. Our commitment to disability equality

- 2.1 The Information Commissioner has overall responsibility for making sure that the ICO demonstrates its commitment to equality and diversity. He has therefore established an Equality and Diversity Committee which is responsible for making sure equality and diversity issues are identified and acted on. The committee and its sub-groups include 28 people from across the organisation; it is chaired by the Director of Human Resources and it reports to the ICO's Executive Team, which is chaired by the Commissioner.
- 2.2 The ICO is committed to meeting and exceeding the requirements placed upon all public bodies to promote disability equality. This means that we will try, in all that we do, to:
- promote equality of opportunity between disabled people and other people;
 - eliminate unlawful discrimination against disabled people;
 - eliminate disability-related harassment;
 - promote positive attitudes towards disabled people;
 - encourage participation by disabled people in public life; and
 - take steps to meet the needs of disabled people, even if this requires more favourable treatment.
- 2.3 This commitment includes all of our work, not just as a provider of public services and as an employer, but also in budget setting, procurement, our regulatory functions and the whole framework within which we operate.
- 2.4 Our Disability Equality Scheme, and the work we will take forward through our action plan, is based on the social model of disability. This model

takes the approach that what stops or hinders a disabled person doing something are the barriers that society has put in place or chosen to ignore. It is society that disables a person, not their impairment.

2.5 We recognise the negative impact on disabled people of a society designed for non-disabled people. We also recognise that active steps are needed to promote equality for disabled people in the way we go about our activities.

2.6 Under the social model of disability, the barriers facing disabled people can be:

- environmental: for example, information or buildings not being accessible;
- systematic: for example, disabled people being segregated away from services or facilities; and
- attitudinal: for example, negative stereotypes about what disabled people can or cannot do.

We are committed through this scheme to identifying and removing these barriers to full participation and equality for disabled people in relation to the work of the ICO.

2.7 Through our Disability Equality Scheme and our supporting action plan, we aim to:

- make sure that disabled people, their representatives and others acting on their behalf are involved in suggesting and helping us to implement improvements in what we do;
- identify and remove unlawful discrimination from any area of our

employment or service delivery activity;

- identify and remove physical, attitudinal or other barriers that prevent disabled people from working with or for us, or from accessing our services and information;
- make sure that those we work in partnership with, or from whom we buy goods, facilities and services, are committed to equality for disabled people in what they do and how they do it; and
- become a beacon of good practice in respect of equality for disabled people.

Our achievements

2.8 We have already taken some steps to achieving our aims. These are some of the things that we have done already.

Our communications

- Our website is fully accessible in line with government standards
- We have adopted corporate font sizes based on good practice guidance
- Our communications plans take account of the needs of disabled people, and we provide materials in alternative formats on request
- Our publications are in plain language and designed to be easy to use and read

Our infrastructure

- We provide disabled access and facilities at our offices in Wilmslow, Cardiff, Belfast and London. In Edinburgh, we are seeking to relocate to premises with disabled access

- In Wilmslow, we have renovated our reception area and installed a new reception desk which complies with disability requirements, as well as a 'Loop' hearing system
- We carry out work station audits for all staff
- We provide additional equipment and make reasonable adjustments to work stations where any needs are identified
- We have established a separate budget for our equality and diversity work.

Our people

- We offer and make reasonable adjustments for disabled job candidates
- We make adjustments to our business processes where necessary for disabled employees
- We have consulted our staff on our Disability Equality Scheme and have established an internal staff reference panel to advise us
- We offer adjustments to the way training is delivered for disabled staff
- We provide equality and diversity training for all staff, and training in specific areas, such as mental health issues, as appropriate
- We have a Dignity at Work policy on which all staff receive training
- We include equality and diversity issues in our management training
- We have reviewed our internal training materials to ensure inclusiveness, and our specification for externally provided training includes full consideration of equality and diversity issues
- We offer regular occupational health medical screening and services to all staff
- We are currently reviewing all of our policies in order to identify and address any adverse impact on disability equality
- We work proactively with our trade union's Equality Officer.

Our service to customers

- We take account of disability equality in our external communications to ensure that they are accessible
- We have consulted service users on the accessibility of our website and written materials
- We have appropriate physical access for disabled callers at most of our sites
- We make appropriate adjustments to the way we offer services to members of the public who are disabled
- We undertake research which helps us to monitor user access to and satisfaction with our service
- Our staff receive training to help them to meet the needs of disabled customers effectively
- We are a member of the Cheshire Public Authorities Disability Equality User Group, which provides us with advice on disability equality issues from a service user perspective.



3 Our arrangements for complying with the Disability Equality Duty

Involving disabled people

- 3.1 Our Equality and Diversity Committee was set up to improve inclusiveness and diversity. Its members are drawn from across the organisation, and its subgroups cover specific activities: communications, infrastructure, people and service delivery.
- 3.2 As well as encouraging disabled employees to take part in the Committee's work, we have established a reference panel made up of volunteers who have a particular interest in disability, and we have given all of our staff the opportunity to comment on our Disability Equality Scheme. We have also consulted with and involved disabled people from outside the organisation through our membership of the Cheshire Public Authorities Disability Equality User Group. We have taken account of all of the comments and suggestions we have received in finalising the scheme.
- 3.3 We aim to continually improve our efforts to involve disabled people, their representatives and others who act on their behalf.

Collecting information on the effect of our policies and practices on disabled people

- 3.4 Collecting information is not an end in itself, but is there to help us with preparing action plans, assessing the impact of what we do, reviewing the effectiveness of our activities and developing plans for improvement.
- 3.5 To collect information about the impact of our policies and practices on the recruitment, development and retention of employees with disabilities, we will use:

- External research on workforce and community profiles
- Equal opportunities monitoring forms returned with application forms
- Statistics on applicants short listed and appointed
- The views of our Disability Reference Panel
- The views of our trade union representatives
- Feedback from all staff, including staff survey results
- Statistics on how our staff are divided up into types of jobs, grades and departments
- Statistics on performance appraisal markings and benefits
- Statistics on the numbers of people applying for and receiving training and promotion
- Statistics on staff grievances and on disciplinary action
- Statistics on the numbers of people leaving, including reasons for leaving
- Exit interviews and questionnaires

3.6 To collect information on the extent to which the services we provide take account of the needs of disabled people we will use:

- Service user satisfaction surveys and annual tracking surveys
- Website feedback and statistics
- Service user complaints and compliments about our service
- Feedback from disabled people on our disability reference panel.

3.7 Where consultation, involvement, or impact assessment reveals a gap in information needs, we will take steps to introduce methods of collecting the required information and update our action plan accordingly.

Our arrangements for assessing the impact of what we do on equality for disabled people

- 3.8 We are considering the impact of both our existing and future policies and practices on equality for disabled people so that we can make sure we do not disadvantage disabled people in any way, and also identify where we might better promote equality. We have therefore listed the functions within our organisation and identified the policies, procedures, practices and information currently in place, whether they are provided by us or by contractors on our behalf.
- 3.9 We have developed a template to help us decide if our policies, procedures, practices and information in all of the areas identified are relevant to our general duty to promote equality. In reaching these decisions we have considered the following things:
- whether the policy, procedure, practice or information is a major one in terms of scale or significance for our activities; and
 - whether, if the policy, procedure, practice or information itself is minor, it is likely to have a major impact upon disabled people, regardless of the number of people affected.
- 3.10 If the area examined falls in to either of those categories, we then carry out a full impact assessment which involves a thorough consideration of:
- relevant available data and research to show us how the policy, procedure, practice or information works in practice, or may work when we introduce it;
 - what effect it may or does have on disabled people; and

- any measures which might lessen any adverse impact, and alternative ways of doing things which might better achieve the promotion of equality of opportunity for disabled people.

3.11 When we have reached a decision, we will publicise the results of the impact assessment report and make arrangements to monitor for future adverse impact.

3.12 The Equality and Diversity Committee and its subgroups are responsible for involving disabled people, carrying out screening and impact assessments and identifying any actions required for improvement. It will also ensure that the same assessment is applied to future policies, procedures and practices throughout the ICO.

Our arrangements for using the information collected

3.13 Collecting evidence is part of the process of achieving greater equality for disabled people, and for making sure we are treating employees, service users and members of the community fairly and with respect.

3.14 The information we collect will allow us to:

- assess our performance;
- carry out effective impact assessments;
- identify barriers to good performance and potential improvements;
- review progress and adjust actions as appropriate;
- set targets for improving outcomes; and
- benchmark against other comparable organisations.

3.15 The Equality and Diversity Committee will consider the information

collected and be responsible for identifying, exploring and acting on any trends or patterns. Our internal and external disability reference panels will help us to do this.

Our arrangements for publishing results

3.16 Each year we will publish progress in our Annual Report. You will be able to see a copy:

- on our website at www.ico.gov.uk; or
- by contacting our helpline on 08456 30 60 60 or 01625 545745.

Our arrangements for revising this scheme

3.17 We will review and revise this Disability Equality Scheme as necessary and at least every three years. We will work with disabled people in doing this.



4 ICO's Disability Equality Action Plan 2008 – 2011

What we are going to do	Expected outcome	Who is going to do it	When they will do it by	Additional resources required
Review recruitment procedures, advertising and materials.	Attract more people with disabilities to work at ICO	Human Resources	31 March 2009	None
Achieve 'Two Ticks' accreditation	Guaranteed interviews for all disabled applicants meeting minimum criteria for all positions	Human Resources	31 March 2009	None
Set up employment monitoring methods to track relevant disability statistics	Ability to measure the effectiveness of our employment practices in relation to the recruitment, development and retention of disabled people	Human Resources	31 March 2009	IT developments – planned to be in place by 30 September 2008
Develop an Equality and Diversity Workforce Plan	ICO's workforce includes members of minority groups and is more representative of wider society	Human Resources	31 March 2010	None
Join the Employers Forum on Disability	Share knowledge and learn from the experience of others	Equality and Diversity Committee	31 March 2011	None

What we are going to do	Expected outcome	Who is going to do it	When they will do it by	Additional resources required
Assess all policies and functions for relevance, carry out impact assessments and develop action plans for improvement where appropriate	Disability equality in all areas of the ICO's work Compliance with legislation	Equality and Diversity Committee	31 March 2010	None
Develop a Reasonable Adjustments Policy and Register to cover both employment and service delivery	Consistent and effective approaches to all activities where adjustments are required.	Human Resources Customer Services Team	31 March 2009	None
Develop a Redeployment and Redundancy policy which takes account of the need to treat disabled people fairly	Ensure fair treatment of disabled employees	Human Resources	31 March 2011	None
Provide disability awareness information to all staff	Raised awareness of disability issues and improved ability to deal with them confidently and competently	Communications and External Relations	31 March 2009	None

What we are going to do	Expected outcome	Who is going to do it	When they will do it by	Additional resources required
Involve disabled people or their representatives in running awareness sessions for staff	Raised awareness of disability issues and improved ability to deal with them confidently and competently	Equality and Diversity Committee	31 March 2009	None
Provide general equality and diversity awareness training for all staff, focussing on personal responsibility for cultural change within ICO	Raised awareness of equality and diversity issues Changes in behaviour which lead to cultural change in relation to equality and diversity issues	Human Resources	31 March 2009	Provision included in Learning and Development budget for 2008-09
Identify specific equality and diversity training needs for staff and managers and develop short, medium and long term plans for delivery	Staff and managers equipped with skills to deal with diversity issues effectively in their everyday work Improved customer service Improved management skills	Human Resources	31 March 2009	Need to make budget provision in Learning and Development and in Communications and External Relations 2008-11

What we are going to do	Expected outcome	Who is going to do it	When they will do it by	Additional resources required
Extend standard corporate font sizes to standard email font sizes.	Emails easier to read Compliance with good practice guidance	Information Services	31 March 2009	None
Review procurement policy and revise if necessary. Compile central list of suppliers and contractors	Suppliers and contractors are committed to achieving disability equality	Equality and Diversity Committee Corporate Support Unit	31 March 2010	None
Set up list of accessible transport providers offering services to ICO	Accessible transport is available to those who need it	Staff Transport Group	31 March 2009	None
Commission a disability needs audit of ICO premises	Advice on disability needs will be built into future office requirements and developments	Human Resources Facilities	31 March 2010	Need to make budget provision to fund audit

5 Getting involved

- 5.1 Involvement is a central concept in our disability equality work and we would like to invite you to take part in it. You may be a disabled person, a friend, partner, relative or carer of a disabled person, or a person with an interest in disability equality. You may be interested in all of our work, or just some of it.
- 5.2 If you would like to get involved, if you require further information or if you want to comment on this Disability Equality Scheme, please contact Vicky Best, our Human Resources Director, whose contact details are:

Director of Human Resources
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 01625 545762

Email: Vicky.Best@ico.gsi.gov.uk

- 5.3 If during any dealings with the ICO you feel we have failed to meet the commitments set out in this scheme, we would welcome your feedback and the opportunity to put things right. If you are happy to contact us by telephone our customer service staff can be contacted on 08456 30 60 60, or if you would prefer to communicate in writing you can complete one of our service complaint forms available through our website.