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## **Questionnaire - Consultation on a New Code of Practice (The Duty to Promote Disability Equality)**

The Disability Discrimination Act 1995 will be amended by the Disability Discrimination Bill to place a duty on all public sector authorities to promote disability equality. The duty on the public sector will have a significant impact on the way in which all public services are run and on improving the lives of disabled people.

The draft Code of Practice explains how the legislation seeks to improve equality for disabled people by placing this new duty on the public sector. We would welcome your views on this draft Code of Practice. We will revise the Code on the basis of comments and aim to produce a final Code in December 2005.

Please note:

The draft Code is based upon the Disability Discrimination Bill and upon regulations relating to the specific duties neither of which have been approved by Parliament, and thus may be subject to change.

We would be most grateful if you could complete this questionnaire. Please answer each question by ticking the relevant box and writing any comments in

the box provided. Please send completed questionnaires and/or written responses in the Freepost envelope provided to:

Post: DRC Consultation  
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You can send responses electronically by Email to:  
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**Responses to this consultation must be received  
by Friday 22 April 2005.**

There are two Versions of this draft Code of Practice – one for **England and Wales** and one for Scotland.

Please tick the box indicating which version you are responding to:

England and Wales....XX

Scotland.....

**The closing date for this consultation is 22 April 2005. We need to receive your comments on or before that date.**

Please fill in your name and address or that of your organisation if relevant.

Name: Discrimination Law Association

Position and Organisation (where relevant):

Address: PO Box 6715  
Rushden, Northamptonshire  
NN10 9WL

Responses will remain confidential unless respondents indicate by ticking this box  that they may be made available to the public on request.

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## **Section One – Yourself and your organisation**

The questions in this section will enable us to have a better understanding of who has responded to this consultation.

**Q1a If you are responding as a private individual, please indicate where you are based.**

Wales.....

Scotland.....

England.....

**Q1b If you are responding on behalf of an organisation, please indicate which countries your organisation covers.**

Wales..... XX

Scotland.....

England.....XX

**Q2a In which capacity are you responding to this questionnaire?**

On behalf of:

A representative organisation.....XX

Central or devolved governments.....

- A Local Authority.....
- A health sector organisation.....
- An education body.....
- A criminal justice body.....
- An employer, or,.....
- As an individual.....
- Other – please tick box and describe below.....

**Q2b If responding on behalf of a representative organisation are you a:**

- Voluntary organisation of disabled people.....
- Voluntary organisation for disabled people.....
- Trade union or professional association.....
- Other representative organisation – please tick box and describe below.....

The Discrimination Law Association ('DLA') is a membership organisation established to promote good community relations by the advancement of education in the field of anti-discrimination law and practice. It achieves this by, among other things, the promotion and dissemination of advice and information; the development and co-ordination of contacts with discrimination law practitioners and similar people and organisations in the UK and internationally. The DLA is concerned with achieving an understanding of the needs of victims of discrimination amongst lawyers, law makers and others and of the necessity for a complainant-centred approach to anti-discrimination law and practice. With this in mind the DLA seeks to secure improvements in discrimination law and practice in the United Kingdom, Europe and at an international level.

**Q2c If responding as an individual are you a:**

- Disabled person.....
- Parent or carer of a disabled person.....
- Practitioner – lawyer etc.....
- Other – please tick box and describe below...

**Q3 If you are responding as a representative of an organisation. How many people does it employ?**

- Up to 50.....XX
- 51 to 100.....
- 101 to 500.....
- 501 to 1,000.....
- 1,001 to 5,000.....
- 5,001 and over....
- Don't know.....

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**Section Two – Chapter evaluation**

This section of the questionnaire covers the individual chapters within the Code of Practice.

**Chapter 1: Introduction**

**Q4 How much of Chapter 1 have you read?**

- Read all/most of it.....XX
- Read about half.....
- Read less than half.....
- Not read any of it.....

If you have not read any of chapter 1, please go to Q8 of the questionnaire – all others please continue with Q5.

**Q5 How strongly would you agree or disagree that Chapter 1 is clear and easy to understand?**

- Agree strongly.....
- Tend to agree.....
- Neither agree nor disagree.....
- Tend to disagree.....
- Disagree strongly.....
- Don't know.....

**Q6 Is there sufficient explanation of the issues addressed in Chapter 1?**

- Too much.....
- About right.....
- Too little.....

**Q7 Are there any comments that you would like to make about Chapter 1?**

Where relevant please mention paragraph numbers. We welcome both positive and negative comments. Please write in the box below.

1.2 The definition of what constitutes a public authority for purposes of the disability equality duty is likely to be problematic, and we comment more fully under Chapter 4. However, from the outset, one issue for the DRC and effective enforcement of the general duty is how any organisation that is not listed in Schedule 1A of the RRA or is not a “pure” public authority will recognise that they are, or may be, subject to the duty to promote disability equality; further, how would such organisations know to consult the DRC Code of Practice? It would be interesting to know the level of response to the current consultation from private or voluntary sector organisations that in respect of at least some of their activities would come within the definition of ‘public authority’ for purposes of the DDA duty.

1.3 This is the same list as in 4.2. In both cases a major omission is governing bodies of educational establishments maintained by local education authorities.

1.5 It is not clear what is meant by “duties presently in the DDA”. Is this meant to include a duty to avoid discrimination and harassment? While this draft code was prepared before the DDA 2005 was enacted we presume the final version will, at some

point, refer to the extension of the DDA to prohibit discrimination by public authorities in carrying out all of their functions.

1.6 We welcome the useful exemplification of the social model of disability as the real target of the duty to promote equality; we do not see the benefit of including the last sentence.

1.8 We suggest procurement is added to the list of public authority functions.

1.15 Strictly the duty to promote race equality is a duty under the RRA 1976 and not the Race Relations (Amendment) Act 2000, which amended the 1976 Act to include the duty (parallel to description of this duty as a duty under the DDA)

1.16 The Code should also help disabled people to understand what they are entitled to expect from public authorities, since it will often be individuals or groups of disabled people who will alert the DRC to non-compliance and/or who will themselves challenge failure by public authorities to comply with the general duty.

## **Chapter 2: The General Duty**

**Q8 How much of Chapter 2 have you read?**

- Read all/most of it.....xx
- Read about half.....
- Read less than half.....
- Not read any of it.....

If you have not read any of Chapter 2, please go to Q12 of the questionnaire – all others please continue with Q9.

**Q9 How strongly would you agree or disagree that Chapter 2 is clear and easy to understand?**

- Agree strongly.....
- Tend to agree.....
- Neither agree nor disagree.....
- Tend to disagree.....
- Disagree strongly.....
- Don't know.....

**Q10 Is there sufficient explanation of the issues addressed in Chapter 2?**

- Too much.....
- About right.....
- Too little.....

**Q11 Are there any comments that you would like to make about Chapter 2?**

Where relevant please mention paragraph numbers.  
We welcome both positive and negative comments.  
Please write in the box below.

2.2 In the example, which is meant to illustrate what 'due regard' means, the final paragraph could be worded slightly differently to illustrate how an outcome that promoted disability equality could have been achieved if due regard had been given to the issues stated under the general duty.

2.3 It might be more helpful to move this paragraph, which gives some explanation of unlawful discrimination, to follow paragraph 2.4 which refers to the duty to have due regard to the need to eliminate unlawful discrimination. The phrase "the exercise of a function" is unlikely to be understood. For public authorities (which, of course, include 'hybrid' public authorities) the DDA will prohibit discrimination across the whole of what they do (other than certain statutory exceptions) and we would recommend that this brief paragraph explains that to readers.

Somewhere the Code should remind readers that under the DDA it is never unlawful to treat disabled people more favourably than non-disabled people; the Code could highlight that the issue of positive action that may be problematic on other grounds is not a problem in relation to disability.

2.4 We would recommend some sort of heading

before this paragraph so readers would know that this and subsequent paragraphs are explaining the different matters to which public authorities must have due regard in order to comply with the general duty.

It may be a matter of semantics, but as the legislation says “have due regard” which we understand to imply a continuous process, we are concerned that the same message may not be conveyed by “pay due regard” or “give due regard” (used in this and other paragraphs throughout the draft Code) which could be read as implying a single act.

2.12 The example is a helpful one, as it demonstrates how the equality duty requires more than reasonable adjustments.

2.14 We wonder whether ‘accountability’ should not also be a principle governing compliance with the duty to promote disability equality. Was it intended that ‘accountability’ would be subsumed within ‘transparency’? If so, perhaps that should be more clearly stated in paragraph 2.22.

2.18 Emphasis in this paragraph is on the achievement of outcomes, without clarifying what “outcomes” means. The example itself does not appear to illustrate achievement of an outcome, if what was desired was an increased number of employees with visual impairments.

2.19 We suggest this paragraph should be far more positive about the importance of involvement for compliance with the general duty (see, for example, para. 3.21). What involvement means should be clearer. An example illustrating how the experience of disabled people assisted a public authority to recognise what measures it needed to take to promote disability equality would be helpful.

2.22 and 2.23 As mentioned above, the relationship between transparency and accountability should be made very plain. In para. 2.23 the point should be that authorities subject to specific duties will be required to provide transparency by annual reporting, and other public authorities will need to ensure transparency by regular reporting or otherwise. In both cases authorities can build on current practices.

2.27 We suggest that this is not quite the correct question (and para 2.28 is closer to what needs to be assessed); the issue is not whether there are mechanisms to assess whether due regard has been paid to the need to combat discrimination etc. but whether in carrying out its various functions the authority has had due regard for the need to combat discrimination etc. It would be helpful to provide an example.

2.30 The first sentence is unclear. The rest of the paragraph is helpful as is paragraph 2.31.

2.35 This paragraph is unclear and governing bodies of schools are unlikely to understand what their obligations are.

2.36 The example is unlikely to be a helpful one for school governing bodies since, in reality, to secure funding for capital works in schools is extremely complicated and not easily done in one year. We would recommend using a different example in which the action would be wholly within the control of the school.

### **Chapter 3: Specific Duties**

#### **Q12 How much of Chapter 3 have you read?**

Read all/most of it.....XX

Read about half.....

Read less than half.....

Not read any of it.....

If you have not read any of Chapter 3, please go to Q16 of the questionnaire – all others please continue with Q13.

#### **Q13 How strongly would you agree or disagree that Chapter 3 is clear and easy to understand?**

Agree strongly.....

Tend to agree.....

- Neither agree nor disagree.....
- Tend to disagree.....
- Disagree strongly.....
- Don't know.....

**Q14 Is there sufficient explanation of the issues addressed in Chapter 3?**

- Too much.....
- About right.....
- Too little.....

**Q15 Are there any comments that you would like to make about Chapter 3?**

Where relevant please mention paragraph numbers or examples. We welcome both positive and negative comments, as well as any examples which you may wish to provide. Please write in the box below.

3.5 It is essential that public authorities clearly understand the provisions of the regulations containing the specific duties with which they must comply. To this end, would it be possible, in the final version of the Code, to alter the layout of the regulations so that the sub-paragraphs could be more easily distinguishable from the paragraph to which they refer, for example 2(3)(d) and 2(3)(d)(i), 2(3)(d)(ii), etc?

3.6 We would recommend an introduction that

explains the purpose of a Disability Equality Scheme since that should, to some extent, shape its contents or how the contents are presented. For example, who should see it? why? How would it benefit them to know what the authority has committed itself to do? - possibly refer to principles in para 2.14 – but also to lines of accountability and reporting lines within the authority.

3.7 Why would this be a good idea?

3.8 This paragraph should be stronger. The experience in public authorities in relation to their compliance with the RRA duty is that if at the very top of the organisation there is no real commitment to meaningful and sustained compliance at every level across the organisation, the duty will have little or no impact.

3.13 and following paragraphs – it would be helpful in the final version to show the relevant regulation reference in the margin, as is already done for sections of the DDA.

3.20 How does involvement differ from consultation? Should some explanation be provided?

3.21 This important point could benefit from an example.

3.22 Does this paragraph refer to involvement in

development of the DES or involvement more generally? Some of the bullet points seem to suggest the former and some the latter.

We do not disagree that the approach to involvement should be proportionate but the size of the authority (however that is measured - budget, number of employees, geographical area or ??) may not be the only factor that should be taken into account; for example, compare, for their relevance to the promotion of disability equality, the Ministry of Defence to the Department for Culture Media and Sport.

3.29 We have some reservations about the definitions of “practice” and “policy” as they relate to the functions of a public authority.

3.31 It would be helpful to explain what “broader community role” means in this paragraph; does it apply only to central government departments that determine or regulate activities at community level? One problem with using as an example a function of a public authority that specifically relates to disabled people is that anything they do to carry out that function can be regarded as positive, but it may be more difficult to measure whether enough is being done. It might be more instructive to choose an example that relates to a generic function, for example management of prisons or national parks, or the licensing of broadcasting.

3.34 Possibly add workforce monitoring.

3.38 If the information is not sufficient what should an authority do?

3.39 In this paragraph and 3.40 the meaning(s) of the term “measure” is unclear. The second example is a good statement of a real problem but the solution is not very clear.

3.42 This is an important point, consistent with principles of data protection, that possibly should be emphasised. Should there be some reference in the Code to the Data Protection Act?

There follows a heading “Specific measures which must be included in the Disability Equality Scheme”. Strictly to comply with the regulations a Disability Equality Scheme would not contain ‘measures’ but an action plan and a set of statements that describe methods for carrying out impact assessments and arrangements for gathering information and making use of such information to comply with the general duty.

From para 3.43 to para. 3.60 the Code describes what an authority should include in its arrangements for gathering different types of information. For greater clarity the heading and sub-headings should reflect the provisions of the regulations.

3.47 and 3.48 These paragraphs do not appear to cover what is required under regulation 2(3)(d)(i), which refers to recruitment, development and retention of disabled employees. To cover 'recruitment' will require collecting information about applicants and successful candidates and could include monitoring of each stage of recruitment to see what happens to disabled applicants. To cover 'development' will require collecting information about training (who applies, who is offered training, and what types of training), promotion (success rates of disabled employees), performance reviews, workplace benefits and facilities as well as treatment generally (harassment, discrimination, grievances, disciplinary action. To cover 'retention' will require collecting information about termination (redundancies, resignations, dismissals, end of fixed term contracts etc.), but many of the development issues would also be relevant to retention.

3.50 (please see comments above re para 3.42)

3.56 The DLA strongly supported the extension in the of the anti-discrimination provisions of the DDA to all functions of public authorities. While we note that the DDA 2005, like the Race Relations (Amendment) Act 2000, leaves in place existing anti-discrimination provisions that applied to 'services', we would expect public authorities generally to perceive their provision of services as a sub-set of their total functions. We would therefore encourage the DRC to use this Code

on the duty to promote disability equality to emphasise the comprehensive coverage of the DDA. For example, in this paragraph to refer to “those services it provides and those other functions it performs...” This is consistent with the language in the draft regulations 2(3)(d)(iii) which refer to “those services... and.. those other (our emphasis) functions....”

3.60 Is it not the case that nearly every employer, public or private sector, with more than, say, 10 employees, will have a workforce in which disabled people are under-represented. Should the comparison be with the number/proportion of disabled people or disabled people who are of working age?

3.72 We do not disagree, but recommend re-emphasising the importance of leadership from the top; managers need to be advised by someone with disability expertise but they will be more inclined to act on such advice if they know that their progress within the organisation depends on their doing so.

3.74 We endorse this narrow interpretation of the ‘exception’ provision in the regulations. We would recommend that in addition the Code should include a reminder that the general duty does not include a similar exception, but the principles of relevance and proportionality allow some flexibility of approach.

## Chapter 4: Public Authorities

### Q16 How much of Chapter 4 have you read?

- Read all/most of it.....XX
- Read about half.....
- Read less than half.....
- Not read any of it.....

If you have not read any of Chapter 4, please go to Q20 of the questionnaire – all others please continue with Q17.

### Q17 How strongly would you agree or disagree that Chapter 4 is clear and easy to understand?

- Agree strongly.....
- Tend to agree.....
- Neither agree nor disagree.....
- Tend to disagree.....
- Disagree strongly.....
- Don't know.....

### Q18 Is there sufficient explanation of the issues addressed in Chapter 4?

- Too much.....
- About right.....
- Too little.....

## **Q19 Are there any comments that you would like to make about Chapter 4?**

Where relevant please mention paragraph numbers or examples. We welcome both positive and negative comments, as well as any examples which you may wish to provide. Please write in the box below.

4.1 and 4.3 - 4.5 The DLA remains concerned that the full range of public authorities subject to the DDA duty cannot be easily identified by reference to a list, as is the case for the comparable duty under the RRA. As we mentioned above in relation to Chapter 1, a major hurdle for the DRC and the government is to bring the obligations under s.49A of the DDA to those “public authorities” that are not included in Schedule 1A of the RRA or are not other ‘pure’ public authorities.

While it is right to state in para 4.5 of this Code that if an organisation is in doubt as to whether they are subject to the duty to promote disability equality, they should conduct themselves as if they are, to achieve this in practice may be difficult. To what extent should a large organisation with a wide range of functions most of which are not functions of a public nature, for example Group 4 which currently manages one or more prison establishments but otherwise operates primarily in the private sector, be expected to comply with the general duty? Unlike pure public authorities, their staffing functions and their policies and practices

for sub-contracting are unlikely to be regarded as public functions. To operate within the principles stated in paragraph 2.14 across all of their activities, for example transparency, might conflict with operating as a profit-making corporation and primary accountability to shareholders.

The need for clarity as to what constitutes a public authority under the Human Rights Act 1998 was highlighted by the Joint Committee on Human Rights. They recommended that this could be achieved by way of judicial decision. If, however, what is desired is that organisations carrying out functions of a public nature should now be preparing for the coming into force of the disability equality duty, then, until the courts provide greater clarity, the DLA would urge the DRC or, preferably, the Secretary of State, to issue guidance on this issue.

The Code might also advise organisations to seek legal advice if they are in any doubt as to whether, and to what extent, they are subject to the DDA duty.

The issue of what is a public authority is a matter the DLA believes should be considered in the forthcoming equality review and the review of discrimination law.

4.2 As mentioned above, we suggest that “governing bodies of educational establishments maintained by local education authorities” should be added.

4.10 The question of liability under the DDA is more complicated than under the RRA, where it is clear that the public authority remains fully liable regardless of whether they or a contractor is carrying out particular functions. We note the second sentence in para 4.13. It might be helpful if more were included in this paragraph regarding the continuing liability of public authorities. We would welcome greater clarity on the position of a public authority when it contracts out one of its 'public functions' so the contractor becomes a 'public authority' with liability to comply with the general duty in respect of that function; what liability for compliance with the general duty, or for any specific duties, in respect of that function would the public authority retain.

On a more minor point, it may be helpful to indicate which groups/individuals are legally liable, ie that in most cases (other than Chief Officers of Police) it is the elected members, appointed board, governing body or the Secretary of State as opposed to officials head teachers etc.

4.12 The example could make the point more effectively if the partnership also included organisations that are not public authorities (under any definition) for example the local chamber of commerce, representatives of local churches etc. It is not clear in the example what "listed" authorities means.

4.13 If, under contractual arrangements, a private sector organisation ‘stands in the shoes’ of a public authority in respect of one of its public functions with a duty to comply with the general duty, how is it envisaged that the public authority could comply with any specific duties in respect of that function, as is suggested in this paragraph? If it is the intention that specific duties will be incorporated in the contract as obligations of the contractor, public authorities will need detailed guidance on the development of suitable specification and enforcement.

4.14 While the wide variety of public authority contracts is acknowledged; the steps that are recommended do not appear to distinguish between, for example, contracts for goods and contracts for services. As we read the first bullet-point, the Code is recommending that authorities should include in contract conditions in all contracts an obligation on the contractor to comply with the general duty and all/certain specific duties. To do this, we suggest, may in some cases be disproportionate and fall outside the test of relevance, for example in contracts for supply of goods. However, it is relevant, and proportionate, firstly to include in information to potential contractors (normally in the Invitation to Tender) information about the duty to promote disability equality and how the authority intends to comply with its duty in the context of the contract in question. It is also relevant and proportionate to

require every contractor to comply fully with all of the anti-discrimination provisions of the DDA. The benefit of including such obligation in contractual terms is that it gives the public authority power to enforce compliance through the enforcement mechanisms of the contract, rather than relying on a victim of discrimination to bring proceedings.

We endorse the other recommended steps.

It might be useful to use the example given as an illustration of a contract in which the contractor does not 'step into the authority's shoes' In this example as it has been drafted, it is not clear whether what is included in the tender documents is requirements on the intending contractor to comply with the disability equality duty, which may not be appropriate, or merely to include appropriate requirements, for example, the requirement to ensure accessibility, into the contract, with reference to the authority's disability equality duty. Further it is more likely that a requirement regarding updating and maintenance of the website would be included in the specification rather than as an amendment to the 'standard terms of contract'.

The problems we have indicated concerning lack of clarity as to what needs to be done in this complex area is an indication of the need for the DRC to prioritise guidance on procurement.

## **Chapter 5: Enforcement of the Disability Equality Duty**

### **Q20 How much of Chapter 5 have you read?**

- Read all/most of it.....
- Read about half.....
- Read less than half.....
- Not read any of it.....

If you have not read any of Chapter 5, please go to Q24 of the questionnaire – all others please continue with Q21.

### **Q21 How strongly would you agree or disagree that Chapter 5 is clear and easy to understand?**

- Agree strongly.....
- Tend to agree.....
- Neither agree nor disagree.....
- Tend to disagree.....
- Disagree strongly.....
- Don't know.....

### **Q22 Is there sufficient explanation of the issues addressed in Chapter 5?**

- Too much.....
- About right.....
- Too little.....

**Q23 Are there any comments that you would like to make about Chapter 5?**

Where relevant please mention paragraph numbers or examples. We welcome both positive and negative comments, as well as any examples which you may wish to provide. Please write in the box below.

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**Section Three – Appendices**

**Q24 Did you read any of the Appendices to the Code of Practice?**

Yes.....  Go to Q25

No.....  Go to Q26

**Q25 Are there any comments that you would like to make about any of the Appendices?**

Please write in the Appendix number that your comment relates to. We welcome both positive and negative comments.

<b>Appendix Number</b>	<b>Comments</b>

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## Section Four – Code of Practice overall

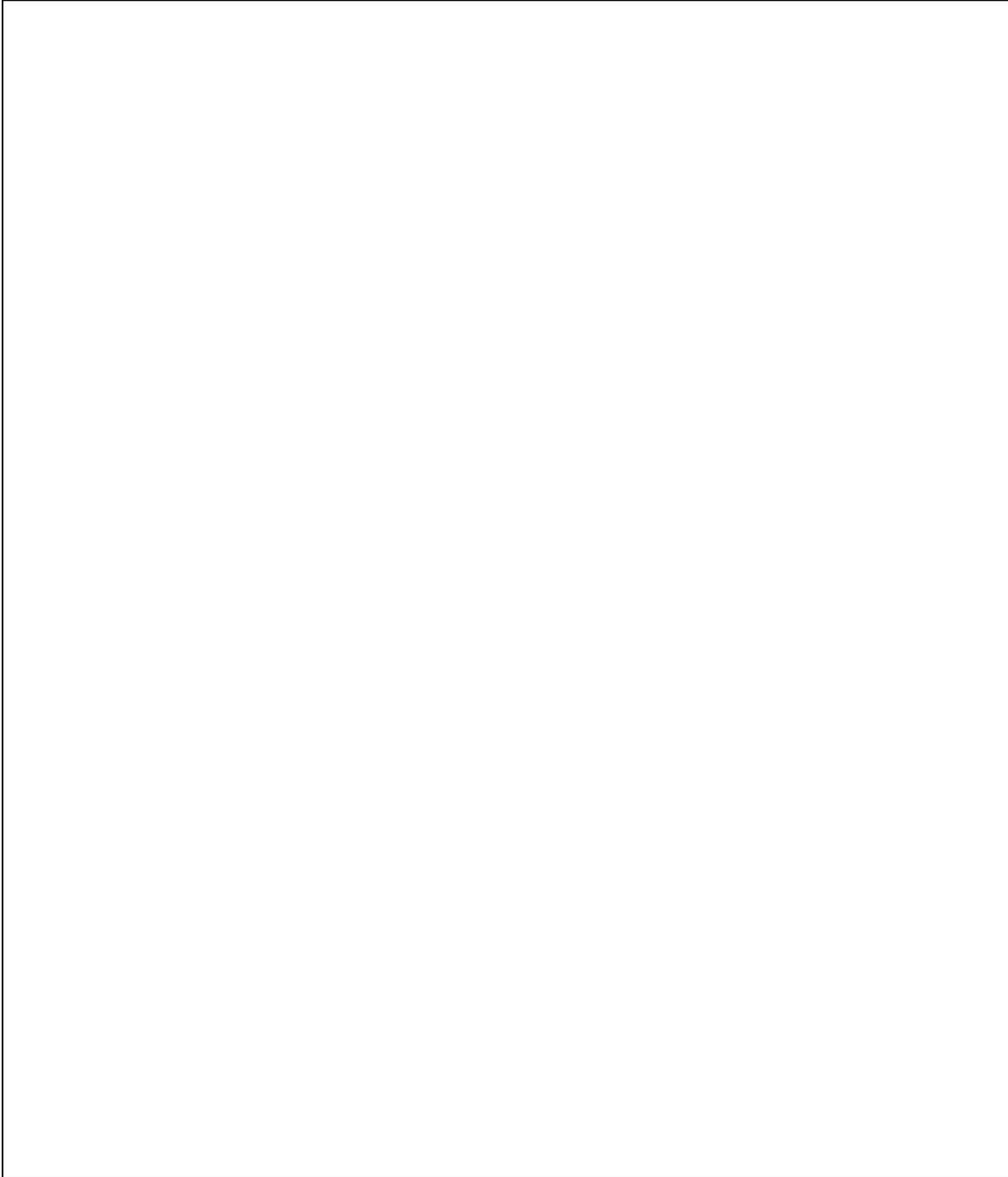
**Q26 How strongly would you agree or disagree that the Code of Practice provides you with a clear understanding of the duties that apply to public bodies and others with obligations under the Act under the revised Disability Discrimination Act?**

- Agree strongly.....
- Tend to agree.....
- Neither agree nor disagree.....
- Tend to disagree.....
- Disagree strongly.....
- Don't know.....

**Q27 If you disagree strongly or tend to disagree please tell us where the Code is unclear and/or how it could be improved. Please write in the box below.**

**Q28 Are there any other comments you would like to make about the draft Code of Practice? Can you suggest ways in which the draft Code of Practice could be improved?**

We welcome both positive and negative comments.  
Please write in the box below and continue on a  
separate sheet if necessary.

A large, empty rectangular box with a thin black border, intended for writing comments. It occupies the central portion of the page below the introductory text.

**Q29 The DRC will be producing a range of guidance on the new duties.**

Set out below are some suggestions for guidance. Please tick boxes on the right to indicate what you consider to be the top 5 and write in the box below suggestions for further guidance.

- 1. General Overview and Introduction.....
- 2. Guidance for Disabled People.....
- 3. Involvement of Disabled people.....
- 4. Monitoring.....
- 5. Local Authorities.....
- 6. Health and Social Care.....
- 7. Housing.....
- 8. Local Transport Plans.....
- 9. Planning.....
- 10. Highways.....
- 11. Education – FE and HE.....
- 12. Education – Schools.....
- 13. Procurement.....
- 14. Employment Practices.....
- 15. Effective Impact Assessments.....
- 16. Parish Councils.....
- 17. Advisory Bodies.....

Thank you very much for taking the time to complete this questionnaire. Please return it in the Freepost envelope provided. You do not have to put a stamp on the envelope.

For further copies or copies in accessible formats (such as Braille, audio cassette, disk and large print) please contact the DRC Helpline. There are 2 versions of this Code – one for England and Wales and one for Scotland – please specify which version you require.

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For a link to the online Questionnaire and the Questionnaire and Codes of Practice in downloadable formats please use the DRC website: [www.drc-gb.org](http://www.drc-gb.org)

Responses to this consultation must be received by Friday 22 April 2005.

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