

**BERR**

Department for Business  
Enterprise & Regulatory Reform

**REVISED DTI DISABILITY  
EQUALITY SCHEME FOR THE  
DEPARTMENT FOR BUSINESS,  
ENTERPRISE & REGULATORY  
REFORM**

December 2006

Revised November 2007

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## Revised BERR Disability Equality Scheme, November 2007

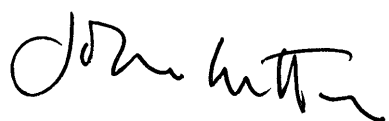
### Statement from John Hutton, Secretary of State for Business Enterprise & Regulatory Reform and Brian Bender, DTI Permanent Secretary

We are delighted to have revised the former DTI's Disability Equality Scheme, published in December 2006, to reflect the creation of new Department for Business Enterprise & Regulatory Reform and to report on progress. We are committed to ensuring that this Department meets its obligations to the Disability Equality Duty and as such this scheme sets out how we will meet out statutory duties under the Disability Discrimination Act.

BERR's overall objective is to work to create the conditions for business success through competitive and flexible markets that create value for businesses, consumers and employees. It drives regulatory reform, and works across Government and with the regions to raise levels of UK productivity.

But in order to achieve this we must appreciate our diverse society and this department's policy and service delivery must take account of the needs of and impacts on all those in our communities.

This revised Disability Equality Scheme is re-focused with the aim to fully include and involve disabled people in the delivery of our objectives, to ensure equality across the Department and in all the policy and services that we deliver.



The Rt. Hon John Hutton



Sir Brian Bender

## DTI Disability Equality Scheme, December 2006

**Joint statement from Alistair Darling, Secretary of State for Trade and Industry, and Brian Bender, DTI Permanent Secretary**

We are pleased to present the Department of Trade and Industry's first Disability Equality Scheme.

This document is designed to act as a framework by which we, along with other public authorities, will meet our new legal obligations under the Disability Discrimination Act.

This document aims to set out the way in which DTI will make consideration of the inclusion and involvement of disabled people an inherent part of our policy and programme development and service delivery. Making an assessment of the impact on equality in our work is not just something we should do; it is an intrinsic part of better policy making.

We have already set out how we can work to ensure that we are considering the needs of all ethnic minorities in our Race Equality Scheme. This document will sit alongside that work, and ensure we are providing equality of opportunity to disabled employers, employees, consumers and other groups who work with the DTI.



The Rt Hon Alistair Darling MP



Sir Brian Bender

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## 1. Structure of the Scheme

BERR's role is to create the conditions for business success. We seek to do this by responding to the challenge of globalisation, protecting the rights of working people and consumers, and standing up for fair and open markets across the world. More information on our vision can be found in Section 3.

The assessment of our performance in Section 4, full details of which can be found at the back of this document, shows that a number of issues that BERR deals with are of real relevance to people with disabilities<sup>1</sup>. In a number of areas, we have an idea of the effect a programme or policy may have on disabled people, and are working with disabled stakeholders. In other areas, we are less sure of potential impact, and need to do more work to identify areas of importance to disabled staff, entrepreneurs, consumers and employees.

Section 8 seeks to illustrate what we are doing, and plan to do as an organisation for our disabled staff. Section 9 sets this out in an Action Plan that covers both what BERR does for its staff, and also what it does for its disabled customers.

This is intended to be an evolving document, which we will build on as we implement the Disability Equality Duty into our organisational structures. Section 7 gives more detail on this, outlining how we are seeking to ensure that assessments of equality impact are made part and parcel of all that BERR does.

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<sup>1</sup> The terms "people with disabilities" and "staff with disabilities" are used throughout this document. Some individuals may prefer to be referred to as "disabled people" or in other ways. For the purpose of this document, the terms can be interchanged.

## 2. The Legislation

The Disability Equality Duty is contained in the Disability Discrimination Act 1995 (as amended by the Disability Discrimination Act 2005), and comes into force on 4<sup>th</sup> December 2006. From this date, all public authorities will have a statutory duty to promote disability equality (similar to the duty contained in the Race Relations (Amendment) Act 2000). The duty aims to change the way our laws work in this area; from relying on individual disabled people making a complaint to encouraging public authorities to take a positive approach to removing barriers.

The legislation requires public authorities to carry out their functions with 'due regard' to the need to:

- o promote equality of opportunity between disabled persons and other persons;
- o eliminate discrimination that is unlawful under the Act;
- o eliminate harassment of disabled persons that is related to their disabilities;
- o promote positive attitudes towards disabled persons;
- o encourage participation by disabled persons in public life; and
- o take steps to take account of disabled persons disabilities, even where that involves treating disabled persons more favourably than other persons.

The principle of 'due regard' means that authorities should give due weight to the need to promote disability equality in proportion to its relevance.

When considering proportionality, public bodies need to give greater consideration to disability equality in relation to the areas which have the most effect on disabled people. Clearly, disability equality will be more relevant to some functions than others, but because of the range of issues which impact on disability equality, many functions are likely to be of relevance to disabled people. When it is clear that changing the way in which a function or proposed function is carried out would lead to significant benefits for disabled people, then the duty places additional weight on the need to make such a change, to then be balanced against other considerations.

## The Disability Equality Scheme

In addition to the above, certain public authorities are also required to produce and maintain a Disability Equality Scheme. The purpose of having a scheme is to provide a framework by which we will meet the general duty on disability. Each Scheme needs to contain:

- A statement on how impact assessment work is carried out in the organisation;
- A statement on how information on the employment of its disabled staff is gathered;
- An action plan which sets out the steps needed to ensure the disability equality duty is met;
- A statement on the way in which disabled people have been involved in the development of the scheme; and
- The arrangements for reviewing the effectiveness of the action plan and for preparing subsequent schemes (a review is required every three years).

The former DTI already has a Race Equality Scheme that implements the Race Equality Duty, which has been revised for BERR. We have worked to learn from this document, and build on it in the work for this Scheme. This document will sit alongside our work on race, and form part of BERR's commitment to equality of opportunity. Our Race Scheme can be found at:

<http://www.berr.gov.uk/about/strategy-objectives/how-we-work/equality-schemes/Race%20Equality%20Scheme/page31423.html>

### 3. Our work

The Department for Business, Enterprise & Regulatory Reform was created on 28 June as a result of machinery of government changes with a new statement of purpose: Creating the conditions for business success and helping the UK respond to the challenge of globalisation.

BERR's overall objective is to work to create the conditions for business success through competitive and flexible markets that create value for businesses, consumers and employees. It drives regulatory reform, and works across Government and with the regions to raise levels of UK productivity.

In the face of continuing globalisation, it is the success of business that will underpin wealth creation and opportunity for all. Britain must continue to develop a business environment that actively promotes business success, by enabling a more dynamic, flexible and competitive economy in which business, consumers and employees can make the most of the opportunities from global markets and can best respond to future challenges.

The new Department will ensure a renewed focus from central Government on these important challenges. It will ensure that there is a Department in Government which has a deep and effective engagement with the business community, with the ability to promote the productivity and competitiveness agenda across critical policy areas and to deliver a radical programme of regulatory reform for the business, public and third sectors.

For more information on our work, visit [www.berr.gov.uk/about/index.html](http://www.berr.gov.uk/about/index.html)

BERR is also responsible for two Executive Agencies. These are:

**Companies House** ([www.companieshouse.gov.uk](http://www.companieshouse.gov.uk)), whose main functions are to: incorporate and dissolve limited companies; examine and store company information delivered under the Companies Act and related legislation, and make this information available to the public

**The Insolvency Service** ([www.insolvency.gov.uk](http://www.insolvency.gov.uk)) that works to ensure that financial failure is dealt with fairly and effectively, thereby encouraging enterprise and deterring fraud and misconduct.

In August 2007 The Small Business Service, which formally held Executive Agency status, became a policy unit within BERR called the Enterprise Directorate. Its work is therefore covered under BERR's main objectives.

BERR also has joint responsibility with the Foreign Office for **UK Trade and Investment** ([www.uktradeinvest.gov.uk](http://www.uktradeinvest.gov.uk)), which supports companies in the UK doing business internationally and overseas enterprises seeking to set up

or expand in the UK. It does this by helping companies realise their international business potential through knowledge transfer and ongoing partnership and support.

## 4. Assessing our Performance

### The Evidence Base

The Disability Equality Duty requires public authorities, when drawing up their Disability Equality Schemes, to set out how they gathered information on the effect of their policies and practices on disabled people. This evidence base should provide organisations with a better idea on how they are performing on disability equality, and what they need to do in the future. These results then provide the material for each organisation's Action Plan.

The former DTI gathered this information in two different ways:

#### *a. Screening by Business Planning Objectives*

First, we carried out an extensive screening exercise of all our various functions. BERR has an established business planning system, inherited from DTI, that covers all parts of the organisation, and this provided a sound basis for the screening.

BERR's business plan is divided into 12 delivery objectives and 5 enabling objectives. These objectives cover all of the department's functions and policies. Each is locally owned in the organisation by an Executive Director, who is assisted by an Objective Delivery Secretary. For more information on the business plan, see [www.berr.gov.uk/about/strategy-objectives/Business-Plans/page12611.html](http://www.berr.gov.uk/about/strategy-objectives/Business-Plans/page12611.html)

Objective delivery secretaries carried out an assessment of all the functions contained within their objective. They were asked to consider the following questions:

- Will the activity help the Department meet the duty to eliminate unlawful discrimination, and to promote equality of opportunity and good relations between disabled people and other people?
- Is there any evidence or reason to believe that the activity is affecting/could affect disabled people differently?
- Is there any evidence of external/internal stakeholder concern that the activity could have/is having an adverse impact on some people with disabilities, or that its delivery could prove discriminatory?

Using the results of this assessment, each objective was rated to be of low, medium or high relevance to the Disability Equality Duty. Where the response was "yes" to all three of the questions above, a rating of "high" relevance to

the Duty was awarded. Where the response was “yes” to two questions, a “medium” marking was accorded, and one or no “yes” responses merited a “low” marking. The information provided in this exercise gave us a sound evidence base of work taking place across the former DTI, and enabled us to judge whether disability equality was being factored into our planning processes. It also identified where, in those areas deemed to be of medium or high relevance to the duty, more work would be required. For the full results, see the Annex to this document (page 28).

BERR’s Executive Agencies have their own corporate plans and BERR’s current executive agencies continue to have their own corporate plans. However, in the assessing the department’s performance it was decided that an overall relevance rating would be meaningless due to the diverse nature of each organisation’s activities. Instead, relevant activities are simply listed. This was with the exception of UK Trade and Investment, whose work is captured under Objective 8 of the department’s Business Plan.

#### *b. Involving our stakeholders*

Alongside this formal screening exercise, key internal and external stakeholders with an interest in the former DTI’s work and disability were asked to contribute their views. Our work with stakeholders is covered in more detail in the following section.

## 5. Involving disabled people

The Disability Equality Duty requires public bodies to involve disabled people in the work to produce their Disability Equality Schemes.

For the former DTI, and now for BERR stakeholders are a disparate group; ranging from employers, and employees, to consumers and non-Governmental organisations. Some of these groups or individuals would not identify themselves as disabled stakeholders, rather as someone with an interest in disability as one of many area of their business.

We therefore decided to take a varied approach to involving disabled people in our scheme.

### *Internal Stakeholders*

The former DTI held a dialogue with its internal staff network, the Disability Advisory Group (around 100 members), on its Disability Equality Scheme. Group members have been invited to contribute their views on both the actions identified from the former DTI's screening exercise, and more generally, on the former DTI as an employer of disabled people. The department's trade union representatives have performed a similar function for its members.

### *External Stakeholders*

*The following groups of external stakeholders were also involved in the development of our Scheme and action plan:*

*Disabled people involved in small businesses.* The former DTI identified 10-15 small businesses from its internal database that are run by disabled people, employ disabled people or provide services to disabled people;

*Support organisations* who work to help disabled people in business start ups or entering into employment or education;

*National disability organisations* who were not familiar with much of the former DTI's work, but were able to critique the plans for our Scheme as a stand-alone document.

*Our partners in delivery.* BERR, works in partnership with the 9 Regional Development Agencies (RDAs) to co-ordinate regional economic development and regeneration, and improve competitiveness at the local level. A number of the services for which BERR now has overall responsibility, such as Business Link, (a service that gives practical support and guidance to businesses), are delivered by the RDAs. In assessing the

department's performance they were able to provide feedback which comes directly from disabled people they are working with (such as those who use Business Link's services), which informed the former DTI on how these services are reaching disabled people.

Organisations with which the former DTI had contracted with to deliver disability services were also invited to comment.

A full list of stakeholders can be found at Annex B to this document.

## 6. Common Themes

The Disability Equality Duty asks that public authorities give “due regard” to the need to promote equality of opportunity for disabled people in proportion to its relevance. This demands that we concentrate action on those issues that are of most relevance and importance to our disabled stakeholders.

The former DTI used the results of the screening exercise and the feedback from internal and external stakeholders to do this. The five common themes below emerged from this data. They therefore represent the priority areas for the Action Plan (see Section 9).

- **Knowledge and Training.** Internal and external stakeholders reported that although progress has been made in this area, knowledge amongst line managers of disabled members of staff varies across the Department. Experiences ranged from real pockets of excellence to areas where individuals still struggled to gain understanding and acceptance of their workplace requirements.
- **Working with our partners.** Although the former DTI and now BERR provides very few services directly to the public, it was felt that more could be done to influence those who deliver services on its behalf. Stakeholder views ranged from individual dissatisfaction with internal services that were delivered by third parties to the rules and frameworks that govern such arrangements. It was felt that the former DTI could have used its influence more in this area.
- **Tools needed to make an assessment of equality.** Whilst the screening exercise identified areas of work in the Department where an assessment of equality was carried out routinely as part of the policy making process, other areas less familiar with the process felt more guidance would be needed to help them embed the work into their policy, programme and service design. It was felt that this assessment process needed to be mainstreamed into the policy making process, and considered alongside regulatory impact assessment work.
- **The need for a disability evidence base.** A large amount of monitoring is done across the Department as an inherent part of policy, programme and service evaluation, and as part of the data Human Resources routinely collects. However, this information needs to be fully utilised in Departmental decision making, rather than simply collected. In many areas of the former DTI, data was collated and disaggregated by disability, particularly where a concern for a certain group in society (such as the elderly) had already been identified. In other cases, the facility to disaggregate by disability did exist, but this was not done as a matter of course.

- **Access to information and services.** Feedback from internal and external stakeholders suggested that more could be done in this area. The former DTI's main website did not perform well against the Web Content Accessibility Guidelines (WCAG 1.0) in terms of accessibility, and it needs to be able to meet the standards set for Government by the Office of the E-envoy. Disabled staff also wanted more involvement at the design stage of new IT products in the Department, to ensure that user accessibility issues were dealt with swiftly.

## 7. Disability and better policy making

BERR is working towards ensuring all areas of diversity, including disability, are mainstreamed into all our working practices. Because most of our work is not providing services directly to the public, mainstreaming equality largely means ensuring we adapt our internal systems and procedures to include consideration of diversity issues.

The Disability Equality Duty provides the legal framework for achieving this. But BERR regards equality of opportunity for disabled persons to be more than a legal requirement; - it is also an intrinsic part of good policy making. Delivering appropriate and proportionate policy solutions – better regulation - is core to BERR's business, and we are working to ensure that the whole of Government is promoting an effective framework for corporate activity that will give confidence to all our stakeholders. There are a number of ways in which equality of opportunity for disabled people are part of this agenda:

**Impact Assessment.** BERR, along with other central Government Departments, is required to follow a rigorous impact assessment procedure as part of its policy making procedures. Impact Assessments are required on any new policy proposal, which has an impact on business, charities or voluntary bodies since 1998. As a Department, BERR therefore carries out Impact Assessment work in many areas of its workstreams. BERR recognises the importance of making an assessment of the impact on equality alongside this economic assessment, and many policy areas now carry out this assessment as a matter of course. The better regulation team in BERR acts as the guardian of the Impact Assessment process, and works with teams across the Department to ensure impact assessments are robust and meet the standards required.

We have also designed a Toolkit for Equality Duties, which gives policy makers across the Department the tools and advice they need to decide best how to make an assessment of equality in their work. Whilst it is designed for use by all staff, it is particularly aimed at project managers. The toolkit takes staff through the different stages of making an assessment of impact on equality, including monitoring, consultation and publication/access to information requirements. The toolkit forms part of the Department's better policy making internal website. The Disability Advisory Group have been involved in designing the disability parts of the site. Work will continue to develop the toolkit, to publicise it to staff and to promote the benefits of using it at the design stage of policy development.

**Consultation.** Carrying out a full and representative consultation<sup>2</sup> exercise is intrinsic to any form of policy making. BERR already ensures that policy

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<sup>2</sup> "Consultation" is used here as the recognised term for the policy exercise. No distinction should be made between "consultation" and "involvement" for this purpose.

makers have the support and guidance they need to canvass the views of all groups in society, including disabled people, through its better policy making internal website. This guidance takes staff through the relevant steps, including planning a consultation, identifying the audience, managing risks and different consultation methods (including engaging hard to reach and overlooked groups). It also provides examples of good practice and advises staff on how to improve on the minimum requirements. The quality of consultation documents is also monitored across the Department by BERR's better regulation team. The team recently carried out a review of the way in which assessments of equality issues are monitored as part of the consultation process. The reviewed procedure means that consultation documents will not be published until policy teams can demonstrate that they have made an assessment of equality impact in the course of their planning work.

Some examples of our impact assessment process can be found below:

*The former DTI carried out a review on increasing workers' annual leave entitlements in the UK to a minimum of 28 days. A survey was carried out by TNS for DTI (results published), which found that women, ethnic minorities, and those working part time (a work pattern that disabled people often choose), were less likely than other groups in the workforce to already have a 28 day leave entitlement. The positive impact on diversity that was identified through this assessment of equality issues was a deciding factor in ensuring that the policy change will be taken forward and implemented.*

An assessment of impact on equality may also mean that no further action will be required:

*Work took place recently in the former DTI to improve information about employment rights and responsibilities for workers. As part of this project, the team needed to make an assessment of whether or not something more needed to be done for workers with disabilities. The project's advisory group, which included the Disability Rights Commission and the Department of Work and Pensions, were invited to comment. It was concluded that the targeted information already available on Directgov was extensive, and that the then DTI's site should seek to signpost individuals to it, and help develop Directgov as the centre of expertise in this area.*

BERR accepts that the effectiveness of our monitoring has to be kept under review. For this reason, we are reviewing and updating guidelines first issued in 2003, and incorporating them in the Toolkit for Equality Duties. This will include advice on different monitoring methods – for example, statistical analysis, qualitative analysis and customer surveys -, and possible courses of action if adverse impact is identified. Our Survey Control Unit is updating its guidance to inform policy teams of the need to consider race, disability and gender as part of their monitoring work.

## 8. BERR and its Agencies as employers

*"We believe that every employee should be treated with openness, honesty and respect. We won't tolerate unfair treatment or discrimination. We want to be an organisation that people are proud to be part of.*

*We aim to have a workforce that reflects the diverse community that we serve.*

*We will value and make the best use of the diversity and talent in the DTI so that our people fulfil their potential and enable the Department to deliver its vision".*

DTI's Diversity Strategy 2006

It is BERR's aim, through its Diversity Strategy, to create increased visible diversity throughout the organisation. This is not just about setting targets for diversity, but aiming to increase participation in our workforce overall. This is also one of the aims of the Civil Service 10 Point Plan, produced by the Cabinet Office in 2005. Key to achieving this vision, for disability, will be:

- **Improving the diversity of the Senior Civil Service.** Currently, 4% of senior civil servants in BERR identify themselves as disabled. This exceeds the 10 Point Plan's target of 3.2%, and it is BERR's aim to at least maintain this figure;
- **Improving the diversity of the 'feeder' grades to the Senior Civil Service (those grades just below the Senior Civil Service).** Currently, 6% of staff in these grades considers themselves to have a disability. The Department has a number of leadership development schemes for the 'feeder' grades below the SCS and works to ensure that these schemes and the assessment processes for selection are designed to make them open to disabled people;
- **Improving the progression of the workforce in our lower grade.** A high proportion of disabled members of staff are at the lower grades across BERR, (9% of Band B and 12% of Band A staff identify themselves as disabled). It is our aim to ensure that everyone has the support they need to reach their full potential.
- **Improving employee awareness of diversity issues.** Over the course of 2007, DTI plans to roll out mandatory diversity training. One of these modules will be aimed at all staff, and another at all line managers. Although the training will be on diversity generally, disability will be dealt with effectively as part of this;

- **Improving line management capability.** Feedback from disabled staff has been that some line managers lack an understanding of their access requirements. We plan, over 2007 to roll out new additional training for line managers of disabled staff, to try and address this skills gap. This will be in addition to the mandatory diversity training;
- **Mainstreaming diversity agenda for cost effective delivery.** Consideration of equality in all that we do is key for BERR as an employer, but also as a provider of services. It is our aim to ensure that all staff have the tools and knowledge needed to ensure an assessment of the impact on equality is an intrinsic part of our working methods. For more information, see section 7.

BERR is also providing visible leadership to deliver these aims. The Permanent Secretary is Champion for the whole diversity agenda, supported by a Director-General, who is chairing the Steering Group that is driving the diversity strategy forward. In addition, BERR also has a Director-General level Disability Champion responsible for ensuring BERR's Executive Board takes account of disability issues as they may impact on staff or BERR's customers.

As mentioned in Section 5, BERR has an active staff Disability Advisory Group (DAG) with around 100 members. DAG was established in 1998 to advise and support the Permanent Secretary, the Department's Senior Management and Groups on disability issues, and is funded centrally by BERR. DAG meets regularly, normally every 6 weeks, and works closely to review progress with and to ensure effective delivery of mainstreamed Departmental disability and diversity policies. DAG strives to improve the working environment and opportunities for all people with disabilities and long term health conditions within BERR and to create an environment in which all staff feel valued, irrespective of any disability or long-term health condition, so that they are able to realise their full potential. In addition, there are also active groups within the business units of BERR advising on diversity issues that affect particular groups of staff. These include a group looking at the issues surrounding flexible working, and a "ginger group", based in Legal Services group, that regularly hosts events on a wide range of diversity issues.

There are also a number of other initiatives across BERR designed to support our disabled staff:

#### **- Support in getting a job**

We have, for some time now, operated the Two Tick Scheme for disabled people applying for posts within the former DTI and now within BERR. The system guarantees a disabled person an interview for a post if they are able to demonstrate in their application, that they meet the minimum

requirements of the post. However, BERR recognises that the Two Tick scheme alone will not guarantee a more representative workforce.

The former DTI has worked hard over the last two years to 'equality proof' our internal selection processes: for example, in DTI and now BERR's internal accelerated development programme (ADP) and the competition for promotion to the Senior Civil Service. This involves a whole series of measures, ranging from the selection and training of assessors and the choice of assessment exercises, to practical adjustments - for example, giving dyslexic candidates more time to digest instructions and to complete written exercises at assessment centers.

The Department has also taken the decision that we need to do more to ensure we meet our aims for representation of disabled staff at the feeder grades. The number of staff declaring a disability applying for, and being successful at the ADP competition, has increased in recent years. However, more work is required. The Department has a number of leadership development schemes for the 'feeder' grades below the SCS and works to ensure that these schemes and the assessment processes for selection are designed to make them open to disabled people.

A similar approach is being taken, including staff who identify themselves as disabled at the lower grades in BERR who have the potential to progress up the organisation. A junior leadership development scheme is planned for staff at Band A and B level, for which the selection and assessment processes will be designed to make them open to disabled people.

### **- Support in the workplace**

The former DTI, working with The Disability Partnership, has run the Valuing Ability Mentoring Programme for the last three years specifically designed for people who have identified themselves as having a disability, or who have developed a long-term health condition. Feedback from both mentor and mentee participants has been encouraging, with many positive experiences from the scheme reported.

Another form of mentoring/coaching is currently being provided for disabled staff in partnership with The Shaw Trust. This scheme is specifically designed for members of staff whose jobs are potentially at risk as a result of the job cuts that BERR, along with a number of other central Government Departments, is facing.

Staff who identify themselves as having a disability or long-term health condition, and who require reasonable adjustments to their workstation are initially encouraged to complete a self-assessment form online. Upon completion, improvement measures are provided by BERR's Information and

Workplace Services Directorate (IWS), to protect their health and safety. If a member of staff continually suffers from some form of discomfort in the workplace, they are referred to Systems Concepts, a company working in partnership with BERR. Working with Systems Concept has meant that a better level of consistency is applied to workplace assessments, which gives BERR a clear framework by which to assess reasonable adjustments. Systems Concepts are working to develop a good knowledge of the way in which the Department works, which means that they can recommend solutions that will fit into BERR's existing systems and equipment. All adjustments judged to be reasonable are then implemented by IWS.

Funding for reasonable adjustments for staff with disabilities via the Department for Work and Pensions' Access to Work scheme ceased in October 2006. Typically, reasonable adjustments for staff includes: building adaptations; the provision of equipment such as orthopaedic chairs; IT equipment and software; special lighting; fixed desks; changes to working hours or practices, and the provision of training and support for travel costs. Where BERR staff are currently in receipt of support through Access to Work, the Department intends to fund future support in line with current provision for reasonable adjustments not covered by the Access to Work scheme.

#### **- Monitoring ourselves**

The Disability Equality Duty requires organisations like BERR to set out how it collects information in relation to recruitment, development and the retention of its disabled employees.

The former DTI, for some time, collected information in this area and BERR continues to do so.

For **recruitment** into the organisation, information on all applications has historically only been kept for six months. This will change in line with our obligations under both the disability and race equality duties. BERR also monitors by disability on arrival in the Department, although the process by which we do this has been reviewed (see below). Members of staff are invited to declare their disability (if they choose to do so), via our internal electronic records management system (CALIPSOE), and by our annual employee opinion survey. In 2004-2005, 3.7% of new entrants to DTI declared a disability. The Department is also able to monitor the number of internal positions disabled staff are successful in applying for (level transfers and promotion), via the "two tick" box on application forms. It also monitors the number of staff with disabilities who are gaining promotion.

On **development**, the Department's current information is gained from self declaration on applications for training courses. Human Resources has asked BERR's preferred supplier of learning and development services, PTSC, to

ensure they are monitoring the take up of their services, both by ethnic origin and disability. As part of the annual employee opinion survey, staff, including those who have declared themselves as disabled, are invited to comment on whether they feel their training and development needs are being met. There is also a check on development needs in BERR's reporting system (known as the PADR). All staff are now obliged to have a training and development objective as part of their work objectives for a reporting year. Line managers will be required to cover learning and development as part of the appraisal process.

On **retention**, BERR collects information on the number of people with disabilities who are leaving the Department each year. This data is not disaggregated by reasons for leaving (such as resignation, voluntary severance, retirement or dismissal). The most recent figures (2003-2004) show that 3.9% of staff leaving the Department regarded themselves as having a disability.

The Department recognises that our data is dependent on individuals declaring a disability or long-term health problem. For a number of reasons, individuals may not feel they want to declare themselves as disabled, which makes it difficult to monitor effectively. Work has been taking place, as part of our Diversity Strategy, to try and improve the declaration rates within BERR. Members of the SCS are to be encouraged to declare their disabilities on our internal records system, thereby setting an example to other staff who may have concerns about doing so. It is hoped that this will then lead to more comprehensive data on disability across the Department.

We have also, in response to staff feedback, ended the requirement for individuals to categorise their disability when they make a declaration. Some staff felt that there was no adequate descriptor that covered their disability, and elected not to declare, rather than be wrongly categorised. From now on, the declaration section will simply provide a box in which individuals can describe their disability if they chose to do so.

Continuing from the DTI, BERR is a member of the Employers Forum on Disability and has signed up to its Disability Standard benchmarking exercise that aims to audit our progress on disability throughout our business, and to plan for the future. Results from the 2005 return demonstrated that whilst there were areas in which the Department was performing well (working in partnership, leadership, representation of disabled staff), there were a number of areas, such as mainstreaming diversity issues into service development and procurement, where we hoped to improve. In the 2007 exercise, BERR achieved a Bronze award with a score of 68% and rated 4th in the Public sector.

DTI's annual employee opinion survey always has a high return rate. This provides more complete information on the Department's make up than

asking staff to declare a disability separately. All the data can be disaggregated by disability, so it is possible to monitor whether satisfaction rates are disproportionately higher or lower for disabled members of staff (as well as for other groups), although data protection issues have to be taken into account.

BERR accepts that making an improvement in the way we monitor our performance is not, in itself, a means to an end. We need to be proactive in using this information to inform our policies. It is hoped that the changes we are putting in place will lead to more comprehensive data on disability within BERR, and will allow us to do this.

### **- Our Agencies**

BERR's Executive Agencies have their own diversity policies that deliver fair treatment for their staff. These are outlined in more detail in Annex A.

Some examples of initiatives for disabled people are:

The Insolvency Service is currently benchmarking its performance on valuing diversity by using the Diversity Excellence Model with the National School of Government. The model has helped to assess the Service's current performance, identify an action plan for improvement and to benchmark its performance against other organisations.

Companies House and the Insolvency Service are members of the Employers Forum on Disability independently of BERR's participation. They have used the feedback from the Disability Standard Benchmarking survey to inform their own diversity policies

Companies House and the Insolvency Service have set up their own diversity groups to work towards ensuring that diversity issues are mainstreamed into policies and initiatives within their organisations.

All our Agencies collect data on the recruitment, development and retention of their disabled staff.

## 9. The Action Plan

All objectives are linked to the common themes identified in Section 6

Common theme	Objectives	Actions planned	Success measures	By whom and progress
Knowledge and training	Improved performance by line managers in managing and developing staff with disabilities	Roll out of mandatory diversity training (including disability equality issues) for all staff;	As close to 100% take up in six months following roll out	Human Resources have rolled out diversity training to all senior managers (Range 11 and SCS). Continued workshops will be delivered along with a full evaluation into 2008.  E-enabled mandatory diversity training for all staff is expected to be delivered to all staff by the April 2008.
	Disabled staff at all levels in BERR are given the support they need to reach	Roll out of additional development training for line managers of staff with disabilities;  A junior leadership development scheme to increase SCS feeder grades for	Targets on participation of disabled staff still to be agreed.	BERR offers centrally funded training for line managers of disabled people, through the Employers Forum for Disability.  Human Resource – timing to be agreed

	their full potential	staff at Band A and B level. The Department works to ensure that these schemes and the assessment processes for selection are designed to make them open to disabled people.		
<b>Working with our partners</b>	Organisations working in partnership with BERR are performing their services with due regard to the Disability Equality Duty	<p><u>1. Suppliers to BERR</u></p> <p>Amendments to be made to BERR's standard invitation to tender document alerting potential contractors of obligation under Duty;</p> <p>BERR's Application Guide</p>	<p>All tenders demonstrate an understanding and application of the Duty in the services they provide/are seeking to provide.</p> <p>BERR to include a requirement in its invitation to tender documents for its top 50 suppliers to provide management information on compliance to Equality legislation</p> <p>Guide provides clear information</p>	<p>Finance and Resource Management – All tenders comply with both the Disability Discrimination Act 1995 as amended by the Disability Discrimination Act 2005.</p> <p>Finance and Resource Management – Requirement is included in all of BERR's invitation to tender documents</p> <p>Information and Workplace</p>

		<p>for all programmes on the internal Elgar IT system is updated to reflect the need to implement the Duty</p>	<p>for IWS staff on the need to consider the Duty in the provision of IT products for the Department</p>	<p>Systems (in partnership with Fujitsu) – The Department’s Fujitsu Application Development Guide, published in November 2006, contains a chapter on Accessibility with references to the Duty.</p> <p>IWS also has detailed guidance on Developing Special Needs Applications, published in September 2007.</p>
		<p><u>2. Agencies delivering services</u></p> <p>The former DTI to encourage Regional Development Agencies of the need to ensure the service that Business Link provides are compliant with the Duty.</p> <p>Monitoring of Business Link’s services to be disaggregated by disability</p>	<p>The former DTI to write to RDAs to outline need for full coverage of Business Link in individual Disability Equality Schemes.</p> <p>Clear user information on people with disabilities using Business Link is obtained</p>	<p>Better Regulation Team – DTI wrote to Regional Development Agencies to ensure compliance with the duty, who accepted responsibility.</p> <p>Responsibility for the Business Link network (advisors and national phone line) was devolved to the Regional Development</p>

				Agencies in April 2005. They are fully aware of the obligations under the Duty and accept full responsibility for implementing them.
<b>Tools needed to make an assessment of equality</b>	Individual members of staff have the tools they need to make an assessment of equality	Better Policy Making Toolkit for Equality Duties is updated to reflect Duty  Internal communications strategy (involving top-level leadership), is launched to inform all members of staff of the Duty, and the toolkit for making equality assessments	Unitas can report higher number of hits on toolkit site  All available internal communications channels are utilised to publicise Scheme and toolkit to staff.	Better Regulation Team – ongoing, but to be reported on early 2008 (as part of Departmental report)  Better Regulation Team and Internal Communications – the Duty and the toolkit have been widely publicised within the Department and continue to be publicised.
<b>The need for a disability evidence base</b>	Improved monitoring of equality impact across the Department	Survey Control Unit updates its advice to policy leads to inform them of the need to consider monitoring their policies and service delivery for effect on disabled people.	Unit can report higher level of teams considering the need to disaggregate data by disability	Advice, Better Regulation Team – advice has been provided to Survey Control Unit  Reporting, Better Regulation Team (in consultation with Survey Control Unit), by Jan 2008.

	<p>Improved monitoring of staff data on disability</p> <p>Assessments of equality impact are made on relevant projects across the Department</p>	<p>Initiative to improve declaration rates amongst disabled staff in the former DTI and now BERR is carried out.</p> <p>(assessments deemed necessary as a result of the screening exercise)</p> <ul style="list-style-type: none"> <li>- Production of joint OFT/BERR guidance on implementation of <b>unfair commercial practices Directive</b> which provides additional protection for vulnerable groups (including disabled consumers);</li> <li>- Number of disabled people assisted by <b>over indebtedness</b> project to be monitored quarterly;</li> </ul>	<p>CALIPSOE system records declaration rates at 80-85%.</p> <p>Assessments are completed on time</p>	<p>Human Resources – by end 2007, ongoing.</p> <p>(see individual deadlines below)</p> <p>OFT consultation on draft guidance closed in August 2007. This sets out the additional protections for vulnerable groups will operate in practice. Final guidance is expected to be published in December 2007.</p> <p>Ongoing – 2006-08</p>
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		<ul style="list-style-type: none"> <li>- Full consideration to be given to the involvement of disabled stakeholders as work on <b>Doorstep selling</b> progresses;</li> <li>- Consultation on <b>energy metering and billing</b> to fully involve disabled stakeholders using accessible formats;</li> <li>- Disabled entrepreneurs to be fully involved in the consultation on <b>Business Support Simplification Project</b>;</li> <li>- Monitoring by disability to be carried out on <b>Vulnerable workers pilot</b>;</li> <li>- Equality Impact Assessment to be carried out on work on</li> </ul>		<p>To be determined – Consultation expected in December 2007</p> <p>By 31 October 2007</p> <p>Consultation made fully accessible, with contributions sought from organisations representing disabled stakeholder.</p> <p>From mid 2007 monitoring initiated and is continuing.</p> <p>To be determined</p>
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		<p><b>Employment Agency Standards;</b></p> <ul style="list-style-type: none"> <li>- Equality Impact Assessment to be carried out on work on <b>Increasing statutory paid leave entitlement;</b></li> <li>- Equality Impact Assessments to be carried out on <b>restructuring</b> changes to be made in each of the former <b>DTI /BERR Directorates.</b></li> </ul>		<p>Equality Impact Assessment completed and published in the full Regulatory Impact Assessment.</p> <p>Diversity Impact Assessment has been drafted and will be published on completion.</p>
<b>Access to information and services</b>	BERR and Agency websites are fully accessible to customers	<p>Work is completed to ensure BERR's website meets AA accessibility standards.</p> <p>Agencies' website maintain high standards of user accessibility</p>	Users can report BERR's site is fully accessible in terms of adherence to the AA standard	<p>BERR has made improvements to the accessibility of its core website during the year, which means that the site infrastructure now meets AA accessibility levels, and publishers have started to publish content which meets AA.</p> <p>Ongoing</p>

	Enquiries made by disabled customers are dealt with effectively	already achieved  BERR's response centre/enquiry unit continue to train staff in the provision of reasonable adjustments for people with disabilities contacting the Department	No complaints are received on mishandling of disabled person's enquiries	Ongoing
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The Disability Equality Duty requires public authorities to prioritise the areas of work that are of most importance to its disabled stakeholders. Therefore there are a number of disability equality issues across the Department that do not fit into the common themes and objectives prioritised in this Action Plan. More information on these actions can be found in the results of the former DTI's screening exercise at Annex A.

However, those issues that do not fit neatly into the Action Plan will still be covered in our monitoring and reporting work – for full details, see below.

#### **- Monitoring and reviewing our Action Plan**

BERR recognises that the publication of this scheme is only the start of the implementation process for the Disability Equality Duty. With this in mind, we will review progress made on the action points in its Scheme on an annual basis. This work will form a part of our annual Departmental report, which is published on our website, and can be made available in alternative formats upon request.

Exactly what the most effective mechanism will be for this monitoring was still being decided upon when this document went to press. The Project Steering Board favours a peer review-based approach, which would include benchmarking with other organisations, the results of which would feed into BERR's Departmental report. However, this work will benefit from allowing the scheme some time to bed down. Whilst more work is needed to finalise our plans, BERR is committed to ensuring that our disabled stakeholders will continue to be involved in the evolution of this scheme, and in monitoring it.

BERR is also committed to ensuring that in the event of any machinery of Government changes taking place during the life of this scheme, we will ensure the relevant data is passed on to other Government Departments.

As required by the legislation, the Secretary of State for Trade and Industry will review and report on progress made against this Disability Equality Scheme, by 4<sup>th</sup> December 2008.

Annex 1: Results of the former DTI's screening exercise - relevance of the former DTI's Business Plan (which will emerge into BERR's Business Plan) objectives and the work of its Agencies to the Disability Equality Duty

The former DTI

Objective 1: Improve the relative performance of UK science and engineering and its use by Government and society

As a result of the machinery of Government changes on 28 June 2007, responsibility for this objective has transferred to DIUS.

Objective 2: Promote effective transfer of knowledge and improve UK innovation performance and accelerate business exploitation of science and new and existing technologies

As a result of the machinery of Government changes on 28 June 2007, responsibility for this objective has transferred to DIUS

Objective 3: Extend competitive markets by developing free and fair markets across Europe and throughout the world, and by placing empowered and protected consumers at the heart of an effective competition regime

Overall classification – low, but high for consumer policy

Relevant activities and actions:

SOLVIT is a UK service providing advice on specific problems that individual citizens or businesses experience in exercising their EU internal market rights. Queries for SOLVIT are accepted in whatever way the individual or business finds easiest, and staff respond accordingly. The former DTI and now BERR carries out low-key monitoring by asking enquirers how they were alerted to the scheme in order to ensure that we target awareness raising effectively.

**Proposed Point of Single Contact for the Services Directive.** This is an EC initiative to provide a website portal through which information for service providers and users is delivered. The issue of accessibility to the portal will be considered as part of the appropriate testing regime for the portal. The former DTI and now BERR, on behalf of the UK is urging the European Commission to consider appropriate monitoring mechanisms for usage and accessibility to the portal.

**Setting up of the Local Better Regulation Office (LBRO).** Issues around accessibility will be considered as part of the work to consider the location of the LBRO. Serving the needs of a diverse community will be taken into

account in the work to prioritise the work of the LBRO. This assessment will form part of the preparation work to set up the LBRO in 2007-08.

**Retail Enforcement Pilot (REP).** The REP has developed a range of video-based CDs covering the main retail regulatory areas, such as health and safety. There is one CD covering disability discrimination. These CDs are being used as educational products for retail businesses and are currently being tested with stakeholders. It is envisaged that the final products will be multilingual (voiceover and subtitles), to ensure they are inclusive. This project should be completed in early 2007. Enterprise Directorate will be responsible for monitoring the impact and take-up of the CDs.

**Unfair Commercial Practices Directive (UCPD).** The UCPD introduces a general duty on traders in all sectors not to treat consumers unfairly. The fairness of a practice will generally be judged from the perspective of the "average consumer" (as term used simply as a benchmark by which to gauge treatment). However, the directive contains a provision to provide greater protection for consumers who in the context of this Directive are legally defined as "vulnerable", including consumers who are particularly vulnerable to the practice or underlying product because of their learning or physical disability. The Directive will come into force in December 2007. The guidance accompanying the implementing regulations, and any accompanying publicity will need to fully explain the additional protections available to vulnerable consumers. This will need to be discussed with a diverse range of stakeholders.

**Over-indebtedness.** The former DTI awarded over £1.7m to a disabilities project aimed at providing face-to-face debt advice for those with sight, hearing and mental health problems who are confronting serious over-indebtedness. The project will run for 2 years from 2006-08, and BERR will be monitoring quarterly the numbers helped by the project and the impact it has. The project as a whole will also have a final evaluation. Citizens Advice have been leading on this project, and is working in partnership with a number of disability organisations.

**Consumer Credit.** There are requirements in the Consumer Credit Agreements Regulations on the presentation of key information the consumer needs to know about the agreement they're entering into. These include legibility and prominence requirements in order to make key information easier to read.

The 2006 Consumer Credit Act contains provisions that will give The Office of Fair Trading new powers to consider the fitness of licence holders, and take action against lenders who lend irresponsibly, including to those who might have a health issue or learning disability. The former DTI and now BERR is working with the Money Lending Advisory Group, who have, in consultation with disability organisations, set up a working group on mental health issues.

**Doorstep selling.** The former DTI recently undertook a consultation exercise, gathering stakeholders' views on doorstep selling. This took into account the need to access the views of people restricted to their homes (which includes people with disabilities), who may particularly value the doorstep sales option. Disability equality issues will continue to be considered as part of any future consultation and engagement with stakeholders.

**Package Travel.** The European Commission's Green Paper on how the Package Travel Directive might be revised, is due out later in 2006. Once published, BERR will approach groups such as the Disability Rights Commission and Tourism for All with a view to circulating information through their networks.

**Objective 4: Ensure the continuity and security of energy supply at affordable prices through competitive markets, whilst minimising environmental impacts and delivering social objectives**

Overall classification: Medium

Relevant activities and actions

**Fuel poverty (for England, responsibility shared with DEFRA).** It is the Government's aim to eliminate fuel poverty in vulnerable households by 2010. Vulnerable households are classified as one containing children or those who are elderly, disabled or long-term sick. All actions relating to the fuel poverty targets are also aimed at improving quality of life for disabled people, and those in receipt of disability related benefits are eligible for assistance from Government sponsored grant schemes, such as Warm Front. Consultation on the UK Fuel Poverty Strategy included a number of Health Authorities and non-Governmental Organisations who support the elderly, those with long term health conditions and the disabled. The former DTI (now BERR) and DEFRA annually monitor the number of households in fuel poverty, and separately monitors vulnerable households through the English House Condition Survey. This information can be disaggregated by disability and long-term health conditions.

**Energy metering and billing.** The impending consultation on this issue will include questions around visual display units. Of particular concern is whether disabled people would be disadvantaged by these proposals on metering and billing – this will be addressed in the consultation. Responses from disabled stakeholders and representatives groups will help inform further work in this area.

OFGEM, the industry regulator, is responsible for overseeing the market in these areas and will continue to monitor suppliers' activities in respect of

vulnerable<sup>3</sup> groups under its Social Action Plan. Energywatch, the industry watchdog, along with OFGEM continues to have responsibility for advising BERR of impacts on all vulnerable groups, including disabled people.

**Objective 5: Promote sustainability, including through the delivery of low carbon aims of the Energy White Paper, at least cost to the UK economy, and improve the contribution of business to sustainable development**

Overall classification: Low

Relevant activities and actions

None identified. Activities will be reviewed annually.

Most of the activity under this objective is focussed on industry and markets – working with DEFRA on the EU Emissions Trading Scheme; managing the renewables obligation and working to meet the 2010 renewables target, including removing planning barriers to energy developments on and off-shore. Where the focus is on energy efficiency, remedies are focussed on technologies and market incentives, rather than circumstances of individuals.

**Objective 6: Encourage enterprise, growth and business investment**

Overall classification: High

Relevant activities and actions

The **Phoenix Development Fund** was created as a time-limited programme to support innovative demonstrator projects working in disadvantaged areas and with underrepresented groups. A report on learning from pilots has been completed and is available from Enterprise Directorate. A series of national and regional events looking at lessons learned across a range of projects, including those targeting people with disabilities, is being set up.

The **Enterprise Directorate** is currently carrying out a wide review of business input into policy development. In this work it will take account of the need to engage with disabled business owners. A mechanism is due to be in place by late 2007.

The stakeholder engagement strategy for the **Business Support Simplification**

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<sup>3</sup> “Vulnerable” is used here, and in other parts of this document, as a recognised legal term. It is not meant to reflect any negative stereotyping of people with disabilities, or any other groups covered by the definition.

**Project** will take account of the needs of potential entrepreneurs and businesses owned and led by disabled people.

A consultation is scheduled for late 2006.

Regional Development Authorities have agreed that from 1 April 2007, **Business Link**, (a service that gives practical support and guidance to businesses), will include questions on disability in their customer satisfaction surveys. This will give an indicative level of usage of Business Link services by companies owned or led by people with disabilities or individuals with disabilities thinking of, or in the process of, starting a business. The data will be used to inform policy at regional and national level. For more information on Business Link, see [www.businesslink.gov.uk](http://www.businesslink.gov.uk)

Additional data is available from the Annual Small Business Survey, which will be monitored centrally.

**Objective 7: Strengthen regional economies through making sustainable improvements in the economic performance of all the English regions by 2008, and over the long term, reduce the persistent gap in growth rates between the regions, demonstrating progress by 2008**

Overall classification: Low-medium, but for Regional Development Authorities to deliver. RDAs have their own separate Disability Equality Schemes.

Relevant actions and activities

No special UK schemes aimed at disabled people. Schemes and products delivered by Regional Development Authorities (who have their own Disability Equality Schemes), must comply with all UK legislation.

While both the European Social Fund and European Regional Development Fund have an impact for disabled people, they are monitored by the Department for Work and Pensions and the Department for Communities and Local Government respectively.

**Objective 8: Enhance the competitiveness of companies in the UK through overseas trade and investments: and attract a continuing high level of quality foreign direct investment**

Overall classification: Medium-low

UK Trade and Investment (UKTI), which leads on this objective, is a joint BERR/FCO organisation. The medium-low rating reflects its activities to encourage and support companies of all sizes to improve their international business performance and to attract foreign investment into the UK.

### Relevant actions and activities

UKTI monitors performance against its PSA targets and other performance measures through its newly developed **Performance and Impact Monitoring System (PIMS)**. The first set of results has been published on UKTI website. This data includes information relating to the ethnicity and gender of company directors UKTI has assisted. PIMS results will allow UKTI to monitor the extent to which there is an increase in the number of currently underrepresented groups assessing its services as a result of the targeted initiatives taken. This, in turn, will provide a robust evidence base to help inform future policy direction.

PIMS is a new system which is still bedding down. UKTI are currently considering whether it would provide the most effective mechanism for monitoring on the basis of disability.

UKTI headquarters is in the process of moving to a new organisational structure, and this will result in a reduction of posts, particularly at the lower grades. A diversity impact assessment will be carried out on the effect of moving to the new structure, with guidance from BERR.

UKTI also has its own diversity group, known as the Bringing on Talent Group which meets twice a year to discuss diversity issues affecting the organisation.

**Objective 9: Maximising potential in the workplace by maintaining an adaptable labour market while delivering a reduction of legal complexity for business, both here and in Europe, raising the level of and demand for skills, and outside the workplace by promoting gender equality and diversity.**

Overall classification: high

### Relevant actions and activities

BERR's **Fair Treatment at Work Survey** monitors the extent of employee discrimination, unfair treatment, bullying and sexual harassment on the basis of disability or long-term illness. The first survey was conducted in 2005 (at the former DTI), and the results from this will help inform the second survey, to be conducted in 2008.

**Age discrimination regulations** outlawing discrimination on grounds of age in employment and training came into force on 1<sup>st</sup> October 2006. The assumption is that the regulations may lead to positive outcomes for disabled people, because age is linked to higher rates of disability. The regulations will also help where people experience multiple

discrimination, and is aimed at ensuring all individuals are treated fairly, and on the basis of competence to do the job, rather than other factors. The effectiveness of the legislation will be monitored as it develops.

**Extension of the right to request flexible working to carers of adults from April 2007.** This legislative change will help employees care for disabled relatives by helping them balance their work and caring responsibilities. The former DTI consulted with a wide range of representative bodies on this issue, and will look to monitor the effectiveness of the legislation once in place.

**Employment Agency standards.** BERR is working to ensure standards and policies are developed and enforced to enable all to contribute to a flexible labour market, and addressing problems facing disabled workers and other workers classed as vulnerable. An informal consultation was carried out April/May 2006 and will be followed by a formal consultation paper (timescale to be decided). An equality impact assessment will be carried out as part of the formal consultation process. Monitoring is done by working with equality bodies and stakeholders, and by following up on complaints received about employment agencies are monitored.

**Employment status and rights.** BERR is working to raise awareness of employment status and rights by improving existing guidance and targeting specific groups of workers, including disabled people.

**Increasing statutory paid leave entitlement.** This work is a manifesto commitment to increase annual leave entitlements to be additional to paid leave for bank holidays. This is likely to be of benefit to low-paid workers, and in particular, those who work part-time. Further data is being collected on this issue to enable an equality impact assessment to be assessed. Equality Impact assessments will be carried out on the policy for the formal consultation (expected Dec/Jan 07).

**Employee Direct / Directgov.** Work to improve information about employment rights and responsibilities for workers. Maintenance and continuous development of employee pages of Directgov website ("Employee Direct"). Providing a single, comprehensive source of information for employees on their employment rights and responsibilities. Includes information. Extensive content targeted at disabled users was already available from Directgov when the project was started. We have consulted with the 'disabled people' section of Directgov (run by DWP) to establish where the new content needs to fill gaps in the existing information provision. Our advisory group includes a Disability Rights Commission (DRC) representative. All content has to be AA accredited for accessibility. Specific monitoring of employees content to be determined, users can provide feedback through Directgov helpdesk system. Directgov centrally monitor adherence to accessibility standards. Content that is part of 'Disabled people' franchise will be managed by Department of Work

and Pensions.

**Employment Tribunals** - work to streamline and maximise the efficiency and effectiveness of the employment tribunals system. In considering the development of policy relating to the Rules of Procedure governing access to, and proceedings in, employment tribunals, efforts are made to engage both informally and formally with a range of key interest groups including the Disability Rights Commission. This allows any areas of potential concern or particular requirements to be identified at an early stage, and for experts in the field to be involved in finding solutions. Public consultation also provides a vehicle for gauging potential impact. Impact of policy is monitored through representations made in correspondence, and regular liaison with other agencies involved in aspects of the employment tribunals process (Department of Constitutional Affairs (DCA), the Tribunals Service – administrators and Judiciary, ACAS and other Government Departments).

**Dispute Resolution Regulations** – the Government’s role in setting a framework for the resolution of employment disputes seeks to achieve several key objectives: effective and efficient enforcement; access to justice; higher productivity and cost effectiveness. In accordance with Ministerial commitments, the 2004 Dispute Resolution Regulations are being reviewed to establish their effectiveness in facilitating the resolution of workplace disputes. It has been decided to extend the remit of the review to cover the whole process from the initial trigger event through to a possible employment tribunal hearing. During the evidence gathering phase, the DRC and Trade Unions Congress (TUC) contributed significantly in areas relating to disabled access and making procedures accessible for those potentially vulnerable to discrimination during disputes. The DRC’s provisions for mediation in disability discrimination claims via Mediation UK will be carefully assessed. The uptake of Government provided facilities will be carefully monitored to establish profiles and we will work with CEHR in developing helpline-based access points. This will be matched with the monitoring processes DCA carry out to establish details of employment tribunal access. We will expect ongoing liaison with DRC/CEHR and TUC to assess the success of policies implemented.

**Vulnerable workers Pilots.** These pilots are designed to find ways to ensure that the most vulnerable workers benefit from the Governments’ employment rights, alternatively they may be put in touch with opportunities to advance through skills, language training etc. Our definition of who is vulnerable takes into account peoples’ circumstances at work and ability to take action where the employer treats them unfairly. Some low-paying sectors tend to have more problems at work than others. The Government has announced that there will be two vulnerable worker pilots. The pilots will aim to test ways to ensure that vulnerable workers get their employment rights and help employers overcome difficulties in complying with the law. The TUC will develop a pilot partnership in London focused on the cleaning

and building services sector, mostly cleaners, and some security or transport staff. Marketing Birmingham will develop a pilot focused on workers and employers in the hospitality sector in Birmingham.

Detailed proposals are being developed by the partner organisations, but we would expect the pilots to offer help to workers in the target group enforce rights not to be discriminated against, including on the grounds of disability. The pilots will aim to help business see the benefits of complying with the law and treating workers fairly and this would include taking a positive attitude to employing people with disabilities. Formal monitoring and evaluation of the pilots will take place throughout, this will include drawing out outcomes and benefits for disabled people.

**Guidance/helplines.** As part of the Employment Law Simplification Review, BERR is developing proposals for the rationalisation, signposting and simplification of guidance and delivery channels on employment law so as to increase UK employers' confidence in employing people. The Department is at the very early stages of the project, so thinking is still developing. The project will not be focusing on specific pieces of legislation, but will look to make proposals on how guidance and advice on employment legislation across the piece can best be provided to employers to ensure that employment rules are followed to the benefit of employees and businesses. A report on this work is due by May 2007.

Much of the work under this objective is informed and monitored via the Labour Force Survey. This survey can be disaggregated by disability where required.

**Objective 10: Promote and deliver an effective framework for corporate activity, giving confidence to investors, business and other stakeholders**

Overall classification – Low

This classification reflects the fact that BERR's activities are limited to overseeing Companies House and Insolvency Service performance and the delivery of efficiency benefits. The services delivered by these Agencies are covered separately in this Annex.

Policies and regulations covered by this objective are predominantly directed to companies or organisations and institutions, rather than individuals or groups. Regular policy reviews will continue to take disability equality, alongside other issues, into account where appropriate.

**Objective 11: Safe, economic, efficient and effective management of Departmental (and where relevant, Government) assets and liabilities and to provide a centre of excellence within Government on corporate finance and**

governance issues

Overall classification – Low

Relevant activities and actions

None identified. Activities will be reviewed annually.

**Coal Health Schemes** – Whilst this scheme was considered for relevance for the disability equality duty, it has been screened out of this exercise. The (the former DTI is only paying compensation for coal health claims as a result of Court actions in the late 1990s against British Coal. Whilst the schemes are addressing miners' health related problems, which in some cases lead to aspects of disability for the individuals concerned, often complex cases are already considered, in detail, on an individual basis. These Schemes are the largest personal injury compensation schemes in the world, with approximately 582,000 claims registered. The Claims Handling Agreement already specifies that the most elderly, and those with the most serious health problems and disabilities, are prioritised.

**Objective 12: Ensure nuclear security and safety and effective and efficient DTI (and now BERR) contribution to preventing proliferation of arms and other strategic goods**

Overall classification: Low

Policies and regulations covered by this objective are predominantly directed to the behaviours and actions of companies/exporters or other organisations/institutions rather than individual groups, hence the low classification. Activities will be reviewed annually

## ENABLER OBJECTIVES - THE WAY WE WORK

### Objective: Effective channels with business

Overall classification: Medium

#### Relevant actions and activities:

**Digital Television Switchover.** Digital switchover will give near universal access to high-quality, free-to-view, digital TV. Currently, around 27% of the population cannot receive digital terrestrial TV services free through their aerial. The switchover will make access fairer.

To ensure everyone can benefit from digital switchover, there will be a help scheme for those that need it most. Practical support will be provided for all households where one person is living on Disability Living Allowance, Attendance Allowance, registered blind or partially sighted or aged 75 or over. The first scheme will be available from 2007. The Department of Culture Media and Sport are leading on the development of the scheme, in consultation with BERR, and stakeholders from representative groups. Digital UK will also develop targeted communications to support people through switchover who disabled, but not eligible for help from the scheme.

A 'Switchover Tracker' is published each quarter, reporting on understanding, awareness and take-up of digital TV among those people who are eligible to the help scheme, and separately, those who describe themselves as disabled. The tracker informs communications strategies.

The former DTI, with the support of industry, launched an action plan in July 2006 that aims to see a wider range of **easy-to-use digital TV equipment** available to all consumers.

**The Digital Strategy.** Action 7 in the Digital Strategy is specifically aimed at improving accessibility for the digitally excluded and ease of use for disabled people. Improving Public Sector eAccessibility is one activity. The Disability Rights Commission identified in its document "The Web Access and Inclusion for Disabled People", issues of website inaccessibility for the disabled. In response, the British Standards Institute produced the Publicly Available Specification (PAS) 78 as a guide to good practice in commissioning websites – the former DTI was actively engaged as part of the consultation group. The published information provides disabled people with best practice on website access and guidance on involving disabled people in the development process.

Under Action 1 of the Digital Strategy, there is a specific activity to promote and utilise the UK Online Centres. The Centres continue to be successful in

enabling those that have been, or felt excluded, to get involved in the digital revolution. University for Industry is responsible for managing the UK Online Centre Network. It monitors its users across a number of indicators which highlight to what extent the network is addressing social exclusion, including disability (8% of UK Online Centres' current users regard themselves as disabled).

The Digital Strategy includes a commitment to review the digital divide, including those aspects relating to disability, in 2008

**Myguide.** Myguide was established by DfES to overcome the perceived lack of use and interest barriers which prevent between 11 and 14m people using the internet. Using accessibility software and a radically simple design, the project has been able to offer guided, step-by-step internet use for older people, those with disabilities, and other target groups. Myguide has completed a 6 month pilot and the evaluation will soon be completed. A decision will then be put to Ministers on a possible roll out of the pilot in 2007 – this will be informed by the consultation work undertaken for the PAS 78 (see above). 19% of Myguide customers described themselves as having some degree of disability when using a computer.

**ITEC and women.** The former DTI and BERR will work with its partners in delivery of Information, Technology, Electronics and Communications (ITEC) and women initiatives to ensure all strategies and actions are all consider the Disability Equality Duty in both design and implementation stages of projects. Consultation with partners will be undertaken over the first half of 2007.

#### Objective: Setting and delivering priorities

Overall classification: Low-medium

Relevant actions and activities

**Comprehensive Spending Review.** The former DTI, alongside other Government Departments, worked to feed into HM Treasury's work on the Comprehensive Spending Review, to decide Government spending for the next spending period. As required in the guidance provided to Departments for the Review, the disability equality duty will be taken into account as a part of the former DTI's planning work. This was complete in March 2007.

#### Objective: Excellent corporate services

Overall classification: High

Relevant actions and activities

**Human resources:** activities include planned diversity training across the Department during 2007, meeting commitments in the Cabinet Office 10 Point plan for the civil service. A new development programme for staff at the lower grades in BERR is also planned as part of this work. For the development programme, BERR will work with its staff advisory groups, including the Disability Advisory Group, undertake Equality Impact Assessments where appropriate, and put in place a robust monitoring system for the programme. Equality impact assessments will also be carried out for all relocation and restructuring work (including that for UKTI, see objective 8), the staff reporting process (the PADR process), the employee opinion survey and sickness absence monitoring.

In line with the disability equality duty, BERR is seeking to improve the rates of declaration of disability in the Department, outside the returns to the annual employee survey. This will be a top down initiative, with the Permanent Secretary writing to encourage all Senior Civil Servants to declare. It is hoped that this will then act as an example and incentive to all staff to feel confident and assured in declaring that they have a disability or a long-term health condition. Key to this work will be an explanation of the purpose for collecting employment data by disability, and how it will be used.

BERR already monitors the rates of training received, performance management (including grievances and discipline), promotion rates, and exits from the Department by disability. Increased declaration rates should help make this monitoring in this area more effective (for more information on all these activities, see Section 8).

**Public Appointments:** BERR's Appointment Plan contains an equality statement highlighting our commitment to providing equal opportunities for all. This is sent out with all advertisements and information packs. The Appointment Plan also presents targets for the appointment of disabled people, women and minority ethnic groups to public bodies for 2007 and 2008. Actions to support progress towards our targets include reviews by officials and Ministers at the beginning of each appointment exercise to identify how to reach out to a wide range of candidates and maintaining close links with appointment units in other Government Departments to share best practice. Vacancies are also routinely circulated to the Disability Rights Commission to ensure that suitable disabled candidates are alerted to positions. Applicants are asked to provide information on their disability, as well as gender and ethnic minority, via a form sent out with the application pack.

BERR is aware that people claiming benefits, including disabled people, sometimes cannot apply for paid appointments without losing their benefit entitlements. It is for the Cabinet Office to provide further guidance on this issue.

**Confidence of stakeholders in the use of public money.** BERR's standard contract already contains a section that covers disability discrimination. With the Disability Equality Duty in mind, BERR will take an additional step to promote equality of opportunity for disabled people, by including in the statement for tender document that the Department requires bidders to acquaint themselves with the provisions of the Duty, and will expect bids to be in accordance with them. To monitor the behaviour of existing contractors, the invitation to tender document will be amended to include a requirement for BERR's top 50 suppliers to provide management information on compliance to Equality legislation. This change will be effective from December 2007.

Any further change in the area of procurement policy will require the Office of Government Commerce (who are drafting their own Disability Equality Scheme), to provide guidance to other Government Departments.

**Access to internal IT systems.** BERR works hard to ensure that all of its desktop and laptop design packages are fully accessible for disabled staff. All new systems or applications are designed with a number of potential disabilities in mind – particularly visual and motor (RSI) – and are tested to ensure that they integrate with the existing software designed for people with disabilities, such as SuperNova, Dragon NS, Text Help Read Write and Point 'n Click. All new builds and applications to our ELGAR IT systems are fully tested by BERR staff (including some with disabilities) as part of our User Acceptance process. Where accessibility issues are identified, we work hard to resolve them for the benefit of all staff. BERR's Application Development Guide is in the process of being updated, and this will reflect the need for all new packages to consider the Disability Equality Duty at the design stage. All web page creation or design is required to follow W3C A Conformance.

### **Objective: Excellent Corporate Communications**

Overall classification: High

#### Relevant activities and actions

BERR will seek to ensure that its **corporate communications** include images of diversity, including on disability (this is already covered in our branding guidance).

**Website accessibility.** The former DTI reviewed the accessibility of its website (now: [www.berr.gov.uk](http://www.berr.gov.uk)), following an audit in September 2006 (carried out by Nomensa), which measured the site's performance against the globally recognised Web Content Accessibility Guidelines (WCAG 1.0). The former DTI's site did not perform well in terms of accessibility. Work has

been done to rectify this, and we have achieved compliance with Level AA of WCAG 1.0 and publishers have started to publish content which meets AA. The next step is to review legacy content on the site, and to develop a policy for publishing accessible PDF documents. This improvement work is a priority for BERR, and will be completed during 2007/08.

**Correspondence/telephone enquiries.** Staff answering correspondence and telephone enquiries to BERR are trained in the need to provide alternative format to customers where appropriate and available. Where staff are made aware of a disability, they will seek to provide a response in an accessible format. New staff joining the unit receive information on BERR's disability policy within 3 months of starting their post. All newly appointed managers in the unit are also given training on disability issues within 3 months of joining the unit.

**Dialogue.** Dialogue is the method by which BERR collects feedback from staff on current issues affecting them, such as changes in the Department, and around Whitehall. All staff participate in the monthly meeting, and BERR works with the staff Disability Advisory Group to ensure staff with disabilities feel able to fully participate, and that the Dialogue processes are as inclusive as possible.

### **Objective: Excellent Legal Services**

Overall classification: Low-medium

#### Relevant activities and actions

**Provision of Legal Advice on DTI (and now BERR) Policy.** Legal Services Group will foster an appropriate level of awareness and understanding among Advisory Lawyers of Disability Discrimination issues and obligations through a programme of dedicated in-house training events and the dissemination of information via the Groups Intranet. Feedback from clients, on individual cases, in regular client care meetings and through annual client surveys, will highlight any shortcomings or deficiencies in understanding or effectiveness of implementation.

**Recruitment of Specialist Staff** (and intake of Legal Trainees and Summer Placement Students). Information on declared disabilities is sought from applicants in the early stages of the recruitment process and monitored throughout all stages. Where appropriate, Legal Services Group has made adjustments to cater for reasonable adjustments in the working environment or working patterns. In the case of degenerative disabilities, regular reviews are undertaken to ensure that further appropriate and timely adjustments can be made. Statistics on disability are analysed on an ongoing basis and provides evidence of the Groups' success or otherwise in attracting and

sustaining a consistent level of disabled staff. Monitoring currently shows that 9% of Legal Services Group staff have declared a disability.

**Generally** - in all aspects of providing Excellent Legal Services. Close attention and consideration is paid to the needs of those providing and receiving legal services. Examples are:

***Internally*** –

At the Director General's request, the Group's Diversity Group recently led a numbers of focus groups by way of follow up to concerns about equal; opportunities expressed through the last employee opinion survey. The Senior Management Team is currently considering the Report on the Diversity Group's findings. A response is expected in early December 2006.

**Externally** -

The access requirement of those invited for interview by BERR Investigation Officers and those attending court as BERR Prosecution witnesses are considered, and practical arrangements adjusted as necessary. Feedback in each case will indicate the level of satisfaction and whether improvements are needed.

**Agencies**

BERR's Agencies have not been given an overall classification for relevance to the Duty. This is because the diverse nature of their activities makes any overall classification meaningless.

## The Insolvency Service (INSS)

### Relevant activities and actions:

- Administer and investigate the affairs of bankrupts, companies, and partnerships wound up by the court, and establish why they became insolvent;
- Deal with the disqualification of unfit directors in all corporate failures and bankruptcy restriction orders/undertakings of individuals;
- Authorise and regulate the insolvency profession;
- Assess and pay statutory entitlement to redundancy payments when an employer cannot or will not pay its employees;
- Provide estate accounting and investment services for bankruptcy and liquidation estate funds;
- Conduct confidential fact-finding investigations into companies where it is in the public interest to do so;
- Advise BERR Ministers and other government departments and agencies on insolvency, redundancy and other related issues; and;
- Provide information to the public on insolvency and redundancy matters via our website, leaflets, Insolvency Enquiry Line and Redundancy Payments Helpline.

### **Corporate level**

INSS's Corporate Plan sets out its strategy for delivering its overall Vision and Mission; the objectives, targets and milestones will collectively allow INSS to demonstrate, as part of its ongoing processes and business planning, that equality strands are included as a matter of course.

### **Equality of Service Delivery**

INSS has a commitment to fair and equal treatment of all its users. It will not discriminate on the grounds of race, colour, ethnic origin, nationality, gender, marital status, religious affiliation, disability, age or sexual orientation. Within this is a commitment in ensuring that people with a disability have access to all of its services.

### **Charter Mark**

INSS has held Charter Mark accreditation continuously since 1998. INSS is a recognised excellent customer service provider.

Within the six Charter Mark criteria, based upon the Government's four principles of public services reform, the prime focus is on being fair and accessible to everyone and promoting choice.

### **Diversity Excellence Model (DEM)**

In order to benchmark its responsiveness to the diversity agenda, INSS has undertaken the DEM exercise. Scoring 295 at its first attempt, it is in the top third amidst 21 other public sector organisations. An outcome identified from

this exercise has been the drafting of a Diversity Strategy which acts as an enabler for the disability agenda.

### **Website access**

INSS recognises the importance of providing a website and intranet that is accessible to all its user groups, including those with disabilities. Accessibility standards are in place with the intention of making the content accessible to the widest range of visitors, regardless of disability or impairment. INSS adheres to accessibility guidelines issued through E-Government.

INSS intranet is currently being re-developed and will comply with AA standard, by early 2007. It has been built using their guidelines and previous advice from the RNIB.

### **Stakeholder groups**

Wherever possible, INSS will continue to involve and seek the views of its stakeholder groups at the earliest opportunities, when revising or creating policies or new processes, including taking steps to include individuals with particular access requirements.

### **Surveys**

INSS is committed to continuous improvement. Surveying users allows INSS to assess whether improvements have been beneficial, to both customers or INSS. They also allow INSS to monitor the service it provides to customers in order to identify whether improvements have been successful or not, whether further change is needed and to gauge impact on users. In coming years, this will determine impact in terms of disability, equality.

Currently, comments cards feedback is ongoing and collated quarterly. Changes, where possible, are made, especially where individuals have particular requirements related to their disability.

### **Project working:**

INSS is working on several projects in Enabling the Future (EtF). Benefits to accessibility and to aid all customers and staff, include:

#### *Technology*

- Improve choice and access to services and tools
- Make technology scaleable and user friendly

#### *Flexibility*

- Improve work life balance through operational flexibility
- Be reactive and proactive to needs of our customers

INSS is further raising awareness of equality issues having devised robust

Diversity & Accessibility Guidelines to be used in project set-up. These will also ensure that disability issues are incorporated into its project maintenance systems, e.g. software for people needing particular adaptations being tested for compatibility. INSS' Diversity Group and Diversity Officer are also consulted as appropriate.

### **Monitoring of processes and impact on customers**

INSS has a successful monitoring process for collecting data about the ethnicity of bankrupts and directors. This process is being reviewed with a view to extending monitoring to include all diversity strands.

Impact of processes and policies on customers is currently, within most areas within the INSS, identified through feedback on customer comments cards and the complaints procedure (both available electronically and paper).

### **Making INSS services accessible to all**

a) There are standards of service a customer can expect if they have access requirements or a disability, when visiting the Official receiver. If customers advise in advance, then suitable arrangements can be made; or a home visit or telephone interview may be possible.

b) On-line services:

INSS strives to obey the spirit of the DDA with respect to the provision of services online, as required by the DRC, and so provides a variety (11) of its services on-line; its Bankruptcy On-line service being one such service.

c) INSS Publications

Ensuring the optimum service to all, including those disabled, INSS provides, its most popular leaflets in different languages and alternative formats.

### **Policy:**

**Applying relevant equality legislation to policy developments by the Insolvency Service (INSS).** INSS is in the process of drafting guidance notes regarding the formulation of Equality Impacts Assessments as part of the policy making process, and has programmed in screening exercises to be completed by April 2007 with Impact Assessments to follow in 2008. In advance of legislation coming in to force, revisions to the Technical Manual addressing accessibility and equality issues will be made.

### **People and Buildings**

Feedback, in all areas, is welcome and monitored on all aspects of customer service including accessibility, both by INSS comments card (electronic and card) and the complaints procedure.

### **Property Services Procurement**

INSS has undertaken disability accessibility audits of all its premises, making adjustments as necessary. Following on from which, all offices have either a fixed or portable hearing loop. A budget is also maintained to provide specialist equipment for staff pursuant to work place assessments of needs identified.

### **Operations**

In reviewing operational processes and policies, consideration is given to any potential impact in relation to diversity strands, and amendments are made accordingly. Equality Impact Assessments are carried out on any new or changing procedures where applicable. Advice is provided to staff in the Technical Manual on how to deal with people with special needs, including disabilities. Training is also provided - see below.

### **INSS Staff:**

#### **Training**

INSS constantly reviews how it trains staff to ensure a flexible and accessible framework, less reliant on residential courses. Its qualification-working group has discussed how to make the training of examiners more effective and efficient, less bureaucratic and accessible to all. A flexible approach that is fit for purpose and achieves its business objectives is the driver.

A Disability Equality Scheme seminar was carried out by a disability specialist and attended by a cross-section of INSS to promote the Disability Equality Duty and highlight equality issues.

All staff and managers have mandatory diversity awareness training, which includes awareness of disability legislation.

#### **Diversity Group**

INSS's Diversity Group is a voluntary group made up of a cross section of staff including those with disabilities, who act as an advisory/pressure group. They are particularly interested in, and consulted on, diversity issues that relate to staff within the INSS, e.g. HR revisions, projects that impact on staff working.

### **Human Resources:**

a) INSS has a disability policy that sets out how the Disability Discrimination Act applies within its employment procedures. It makes use of/deploys:

- Occupational health assessment & use of specialist equipment for staff.
- Recruitment procedures are competency based.
- INSS is also a "Two Ticks" symbol user and a member of the

Employers Forum on Disability.

- Equal Opportunities Contact Officers are available to provide staff with advice on the Equal Opportunities issues and support through grievance/ disciplinary/ inefficiency procedures. Conciliation Managers provide a mediation service.

b) Monitoring staff:

On an annual basis, INSS monitors the representation of disabled staff within the organisation and how disabled staff perform relative to non-disabled staff in the following employment processes:

- Recruitment
- Promotion
- Management assessment centre
- Reward arrangements
- Uptake of central training and development provisions
- Discipline and grievance
- Leaving the Service, including dismissal (retention)

Internal staff survey analysis can also be broken down to identify any issues that appear to impact to a greater extent on disabled staff and so inform subsequent action.

Disability status is surveyed on entry and through bi-annual surveys.

## Companies House

*[N.B. Companies House has decided to produce its own Disability Equality Scheme by end December 2006. This entry therefore only relates to its internal functions]*

### Relevant activities and actions:

Companies House has an active and participative **Diversity Forum Group** which is made up of representatives from across the business and at all levels. Its views and opinions are taken into account in decision related to disability issues.

Companies House employs a **Diversity Manager** who has a good knowledge of disability issues, and advises on people related policy as appropriate.

Companies House is active in terms of identifying the needs of staff with disabilities and potential reasonable adjustments that might be required. Information in this area is to be monitored by an internal Impairment/Disability Audit which will be voluntary and in confidence.

A whole range of **diversity related training modules or courses** are run by Companies House, including one covering Dignity at Work.

Companies House uses its dedicated **Diversity intranet site** to promote all elements of diversity. All publications are available in alternative formats.

**Monitoring** is carried out in a variety of ways:

The Companies House Annual Statistical Monitoring report provides data on employee numbers within all diversity categories, including disability. This information is used to address any evidence of under-representation.

Operating the **“two tick” scheme** for disability gives the Diversity Manager information which she can use to get views from disabled staff (where they are happy to be interviewed), on organisational change etc.

Prior to development, all policies, projects and programmes consider disability and possible impact (in particular negative impact), in terms of staff, customers and service delivery (for more information, see Companies House’s Disability Equality Scheme when available).

## Annex B – Stakeholders contacted as part of DTI’s Disability Equality Scheme

Association of Disabled Professionals

Blind in Business Association Charitable Trust

Breakthrough UK Ltd

Disability Rights Commission

The former DTI’s Disability Advisory Group

DTI’s Trade Union Representatives

RADAR

Regional Development Authorities

Remploy

The former DTI also invited the views of individual small businesses from its Small Firms Consultation Database. Small businesses were invited to volunteer to be involve in the production of DTI’s Disability Equality Scheme if they employed disabled, were run by disabled people, provided services to disabled people or simply had an interest in diversity issues.