

If not now, then when?

Protecting and advancing the rights and inclusion of deaf and disabled people in Lewisham



A report from Lewisham Disabled People's Commission



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Nothing about us,
without us ”

Chair's introduction



As I write this report, deaf and disabled people continue to face a series of unprecedented emergencies. Our communities were decimated by the pandemic and collectively have been one of those hit hardest by austerity. The COVID-19 pandemic gave rise to a significant increase in people experiencing mental and physical ill health. Now, we face a cost of living crisis – it is clear that the combination of spiralling energy and food costs together with the relentless increase of pressure on the NHS will cause excess mortality and avoidable deaths of disabled people.

Our research produced one clear outcome: **Lewisham must centre deaf and disabled people in decision making processes.** It is imperative that we embed co-production into the work done by the Lewisham Strategic Partnership with a job role focused on assuring this. Further, we must utilise co-production to develop long-term strategies addressing both broader borough access barriers and the barriers to independent living, which respond to the needs of our residents.

In order to achieve this ideal, we need to recognise that 93% of deaf and disabled residents currently feel that they have no voice in the borough. An issue as pervasive as this requires concrete and significant action to form a Deaf and Disabled People's User-Led Organisation (DDPULO) to bring forward the work of the Commission.

Conducting research on this report has been a privilege, and I am deeply grateful for the steadfast support and commitment shown by both Commission members and the Council and other strategic partners, even through this period of significant national crisis. I look forward to the proposed recommendations within our report being developed, strengthened and embedded into practice in Lewisham.

The public sector is currently in a challenging financial position, and these recommendations come with varying cost implications, meaning the implementation of some will be more immediately feasible than others. However, despite the need to evaluate their costs against the costs of other service provisions, I hope there will be progress towards their implementation immediately. I further hope that all partners to this report will use their influence nationally, where national change is required.

This research has demonstrated that work is needed across Lewisham, from the accessible provision of NHS services to wheelchair access in Lewisham Centre, from public transport to hate crime. It is clear that in places, core legal obligations are not always being met around the provision of safe appropriate housing, compliance with the Public Sector Equality Duty and the Equality Act.

The work taken forward by Lewisham Council and the wider Lewisham Strategic Partnership could serve as a national model for ensuring that the voices of deaf and disabled people are centred in all aspects of life. We hope the work that follows our report continues to embody the ethos of the slogan which roots and connects the campaigning histories of deaf and disabled people:

'Nothing about us, without us.'

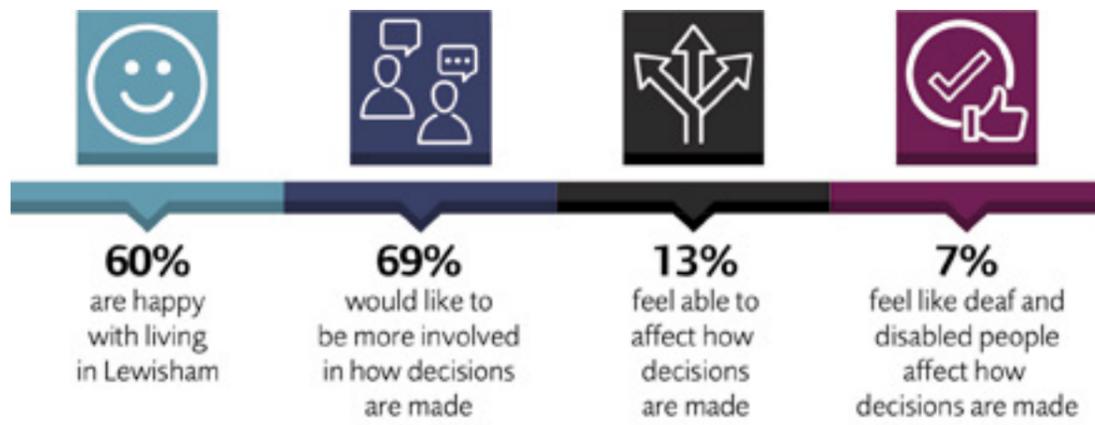
Jamie Hale, Chair of Lewisham Disabled People's Commission

Executive summary

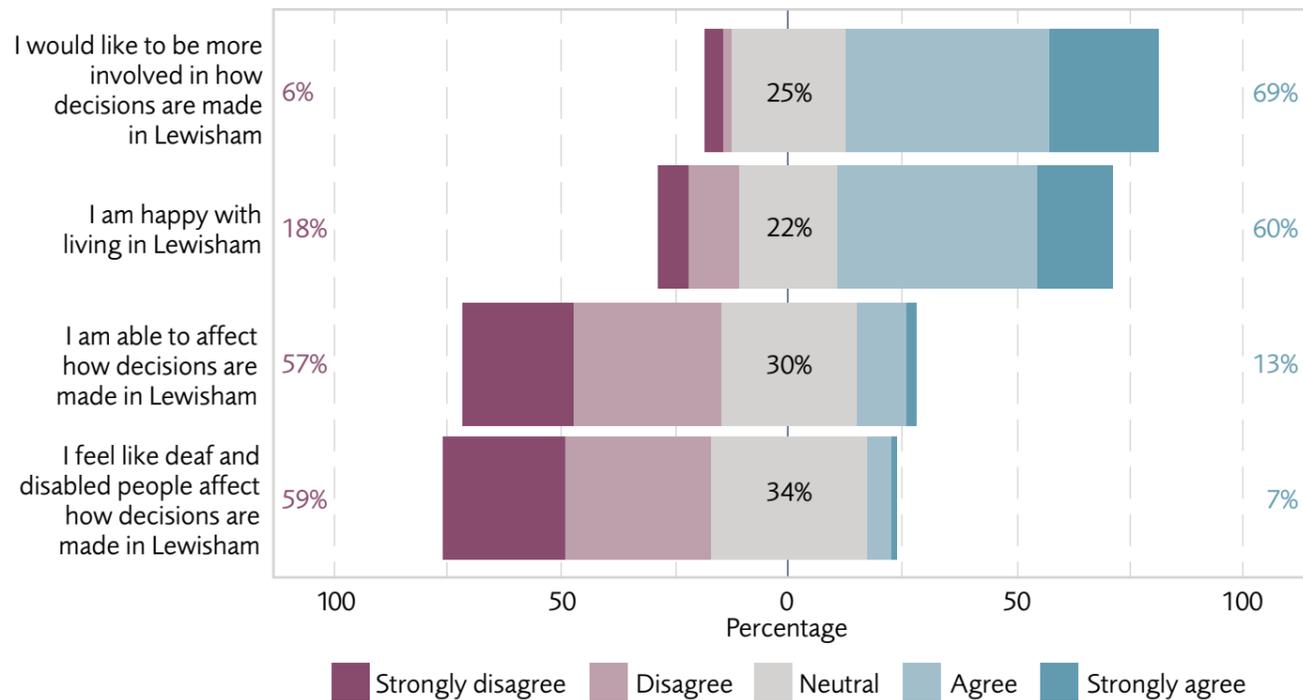
Overview

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.

We found that overall, deaf and disabled residents are happy to live in the borough and are keen to be involved. However, they do not feel like they, or other deaf and disabled people, can affect how decisions are made.



Living in Lewisham All respondents



It is unsurprising that deaf and disabled people do not feel that they can affect decision-making, as on a national level deaf and disabled people in the UK face both frequent human rights violations (United Nations Committee on the Rights of Persons with Disabilities, 2016) and social injustices. Unfortunately, these incidents are at the heart of the deaf and disabled experience.

“ I want to go shopping with friends, but I have fatigue and I need to sit down a lot. Because there aren't enough benches in the town centre, I can't see my friends. ”

Many of the barriers faced by deaf and disabled people are the result of a society which creates barriers to inclusion, independence, and autonomy.

The social model of disability, central to our terms of reference, describes the way in which deaf and disabled people become disabled as a result of the barriers we face when our access needs are not met. It is clear that society constructs these barriers, and as such, society has an obligation to remove them. This report makes recommendations to reduce barriers faced by deaf and disabled people in Lewisham.

Our work and outreach have included:

- 18 members of the Commission 2020–22.
- 378 survey responses from adults who are deaf and/or disabled, living and/or working in Lewisham.
- Approximately 60 focus group attendees.
- Discussions with approximately 12 people working within Lewisham Council and its strategic partners about their perceptions of the needs of deaf and disabled residents.
- Informal interviews and meetings with deaf and disabled residents, as well as disabled-led organisations across London and nationally.

Our recommendations

Our recommendations fall into the following three categories: strategic change, short-term practical change and long-term practical change.

Strategic recommendations

The strategic recommendations are about redesigning how Lewisham Council and the wider Lewisham Strategic Partnership work with deaf and disabled residents. They aim to create a culture of genuine co-production alongside deaf and disabled-led self-organisation.

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.

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 co-production and report implementation, building capacity within these partnerships for genuine co-production.

3. Formation, support and initial resourcing of a Deaf and Disabled People's User-Led Organisation

The Lewisham Strategic Partnership funds and supports resources the establishment of a representative Deaf and Disabled People's User-Led Organisation (DDPULO) in Lewisham.

Short-term actions

There are practical recommendations to tackle some of the immediate barriers frequently highlighted in our research.

1. Cost of Living Crisis

- a. 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.
- b. 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.
- c. For people paying for social care, provide a temporary inflation-equal uplift to the minimum income guarantee and personal expenses allowance.
- d. 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).

2. Accessing Lewisham

- a. 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.
- b. 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.



- c. Place a moratorium on 'shared space' developments and commit to working with deaf and disabled people on the accessibility of future pavement architecture.
- d. Assess and increase the number of benches, toilets, and Changing Places toilets (those with hoists and adult-sized changing beds).

3. Communicating with the public

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

Access 2030: Long-term recommendations

These recommendations respond to key themes from our research. Their implementation may require time, but they reflect many issues that most keenly affect our residents.

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'.



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.

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.

Conclusions

Only **one in five** of residents believe access has improved over the past five years, and just over **one in four** believe it will improve over the next five years. Only **one in twelve** believe that deaf and disabled people can affect decision-making in the borough. **Action on these recommendations allows Lewisham to demonstrate support and commitment to the needs of deaf and disabled residents. This action will position Lewisham as a nationally leading borough, focused on resident responsiveness and creating necessary change.**

Commission and Community Engagement

Lewisham Disabled People's Commission was established in December 2019 following a manifesto commitment from Damien Egan, the Mayor of Lewisham. The Commission was based on the groundbreaking work of Hammersmith and Fulham's Disabled People's Commission. Our remit was to make recommendations on practical and strategic changes that will protect and advance the rights and inclusion of deaf and disabled people in Lewisham, before ensuring their implementation.

The initial terms of reference outlined a process of:

- Reviewing London-based and national work.
- Speaking to local people.
- Carrying out wider inclusion and public hearings.
- Producing a report.
- Implementing the findings of the report.

Across the past three years we carried out many of the aforementioned steps in parallel: reviewing and researching experiences in other London boroughs and Local Authorities; meeting with local people, and carrying out our survey, focus groups, and formal and informal interviews with staff at Lewisham Council and other strategic partners. All of these have contributed to our final report.

Due to COVID-19, the report has taken longer to produce than expected. However, this allowed a wider and deeper engagement with the Council, other bodies such as the CCG / ICS, and local communities, with methods of ad-hoc engagement and co-production taking place. The high demand from Lewisham partners for support from the Commission with various areas of work demonstrates the importance of structuring and implementing formal methods of co-production.

The Commission

The Commission began to meet in 2020. During the COVID-19 pandemic, meetings moved online and some of our focus shifted to pandemic-focused responsive and engagement-based work.

During the lifetime of the Commission, there have been eighteen members and we have met nineteen times as a Commission. In those meetings we discussed our approach to the report, people's experiences and aspirations for the Commission, how we intend to shape the survey and focus groups and the final findings and approach to implementation.

Our Approach

Our work is based on the social model of disability and the Deaf cultural / linguistic model. This means that we have focused on the socially constructed barriers which impact the lives of deaf and disabled people, and how those could be removed. We have also worked to the principles of the United Nations Convention on the Rights of Persons with Disabilities. This recognises that deaf and disabled people are working for our rights to be respected, rather than for additional privileges.

The social model of disability is a set of principles and values. It recognises that people with 'impairments', or health conditions face barriers in society and that we are then disabled by the way that these removable barriers impact on our lives. The social model is designed to identify and address the impact of these barriers. As a result, our recommendations are based around removing unfair and unjust barriers experienced by disabled people.

The Deaf cultural / linguistic model recognises that as well as experiencing disabling barriers, Deaf BSL signers are also discriminated against by a society that defines Deaf signers by a lack of hearing, rather than recognising them as members of a shared cultural and linguistic community.

Engagement

There were 378 survey respondents who live or work in Lewisham and are deaf or disabled. We also carried out four direct focus groups with a total of 19 attendees, and met with 11 individual staff members or groups of staff members from Lewisham Council and associated bodies such as Lewisham Homes. There were a further three focus groups for people with learning disabilities with 38 attendees, and two for Deaf BSL signers. We also met with a range of Deaf and Disabled People's User-Led Organisations both in London and nationally to discuss our approach, perspectives, and findings.

Commission members

The Commission has had a number of members since December 2019, who have served terms of different lengths. We are immensely grateful to the following, who have all contributed to our work at different times.

- Jamie Hale (Chair)
- Tony Pilkington (Vice-Chair)
- Ifeoma Orjiekwe (Vice-Chair)
- Lorraine Ogundiran (until her death in February 2020)
- Barbara Britton
- Carys Kennedy
- Gloria Adoch
- Lesley Palgrave
- Merryn Bishop
- Nana Marfo
- Nigel Bowness
- Peter Cronin
- Priya Bose
- Rev. Tim Goode
- Richard Amm
- Stephen Griffiths
- Thines Ganeshamoorthy
- Anonymous

We are also especially grateful for the support of the following people outside the Commission:

- Councillor Brenda Dacres, Deputy Mayor
- (Former Councillor) Jonathan Slater
- Councillor Juliet Campbell, Cabinet Member for Communities, Refugees and Wellbeing
- James Lee, Director of Communities, Partnerships and Leisure at Lewisham Council
- Catherine Logan, Senior Policy and Strategy Officer at Lewisham Council
- Karen Kemsley, Data Scientist at Lewisham Council
- Adeola Ogunbadewa, Executive Support Officer at Lewisham Council
- Tara Flood and Kevin Caulfield, Hammersmith and Fulham Council
- Tracey Lazard, Inclusion London
- Joanne Munn, Bromley X by X
- Dominic Ellision, West England Centre for Inclusive Living
- Caitlin Richards, Lead Producer at CRIPTic Arts
- Martin Stitchman, Lewisham Speaking Up
- Quinn Clark, Editor
- Captioners from 1:1 captions
- Vicky Penner, Senior Media and Campaigns Officer at Lewisham Council
- Nancy Yuill, Design and Brand Officer at Lewisham Council

Barriers faced by deaf and disabled people in Lewisham

Our survey identified a wide range of barriers affecting deaf and disabled people in Lewisham. These barriers impact on every part of the daily life of deaf and disabled Lewisham residents and in the needs of deaf and disabled people not being met on a local and national level. This snapshot of the barriers faced suggests key areas to address and informs some of our later recommendations for practical change.

Living in Lewisham

- Hard to contact the Council and often passed from person to person
- Lack of BSL on the Council website
- Lack of wheelchair access to shops
- Lack of BSL for services and social events
- Hard to find information if not digitally literate
- Lack of playground facilities for disabled children
- Hate crime
- Isolation
- Lack of disability awareness and sensitivity

Health and social care

- Cost of social care
- Social care and healthcare waiting lists
- Social care not available for some people dependent on immigration status
- Family and partners expected to provide care
- Difficulty getting GP appointments
- Difficulty getting face to face appointments
- Difficulty accessing consistent BSL interpreters for appointments
- Impact of COVID-19 on physical and mental health

Housing, travel and transport

- Not enough adapted housing
- Lack of suitable public toilets (wheelchair accessible and Changing Places)
- Not enough places to park, especially for blue badge holders
- Poor quality and blocked pavements
- Not enough places to sit while out and about
- Freedom pass not working before 9.30am
- Having to pay for carer travel
- Inaccessible bus stops and railway stations

Finance, employment and benefits

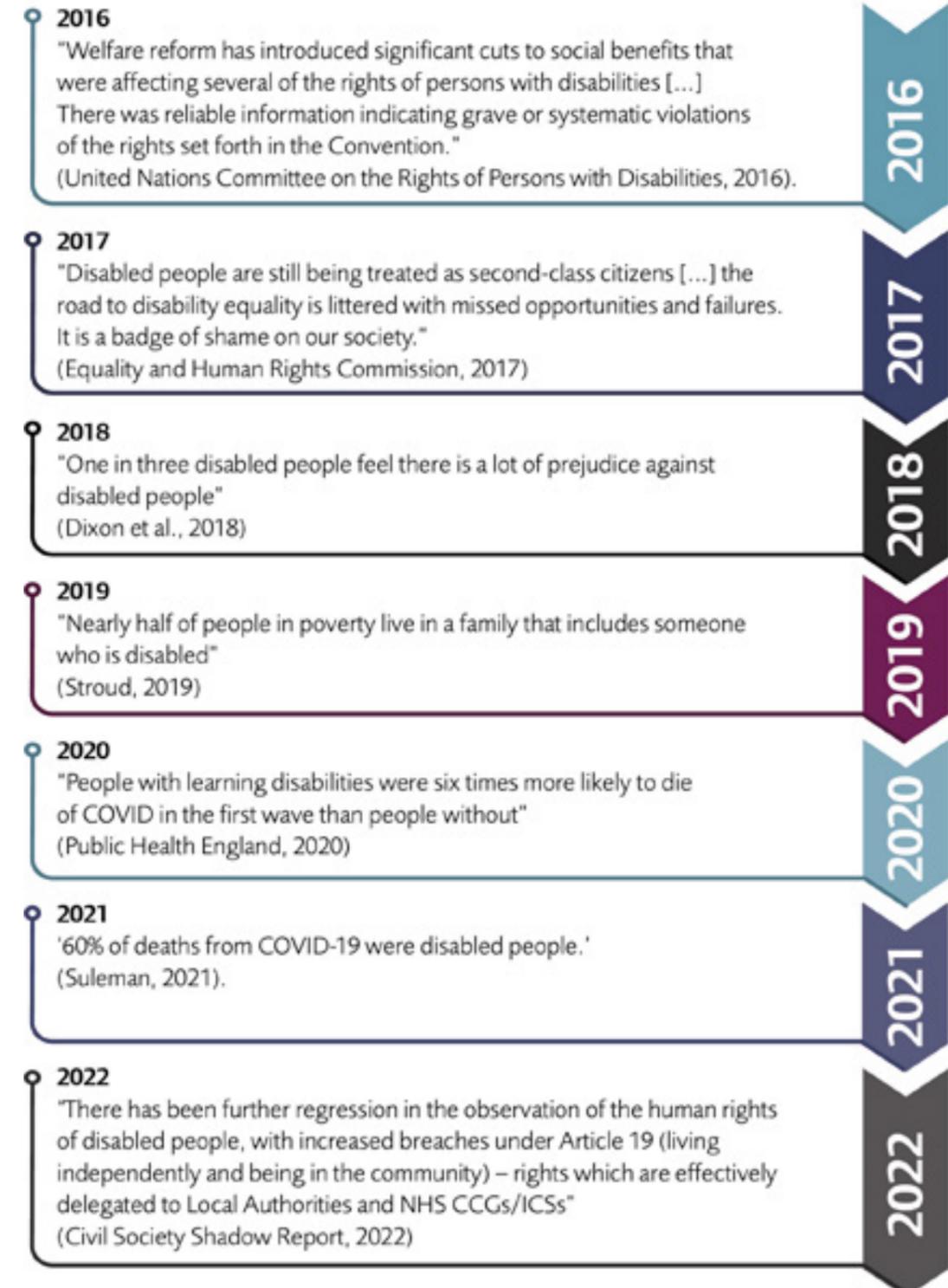
- Not enough money to pay bills and food
- Punitive and unfair benefits assessments
- Lack of support to work while on benefits
- Lack of signposting and support regarding benefits entitlement
- Lack of support into work, especially for people with learning disabilities
- Additional costs of being disabled
- Cost of living crisis impacting on all financial aspects of people's lives

Education, leisure and activities

- Cuts to leisure services
- Cuts to adult education leading to expensive courses and long waiting lists
- Cuts to services for people with learning disabilities
- Cuts to social spaces for people with learning disabilities
- Lack of appropriate education for deaf BSL signers
- Lack of support with digital literacy skills and a focus on online and digital events excluding people from activities

A State of Emergency

Timeline



The experiences of deaf and disabled people

Deaf and disabled people are living in an extended state of emergency.

As inflation increases more rapidly than incomes, the buying power of people is decreasing. With a particular rise in energy bills, an area where disabled people are likely to have higher demand, this is a critical situation. Food price inflation has led to unprecedented demand on food banks. Fuel bills have skyrocketed and disabled people, already struggling financially, are reaching the point where it is no longer heat or eat, but neither heat nor eat. Alongside this, for many disabled people, the pandemic continues.

Within the borough, there were shocking cases of people with clear unmet needs. Of 378 respondents, 64 residents (17%) were in at least one of these groups.

Unmet care and housing needs

- **One in five** respondents don't always have access to food and drink.
- **One in five** respondents are unable to wash (or be washed) regularly.
- **One in five** respondents are unable to go to the toilet when they need to.
- **One in ten** respondents do not have a toilet at home they can use.
- **One in four** respondents do not have a bath or shower at home they can use.
- **One in three** respondents are unable to move around their home easily using the mobility aids they need.

It is a significant mark of shame that there are deaf and disabled people in the borough living without toilets they can use, without access to food and drink, or washing and unable to navigate their own homes.

Addressing both the individual crises that this represents and the wider experiences of difficulty accessing services, exclusion from life in the borough and exclusion from the decision-making process requires a co-ordinated cross-borough response. This must take into account the combined impact of the pandemic and the cost of living crisis, both of which follow a decade of austerity in which funding for social care and housing has been cut nationally.

It is essential that we examine the devastating impact of these combined crises on disabled people and what can be done to mitigate their effects.

Within the cost of living crisis:

Nationally



25% of working-age disabled adults had missed a meal because they couldn't afford it (Leonard Cheshire, 2022).



7% had less than £10 per week for food after rent and bills (Leonard Cheshire, 2022).



18.7% of single adult disabled families were very food insecure (Joseph Rowntree Foundation, 2022).



18.5% could not afford to warm their homes (Joseph Rowntree Foundation, 2022).

In Lewisham in March 2022

All residents



Almost **two out of three** deaf and disabled residents were "often worried about not having enough money".



One out of three residents did not have enough money each month to afford all their rent and bills.



Two out of five did not have enough money each month to afford all of their regular expenses.

Residents on income-related benefits



Three out of four residents were often worried about not having enough money.



Only one in three had enough money each month to pay all their rent and bills



Only one in four had enough money each month to meet their regular expenses.

Residents who paid for social care



Almost two thirds of residents did not have enough money to meet their needs..

In this context, the work of the Commission is more urgent and important than ever before. As well as long-term strategic changes, immediate review and urgent planning will be necessary for deaf and disabled Lewisham residents to survive these crises.

“I'm worried because everything is going up i.e. gas, electric and food and my benefits are not going up as much”

Strategic Change

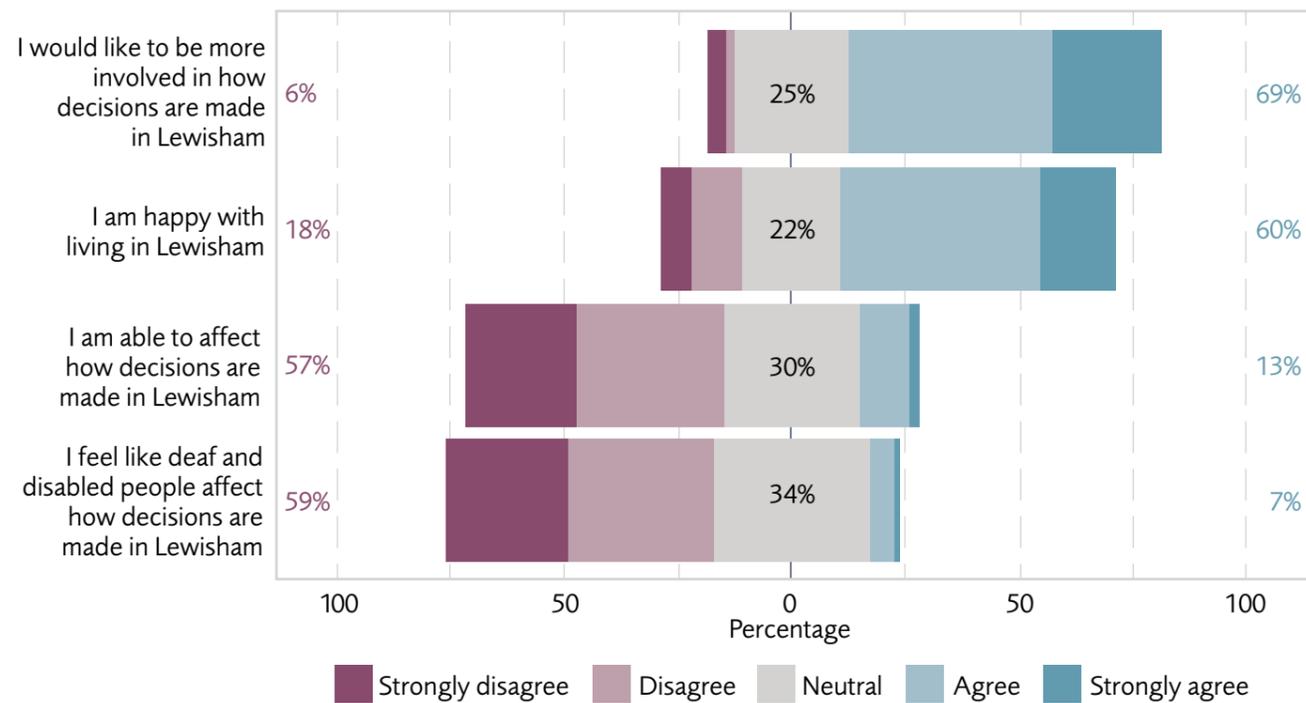
Introduction

One of the key outcomes of the work of the Commission is changing the way deaf and disabled residents are engaged within the borough. Our recommendations focus on establishing co-production and user-driven commissioning, design, and delivery.

There is an obvious desire for deaf and disabled-led work to improve the involvement of deaf and disabled people in Lewisham's decision-making, requiring enough resources to make this possible. Residents are keen to be involved in this work, but currently do not feel that deaf and disabled people affect how decisions are made in the borough.

Where work is being carried out that affects deaf and disabled people, this work must be done in co-production with deaf and disabled residents. This should take place on a basis of equal partnership and shared expertise, keeping in mind the phrase **Nothing about us, without us**. To do this, changes need to be made which affect every aspect of local work.

Living in Lewisham All respondents



Respondents were clear on the following:

“Every area should have deaf / disabled staff”

“Anything to do with deaf / disabled people should be deaf / disabled-led”

“There needs to be more involvement of deaf and disabled people working in Lewisham to ensure decisions are made well for deaf and disabled people”

“The council must “...ensure funds are available to actually make a difference...too much debate, not enough action”

“Lewisham Council by their actions need to show us they are serious about supporting people with disabilities, ‘talk the talk and walk the walk’ which means show in action what you say”

From a focus group for people with learning disabilities, run by our Vice-Chair Ifeoma Orijekwe and Peter Cronin



Introduction to key recommendations

Recommendations

1. A rights-based approach with a co-production focus

Lewisham Council formally adopts a human rights-based approach across its work, shaped by a formal commitment to the rights detailed in the UN Convention on the Rights of People with Disabilities. Council work is led by the social model of disability and the Deaf cultural / linguistic model with an understanding of the obligation to remove disabling barriers.

These policies and commitments should shape the work of the Council with its strategic partners. The Co-Production Lead should work across these partnerships to embed these principles into their practical work as well as their political position.

Human rights

A human rights approach to work for disabled people moves from an understanding of generosity in providing services to people, towards a recognition that society has a specific responsibility to protect and advance the human rights of disabled people, including in service provision.

The United Nations Convention on the Rights of Persons with Disabilities

The United Nations Convention on the Rights of Persons with Disabilities is designed by disabled people to change attitudes and approaches to the way we are treated. The convention focuses on disabled people as having human rights which must be respected.

The Convention possesses eight guiding principles:

- Respect for inherent dignity, individual autonomy including the freedom to make one's own choices, and independence of persons.
- Non-discrimination.
- Full and effective participation and inclusion in society.
- Respect for difference and acceptance of persons with disabilities as part of human diversity and humanity.
- Equality of opportunity.
- Accessibility.
- Equality between men and women.
- Respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities.

Social model of disability

The social model of disability identifies that while people have an impairment (e.g. 'their underlying health condition and diagnosis'), society disables them by placing additional barriers in their way, which prevents their full and active participation in society.

The traditional medicalised understanding of disability may be that 'they can't enter the shop because they're in a wheelchair'. A charity-based approach might note that 'it would be very kind of the shop to provide a ramp'. However, the social model of disability identifies that the problem isn't that the person is in a wheelchair, but that the shop hasn't been made equally accessible to everyone.

Putting the social model of disability at the heart of work related to the needs of disabled people means recognising that society has an obligation to remove the barriers it places in the way of disabled people's full and active participation. Responsibility for removing the barriers to service access sits with those providing the services.

The Deaf cultural / linguistic model

The Deaf cultural / linguistic model rejects the "medical definition of deafness" as either a loss or impairment. This is comparable with the social model of disability and disabled people's rejection of a model that ascribes the barriers we face to our medical conditions rather than to a lack of access provision in society.

For the majority of culturally Deaf people there is no "impairment nor hearing loss". What makes the British Sign Language (BSL) Deaf community unique has been its campaign to be recognised as a linguistic minority. For the BSL Deaf community the capital "D" is used in a political sense to demonstrate their campaign for cultural and linguistic recognition.



British Sign Language is another of the official languages of the UK and is primarily spoken by Deaf BSL signers and their families. Recognising Deaf BSL signers as a cultural and linguistic minority (rather than defining them in hearing terms) requires services to be provided in their own language, or with competent, consistent translators selected by the Deaf BSL signers.



These recommendations fit within the Public Sector Equality Duty that the Council must abide by:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act.
- Advance equality of opportunity between people who share a relevant protected characteristic i.e. disabled persons and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.



Measures of success

- December 2023: the Council has formally adopted both the principles of the UNCRPD and the social model of disability into its work.
- August 2024: Council staff at all levels are confident in explaining how adopting the UN Convention on the Rights of Persons with Disabilities and the principles of the social model of disability has changed the way they work.
- October 2024: Strategic partners including local NHS and policing bodies can address how this change in focus can improve their work with deaf and disabled people.
- December 2024: Deaf and disabled people report a higher level of engagement with Council decision making and a stronger sense of their ability to impact it.
- December 2024: Each Council department produces a brief report demonstrating the impact of co-production on their work, to be shared with the strategic partners as a demonstration of best practice.
- March 2025: an annual reporting process is developed for Council departments and key strategic partners to report on their implementation of the United Nations Convention on the Rights of Persons with Disabilities, the social model of disability and the Deaf cultural / linguistic model.
- June 2025: Public sector organisations and other strategic partners across Lewisham at all levels are confident in explaining how adopting the UN Convention on the Rights of Persons with Disabilities and the principles of the social model of disability has changed the way they work.

2. Senior policy lead in co-production

Decisions made by the Council and its strategic partners have significant impacts on deaf and disabled people and are frequently made without genuine co-production.

*“In practice, co-production involves people who use services being consulted, included and working together from the start to the end of any project that affects them. When co-production works best, people who use services and carers are valued by organisations as equal partners, can share power and have influence over decisions made.”
(Think Local Act Personal, 2021)*

A deaf or disabled person is appointed to the role of Senior Policy Lead in Co-Production from January 2023 – December 2025, as a 36-month fixed term post within the Chief Executive's Directorate. They will be based within Lewisham Council working across the Lewisham Strategic Partnership to ensure a cohesive approach to co-production policy.

The Senior Policy Lead will embed co-production into Council strategy and operations and advise the broader Lewisham Strategic Partnership on co-production with deaf and disabled people. They will also support the development of an effective Deaf and Disabled People's User-Led Organisation to act as lead partner in the ongoing co-production work.

This role will have responsibility for:

- Supporting the growth, development, and funding applications for a local Deaf and Disabled People's User-Led Organisation (DDPULO) to operate as the key co-production partner for bodies across Lewisham.
- Developing a **Nothing about us, without us** co-production strategy alongside deaf and disabled residents and the emerging DDPULO. This should be appropriate for applying co-production to all models of service provision from members of the Lewisham Strategic Partnership. It includes processes to ensure future co-production with deaf and disabled people in the borough operates as a genuine and equal form of engagement.
- Providing policy advice and recommendations as related to deaf and disabled people across Lewisham whilst building capacity across departments to undertake this work in the long-term.
- Establishing and supporting 'co-production champions' within departments and organisations. Senior staff are responsible for managing co-production with deaf and disabled people, initially with focus groups and later with the DDPULO.
- Establishing and supporting a deaf and disabled residents' co-production focus group as an interim body while the DDPULO stabilises, before assisting the two groups to combine.
- Work with the DDPULO on implementing other report recommendations.

Nothing about us, without us

Creating and embedding this framework will ensure that services are designed in partnership with the people utilising those services. An effective process of co-production can:

- Engage a diverse range of disabled people with different backgrounds and experiences.
- Evidence the impact of the 'service user' input on the eventual service or policy design, delivery, or commissioning.

This requires the development of frameworks for these elements of co-production and user-driven commissioning in all areas of:

- Policy creation
- Service design and oversight
- Commissioning

This framework should address:

- How to create and support groups of deaf and disabled people through the Co-Production Lead and DDPULO, which can then engage in processes of co-production and user-led commissioning.
- The expectations on public bodies and other Council partners to engage with these groups, including requirements for embedding their perspectives and taking them forward in order to prevent a process of empty consultation.
- How to ensure that these standards are met and steps to take if this is not the case.

Assuring implementation

Within the Council, in order to ensure that the Co-Production Lead is adequately supported, a Cabinet Member is responsible for supporting the Executive in implementing these recommendations. The Co-Production Lead will be supported by a Member Champion on each of the Scrutiny Committees where their work directly relates to deaf and disabled residents.

Key strategic partners will similarly be advised to appoint an Organisational Champion within their organisation to work with the Co-Production Lead. Their role would include supporting the committee or organisation to deliver results for deaf and disabled people, including the implementation of the relevant parts of the report, its measures of success, and wider co-production development.

Measures of success

- July 2024: A deaf or disabled person is recruited to a job role based in the Council leading on co-production across the Lewisham Strategic Partnership and the wider borough.
- July 2023: A Cabinet Member takes on responsibility for owning the implementation of these recommendations for the Executive.
- November 2023: A 6-9 month project for a freelance activist to research, build and fund a DDPULO bringing together existing organisations and deaf and disabled people is successfully initiated.
- December 2023: Member Champions are in place on Scrutiny Committees whose work affects the lives of deaf and disabled adults and children to support the Committee's work on report implementation, success measures and co-production development.
- December 2023: Organisational Champions are in place with key partners across the Lewisham Strategic Partnership.

- January 2024: Focus groups and working groups and panels are established alongside the emerging DDPULO to work with all relevant key partners on the Independent Living 2030 and the Borough Access 2030 strategies.
- June 2024: The **Nothing about us, without us** co-production frameworks are completed which guide all Council departments and partners on how to ensure effective co-production with disabled people.
- October 2024: The nothing about us without us co-production frameworks are applied to all work across the Council.
- January 2025: Guidance is created for strategic partners to apply the Council's Nothing about us without us frameworks to their work.
- October 2024: Each department has a co-production champion, responsible for oversight of co-production across all policy and service development.
- December 2024: Work on the Independent Living 2030 Strategy is underway with the emerging DDPULO, the Strategic Lead in Co-Production and the Adult Social Care working group.
- December 2024: Work on the Borough Access 2030 Strategy is underway with the emerging DDPULO, the Strategic Lead in Co-Production and bodies across the Lewisham Strategic Partnership.
- April 2025: The DDPULO becomes the key co-production partner within Lewisham.
- January 2026: An assessment of whether this role should continue to receive funding is carried out following the initial 36 months.
- June 2026: All departments and partners are leading on their own co-production work with established and resilient processes and partnerships.

3. Formation, support, and initial resourcing for a Deaf and Disabled People's User-Led Organisation (DDPULO)

As the survey demonstrated, deaf and disabled people do not feel involved in co-production work in Lewisham currently. There is no representative body to work on co-production and service design.

We recommend that the Lewisham Strategic Partnership co-ordinate and resource the establishment of a representative Deaf and Disabled People's User-Led Organisation in Lewisham.

What is a A DDPULO

A Deaf and Disabled People's User-Led Organisation (DDPULO) is an organisation, typically a charity or Community Interest Company, run by deaf and disabled people. Its leadership is usually 75% or greater from deaf and disabled people. There are a wide range of models for how DDPULOs operate and they can focus on areas such as advice, support and advocacy, campaigning, co-production and research.

They are often funded through a variety of means, including from the Local Authority, Clinical Commissioning Groups or Integrated Care Systems and other key local partners, usually through core funding and / or service delivery contracts. They also access finance through fundraising and external grant funders such as Trust for London or the National Lottery.

In Lewisham, a number of smaller DDPULOs exist, but there is no umbrella organisation currently working as a critical engagement partner to bring together other organisations and the wider community. This makes co-production more challenging across the strategic partnership.

What is the value of a DDPULO?

DDPULOs bring key added value to service delivery and offer a great deal to decision makers. They possess expertise of collective lived experience as well as local knowledge, and are an authentic voice by and for local disabled people. DDPULOs have a deeper understanding of the needs of disabled people, the issues faced and barriers and opportunities. They also increase disabled people's participation in decision-making, service delivery and development, and the ability to help public bodies meet their Equality Act duties.

The creation of a DDPULO would also provide economic benefits through identifying added-value services which would be targeted and cost-effective, supporting and expanding personalisation across health, social care and benefits systems, leveraging additional resources from external funders benefiting disabled people in the community, and providing employment opportunities for local disabled people. (Inclusion London, 2021)

Through connecting local disabled people, the establishment of a DDPULO would have a significant role in peer support, providing specialist expertise in supporting disabled people to be independent, have choice and control over their daily lives and to develop their confidence and skills. Peer support models are known to be cost-effective, especially in the context of support planning and brokerage. (Campbell, 2011), (Williams et al., 2014).

A properly resourced DDPULO would allow co-production with partners across Lewisham, focusing on the Independent Living and Borough Access strategies. The establishment of this DDPULO would need to contain a diverse range of disabled people and could offer the Council and its partners consultancy and unique insight into the issues faced by disabled people. In addition, the DDPULO could help design and deliver needs-led services, offering innovative solutions to existing challenges (Williams, 2014), (Social Care Institute for Excellence, 2013).

The DDPULO should initially be supported by the Co-Production Lead. As the Co-Production Lead role comes to an end, the funding should be directed towards supporting and commissioning the DDPULO to support co-production within the Council and with its strategic partners long-term. As it stabilises, the DDPULO will recognise areas of need and apply for further funding grants in order to expand its work into those areas.

To do the initial work of building a resilient and appropriate organisation, funding would be required for a freelance consultant working for 6–9 months. They would work independently of all bodies within Lewisham, including the Commission. The freelance consultant would work closely with both the Co-Production Lead and local deaf and disabled people.

Their role would involve:

- Scoping the possibilities of a local DDPULO.
- Connecting with local deaf and disabled individuals and organisations, bringing them together.
- Designing an organisational blueprint and creating resilient structures around finance and governance.
- Working with the emerging DDPULO on grant and community fundraising.

The role should be commissioned in consultation with Inclusion London. They are a deaf and disabled-led organisation with experience in capacity-building in the disabled people's movement. They would be capable of sourcing someone with the appropriate skills and expertise.

The DDPULO would initially need to secure three years of funding to cover core costs, which would be one of the roles of the consultant. Fundraising options towards this include grant funding for projects, service delivery commissions from across Lewisham, and corporate work such as equality and diversity training.

The DDPULO would initially also support with implementing our findings, including:

- a. Creating and maintaining a representative steering panel of deaf and disabled people which provides consultation and advice to all strategic partners on areas of work that overlap with deaf and disabled residents. This could work in a model such as that of the Positive Ageing Council.
- b. Creating and leading a user-group to work with Adult Social Care and on the co-production, development, and implementation of the Independent Living Strategy.
- c. Creating and leading a user group to work on the co-production, development, and implementation of the Borough 2030 Access Strategy.

The DDPULO will share responsibility with the Senior Policy Lead in Co-Production to ensure the recommendations made within this report are implemented as far as is feasible.

Measures of success

- A 6–9 month freelance role is funded to carry out a specific piece of work, which includes:
 - Connecting deaf and disabled people and existing DDPULOs across the borough.
 - Researching and understanding what people need from a DDPULO.
 - Carrying out the human-centred design required to develop a co-produced blueprint for a DDPULO in Lewisham.
 - Identifying sources of core funding for an emergent DDPULO and agreeing formal governance structures.
 - Applying for operational funding for this DDPO in an ongoing manner.
- A DDPULO is supported by the Co-Production Lead to form, bringing together existing DDPULOs and deaf and disabled residents.
- It has received core funding for three years of operation, either from a single grant-maker or a range of grant-makers.
- Policies are developed which mandate co-production with the DDPULO when developing policies and services and in commissioning and procurement processes of services which have a priority impact on deaf and disabled residents.



Short-term actions

Area of work, Cost of Living Crisis

The cost of living crisis will disproportionately impact deaf and disabled residents, and especially those experiencing intersecting marginalisations.

This will almost certainly lead to avoidable mortality due to hunger, cold, the mental health impact of poverty, debt and more.

Where people pay for adult social care, they may be living on a fixed income which is lower than that of similar disabled people who do not access adult social care services.

Recommendations

- a. An urgent review to assess the impact of the cost of living crisis on deaf and disabled residents locally in order to address what additional support may be required.
- b. A co-ordinated, strategic, cross-departmental and multi-partner approach that recognises the enormous disproportionate impact on disabled people.
- c. An analysis of the financial situations of disabled people who may not have received significant support from central Government or who may have recently lost eligibility for the warm homes discount scheme.
- d. A process developed to offer financial support to disabled people who face unavoidable extra energy costs due to running essential medical equipment, needing a certain temperature indoors, or facing additional energy costs due to the presence of essential carers.
- e. An immediate uplift to the Minimum Income Guarantee and Personal Expenses Allowance to reflect the level of inflation since the rates were last set.
- f. A commitment not to allow local benefit deductions or charging for adult social care to take people below the UK poverty line - currently £141 per week (Trust for London, 2022). Where someone is in receipt of Personal Independence Payments they should not be counted as income for the benefit of these calculations as it is there to mitigate the additional costs faced by disabled people.
- g. A commitment not to levy deductions of benefits for council tax arrears (or other local arrears) until at least August 2023 and to pause any existing third party deductions until that date where it has the authority to do so.

“ I will struggle to pay for [adult social care] service ”

“ I am very worried that I am going to have to either heat or eat ”

Area of work, Borough Access

Disabled people struggle to navigate the borough due to dangerous road design, damage to accessible pavements and crossings, blocked pavements and a lack of facilities such as public benches and toilets. Many local venues do not offer step-free access, preventing some disabled people (including people who are not wheelchair users but cannot climb a step) accessing them. Blue badge parking is not enforced and parking across dropped kerbs frequently block wheelchair access.

Recommendations

- a. A moratorium on development of 'shared space' and same-level pavements and cycle lanes and / or roads without kerbs or appropriate paving to distinguish vehicle and cycle space from road space.
- b. A commitment to developing future cycle architecture in partnership with blind and partially sighted people.
- c. Creation of a reporting strategy through Love Clean Streets for access issues and commit to repairing those as a priority. Categories should include:
 - i) Damaged or missing dropped kerbs.
 - ii) Damaged or missing tactile paving.
 - iii) Blocked pavements causing barriers to access for requesting repair to damaged tactile paving and wheelchair access on pavements, roads, and kerbs, using new sections added through an online form and Love Clean Streets.
- d. Assessing and increase the number of benches, public toilets, wheelchair adapted public toilets, and Changing Places toilets in the borough.
- e. Using Love Clean Streets to pilot the possibility of disabled people reporting local buildings which do not provide wheelchair access, allowing the Council to use all appropriate resources to influence them to become Equality Act compliant, including writing to them, offering advice on basic adaptations and utilising planning and licensing levers where appropriate for enforcement.

“There is no research supporting “shared space”, it places visually impaired people at risk of death”

“More dropped kerbs are needed”

“I hope that Lewisham will become more accessible but I think it is also important to remember that for visually impaired people (VIPs), pavements are crucial especially those with guide dogs etc otherwise it can be very dangerous. Kerbs let us know we are at the boundary of the road. But where they don't exist, we could step out onto a busy road”

Area of work, Communications

Many key local communication services are not accessible to Deaf signers, people who require Easy Read documentation or those who require plain English. This also disadvantages many people who speak English as a second or other language.

Recommendations

All public-facing information should be reviewed in full with regard to ensuring Deaf BSL signers and people with learning disabilities have full access to information, including by employing expert Deaf BSL signers and people with learning disabilities as consultants.

A strategy for future accessible communication is developed to ensure all appropriate formats are provided or alternative methods of accessing the information within are available.

Deaf equality and Plain English (or a suitable alternative) training is offered across all public facing staff, along with broader disability inclusion and equality training.

The Lewisham Council website is

- “...completely inaccessible to Deaf signers apart from one BSL video clip which gives information about the BSL VRS service. This is however difficult to find on the website.”
- “The Lewisham Council website could be better for people with learning disabilities.”
- We need “...teams set up with training on how their professionals speak to, deal with or help people with a disability.”



“

A service for Deaf BSL signers should be commissioned which offers interpretation with reliable, consistent interpreters across the local Council and NHS services, in-person and virtually

”

Access 2030: Long-term change

Single point of access for support and signposting

Deaf and disabled people spend a considerable amount of time interacting with systems and often struggle with accessing services. There is no disabled-specific signposting within the borough, but signposting alone without support often still leaves people to 'fall through the cracks' between services.

We propose designing and commissioning a single point of access service, where deaf and disabled people connect with a navigator to support them through accessing service provision based on their individual needs. This might include attending meetings, following up interactions and ensuring access needs of deaf and disabled people are met.

Barriers

Survey and focus group respondents noted difficulty with accessing services, understanding who to contact and when, services not following up or responding and complaints not being addressed.

Observations

The difficulties with accessing services were noted from respondents across the survey and the focus groups - both those open to all deaf and disabled residents and those for Deaf BSL signers and people with learning disabilities. This indicates a wider problem affecting all deaf and disabled residents.

This should ideally be a deaf and disabled-led service. Peer support has been shown to be cost effective in support planning (Campbell, 2011; Williams et al., 2014) and is likely to be cost effective here also.

“The provision of a service which supports [deaf residents] with accessing Council Services, forms filling, translation and support with making phone calls is a vital safety net”

Recommendations

- A single point of contact should be created within the borough for deaf and disabled residents which offers internal and external signposting and supports the user-journey of deaf and disabled residents throughout their interaction with services provided by the Council and its strategic partners.
- This should be offered in-person, online, by email and by telephone, in spoken English, written English and British Sign Language and with access to other translators where necessary.
- This should include a co-commissioned service for Deaf BSL signers which offers interpretation with reliable, consistent interpreters across services provided by the Council and its strategic partners, both in-person and virtually, as well as support with translation, telephone calls and letter communications.
- This should be commissioned from the DDPULO, potentially in partnership with the National Lottery or other grant-makers. This could operate along a similar model to the Navigators programme run by West England Centre for Inclusive Living. Here, Navigators are able to support deaf and disabled people with any issues that are affecting their lives and overlap with their experiences, including housing, health, care, benefits, and finance and debt.

“People want clear guidelines and one on one help for specific things. There are too many services running on low levels when it should be one big service that everyone knows that can directly pass you on to the exact people you need”

Independent Living 2030 Strategy

It is clear from the research and work of the Commission that many people use services provided through adult social care (or NHS Continuing Healthcare) in order to live independently. There are also others who would benefit from support to live independently who don't currently receive this. For people who do, many find the process of accessing and retaining adequate care packages to be adversarial and that the cost of adult social care pushes them into poverty.

Charges for adult social care cannot be taken from earned income, but can be taken from benefits (means-tested and non-means-tested), pensions and savings. This occurs when "most of us already live in poverty" and is "a tax for being in a vulnerable minority group" putting disabled people who receive social care into poverty over and above those who do not receive it.

Charges being taken from means-tested benefits and pensions results in people who have higher support needs being left with less income than people with lower support needs receiving the same level of benefits or pension. Charging from savings prevents working-age disabled adults ever saving towards items like expensive mobility equipment (wheelchairs and adapted cars can cost £30,000) or house deposits.

We recognise that in the current climate abolishing charging for adult social care in Lewisham would require either significant internal restructuring or a national change in how it is funded.

However, the Independent Living 2030 Strategy should be guided by a commitment to the principle that social care should be free at the point of access and a commitment to make changes to reduce the burden of adult social care charging.

“ Social care charging is evil and immoral, it's a tax for being a vulnerable minority group, most of us already live in poverty ”

“ We get left living with our parents, as this is easy for the Council ”

“ I would like to have my own home with a live-in carer, but because I don't get the hours, I won't get that support ”

“ It seems because I live at home I do not need social care input, which is very frustrating because perhaps I don't want to live at home ”

“ I have had to fight continuously to retain my small care package, though my physical complications remain ”

A long-term co-produced Independent Living Strategy would put disabled people and the emerging DDPULO at the heart of restructuring adult social care, centring a group able to realise the service design benefits of co-production and explore cost-savings that come with increased personalisation.



It would also enable the Council to work alongside the DDPULO and other bodies to explore the feasibility of making adult social care free at point of access, the national policy changes that might be required to achieve this and to take steps to reduce the current cost of adult social care.

Barriers

Services are currently provided to disabled people by adult social care (or NHS Continuing Healthcare). These do not necessarily reflect the desires, needs, and priorities of disabled residents, nor do they necessarily provide the most beneficial and cost-effective service they could. Evidence suggests that direct payments could make cost savings of 6-12% compared to commissioned care, based on data from earlier trials (Glasby et al., 2010).

Adult social care is chargeable for many disabled people, including those on income-related and disability benefits. Two individuals may receive the same benefits, but because one requires care, a portion of their benefits are taken. In the same vein, an individual without social care needs is able to keep their full allocation of benefits, leading to a paradoxical situation in which people with (often, but not always) higher support needs are left with less money because they are 'more disabled'.

For disabled people subject to immigration restrictions, the Council may not be legally allowed to provide care beyond that required to meet their human rights.

“

When I first started using direct payments, which must be about ten years ago now, the Council...had a group that was running every couple of months where people would come in and discuss with social services their experience of direct payments. There was an attempt to kind of build on that experience and there was, what felt for a period of time, like a genuine kind of listening process going on.

”

Observations

Recently, there has been a paucity of research more on the cost-effectiveness of direct payments. However, the general consensus appears to be that "...at worst, this way of working seems to be able to achieve better outcomes for the same money – and this is a major achievement by itself," (Glasby et al., 2010).

Whilst the local authority cannot leave disabled people with less than a figure known as the minimum income guarantee, they are not obliged to charge for care at all, and Hammersmith and Fulham does not charge for social care.

Lewisham Council should consider the position of, effectively, taxing the most disabled people for having higher care needs, and whether this is in accordance with its other stated aims around equity, inclusion, and equality for all residents.

Recommendations

Strategy

A co-produced Independent Living Strategy is developed alongside the analysis of the financial impact of ending charging for adult social care, and movement towards ending care charging over time.

The development of this strategy would be carried out by the Co-Production Lead and the emerging DDPULO. The strategy would reflect both the financial position of the borough and the expertise and recommendations of a representative group of disabled residents. It would need to be developed in co-production with adult social care and NHS continuing healthcare.

The strategy would focus on how resources could be best allocated to maximise holistic benefit for people using adult social care and NHS continuing healthcare. By doing so, this strategy would be designed to realise the benefits of supporting people with 'independent living', as appropriate for them, thereby centring 'choice and control' over one's own life in a person-centred manner.

This must recognise that 'independent living' is not a euphemism for cutting support, but an approach to providing deaf and disabled people with the support they require to lead self-directed lives as a part of their communities.

This Independent Living Strategy should not be limited to a partnership with adult social care and NHS Continuing Healthcare but should work across the borough, with input from housing associations, other NHS bodies and current care providers. This ensures changes can be implemented with a whole system approach integrating the ICS and social care with the other areas of service provision. These are required for alterations to independent living, and preparing current care providers for changes in policy and approach.

This strategy should also advocate for Local Authorities to be permitted to fund adult social care for people in breach of immigration restrictions in the same manner as that for all other adults. This would reflect Lewisham's status as a Borough of Sanctuary.

Adult social care: free at the point of access

This strategy should also focus on what a better adult social care sector would look like, campaigning for it to be free at point of access for Lewisham residents.

In order to achieve this:

- Lewisham Council commits to the principles of the National Independent Living Support Service campaign for a co-produced, disabled-led, locally delivered independent living support service funded through general taxation (Ibbs, 2019). It should work with other local and national DDPULOs and Local Authorities to campaign for this service to be developed by the Department for Health and Social Care.

- A detailed financial analysis should be undertaken to assess the income the Council receives through charging for care, the costs of administering the financial assessment process and recovering the money, the costs of any debt proceedings and what the budgetary impact would be of no longer charging for social care locally.
- A strategy for moving towards an end to social care charging should be developed, with interim stages as required. This should be two-fold, including local and national work:
 - A national element of building campaigns alongside other Local Authorities, in partnership with political parties and through putting pressure on central Government.
 - A local element of addressing the most unjust elements of social care charging by increasing the minimum amount of money people will be left with following care charges and 'disability-related expenditure' (necessary spending on the costs of disability), creating models through which disabled social care users can save towards specific items without the savings becoming chargeable, and ensuring care recipients understand 'disability-related expenditure' and how this applies to their care charges.

One survey respondent noted that care charging is...

“ a tax for being a vulnerable minority group ”

“ I'm worried as everything is going up that I will struggle to pay for service [adult social care] ”

Borough Access 2030 strategy

The work of the Commission has demonstrated that there are a wide range of issues affecting deaf and disabled people living within the borough. Addressing these issues in isolation will be challenging and real change is more likely to be achieved through a long-term access strategy which puts deaf and disabled people at the heart of the borough.

This strategy will require a range of workstreams to address issues raised by the Commission and further issues outlined by people as the strategy is developed. It would need to be developed alongside all partners working within the borough in order to ensure that all recommendations and prioritisation decisions reflect the capacity and priorities of these partners.

Barriers

There are a wide range of barriers to equal access across the borough that are faced by deaf and disabled people. These include:

- Navigating the borough as pedestrians.
- Accessing seating and toilets.
- Navigating and affording public transport in the borough for disabled people and their carers.
- Inaccessible public transport.
- A lack of appropriate and adapted housing.
- A lack of parking, especially for blue badge holders.
- A lack of social and educational spaces for disabled people.

Observations

The immediate recommendations on borough access tackled specific barriers which could be addressed in the short-term, but while viewing them as individual issues. In actuality, these barriers reflect the systemic marginalisation and isolation of deaf and disabled people which emerges from the structure of the borough and which should be addressed.

Recommendations

A Borough Access Strategy is co-produced by the Lewisham Strategic Partnership and deaf and disabled residents, ideally through the DDPULO being established in response to this report. This borough access strategy would look more closely at the access barriers faced by disabled people living in Lewisham and would lay out the changes that will be made to those access barriers across an extended period.

These changes would include further addressing the recommendations around a moratorium on shared space (the facilities to report poor access) including damage to pavements and kerbs, blocked pavements and an increase to public toilets and benches, public adapted toilets and Changing Places toilets.

Creating an accessible borough goes beyond a strict adherence to legal minimum standards and recognises that disabled people are also often experts on access. The redevelopment of Deptford Market Yard is a key example of a process in which minimum legal standards for flooring may have been met. However, a lack of engagement and co-production with disabled people and a lack of Equalities Impact Assessment led to additional access barriers being created as this venue was redeveloped.

This Borough Access Strategy should also look into developing borough-wide strategy changes or national campaigning on other areas of concern raised by deaf and disabled residents during the work of the Commission. It makes recommendations to a wide range of bodies working within Lewisham including:

The Deptford Market Yard redevelopment

'In 2016 this redevelopment process installed an inaccessible cobbled surface for 30 to 100 metres around the station. Granite sett cobbles are not just inappropriate for wheelchairs, but also for walking sticks, bikes, pushchairs, luggage, and people with visual impairments. An anonymous source wrote: "I was shocked; I attended the BEAP on the design process and know it was pointed out that cobbles or setts are not accessible. The Council and Network Rail knew that they shouldn't lay this floor surface and without an Equalities Impact Assessment they know they've broken the law." No Equality Impact Assessment (EqIA) was completed for the work, in spite of the redevelopment also building accessible homes, improving station accessibility by installing lifts and making multiple step-free businesses.

The accessible surface standards, BS 8300-1:2018 8.4.1, formalised in 2018 (only 2 years later), state that a surface with undulations exceeding 3mm under a straight edge is not considered accessible, while the market yard used bevelled granite sett cobbles with 20mm undulations. There were also irregularities in the planning permission where asphalt mix surfaces appeared on the access documents but disappeared from the heritage statement and later planning. This development, intended to improve accessibility, ignored input from disabled users and cemented exclusion to shops and public transport for decades to come. No explanation has yet been offered as to why no EqIA was completed, and the Council currently has no plans for remedial work.

While the development met the technical standards at the time, it did not meet actual useability needs or appropriately consider access for disabled people. Meaningful engagement and co-production with disabled residents could have prevented this. Meeting minimum standards without considering overall usability is not an appropriate long-term strategy for infrastructure development.'

Rich Amm

Transport recommendations Including Transport for London, National Rail and other partners

- Subsidising or campaigning to allow for a Freedom Pass to be used at any time of the day or night.
- Subsidising free travel for carers when with a Freedom Pass holder.
- Working closely with National Rail and setting a timetable for making adaptations to inaccessible stations in the borough.
- Ensuring that community transport options for those who cannot use public transport (such as community transport schemes and that previously provided by VSL) are provided for all deaf and disabled residents who need them regardless of age.

“Shame you cannot use the freedom pass on trains first thing in the morning as I need to use these to access healthcare appointments”

“When can we expect a carers freedom pass when we need them to accompany us on public transport? The same fair rules would be good for them and help us in our daily lives”

Housing recommendations
Including Lewisham Homes, Phoenix Community Housing, local housing developers and Goldsmiths

- Recognising that there is a significant undersupply of accessible and adapted housing for disabled people.
- Committing to ensuring that 30% of housing built meets the M4(3)(2)a criteria ('wheelchair adaptable'), rather than the government minimum of M4(2), and that the maximum viable amount for each site meets the M4(3)(2)a criteria
- Reviewing the Disabled Facilities Grant scheme to simplify and clarify it.



Driving and parking recommendations

- Assessing the positive and negative impacts of the Low Traffic Networks on disabled people, committing to mitigations which might include offering exemptions on additional routes, multiple vehicle exemptions for blue badge holders legitimately using multiple vehicles and options for exemption other than being a blue badge holder. Sentiment was broadly negative regarding the LTNs, with disabled residents feeling trapped in their neighbourhoods.
- Reviewing the availability of parking for disabled people and blue badge holders, including the provision of disabled bays and assessing the feasibility of permitting blue badge holders to use residents-only bays across the borough.
- Ensuring that all 'disabled-only' parking is properly enforced and working with disabled people to understand what would be necessary to achieve this, including methods of anonymous reporting (potentially via Love Clean Streets), a sustained campaign about blue badge parking space abuse and a greater emphasis on ticketing for drivers abusing disabled bays which are under a traffic management order. Another tool for compliance could be in reflecting Bromley's 'name and shame' system for misuse of blue badges.

“ There needs to be more wheelchair accessible homes as the waiting list is far too long and people are left in dangerous homes for years ”

“ What it says about the process on the Council website is different to what actually happens. Also the form is massive and off-putting because it includes all the different situations in one form ”

“ The air quality is very bad ”

“ There are... speeding cars - despite 20 mile restrictions ”

“ I feel disabled people's opinions about LTNs have been completely ignored and are against the Disability Discrimination Act. Very few disabled people qualify for blue badges or freedom passes and often are on low incomes and can't afford taxis and find walking and cycling difficult ”

“ The main issue for me is the availability of blue badge parking. There just isn't nearly enough, anywhere ”

“ Why can't I use my blue badge to park in residential parking areas to visit others? I cannot maintain any connections with other people ”

“ Although I have a blue badge and a parking bay outside my home, the bay is usually taken up for days at a time with non-disabled drivers ”



Healthcare recommendations

- Increasing the appointments available through local GP services to reduce waiting times.
- Ensuring all patients have access to face to face appointments where these better meet their access needs.
- Increasing the local provision of mental health services.
- Provision of a 24/7 remote interpreting service for Deaf BSL signers, in the model of BSL Health Access, and co-designed by Deaf BSL signers accessing healthcare.



“GP service is almost non-existent. No appointments when I call after waiting on phone up to 45 mins, no appointments online to book”

“Changes to appointments such as digital or telephone access are fine, but it’s not always suitable and there should be a choice for those who prefer to communicate face to face”

“BSL Health access got introduced and then cut by NHS. It changed my life but it’s now gone”

“I’ve been waiting for therapy for approx 3 years because of my mental health. Numerous people, doctors and even myself have referred or self-referred for IAPT or other counselling sessions and I have never received a single letter or word back – it’s literally been almost 3 years”

Recreation recommendations

- Ensuring the borough meets its legal obligations with regard to access for disabled residents.
- Ensuring all adult learning provision is financially accessible, on good public transport links and accessible to all deaf and disabled people.
- Providing adaptive playground equipment to allow disabled children to participate in play alongside their peers.

“Bring back adult education courses that I can afford. I do not understand the concessionary requirements”

“There is apparently... no wheelchair accessible playground equipment in the entire borough”

“There are still too many places without wheelchair access - even brand new places that have to be by law”

Conclusion

The Commission was set up as part of a manifesto commitment by Damien Egan, the Mayor of Lewisham. These recommendations and appendices are the result of our work from Winter 2019 to Winter 2022.

We have identified a wide variety of barriers to full civic participation for deaf and disabled people. These exist and impact individual lives, but also the wider community of deaf and disabled people within the borough. There is a sense of under-engagement and lack of genuine co-production on work affecting the lives of deaf and disabled people. Our key recommendations focused on strategic change and whilst we have also addressed a limited number of specific barriers, we recognise that far more exist than those which have been outlined here.

We have produced expansion packs on several of the areas discussed within the report, which will offer further statistical analysis, guidance and recommendations for specific areas of work.

We have greatly appreciated the degree of engagement we have had from the Council and its partners while researching and developing these recommendations. We hope that this is reflected in the desire to embed the changes highlighted in these recommendations and that these are received and reflected upon.

As the role of the Commission comes to an end with our report and recommendations, and as we support the implementation period going forward, we are concerned that this report should not be left to ‘lie on a shelf’.

Instead, we hope that its findings be taken as crucial evidence of what deaf and disabled people in Lewisham require.

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Extension documents

Accessing Local Businesses and Venues

Deaf BSL signers

Driving, Parking and Blue Badge

Hate Crime

Healthcare

Housing

Finance, benefits and employment

Reasonable Adjustments

Social Care

Critical Unmet Care and Housing Needs

Pavements, roads and crossings

People with Learning Disabilities

Public Transport

