

From: Monk Peter [Peter.Monk@lbhf.gov.uk]

Sent: 21 April 2011 15:04

To: Specific Duties

Subject: Specific Duties - Policy Review

Good afternoon,

You have invited comments on the streamlining of Specific Duty Regulations which is proposed in the above Paper.

There are two points I would like to make.

1. The Paper explains that more direction will be given to public bodies about their specific and general duties in supporting guidance, if less direction is written into Regulations themselves. However much current guidance, for example on the superseded Disability Discrimination Act, has included material which serves to confuse explanation of legal requirements, addresses issues that are not central to the actual experience that disabled people and other disadvantaged groups suffer when public bodies do not deliver services in ways that absolutely respects their rights as citizens, or which is so bland as to be meaningless or actually distracts attention from real issues.

The suggestion I would make, as a local government Access Officer with 25 years experience working with disabled people in this capacity, and on projects such as British Standards Codes, is that the government should ensure that all the guidance it issues or sponsors through organisations such as ACAS, is written in an informing, cogent and specific way. There is then a parallel role for broader publicity to be produced that will capture interest and sharply raise the public's awareness that national and local public bodies have some new duties to do, in leaflets and advertising that can in turn refer those in public life, people who the Equality Act sets out to protect, and the much wider public, to the specifics contained in guidance.

2. The Regulation that will require public bodies to set one or more objectives, itself deserves to underline the government intention that customers and users of public body services should have the ground to challenge organisational practices and policies.

It might avoid any public body issuing general restatements of the law or of process objectives, if the Regulation qualified the specific duty by requiring one or more "specific" objectives; or one or more "practicable" objectives.

Thank you for producing a clear and easy to read Review document.

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