

Mayor and Cabinet

Report title: Response to the recommendations of the Disabled People's Commission Report; *If not now, then when?*

Date: 6 December 2023

Key decision: No.

Class: Part 1

Ward(s) affected: All

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Outline and recommendations

This report provides the Council's response to the Disabled People's Commission Report (If not now, then when?).

Mayor and Cabinet are asked to review and approve the Council's response to these recommendations.

Timeline of engagement and decision-making

29 March, 2023 – Publication of the Disabled People's Commission Report at the Council's AGM

12 September, 2023 – Cabinet Briefing

13 September, 2023 – Executive Management Team meeting

14 September, 2023 – Safer Stronger Communities Committee Meeting

1. Summary

1.1. This report provides a summary of the recommendations outlined in the Disabled People's Commission Report: *If not now, then when?* The report also

provides the Council's response to these recommendations, as well as information regarding work the Council is planning to do to improve the borough for deaf and disabled residents alongside the recommendations in the commission's report.

2. Recommendations

- 2.1. Note the contents of the report
- 2.2. Approve the Council's response to the Disabled People's Commission Report (*If not now, then when?*).

3. Policy Context

- 3.1. This report aligns with Lewisham's Corporate Priorities, as set out in the Council's Corporate Strategy (2022-2026):
 - Cleaner and Greener
 - A Strong Local Economy
 - Quality Housing
 - Children and Young People
 - Safer Communities
 - Open Lewisham
 - Health and Wellbeing
- 3.2. In particular, this report is closely aligned to the Open Lewisham priority. It aims to ensure that we are inclusive as a Council, actively listen to our residents and responsive to their concerns, aiming to co-design services with those affected by them.

4. Background

- 4.1. Lewisham Disabled People's Commission was established in December 2019 to research and report on barriers affecting deaf and disabled adults who live or work within the borough. The report was published at the Council's AGM on 29 March 2023, and a commitment was made that the Council would bring a report to Mayor and Cabinet stating its response to the recommendations made by the Commission.
- 4.2. Tackling inequalities is one of Lewisham Council's key priorities, and is fundemental to all the work we do. It is at the heart of our Corporate Strategy and the Mayor's manifesto. Our response to the Disabled People's Commission Report sits alongside a significant and ambitious programme of work being undertaken to put Lewisham at the forefront of the radical change needed to make a fairer society.
- 4.3. Lewisham Council does face challenges to supporting deaf and disabled residents that do not apply to all local authorities, or even all London boroughs. The Council is ambitious about what it wants to achieve, but faces significant constraints due to ageing infrastructure, density of residential housing and financial limitations. These obstacles present fundamental challenges to Lewisham developing a public realm that is fully accessible to all disabled residents.

- 4.4. However, the Council does not believe that we should lower our ambition because of those challenges. Instead, it is hoped that this report sets out what is possible, even when faced with those constraints. By utilising innovation, co-producing with those who have lived experience and gathering grass-roots support from within the Council and across the borough, Lewisham can set the standard as one of London's most accessible boroughs. We know that doing this will take time, and the Commission's report acknowledges that many of the solutions to challenges deaf and disabled residents face are long-term, but this report should act as a launch-pad for the borough to deliver something truly ambitious and forward thinking for its residents.
- 4.5. Outlined below are the recommendations the Council has received from the Disabled People's Commission Report. Section 10 of this report details the actions the Council will take in response to these recommendations.

5. Strategic Recommendations:

- 5.1. A rights-based approach with a co-production focus. Lewisham Council formally adopts a human rights based approach, including committing to the UN Convention on the Rights of People with Disabilities. The Council uses this and the social model of disability to inform all aspects of its work. This is applied with an active commitment to 'nothing about us without us' co-production with deaf and disabled people in service and policy design and commissioning. As it develops skills and expertise in this approach, it works with key partners such as the NHS to embed this approach within the work of relevant bodies across the borough.
- 5.2. **Senior policy lead in co-production.** A Senior Policy Lead in Co-Production based within Lewisham Council is appointed to work across the Lewisham Strategic Partnership, leading on coproduction and report implementation, building capacity within these partnerships for genuine coproduction.
- 5.3. Formation, support, and initial resourcing for a Deaf and Disabled People's User-Led Organisation (DDPULO). The Lewisham Strategic Partnership funds and supports the establishment of a representative Deaf and Disabled People's User-Led Organisation (DDPULO) in Lewisham.

6. The Short-Term Actions: Cost of Living Crisis

- 6.1. Review the impact of the cost of living crisis on deaf and disabled residents, developing a coordinated strategic response and halting local benefit deductions and debt recovery processes.
- 6.2. Carry out an analysis of the financial situations of disabled people on and off means-tested benefits and ensure that people who are no longer eligible for the warm homes discount and larger energy bills payments are receiving the support they need. This is especially important where they may face unavoidably increased energy costs due to running essential medical equipment, requiring a home of a specific temperature, or facing additional energy usage due to the presence of essential carers.
- 6.3. For people paying for social care, provide a temporary inflation-equal uplift to the minimum income guarantee and personal expenses allowance.
- 6.4. Commit to ensuring that charging for social care will never take anyone's

income below the UK poverty threshold (excluding any income from Personal Independence Payments, designed to meet the extra costs of disability).

7. Short Term Actions: Borough Access

- 7.1. Adapt Love Clean Streets to allow people to report missing, damaged, or inappropriate dropped kerbs and tactile paving, and access barriers such as overgrown vegetation and pavement blockages.
- 7.2. Develop a plan using Love Clean Streets for people to report buildings which do not provide wheelchair access to the Council, and for the Council or an appropriate partner to follow this up with a reminder of the legal obligation to provide reasonable adjustments. Where there are persistent and egregious offenders and it is appropriate, use levers such as planning and licensing to achieve these outcomes.
- 7.3. Place a moratorium on 'shared space' developments and commit to working with deaf and disabled people on the accessibility of future pavement architecture.
- 7.4. Assess and increase the number of benches, toilets, and Changing Places toilets (those with hoists and adult-sized changing beds).

8. Short-Term Recommendations: Communicating with the public

- 8.1. Work with deaf and disabled people including Deaf BSL signers and people with learning disabilities to improve access to the Lewisham Council website.
- 8.2. Develop a wider communication strategy that works across the borough to ensure that all content produced is accessible to everyone.

9. Long-Term Recommendations

- 9.1. Access Point. Create a deaf and disabled-led single point of access service working across the Council, NHS, policing, Department of Work and Pensions and other bodies as appropriate to support deaf and disabled people through their user-journey with services. It should tackle barriers faced (such as inconsistency of support and contact), ensuring they don't 'fall through the gaps'.
- 9.2. **Independent Living Strategy 2030.** Co-produce a long-term Independent Living Strategy 2030 alongside the DDPULO, maximising the independent living benefits across the borough offered by increased personalisation including improved outcomes and reduced costs. This must commit to the principle that adult social care should be free at the point of access and to working towards achieving this, exploring interim steps such as reduced charging.
- 9.3. **Borough Access Strategy 2030.** Co-produce a Borough Access Strategy 2030 working with the DDPULO, Lewisham Strategic Partnership and deaf and disabled residents across the borough. This will select and prioritise changes required to make Lewisham a national pinnacle of accessibility, in areas including housing, transport, policing, education, recreation, and community access. It will interact with processes such as the redevelopment of Lewisham and the Catford Centre, creating a vision of how the ideal accessible borough might be experienced.

10. Council response to the recommendations of the Commission

- 10.1. The Council welcomes the Commissions' recommendations and the work it has done since it was established. In particular, Jamie Hale is thanked for their substantial contribution to this work, and commitment to improving the lives of deaf and disabled people across the borough. The report highlights the genuine challenges faced by those with disabilities, and it would not exist if it were not for the effort of the Commissions' members, each of whom is noted in the Commissions' report.
- 10.2. The Council's response to each of the recommendations listed above is outlined in the paragraphs below:
- 10.3. A rights-based approach with a co-production focus (5.1). The UK Government is a signatory to the UN Convention on the Rights of People with Disabilities, meaning all UK public bodies should take the convention into account when carrying out their work. Lewisham Council is supportive of the convention's principles which help inform how public bodies such as the Council meet the Public Sector Equality duty and comply with disability discrimination legislation. Furthermore, the Council welcomes and endorses a social model of disability that recognises that society and the environment inhibit people with disabilities from fully exercising their citizenship and role in society. The Council's Corporate Strategy explicitly states the Council's support for this model.
- 10.4. Additionally, the Council has expanded the work it has undertaken using a coproduction model and acknowledges fully the importance of the principles of coproduction. This report expands on policy areas, such as Play and Public Realm where specific action is being undertaken to further develop the Council's approach to co-production. A core tenet of the role of the policy post (referenced in paragraph 10.5), will be to ensure that a 'nothing about us without us' approach is taken across all aspects of the Council's work which have a direct impact on deaf and disabled residents.
- 10.5. Senior policy lead in co-production (5.2). Following discussions with partner organisations within the Lewisham Strategic Partnership, it has been agreed that this post will be jointly funded, primarily by Lewisham Council and the ICB. This role will be responsible for providing advice and co-production capacity across the Strategic Partnership. The report recommends this post is recruited on a 36-month contract, but due to financial implications the post will be advertised on a 24-month contract. Recruitment for this post is planned to begin shortly, and will be done in consultation with Jamie Hale, as a representative of the Disabled People's Commission. The successful applicant will be responsible for assessing and delivering a number of the recommendations within the report.
- 10.6. Given the report's specific recommendation that a deaf or disabled person take up this post, the Council can commit to being proactive in ensuring that the recruitment campaign is targeted to groups representing deaf and disabled people. The Council will additionally ensure a fully accessible recruitment process, including creating a BSL interpretation of the job description, and an easy read version of the job description which will be available on request.
- 10.7. In addition to recruiting to this post, the Council will also be recruiting a more

- senior equalities officer, who will oversee all Council work relating to EDI, and provide support and line management to the Disability Policy and Co-Production Officer. This additional capacity will allow the Council to ensure it has the expertise in place to effectively deliver on the commitments outlined in this report, and to tackle the challenges of intersectionality which we know exist within the borough.
- 10.8. Formation, support, and initial resourcing for a Deaf and Disabled People's User-Led Organisation (DDPULO) (5.3). Following the fantastic example of co-production that has been set by the Disabled People's Commission, the potential benefits of a User-Led organisation to the borough are self-evident. In response to this recommendation, the Council has earmarked £20,000 of funding, which has been set-aside pending a business-case being presented to the Council setting out how this group will be formed. The newly recruited Disability and Co-Production Officer will be responsible for coordinating the resourcing of this group, and providing support that may be needed with its formation.
- 10.9. **Cost of living crisis (6.0 6.4).** As the cost of living crisis had an immediate and direct impact on a large number of Lewisham's residents, the Council took rapid action to provide targeted support wherever it could. As a result of this, the work contained within these recommendations has largely already been undertaken by the Council, and much of the support which has been provided can be seen on the Council's website (https://lewisham.gov.uk/myservices/cost-of-living).
- 10.10. In January 2023, the Council completed an equalities screening, assessing the socio-economic impact of the cost of living crisis on residents with any of the nine protected characteristics. This screening identified the specific impact that the cost of living crisis was having on disabled residents, and the information gathered through it was used to assist the council in targeting the support it subsequently provided.
- 10.11. In addition to this screening, the Council has undertaken an analysis of the financial situations of disabled people on and off means-tested benefits. However, this is an initial analysis based on readily available public reports, and a more detailed, local analysis will be scoped following the appointment of a Disability Policy and Co-Production Officer.
- 10.12. With regards to providing a temporary, inflation-equal uplift to the minimum income guarentee (MIG), Lewisham already has a more generous MIG than the DHSC prescribes. For example, the April 23/24 DHSC figures for MIG for those aged 60+ and receiving Pension Credit is £214.35pw. Lewisham actually allows £251.31pw, £36.96pw more generous. If the Council applied inflation at 6.5% to the DHSC figure, this would result in an additional £13.93pw, which would total £228.28pw. This figure would remain far less than the current MIG in place at Lewisham, and therefore the Council feels that its currently policies already take account of the cost pressures that many residents face.
- 10.13. **Borough Access (7.0 7.4).** The recommendations within the Commission's report relating to updating the Love Clean Streets app to allow residents to report issues related to accessibility have been actioned, and this function is now possible within the app. In addition to this, the Council has gone even further in creating a specific section within the app related to accessibility. This

- functionality will allow deaf or disabled residents to more easily navigate the tool, and will allow the Council to collect valuable data on how frequently reports of this nature are being made.
- 10.14. In addition to the above, the Council is currently undertaking work to develop processes that would ensure any complaint relating to building accessibility, including public buildings and privately owned businesses, would be dealt with by an appropriate team, within an appropriate timescale. This would be delivered through expanded use of the Love Clean Streets application, and although this feature has not yet been implemented, it is something the Council is actively pursuing.
- 10.15. The Council is committed to utilising <u>AccessAble</u>, an online accessibility guide containing information about venue accessibility. Between 1 January 2022 1 January 2023, Lewisham's pages on AccessAble's website were viewed 19,787 times, and the Council's communications team will be working over the course of this administration to raise the visibility of this tool within the borough, particularly with partner organisations.
- 10.16. In response to recommendations in the Commission's report, the Council will create a list of the top 100 most accessed venues within the borough, and arrange for a window sticker to be sent to each of them featuring a QR code that can be scanned for accessibility information. In addition to this, over the course of this administration we will work to ensure that every venue, operated by every member of the Lewisham Strategic Partnership, is signed up to AccessAble, providing a single, easy to use source of accesisbility information within the borough.
- 10.17. In response to the Commission's recommendation around working with deaf and disabled people on accessibility of the public realm for all future tenders of public realm consultations, the Council will specify during the tender process that any organisation working with the Council to conduct consultations must seek representations from key disability groups; this will also be included in the Council's Streetscape Design Manual as a crucial consultation step. The Council will continue to conduct a full Equality Impact Assessment for all major schemes. In the long-term, the Council would hope to utilise the Disability Policy and Co-Production Officer, and potentially a DDPULO, to ensure that these representations are sought effectively.
- 10.18. On shared space developments and the recommendation for a moratorium, the Council will follow the guidance set out in 'Inclusive Mobility'. This guidance states that: "Conversion of an existing footway to a shared use route should only be considered when options that reuse carriageway or other space have been rejected as unworkable. Even then, this option may only be acceptable if there is sufficient space available, with low pedestrian and cycle user numbers along the route, and low expectations that pedestrians will cross the path to access adjacent facilities, such as shops."
- 10.19. Additionally, Local Transport Note 1/20 sets out that "In urban areas, the conversion of a footway to shared use should be regarded as a last resort." However, the Council is required to be pragmatic and to acknowledge that there may be situations where physical constraints do not allow for segregation. As a result of this, placing a moratorium on shared use would not be possible at this time. The Council will continue to regard shared use as a last resort and make

best efforts to avoid its use whenever possible.

- 10.20. The Council will additionally support a strong position against the introduction of new cobbled streets. Public realm should always be designed to be accessible, and the Council will work to ensure that there is no new introduction of cobbled streets. Where a proposed development site has historic cobbles, consideration will need to be given for their historic value and how they can be integrated into a development project. However, as with shared use, cobbled streets will be regarded as a last resort.
- 10.21. The Council can commit to increasing the number of Changing Place toilets within the borough. There are plans to create a new community space in the Lewisham Shopping Centre, and this will include the provision of a new Changing Place Toilet, accessible to all residents. In addition to this, further plans have been developed to deliver an additional Changing Place Toilet in Downham Leisure Centre. The Council's ambition is to have both of these facillities delivered before the end of 2023. The Council will continue to look for further opportunities and funding to increase the number of accessible toilets within the borough.
- 10.22. Finally, Lewisham Council currently has over 700 benches, including 27 disabled user friendly picnic table/benches funded via Lewisham Mayor's Greening Fund. Over the remainder of 2023, the Council intends to install seven additional public benches within the borough, as well as three additional Disabled user friendly picnic tables. This is a significant increase from the number of public benches instaled during 2022. To fund the delivery of further benches and other outdoor furniture, the Sustainable Streets scheme will be used to fund improvements to local streets. Although the Council cannot commit to a definite figure for the number of benches that will be installed under this scheme, all funds raised are ring-fenced for local transport and highways improvements.
- 10.23. **Communicating with the public (8.0 8.2).** Accessible language and design are key considerations in all our communications work and are at the heart of our new website and communications strategies.
- 10.24. We know there are improvements that need to be made to our website, and this is a focus for both our IT and digital, and communications teams. We are currently undertaking a major review of the website to improve its content and usability. This is in line with government legislation for public sector organisations, that requires a WCAG 2.1 level AA standard for public sector websites. This includes a wide range of accessibility measures including recommended colour contrast ratios, making text easier to read, a heading structure to website, URL highlights and an inbuilt text to speech web reader.
- 10.25. We are using Site Improve software to analyse our website for accessibility issues. We currently have a 96/100 rating for content, however we know there are improvements we can make relating to the technical performance of the site, so this is a priority. The Council's Disability Policy and Co-Production Officer will work closely with the Communications team to provide their expertise in terms of creating accessible communications.
- 10.26. In addition to the above, following this report the Council will commit to providing BSL signers to all large, Council run events, on request. The Council is also committed to ensuring that its cultural offer to the borough is more

- accessible than ever. From 2023 onwards, the Council is committing to holding a British Sign Language show for the pantomine performance at the Council owned Broadway Theatre every year. We are also exploring options and costs for a relaxed environment show.
- 10.27. Access Point (9.1) The Council is currently working collaboratively with the NHS and VCS partners towards improved signposting and referral abilities. The Council's partners at Community Connections host their own directory. In addition to this, as part of the Council's response to the cost of living crisis, we worked with the Independent Food Aid Network to co-create the Worried About Money tool for assisting residents with finding financial support services. Through the Leiwsham Strategic Partnership, the DWP, Police, local NHS and other partnership organisations have been passed information regarding these tools, and encouraged to direct the residents they interact with on a regular basis towards them.
- 10.28. In the long-term, the Council does recognise the need to reduce points of access for residents, particularly those who are deaf or disabled, seeking advice. A project to achieve this is already being scoped and following the appointment of a Disability Policy and Co-Production Officer, one of their key tasks will be to provide advice to the project group tasked with improving access to the Council. They will use their experience and expertise to ensure that accessibility for deaf and disabled residents is a priority for this project, tackling the barriers which are highlighted in the Commission's report alongside these recommendations.
- 10.29. In addition to the above, the Council is committed to maintaining it's 24 hour, online interpreting service for BSL users who need to contact the Council either during, or out of hours. This service will be inetgrated within any project which is undertaken to improve access to the Council for residents.
- 10.30. Independent Living Strategy (9.2). Following the appointing of a Disability Policy and Co-Production Officer, they will be asked to review whether they feel an Independent Living Strategy is the most effective method of ensuring improved outcomes across the borough. In addition to this, the Council recognises the substantial benefits of the principle of making Adult Social Care free at the point of access. Lewisham will, where possible, work closely with other London boroughs to ensure that the case for the national changes required to make implementing this policy feasible, are made to central Government.
- 10.31. Borough Access Strategy (9.3). As above, the Council's Disability Policy and Co-Production Officer will be asked to assess the need for a Borough Access Strategy, and to work closely with residents, Council services and partner organisations to ensure that Lewisham matches the ambition set out in the Commission's report to be a "national pinnacle of accessibility". In the short term, this officer will work closely with the services outlined in the Commission's report to ensure that principles of accessibility are enshrined into Council policy. This will ensure that planned development, both of buildings and policies, takes into account the access requirements of deaf and disabled residents.
- 10.32. In order to fully show the Council's commitment to establishing a public realm that is accessible for all residents, Lewisham will fully adhere to the Department for Transport <u>Inclusive Mobility</u> guidance, ensuring the Council follows best

practice on access to pedestrian and transport infrastructure. The Council are additionally considering the <u>Equal Pavement Pledge</u>, and assessing the viability of the commitments contained within it. At present, this cannot be committed to as a result of the financial implications on the Council and businesses, but it remains under consideration.

11. Additional work

11.1. Although the Council's response to this commission has considered all the recommendations made, we are ambitious about our plans for accessibility and want to go even further. Utilising the experience we will gain from hiring a dedicated expert on disability issues, the Council has outlined a number of additional actions/ projects which we will undertake to ensure that we are a leading borough for accessibility and providing support to our deaf and disabled residents. Further work which the Council intends to undertake, and which falls in line with the spirit of the Commission's report, is outlined below in paragraphs 12 – 16.

12. Extensions to the report

- 12.1. The Disabled People's Commission Report included a number of extensions, focused on specific policy areas where improvements could be made to support deaf and disabled residents. We know that we cannot act on all the recommendations contained within these extensions alone, and are committed to working closely with our partners to reach our ambitions.
- 12.2. The Council has shared and promoted the extensions to all members of the Lewisham Strategic Partnership. Encouraging each partner organisation to assess the recommendations that are most relevant to their organisation, and to act on them, with the support of the Council where possible.

13. Disability Confident Leader

- 13.1. Lewisham Council is proud to be certified as a Disability Confident Employer. However, as has been stressed throughout this report, we want to go even further and to act as a leader both within our Borough and the wider national context in terms of our approach to working with deaf and disabled residents.
- 13.2. Over the course of this administration, the Council will be focusing on achieving status as a <u>Disability Confident Leader</u>. Accreditation at this level within this nationally recognised scheme would showcase the Council as a champion for Disability Confident within our local and business communities, and show disabled residents that we are leading the way in getting every business to become Disability Confident.
- 13.3. As well as setting ambitious targets for ourselves as an empoyer, the Council is also committeed to championing the importance of becoming a Disability Confident Employer. Utilising the Lewisham Strategic Partnership, we will support all partners who have the capacity to achieve this level to reach it over the course of this administration. These partners will be supported by the newly appointed Disability Policy and Co-Production Officer who will support effective implementation of policies through working closely with the deaf and disabled community in the borough.

14. Inclusive Playgrounds

- 14.1. In 2020, the Council set out in its Parks and Open Spaces Strategy that it would "seek advice through the new Disabled People's Commission, and identify the best way to engage with disabled young people, their parents and carers to ensure that our parks and open spaces are designed to enable children of all abilities, to access and enjoy". In order to achieve this goal, the strategy set out three measures: monitor the number and outcome of consultation with disabled stakeholders and the application of inclusive play principles in their design, layout and equipment choices. Develop a play strategy that balances inclusive play for children of all abilities and age ranges, and ensure that the design brief builds on best practice in terms of intergenerational design.
- 14.2. We are following through on these commitments, and other recommendations such as the "Let's Play Fair" campaign from Scope, which highlights the importance of inclusive play for children, and outlines persistent issues such as the lack of inclusive and accessible playground equipment provided by local authorities. We have been consistently raising expectations on our playground providers that the equipment they provide is accessible, and our Play Strategy highlights the Council's expectation that "Providers of play services and facilities will ensure their offer is... accessible for all, particularly disabled children".
- 14.3. We have also recently introduced a model of co-design, as promoted in the Commission's report and set out in the Parks and Open Spaces Strategy. In 2022, the Council utilised a co-production approach to deliver a new children's play area within Blackheath Ward, and is now committing to ensuring that whenever possible, the Portage Service will be utilised by the Council to ensure that the voices of deaf and disabled children, as well as their families, are heard in the creation of any new play area.

15. Levelling Up Fund

15.1. Earlier in 2023, the Council secured £19m from the Government's Levelling Up Fund to improve Lewisham Town Centre. In order to ensure that this substantial development of our public realm is accessible, the Council will work with disabled experts, with lived experience, during the design process. Given the Council's commitments throughout this report to fully utilise the effects of a coproduction approach, the Council will be calling upon the insight and knowledge of disabled residents, making full use of their lived experience to ensure that the best possible town centre for all residents is delivered.

16. Reviewing our work

16.1. We know that much of the work needed to fully deliver on the spirit of the recommendations contained within the Commission's report will require years of work, and many of the commitments contained within this Council report set out work that has only recently begun. Therefore, the Council will commit that in between 24 and 36 months time, the Council will commission an independent disability-led organisation to review it's progress against these recommendations. It is the intention of the Council to be transparent about the challenges it faces in achieving the ambitions set out in the Commission's report, and the work it will do to overcome those challenges. Any independent assessment of this work commissioned by the Council will be published in the

public domain.

17. Financial implications

17.1. This report sets out the Council's response to the Disabled People's Commission Report. Any expenditure arising from the actions set out in this report will be met from within existing budgets except for the expenditure on the senior policy post (2 year contract) of which the Council share (50%) is £78k spread over two years and will be funded from corporate provisions; and the expenditure to be incurred on the initial resourcing of the Disabled People's User-Led Organisation which will be funded from £20k corporate reserves held under Community Services for the Lewisham Disabled People's Commission.

18. Legal implications

- 18.1. [Type here, Arial size 12]
- 18.2. See Section 6.10.2. "Legal implications" in the guidance for more information

19. Equalities implications

- 19.1. A full EIA screening has been carried out alongside this report, outlining that there are no negative implications for any group as a result of the recommendations contains within this report.
- 19.2. The EIA screening notes that this report will have a positive impact on deaf and disabled residents, primarily through improving accessibility within the borough and changing the way in which services are designed so the potential impact of decisions on deaf and disabled residents is better considered.
- 19.3. The full report, and in particular commitments made to increase the Council's co-production capacity, fall in line with the social model of disability which Lewisham Council supports and adheres to.

20. Climate change and environmental implications

20.1. There are no specific climate change and environmental implications arising from this report.

21. Crime and disorder implications

21.1. There are no specific crime and disorder implications arising from this report.

22. Health and wellbeing implications

- 22.1. It is expected that the impact of this report will be to improve the wellbeing of deaf and disabled residents within the borough. Commitments made around public realm, and the way in which infrastructure decisions are taken will be expected to have a positive impact to the accessibility of the borough over time, and therefore the wellbeing of disabled people.
- 22.2. Additionally, commitments to increasing provision of Changing Place toilets will further improve the borough's accessibility and resident wellbeing. There are no negative health and wellbeing implications arising from this report.

23. Background papers

23.1. Lewisham Disabled People's Commission Report (If Not Now, Then When)

23.2. Extensions to the Lewisham Disabled People's Commission Report

24. Report author(s) and contact

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- 24.3. Financial Implications: Peter Allergy
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25. Appendices

• Appendix A – Disabled People's Commission Report: If not now, then when?