



***Office of the Immigration Services
Commissioner***

**Disability Equality Scheme
2008 - 2011**

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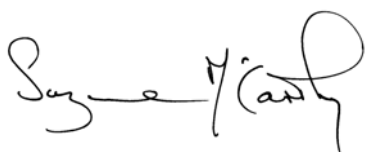
FOREWORD

Welcome to the OISC's Disability Equality Scheme for 2008-11.

This scheme is the end product of consultation with local and national disability organisations, key stakeholders within the immigration community, other organisations that the OISC regularly works with, and of course OISC staff.

In the scheme, we outline our plans for the next three years.

For those of you that have helped us so far with this project, thank you for your input and assistance. For those of you we have not yet encountered, we trust that the objectives of our scheme will help us meet your own expectations if and when we do encounter you in the future.

A handwritten signature in black ink that reads "Suzanne McCarthy". The signature is written in a cursive style.

Suzanne McCarthy
Immigration Services Commissioner

The role of the OISC

The OISC was established by the Immigration and Asylum Act 1999 as an independent Non-Departmental Public Body (NDPB). It directly regulates the provision of immigration advice and immigration services by persons who are not regulated by one of the seven Designated Professional Bodies¹ (DPBs) or European equivalent or who have otherwise been exempted from regulation by Ministerial Order.

The Immigration Services Commissioner has regulatory, ombudsman and prosecutorial responsibilities. Her main roles are to operate a regulatory scheme and a complaints scheme, to prosecute those who are operating illegally, to monitor and report to the Home Secretary on how the DPBs regulate their members in respect of immigration advice or services and to promote best practice. The OISC works to maintain high standards of professionalism in the immigration advice industry. As of 31st March 2008, 4061 advisers and 1680 organisations were directly regulated by the OISC.

In summary, the OISC's core business is to:

- Ensure that those who give immigration advice and/or services are fit and competent to do so;
- Ensure that advisers who should be within the regulatory scheme apply to be admitted or are prosecuted;
- Promote good practice within the immigration advise sector, so far as reasonably practicable;
- Discharge the Commissioner's responsibilities in respect of the DPBs; and
- Operate as an effective, efficient and economical regulator in accordance with Better Regulation principles.

The OISC aims to regulate in a proportionate, targeted and transparent manner.

¹ The seven DPBS are The Law Society of England and Wales; The Law Society of Scotland; The Faculty of Advocates; The General Council of the Bar of England and Wales; The Law Society of Northern Ireland; The General Council of the Bar of Northern Ireland; the Institute of Legal Executives

The Disability Equality Duty

General duty

The Disability Discrimination Act (DDA) 1995, as amended by the DDA 2005, places a general duty on public authorities to promote disability equality. This means that the OISC, as a public authority, should aim to:

- Promote equality of opportunity between disabled persons and other persons;
- Eliminate unlawful discrimination;
- Eliminate harassment of disabled persons that is related to their disabilities;
- Promote positive attitudes towards disabled persons;
- Encourage participation by disabled persons in public life; and
- Take steps to take account of disabled persons' disabilities, even where that involves treating disabled people more favourably.

Specific duties

Following Amendment Regulations under the Disability Discrimination (Public Authorities) (Statutory Duties) Regulations 2005, the OISC was added to the list of bodies, requiring us to publish and implement a Disability Equality Scheme by 1 December 2008. The OISC must now, in addition to the general duties described above, meet certain specific duties, which fall into two categories as explained below.

Regarding policy development and service delivery to:

- Produce and publish a Disability Equality Scheme demonstrating how it intends to fulfil both its general and specific duties;
- Involve disabled people in the development of its Scheme;
- Produce an action plan setting out the key actions it will take to promote equality;
- Assess functions and policies, or proposed policies, which are relevant to the general duty;
- Assess and consult on the likely impact of proposed policies on the promotion of disability equality;
- Monitor policies for any adverse impact on the promotion of disability

equality;

- Publish the results of these assessments, consultation and monitoring;
- Report annually on the progress of the action plan; and
- Review the Disability Equality Scheme every three years.

Regarding the OISC's role as an employer to:

- Gather information on its disabled staff in relation to applications for vacancies, development and retention.

Defining disability

A person has a disability under the legislation if she or he has a physical or mental impairment, which has a substantial and long-term adverse effect on her or his ability to carry out normal day-to-day activities. Included in this definition are:

- **Physical impairments** - these include a weakening of part of the body through illness, by accident or congenitally (such as paralysis of a leg or heart disease. Musculoskeletal conditions, affecting the limbs, hands, back or neck are included. It also includes conditions such as asthma, diabetes, epilepsy, etc);
- **Mental impairments** - includes, but is not limited to, an impairment resulting from or consisting of a mental illness but only if the illness is a clinically well-recognised illness e.g. clinical depression. It also includes learning disabilities, Asperger's Syndrome, etc);
- **Sensory impairments** such as hearing impairment or visual impairment (not corrected by glasses or contact lenses);
- **Severe facial disfigurement** (people with severe disfigurements do not need to demonstrate that the impairment has a substantial adverse effect on their ability to carry out normal day-to-day activities);
- **Progressive conditions** such as cancer, multiple sclerosis, muscular dystrophy or HIV;
- **People who have had an impairment in the past but have since recovered** (impairments such as cancer, mental health issues).
- **Substantial adverse effect** means that the effect of the physical or mental impairment to carry out normal day-to-day activities must be more than minor or trivial. It does not have to be a severe effect. The person must be affected in at least one of the respects listed in the DDA – mobility, manual dexterity, physical coordination, continence, ability to lift, carry or otherwise move everyday objects, speech, hearing or eyesight, memory or ability to concentrate, learn or understand, or perception of risk or physical danger; and
- **Long-term effects** are defined as having to have lasted or be likely to last, overall for at least 12 months or for the rest of the life of the person affected. A person with a life expectancy of less than 12 months would be covered if the effect is likely to last until that person dies.

There is no definitive list of the conditions covered by the Act, and each case must be individually considered in accordance with the principles outlined above. The general definition is very wide, and depending on their nature and

severity and their effect on normal activities, they could include, for example, people with:

- Recurring or fluctuating conditions such as arthritis;
- Dyslexia;
- Progressive conditions (these are conditions that are likely to change and develop over time. Where a person has a progressive condition, they will be covered by the DDA from the moment that the condition leads to an impairment that has some effect, however slight on the ability to carry out normal day-to-day activities. Examples given in the DDA are cancer, multiple sclerosis, muscular dystrophy and HIV infection; and
- Recurring conditions, for example bi-polar affective disorder.

The following conditions specifically do not count as impairments:

- Addiction to or dependency on alcohol, nicotine or any other substance (unless resulting from the substance being medically prescribed);
- Seasonal allergic reactions (for example hay fever) unless it aggravates the effect of another condition;
- Tendency to set fires, steal or physically or sexually abuse other persons; and
- Exhibitionism and voyeurism.

Severe disfigurements consisting of tattoos, non-medical body piercing or attachments to such piercing, or which may otherwise be regarded as self-inflicted, are not treated as having substantial adverse effects.

Whilst addiction to or dependency on substances is not covered, conditions relating to or stemming from these (such as clinical depression, or certain types of liver disease) may mean that the person does meet the definition of disability.

OISC Equality and Diversity Policy Statement

The OISC is committed to equality of opportunity in the selection and development of its staff and to the provision of a work environment free from discrimination. Our aim is for all our staff to put into practice the principles of equal opportunities and to be aware of the part they play in making this Policy a reality. In addition, the OISC's objective is to be respected by our external stakeholders for the professionalism and impartiality of our staff.

Part of that commitment is the fair treatment of our staff. Harassment and bullying are serious matters and the consequences of such behaviour may lead to disciplinary proceedings and individual liability under the relevant legislation. Because of the importance the OISC attaches to this, a separate policy, the OISC's Dignity at Work Policy, has been published which also contains advice and guidance for those involved in these issues, either as a complainant or as someone alleged to have bullied or harassed.

Managers and Senior Managers within the OISC have particular responsibilities and accountability for equality and diversity issues and for ensuring that equality and diversity principles are applied both internally and externally.

The benefits of Equality and Diversity

Providing equality of opportunities and valuing diversity gives operational and business benefits helping to:

- Attract the right people for our jobs and retain them thereafter;
- Develop our staff's potential;
- Value and utilise the different qualities people bring to the job;
- Improve motivation, efficiency and effectiveness; and
- Establishes and maintains our reputation as a good and effective service provider in the immigration sector.

Our practical support

The OISC shows its positive commitment to equality and diversity by:

- Supporting equality and diversity initiatives;
- Communicating equality and diversity developments to staff;
- Ensuring staff receive the appropriate awareness training;

- Listening to the views of staff on how improvements can be made, e.g. through Staff Surveys; and
- Listening to our external stakeholders on how we can improve our services in line with the principles of the Race, Gender and Disability Equality Duties.

Disability Equality Duty – what the OISC currently has in place

Although the action plan contained within this document outlines what additional things we want to put in place to comply with the Disability Equality Duty, the OISC already has many things in place, which meet the general duty. They are listed below.

Non-statutory initiatives

- Staff surveys issued asking staff about disability issues;
- Equality & Diversity questionnaire issued in May 2008 including disability;
- Induction training on joining includes reference issues where disability may be relevant e.g. Display Screen Equipment, evacuation procedures/assembly points etc;
- Guaranteed Interview Scheme at recruitment stage for applicants with disabilities who meet essential criteria;
- HR policies including Equal Opportunities/Dignity at Work are disability compliant;
- Camden Primary Care Trust engaged as Occupational Health provider, including provision of advice on disability related illnesses and any adjustments required;
- Staff Welfare service available via Home Office, including advice/guidance on disability;
- 24 hour telephone counselling service for staff available in cases where Welfare service not considered appropriate;
- Wheelchair access via Lift to OISC's offices on 5th floor, ramp access from lift to door;
- Intercom at staff entrance designed for use by wheelchair users;
- Disabled toilet available;
- OISC premises on one floor, no stairs to negotiate;
- Flexible working policies in place;
- Special leave available with pay for employees with HIV, cancer and other long-term medical conditions;
- Staff with caring responsibilities including family with disabilities, given high priority for Homeworking and/or Career breaks;

- OISC Website content in line with Web Content Accessibility Guidelines (OISC is currently tendering Web Development agencies with a view to designing a revised web site).

In addition to the above, the OISC aims to fully comply with health and safety and employment law requirements.

Consultation

About our approach to the development of this scheme

This scheme has been developed in partnership with external stakeholders and OISC staff.

When developing this scheme we wanted to hear about:

- Ease of access to information on the OISC website;
- Ease of accessing the OISC by telephone;
- Assistance given by our staff;
- Ease of access to the building;
- Whether the environment generally was user friendly; and
- The OISC's recruitment, retention and promotion processes and what the OISC might do to actively help encourage disabled people to apply for jobs at the OISC; and
- How the OISC could improve the service we provide to disabled people.

The full questionnaire is attached at Annex 1.

Involving people in public consultation

Prior to issuing the consultation document, which included questions relating to the above, we invited representatives of organisations supporting disabled people to attend a meeting at the OISC (see list at Annex 2).

Regrettably, none of the organisations were able to attend, some having experienced 'consultation fatigue' due to the number of requests received by other public bodies to contribute to their schemes. Some did however express interest in hearing about what we did, and having the opportunity to input into the main consultation, as well as seeing the Scheme itself when published. Annex 2 lists the organisations consulted.

The consultation document itself was sent to 27 disability organisations in total and a further 5 key OISC stakeholders were also consulted. The responses to the consultation can be found at Annex 3.

OISC Action Plan – Impact Assessments

Requirement to undertake Impact Assessments

One of the essential elements for inclusion in the DES is arranging for the assessment of the impact of the activities of the OISC on disability equality and improving these when necessary.

The benefits of impact assessments

Impact assessment helps the OISC to measure whether it is meeting its obligations under the Disability Equality general duty.

What should be impact assessed?

New business proposals, policies, consultation documents, project proposals, procurement proposals, or other documents which set out a strategic direction for the OISC, and which impact on delivery of services to OISC stakeholders, or which could be used to inform strategic decision making, should be impact assessed and their relevance to disability equality considered.

How to assess the impact

Approaches to impact assessments vary depending upon the degree of relevance of the function for disabled people. Where the relevance of function is high, this indicates a need for a detailed impact assessment. Where it is clear that relevance is low, a system for identifying this and recording what actions have been taken should be used if a full impact assessment is not undertaken.

As well as new policies and activities that need to be impact assessed as they are developed, the OISC will carry out impact assessments at the renewal stage of its existing policies. All OISC policies are listed on a schedule that is reviewed annually by the Senior Management Team (SMT).

When undertaking impact assessments, the 'Doing the Duty' guidance and associated documentation provided by the Equality and Human Rights Commission will be used to inform the process.

Who is responsible for conducting impact assessments?

The person(s) preparing the policy/proposal/document etc. is responsible for conducting an impact assessment. Existing policies should be impact assessed in relation to disability equality, by the author, or should they no longer be in post, or with the organisation, then by the person now responsible for their maintenance and upkeep.

Developing our action plan for 2008 – 2011

Updating the Disability Equality Scheme

We will review the scheme after one year of its operation to determine if it works and whether it needs changing. We will thereafter review our Disability Equality Scheme every three years.

During the life of the Disability Equality Scheme, we shall monitor our progress and if we identify any changes that need to be made prior to the review period, we shall implement them.

As a small non-departmental public body (NDPB) employing less than 70 staff and with an annual budget of just over £4 million, there are constraints we face both in terms of time and resources in producing this scheme and resourcing actions arising from it. Any action we do take therefore will be reasonable and proportionate in relation to our resources.

Contact information

Your comments on this scheme are welcome; please contact us as follows:

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Fax: 020 7211 1532
e-mail: larry.rush@oisc.gov.uk

Annex 1: Disability Equality questionnaire

Ease of access to OISC services

Q 1. The three questions in this section are about ease of access to OISC information and help/assistance given by OISC staff. You may have accessed our services already, in which case we would like to know about your experience and what improvements we might make. Alternatively, if you have not yet accessed these services, we would like to know what you consider would be a positive experience if you did.

a) Ease of access to information on the OISC website:

Your Comments:

b) Ease of accessing the OISC by telephone

Your Comments:

c) Given your individual needs, did our staff fully assist you?

Your Comments:

Ease of access to the OISC's office

Q 2. When visiting us at our premises at Counting House in Southwark, how did you find the following?

a) Ease of access to the building

Your Comments:

b) Once inside our 5th floor office, did you find the environment generally user friendly? If not, please tell us which aspects could be improved.

Your Comments:

Recruitment of OISC Employees

Q.3 The OISC applies the principles of the 2-tick symbol by offering Guaranteed Interviews during recruitment. We would like to hear from you on how the OISC can ensure that its recruitment, retention and promotion processes are fair, equal and inclusive to all?

Your Comments:

Q.4 What might the OISC do that would actively help encourage disabled people to apply for jobs at the OISC?

Your Comments:

Improvements in service provision

Q.5 We would like your comments on how you think we can improve the service we provide to disabled people?

Your Comment:

General

Q.6 Please use the space below for any additional comments you may wish to make. In particular, is there anything you would like to tell us which is not covered by the questions above?

Your Comment:

Thank you for taking time to give us your views. Your input is vital to ensuring that the OISC Disability Equality Scheme reflects the needs of its stakeholders.

Please tell us if you would like to be involved in the design and delivery of our services for disabled people. If so, please provide us with your contact details below.

Contact details:

If you would like a copy of the published OISC Disability Equality Scheme sent to you, please tick this box [].

Annex 2: List of organisations consulted

OISC Disability Equality Duty Stakeholder Consultation Groups

1. List of OISC Adviser organisations invited to meetings/workshops:

ARIA

ILPA

2. List of 11 key Disability organisations invited to meetings/workshops:

The British Council of Disabled People

MIND (Southwark)

The Royal National Institute for the Deaf (RNID)

The Royal National Institute for the Blind (RNIB)

Southwark Disability Association

Southwark Disability Forum

RADAR

Disability Alliance

Disability Employment Adviser – Southwark Job Centre Plus

Diabetes UK

Terence Higgins Trust

3. List of other key OISC stakeholders vis a vis employment invited to meetings/workshop:

Benenden

Camden OHS

Grays Employment Agency

4 List of Disability Groups/Adviser organisations/key stakeholders included in full consultation:

Name of organisation	Invited to meeting at OISC on 15/9/08	Consultation doc. issued on 9/10/08
United Kingdom's Disabled People's Council (UKDPC)	Yes	Yes
MIND (Southwark)	Yes	Yes
RNID (Royal National Institute for Deaf People)	Yes	Yes
RNIB (Royal National Institute of Blind People)	Yes	Yes
Southwark Disability Association	Yes	Yes
Southwark Disability	Yes	Yes

Forum		
RADAR (Royal Association for Disability and Rehabilitation)	Yes	Yes
Disability Alliance (Recommended for inclusion by ILPA)	Yes	Yes
Disability Employment Adviser – Southwark Job Centre	Yes	Yes
Diabetes UK	Yes	Yes
Terrence Higgins Trust	Yes	Yes
Others – 16 (27 in total)		
Employers Forum on Disability	N/A	Yes
Macmillan Cancer Support	N/A	Yes
MENCAP (National Association for Mental Health)	N/A	Yes
SCOPE	N/A	Yes
SENSE	N/A	Yes
Spinal Injuries Association	N/A	Yes
The British Heart Foundation	N/A	Yes
The Multiple Sclerosis Society	N/A	Yes
National Autistic Society	N/A	Yes
Leonard Cheshire Disability	N/A	Yes
Deaf Blind UK	N/A	Yes
People First	N/A	Yes
British Dyslexia Society	N/A	Yes
British Epilepsy Association	N/A	Yes
Adviser organisations – Six in total		
ARIA	Meeting held at OISC on 30/7/08	Sent by letter 9/10/08
ILPA		Yes

RLC		Sent by letter 9/10/08
IAS		Sent by letter 9/10/08
Discrimination Law Association (Recommended for inclusion by ILPA)		Yes
DisabledGo (Recommended for inclusion by ARIA)	Yes	Yes

Annex 3: Comments received from consultation with OISC response

External Organisations	Summary of Comments received	Our Response
DisabledGo	<ul style="list-style-type: none"> ▪ Questions/information should be available in alternative formats to allow for people with particular access requirements to respond such as large print, audio, Braille, easy read (learning difficulties)? – Usually you can offer this on request rather than stock them to avoid unnecessary expense 	<ul style="list-style-type: none"> ▪ The provision of alternative versions is currently considered by the OISC on a request basis and will continue as such
Southwark Disablement Association (SDA)	<ul style="list-style-type: none"> ▪ You may want to include something about your understanding/definition of a disabled person (including sensory disability) and why you believe that the equality duty is important (rather than just having to do it). 	<ul style="list-style-type: none"> ▪ Agreed, definition included with reference to sensory disability
Camden Primary Care Trust	<p>Ease of access to OISC services</p> <p>Q1a) Ease of access to information on the OISC website</p> <ul style="list-style-type: none"> • Easy to navigate • Plain language • Clear text • Emphasis on key points • Robust links • Options for those with sensory impairments <p>Q1b) ease of accessing OISC by telephone</p> <ul style="list-style-type: none"> • User friendly • Knowledgeable 	<ul style="list-style-type: none"> ▪ OISC are pleased the ease of access to its services and office meet the expectations of Camden PCT. Regarding recruitment of employees, the OISC notes the good practices suggested. We believe we do encourage a culture where it is safe for the client to disclose a disability and will endeavour to continue fostering that culture. Applicants are able to apply for positions in the OISC using a variety of formats.

External Organisations	Summary of Comments received	Our Response
	<ul style="list-style-type: none"> • Minimise the need to be put on hold • Options for those who are deaf e.g. type talk <p>Q1c) given individual needs did our staff fully assist you?</p> <ul style="list-style-type: none"> • Sensitive to my individual needs • Understand who would need to use any equipment <p>Ease of access to OISC's office</p> <p>Q2 ease of access to building</p> <ul style="list-style-type: none"> • Clear signage • Option to be met or escorted • From memory appeared tidy but need to check re tripping/ falling hazards • Colour contrasting wall and floor <p>Recruitment of OISC employees</p> <p>Q3. How can the OISC ensure that its recruitment, retention and promotion processes are fair and equal and inclusive to all?</p> <p>At recruitment ask if disabled and adjustment required for</p> <ul style="list-style-type: none"> • Culture of the organisation where it is safe for the client to disclose a disability • Application e.g. on audio tape, Braille, large type • Communication e.g. minicom, large type, email • Procedure of the interview <p>For retention of staff</p> <ul style="list-style-type: none"> • Culture of the organisation where it is safe for the client to disclose a disability • Continue to provide support to staff that become disabled in employment, through reasonable adjustments, 	<ul style="list-style-type: none"> ▪ In terms of retaining staff, we encourage all staff to report disabilities that may arise during OISC employment as distinct from those known/declared on joining. Advice is sought from our occupational health service providers (who happens to be the consultee in this case) and reasonable adjustments are made when necessary, ▪ The Line Manager carries out regular one to one performance reviews with a formal performance appraisal process at the end of March each year. There is also a performance interim review carried out mid-year. Any barriers to career progress would be identified in this process. ▪ The suggestion of a Disability Advocate is an interesting one which the OISC will research further during the currency of the action plan in this document, given we are not entirely sure of how this would work in practice. ▪ Consideration will be given to

External Organisations	Summary of Comments received	Our Response
	<p>Occupational Health advice, Access to Work to help them to stay in employment.</p> <ul style="list-style-type: none"> • Ensure disabled staff have regular reviews with their line managers to ensure reasonable adjustments are updated and reduce any barriers to career progress • Disability advocate scheme • Produce a Disability Equality Annual report including anonymous data on staff with disabilities <p>For promotion of staff</p> <ul style="list-style-type: none"> • Culture of the organisation where it is safe for the client to disclose a disability • Adjustment to the promotion post given the disability of the staff applicant • Adjustment to the application and interview for the promotion post <p>Q4 What might OISC do that would actively help encourage disabled people to apply for jobs at the OISC?</p> <ul style="list-style-type: none"> • Offer work experience or a return to work programme to disabled people wanting to return to the workplace • Have contact with local disability organisations <p>Improvements in service provision</p> <p>Q5 How do you think we can improve the service we provide to disabled people?</p> <ul style="list-style-type: none"> • Check policies and procedures are disability compliant • Ensure the physical environment and access is disability compliant 	<p>producing a Disability Equality Annual report with anonymous data.</p> <ul style="list-style-type: none"> ▪ The OISC does operate Work Experience programmes and these are open to and have included, persons with disabilities and will continue to be so ▪ OISC policies will be checked in the future to ensure disability compliance and training will continue to be provided on the full range of equal opportunities/diversity, including disability issues. ▪ OISC does not currently monitor or keep disability data relating to its adviser clients. The Operations teams will be asked about the appropriateness and feasibility of capturing this data during the currency of the plan.

External Organisations	Summary of Comments received	Our Response
	<ul style="list-style-type: none"> • Consider disability when writing new policies procedures • Training for staff in disability equality <p>General Q6 additional comments OHS could provide anonymous data regarding clients seen who have disabilities:</p> <ul style="list-style-type: none"> • Impairment groups, such as, numbers with mobility, vision, hearing impairments • Range of adjustments made 	
Gray & Associates recruitment agency	<ul style="list-style-type: none"> ▪ OISC website - We find the site very straightforward to use and find information. However I note the site is in development as there is currently no consistency in the page presentation and some pages are easier to see and read than others. I am sure this is being addressed currently ▪ Ease of accessing the OISC by telephone - We have always found telephone access to be very straightforward ▪ Staff assistance - We have always found the staff within OISC very thorough and efficient and any questions we have had have been handled professionally ▪ Ease of access to the building - Access was very easy and there was a lift to the 5th floor ▪ Environment - The environment was user friendly ▪ Recruitment of OISC Employees - Ensure that all 	<ul style="list-style-type: none"> ▪ The current website deficiencies are known to OISC. We are in the process of tendering for a revised web site. This will be designed in accordance with Web Content Accessibility Guidelines. ▪ OISC is pleased that the consultee found our services and environment were user friendly. ▪ OISC selection panels/boards always contain an HR professional trained on equality issues including disability. We also try to ensure wherever possible that they are fully representative in all

External Organisations	Summary of Comments received	Our Response
	<p>recruitment/selection panels are fully representative (including a member that has been trained and/or is aware of issues that affect Disabled people). Monitor and report on staff training, leaving, grievances and disciplinaries by ethnicity, gender, disability, age, sexuality and religion/faith/belief (where known)</p> <p>Look at potential reasonable adjustments you can make to allow equality of opportunity</p> <ul style="list-style-type: none"> ▪ Encourage disabled people to apply for jobs at the OISC - Promote the OISC as an employer of choice for example ensure all advertisements contain a short statement that applications from people with disabilities are welcome. Ensure you have accessible application forms and interview venues ▪ Improve the service we provide - Education and training of internal staff to understand a range of disabilities is beneficial. 	<p>equality senses.</p> <ul style="list-style-type: none"> ▪ Grievances and disciplinaries are monitored, as are reasons for leaving the organisation, which are captured in both an Exit interview and by way of an Exit questionnaire. ▪ OISC recruitment adverts all contain equal opportunities statements. We also operate a Guaranteed Interview Scheme which applies the principles of the 'Two Tick' scheme run by the Department of work & pensions ▪ All OISC staff are given equality & diversity training.
British Dyslexia Society	<ul style="list-style-type: none"> ▪ For employees, we have produced a very useful document: Code of Practice for Employers. This offers helpful guidelines in supporting employees with dyslexic difficulties. 	<ul style="list-style-type: none"> ▪ OISC is grateful for being made aware of the Code of Practice and will look to purchase a copy and incorporate any guidance into the second year of the three year action plan.
OISC Staff	Summary of Comments received	Our Response
Via Disability Working Group and e-mail	<ul style="list-style-type: none"> ▪ The Disability Working Group endorsed the HR Guidance notices on disability sent to both Line Managers and staff. They also recommended that staff as a whole in the OISC 	<ul style="list-style-type: none"> ▪ OISC is grateful for being made aware of the Code of Practice and will look to purchase a copy and incorporate any

External Organisations	Summary of Comments received	Our Response
<p>consultation</p>	<p>were e-mailed seeking their views on the Consultation document.</p> <ul style="list-style-type: none"> ▪ The one area the Disability Working Group wanted to see included/highlighted was reference to carers of those with disabilities, and not just those with disabilities themselves. This accepted that those with caring responsibilities for disabled family members needed access to the same special leave and reasonable adjustments as staff with disabilities themselves. 	<p>guidance into the second year of the three year action plan.</p> <ul style="list-style-type: none"> ▪ OISC will review its HR policies during the currency of the Action Plan to identify areas for amendment

Annex 4 – Action plan for implementing OISC Disability Equality Scheme

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
Equality Impact Assessments (EQIAs)	Carrying out EQIAs	<ul style="list-style-type: none"> • All new business proposals, consultation documents, project plans, business and corporate plans/strategy to be impact assessed during their development • Impact assessments will be carried out at the renewal stage of existing policies. This is normally on a three year programme but may be sooner e.g. changes in the law • All OISC policies with dates for review are listed on a schedule that is reviewed annually by the Senior Management Team (SMT) 	<p>Ongoing</p> <p>As and when</p> <p>December of each year</p>	<p>Authors of the policy, document etc.</p> <p>Authors of the policy, document etc.</p> <p>Authors of the policy</p>
Progress Reporting	<p>Half yearly reports to Senior Management Team (SMT) on initial action plan progress</p> <p>Annually publish action plan progress on OISC website</p> <p>Review of Scheme</p>	<ul style="list-style-type: none"> • Include in SMT schedule as part of HR Corporate data set reporting • Place annual update on OISC website each year • Initial Review after first year 	<p>Bi-annually</p> <p>December of each year</p> <p>Dec. 2009 Dec. 2012</p>	<p>Head of HR</p> <p>Head of HR</p> <p>Head of HR</p>

Area of Implementation	Element	Performance Indicator	Milestone	Responsibility
		<ul style="list-style-type: none"> • Triennial review thereafter 		
Communication	Publication of Disability Equality Scheme Dissemination to key stakeholders	<ul style="list-style-type: none"> • Scheme published after following SMT approval • Scheme to be made available in accessible formats on request • Scheme to be published on website • Copy of Scheme to be made available to all staff • Copy of Scheme mailed to all those consulted on the Scheme who requested a copy, and to others on request • Article in OISC Newsletter informing of the publication of the Equality Scheme 	1 December 2008 1 December 2008 onwards 1 Dec. 2008 1 December 2008 By 16 Jan.2009 Jan/Feb. 2009	Head of HR Head of HR/Head of Comms. Head of IT Head of HR Head of HR Head of Comms.
Complaints	Complaints procedure	<ul style="list-style-type: none"> • To respond to any complaints in accordance with the published timescales in the OISC internal Complaints Procedure • To provide SMT with details of complaints made relating to disability and action taken as per existing reporting system 	Ongoing Bi-annually	Head of HR Head of HR