Policy and Sustainability Committee

10.00am, Tuesday, 1 November 2022

Response to Motion by Councillor Cameron - Improving Accessibility and Inclusion for Edinburgh Citizens

Executive/routine	**Executive**
Wards	**All**
Council Commitments	

1. Recommendations

1.1 It is recommended that Policy and Sustainability Committee:

1.1.1 Note the actions being taken by the Council and its agencies to improve accessibility and inclusion in Edinburgh for citizens and visitors;

1.1.2 Note that the Consultation Advisory Panel (CAP) has been strengthened, as set out in paragraph 4.21; and

1.1.3 Discharge the motion from the Council on 16 December 2021 titled Improving Accessibility and Inclusion for Edinburgh Citizens.

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Report

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Response to Motion by Councillor Cameron - Improving Accessibility and Inclusion for Edinburgh Citizens

2.   Executive Summary

2.1   This report responds to a motion approved by the Council on 16 December 2021 on Improving Accessibility and Inclusion for Edinburgh Citizens.

3.   Background

3.1   On 16 December 2021 the Council approved the following adjusted motion titled Improving Accessibility and Inclusion for Edinburgh Citizens and Visitors.

- The City of Edinburgh Council was committed to Edinburgh becoming a safer, more accessible, and inclusive city for Edinburgh residents and visitors.

- To note recent policy and project development and implementation which had been designed to improve accessibility and inclusivity, including, the citywide A Board ban which was designed to significantly reduce trip hazards and the enhancement of the dropped kerb programme, as well as the agreement to provide 4,500 new homes within the house building targets which would be wheelchair accessible or adaptable.

- To note current bin collection arrangements limited access to the public footpath for people with a disability and others, including parents with buggies, in many of the capital's streets, particularly in residential areas.

- To also note that in order to achieve the real benefits of Equality Impact Assessments, they needed to be designed with the input of people with lived expertise of the barriers that the assessments and recommendations intended to remove.

- To call for Equality Impact Assessments to be undertaken, in respect of proposals pertaining to the temporary and permanent use of buildings, parks, land, public facilities and amenities, bus stop closures and pavement parking in the Council ownership which would affect citizen and visitor access to these.

- Equality Impact Assessments of such proposals, temporary and permanent, should consider and clearly set out in reports, how proposals would impact on improving the accessibility and inclusion of the city to Edinburgh citizens and visitors.

- To call for a report to the Policy and Sustainability Committee within three cycles setting out progress on improving the accessibility and inclusion of Edinburgh; how this was being achieved; and what further steps Council could take to work with its partners to improve the accessibility of major attractions, public services and amenities which were not in the Council ownership.

4. Main report

4.1 The first section of this report gives an overview of the Equality and Diversity Framework and the Integrated Impact Assessment (IIA) which the Council and its partners use to assess the impact of proposals on equalities.

Equality and Diversity Framework

4.2 The Council's Equality and Diversity Framework 2021 to 2025 sets out how the Council will fulfil its legal duties under the Equality Act 2010 and the Public Sector Equality Duty.

4.3 One of the core aims of the Framework is to ensure that people can access facilities and support communities by improving accessibility of buildings, services and communications.

4.4 The Framework also includes outcomes in relation to providing warm and affordable homes. This includes actions to improve accessibility such as making 10% of social rented housing wheelchair accessible.

Integrated Impact Assessments

4.5 The Council uses an Integrated Impact Assessment (IIA) to meet the requirements of the Equality Act 2010, human and children's rights conventions, Fairer Scotland Duty 2018 and the Climate Change (Scotland) Act 2009.

4.6 The IIA is an integral part of the Council's decision-making process, enabling it to identify and address any unintended consequences of its decisions. The scope of potential impacts includes equalities and diversity, human rights, the environment and the economy.

4.7 The IIA process is designed to include data and evidence about the needs and experiences of people with protected characteristics and those vulnerable to experiencing poverty and ill health in the context of the work being considered.

4.8 The input of people with lived experience is generally achieved through: published research; service knowledge of communities and citizens receiving a service; including data on services; and the findings of previous relevant consultation and engagement exercises. This can also include direct discussion with people with

protected characteristics, but the most effective, proportionate approach to gathering evidence is determined on a case by case basis.

4.9   The Council's Consultation Policy supports the IIA process by increasing the effective use of feedback gathered through consultations, including the potential impact of proposals on protected characteristic groups. It is designed to ensure that stakeholder mapping has been carried out and that methods of engagement are inclusive and proportionate.

4.10   A completed IIA is published in advance of the relevant committee meeting, its findings summarised in the committee report and a link provided to the published assessment. Published integrated impact assessments are available on the [Council's website](#).

4.11   Elected Members have a key role in scrutinising the quality of the IIA, including the evidence used to support the assessment, and in ensuring that the findings have informed the proposal in a transparent way.

Support for Council Officers and Elected Members

4.12   An Equality, Diversity and Rights (EDR) Advisors' Network was set up across the Council in 2018. EDR Advisors use knowledge of their service area together with learning from IIA training to support colleagues to carry out IIAs.

4.13   EDR Network Members are supported by a programme of additional learning and development, delivered by in-house topic experts and by the Equality and Rights Network (EaRN). Topics have included - Equality and Diversity Awareness, British Sign Language, Disability Awareness and Human Rights.

4.14   Training on the IIA process is available to all relevant staff, and is provided on a regular basis, with around five training sessions delivered each year.

4.15   Training on the Equalities and Rights Framework and on the IIA process is also provided to Elected Members. The training provides an understanding of equalities legislation, the Council's Equality and Diversity Framework 2021-25 and the IIA process, enabling them to play an effective scrutiny role to ensure equality considerations are included in the Council's work. At the time of writing the report the training was scheduled for October.

Continuous Improvement

4.16   Effective use of the IIA process will allow any disconnect between proposed actions and strategies and the stated objectives of the proposals to be identified and addressed, for example, through mitigating actions or changes to proposals. This can be supported through staff training, as noted above, as well as Elected Member scrutiny through the committee process.

4.17   The IIA process was considered in 2020 as part of an internal audit of the Council's Policy Management Framework. This process led to a number of actions being taken to raise awareness of the requirements among all policy developers, revising the policy template to improve clarity and improving links to guidance and sources of support.

4.18   As requested in the motion, IIAs will be undertaken in respect of the proposals pertaining to the temporary and permanent use of buildings, parks, land, public facilities and amenities, bus stop closures and pavement parking in the Council ownership which would affect citizen and visitor access to these. Responsibility for ensuring these are undertaken to a high standard rests with Service Directors and Executive Directors. As noted, Elected Members play an essential scrutiny role at committee.

4.19   There is a wide range of actions being undertaken or planned across the Council to improve accessibility and inclusion in Council services. A summary of key policies is provided below.

The Council's Approach to Improving Accessibility and Inclusion for Edinburgh Citizens

4.20   The Council's Consultation Policy requires that all public consultations are self-assessed against risk criteria. High-assessed consultations are considered by the Consultation Advisory Panel (CAP) composed of accredited consultation professionals, senior managers from across the Council, and the communications service.

4.21   In addition to the assessment of impacts made by the IIA, this process gives additional consideration to stakeholders' needs, specifically around consultation activity. This ensures that the consultation activity is undertaken in a way that appropriately recognises, encourages and values the views of those impacted by changes, especially in relation to protected characteristics. The CAP process has been further strengthened to encourage services to include stakeholders in conducting an IIA where appropriate, and to challenge services where this has not happened. This process is supported by a programme of skills training for key officers, delivered by the Consultation Institute.

4.22   The Council's Sustainable Procurement and Commercial Strategy 2020-25 includes actions to ensure equalities considerations and requirements are incorporated in contact and grant conditions.

Improving Mobility

4.23   The City Mobility Plan (CMP), which was approved in February 2021, sets out the Council's strategic approach to the sustainable, safe and effective movement of people and goods around Edinburgh up to 2030. Sustainability, equality, accessibility, placemaking, health and wellbeing all sit at the core of the CMP.

4.24   The CMP sets out nine objectives and 49 policy measures supported by an Implementation Plan, which together direct the delivery of detailed actions and action plans across Council key services.

4.25   The City of Edinburgh Council has adopted the seven-point Equal Pavements Pledge – a campaign endorsed and supported by RNIB, Living Streets, Sustrans and others. The Equal Pavements Pledge seeks to improve the accessibility of streets for all, by reducing street clutter, retaining and improving accessibility

functions such as drop kerbs and Blue Badge parking bays, and working with disabled experts.

4.26 While, at present, there is no legislation to prevent pavement parking this is being monitored by Council's Transport and Environment Committee, and a report on legislative changes in respect of pavement parking is expected in 2023, once the Scottish Parliament have considered this further.

20 Minute Neighbourhoods

4.27 The Council's 20 Minute Neighbourhood Strategy 'Living Well Locally', was approved on 10 June 2021. This focusses on finding ways for residents to access most of their daily services and amenities in a single 20-minute round trip by foot, cycle, wheel or public transport.

4.28 An annual capital budget of £400,000 has been established in the Capital Investment Programme to deliver accessibility improvements across the existing operational properties. Improving access to services in local areas in line with the 20 Minute Neighbourhood principles has been established as an action in the Council's Business Plan.

Women's Safety in Public Places

4.29 Recognising that many women and girls do not feel safe in public places, the Council are carrying out public consultation to find out what makes particular areas and places feel safe or unsafe for people.

4.30 Views are being sought from Edinburgh residents, particularly women and girls, who live, work and/or study in Edinburgh on where they feel safe, unsafe, and what would help them to feel safe when out and about. The online survey closed on 20 September 2022. Focus groups are also being held to make sure that a more diverse group of Edinburgh residents can contribute and to help gain a deeper understanding of people's experiences.

4.31 There is a lot of evidence that improving the safety of public places for women and girls, contributes to improving public safety for everyone. Therefore, all residents are likely to benefit from this exercise.

4.32 Findings will be reported to the Edinburgh Community Safety Partnership to inform current city approaches and to make recommendations for improving women's and girls' safety in public places in future.

Planning and Building Standards

4.33 All planning applications within the city are assessed against the development plan. Both the current Edinburgh Local Development Plan (LDP) and the proposed City Plan 2030 encourage accessibility both within and to new developments. Safe and convenient access and movement in and around development is to be promoted, having regard especially to the needs of people with limited mobility or special needs.

4.34 The Building Regulations are set by Scottish Government but are administered by the Council as Building Standards verifier for this Council's area. Among other

things, the Building Regulations secure the health, safety, welfare and convenience of persons in or about buildings and of others who may be affected by buildings. The regulations require access to and within buildings. These are supported by Technical Handbooks which set out clear guidance on how designers can meet the regulations. Only if the regulations are met will a building warrant be granted, and a completion certificate accepted by the Council.

Council Estate

4.35   A refreshed Council Property Strategy is being prepared over the next 12 months and will include details on the approach to improving accessibility in the operational estate.

4.36   For the Council's operational portfolio, the Council follows Building Standards (Scotland) Regulations which make provision for Accessibility. Guidance on Accessibility is embedded in the Technical Handbook. Every new building or building undergoing renewals or upgrades will have to demonstrate accessibility is achieved before being granted a Building Warrant to proceed.

4.37   For the Council's new build operational buildings, British Standard BS 8300 1 & 2, for External and Internal Environments design is used as the Council's approach with regards to Accessibility. Accessibility requirements are typically embedded into a new build project's Authority Construction Requirements (ACR).

4.38   However, it is important to recognise that The Council has around 600 buildings in its operational estate with a diverse portfolio of different building types and building ages. Typically, older and 'heritage' buildings offer the biggest challenges in terms of making them fully accessible due to their existing building form and construction, with some simply not physically possible to adhere fully to the current accessibility standards even with accessibility improvements.

Housing

4.39   The City of Edinburgh Council was one of the first local authorities to set a minimum Wheelchair Accessible Homes target for its Affordable Housing Supply Programme (AHSP) delivered by the Council and Registered Social Landlords (RSLs); with 10% of all social rented homes to be fully wheelchair accessible.

4.40   The majority of new build properties funded through the AHSP are designed to meet the Housing for Varying Needs Standard (HFVN) which sets out good practice on the design of housing to achieve flexibility and suitability for people of all abilities. Around 11% of the homes to be approved in the current Strategic Housing Investment Plan are specifically designed for specialist housing, including amenity, supported and fully wheelchair accessible homes.

4.41   However, it is important to recognise that Edinburgh has the oldest housing in Scotland, with almost half (48%) of homes built before 1945 (Scottish House Condition Survey 2016-18). This poses significant challenges for upgrading homes. In addition, 66% of homes in Edinburgh are flats, compared to the Scottish average of 36% (Scottish House Condition Survey 2016-18), increasing the challenges in relation to adaptations and provision of accessible homes from existing stock.

4.42   The reality for Edinburgh is that demand for social housing is significant and helping households with mobility and or complex needs within this context is challenging. Social housing makes up only 15% of the housing stock in Edinburgh, compared to the Scottish average of 23%. It is important that households consider the range of housing options in Edinburgh that may be suitable for their household. An online housing options checker that will help households identify potential options based on their circumstances is planned as phase two of the IT improvements following the implementation of the online housing application.

Communication and information (accessibility of information/services) for citizens

4.43   A number of actions are in place to make sure that information on what help is available from the Council, and how to get it are accessible, and that the services themselves are too.

4.44   The Council is committed to delivering services that are simple to access and straightforward to use. Service user feedback highlights the need for a blended approach that offers online/self service options as well as telephone and face to face service delivery. Local office teams continue to help citizens progress a wide range of service requests and similar support is available from the Council's contact team. This is a vital part of the Council's ongoing service approach, and officers will continue to work with relevant bodies, such as Social Security Scotland, Citizen Advice, Job Centre Plus etc, to ensure that citizens receive comprehensive and knowledgeable support.

4.45   Online services continue to be popular, allowing citizens to self-serve at a convenient time. However it is important that no one is excluded from Council services. As well as providing direct access to services, local office teams are trained to provide practical support on how to use computers/smart phones and self-service devices are located in many of the Council's public offices. This approach supports those who may have difficulty using online forms or do not have access to an online device. Council officers are continually improving the online service experience, working with organisations such as Edinburgh Tenant Federation and Citizens Advice to develop intuitive forms.

4.46   Officers are also exploring new ways to make the Council's website and online forms easier to use, including a tool that will translate or speak the content of the website/online forms. ReciteMe is a cloud-based technology toolbar which will be embedded on the Council's website, increasing digital inclusiveness by allowing visitors to customise content so they can consume it in a way that works best for them. The tool also allows styling/customisation to support citizens who experience difficulty stemming from conditions like dyslexia. We are also intending to embed this tool onto the Orb to support colleagues in the Council in the same manner. Work is also underway to create British Sign language videos for essential services - these will be available over the next few months on the Council's website.

4.47   To improve accessibility in our local offices WelcoME has recently been introduced. This is a cloud-based customer service platform solution that enables disabled

visitors to plan assistance in advance of arriving at a venue. WelcoME is now live on the local office webpages, supporting citizens with evident and hidden disabilities to access Council buildings. In addition, the tool will allow staff in the local offices to broaden their knowledge on the various challenges faced by citizens with disabilities, therefore generally providing a more supportive service.

4.48 The Edinburgh Integration Joint Board are also taking a number of actions to ensure that people know what support and services are available and know how to access them. These include:

- Ensuring that the information on their website, social media, blogs are fully accessible;
- Progressing the IJB's British Sign Language (BSL) Plan with actions including:
  - Commissioning BSL videos which describe a range of key EHSCP services and embedding these on the Partnership's website, and further videos are planned;
  - Undertaking a BSL in care settings project which included BSL training for care home staff; and
  - Lyrics for Life EHSCP project on suicide prevention included BSL videos.

4.49 As digital connectivity is increasingly becoming part of everyday life, socially, for learning and work, and for accessing services including banking and utilities, the Council continues to provide support to people to make sure that they can access education, information and services. Examples include:

- Upgrading the computer hardware and infrastructure in libraries, providing enhanced access to devices and printers for all citizens;
- The Empowered Learning project, which is on track to deliver around 41,000 iPads by December 2022 to school pupils; and
- Working in partnership with CityFibre and Openreach to provide super-fast fibre broadband infrastructure to all of Council owned homes, with 15,449 homes connected to date.

Businesses, employers and Employment Opportunities for People with a Disability

4.50 The Council's Business Growth and Inclusion team provide strategic leadership in supporting disabled small business founders and to support businesses to improve access for people with disabilities as well as becoming Disability Confident employers.

4.51 On 22 February 2022, Committee received an update on the Council's support for the small business sector to become more sustainable and accessible. This includes providing accessibility and inclusion training for Business Gateway advisers to enable them to raise awareness of, and appetite for, this within small businesses.

4.52 As reported to Housing, Homelessness and Fair Work Committee on 24 March 2022, the Council recognises the importance of having people employed in fair,

sustainable jobs and the Council Commitments specifically focus on improving access to employment and training opportunities for people with disabilities.

4.53 The Council currently invests around £7m annually to support the most vulnerable citizens who have barriers to employment, including those with disabilities, to access opportunities for employment, education and training.

4.54 The funding enables both the Council and partners through a range of programmes including: Edinburgh Project Search, Targeted Employability Services, and Complex Needs Employability Services. A Supported Employability Services, delivered by the consortium, All in Edinburgh, offer a pan-disability services for anyone with a disability or long term health condition.

Working with Partners to Improve Accessibility and Inclusion for Edinburgh Citizens

4.55 The motion called for this report to explain what further steps Council could take to work with its partners to improve the accessibility of major attractions, public services and amenities which were not in the Council ownership.

4.56 The Council works closely with partners across the city on a daily basis.

4.57 While the Council has no mandate other organisations to improve accessibility and inclusion to their buildings and services, Council officers will continue to work with partners and to provide support and leadership if requested.

4.58 In addition, on 30 June 2022 the Council approved a motion by Councillor Macinnes on an Accessibility Commission. This called for a report on how the Council's engagement with the Edinburgh Access Panel could be strengthened and how the panel's role in shaping Council decisions could be improved.

4.59 The Council also agreed an annual report on accessibility would be presented to Transport and Environment Committee, detailing the steps taken by the Council in the preceding 12 months to address accessibility issues and to set out key priorities for the year to come.

4.60 An initial report on the Accessibility Commission will be presented to Transport and Environment Committee in early 2023.

5. Next Steps

5.1 The Council will continue to implement the Equality and Diversity Framework 2021 – 2025.

5.2 The actions outlined in this report will continue to be progressed.

5.3 The Council will continue to lead on improving accessibility and inclusion in delivery of services and will seek to support external partners in this, where it is appropriate to do so.

5.4 Improving awareness of Council officers in ensuring that impacts are appropriately captured in Committee reports will be progressed with the next refresh of the Council's reporting writing guidance.

6. Financial impact

6.1 The activities outlined in the report are met from the Council's existing budgets. There are no new financial impacts arising from this report.

7. Stakeholder/Community Impact

7.1 As set in paragraph 4.5, the Council utilises IIAs to assess the impact of any Council policies, strategies and operational service delivery changes. This includes, where appropriate, engaging with people with protected characteristics to identify possible impacts and potential mitigations.

7.2 Council officers are trained in completing IIAs and a rolling programme of training is in place to ensure that new members of staff or people newly involved in preparing IIAs are appropriately trained.

7.3 The Council publishes IIAs on its website

8. Background reading/external references

8.1 Delivering the 20-Minute Neighbourhood Strategy – Policy and Sustainability Committee, 30 November 2021.

8.2 Women's Safety in Public Spaces – Policy and Sustainability Committee, 30 November 2021.

9. Appendices

9.1 None.