

# Disability-inclusive policies in Scotland

# For a study by the Special Rapporteur on the Rights of Persons with Disabilities

1. **Introduction**

The Equality and Human Rights Commission (EHRC) is the national equality body and national human rights institution (NHRI) for Great Britain. The Scottish Human Rights Commission (SHRC) is the NHRI for Scotland. We are both ‘A’ status NHRIs, accredited by the United Nations (UN).

The EHRC and SHRC have distinct and separate functions. However, because we both promote and protect human rights in Scotland we work closely and, in particular, we work jointly to promote, protect and monitor implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD).

1. **Scope of this response**

This is a joint submission to the UN Special Rapporteur on the rights of persons with disabilities for the study on ‘disability-inclusive policies’. Our submission is based on the specific information requested by the Special Rapporteur and provides information explaining the legal and policy framework that applies in Scotland. We have also provided information about some of the issues that disabled people have raised about access to the physical environment, transport, information and communications, and other services.

The EHRC has submitted a separate response to the request for information about disability-inclusive policies in England and Wales.

1. **Background**

The United Kingdom of Great Britain and Northern Ireland (UK) consists of four countries (England, Scotland, Wales and Northern Ireland) and fourteen British Oversees Territories. The UK Parliament has devolved various powers to parliaments or assemblies in each country.

On 1 July 1999, the Scottish Parliament and Government were officially convened. The Scotland Act 1998 transferred responsibility in areas such as education, health, housing, police and justice from the UK Parliament and UK Ministers to the Scottish Parliament and Scottish Ministers. The 1998 Act also transferred functions relating to observing and implementing obligations under EU law[[1]](#footnote-1) and provides that Scottish Ministers have no power to make subordinate legislation, or do any other act that is incompatible with the European Convention on Human Rights (ECHR) or with EU law.[[2]](#footnote-2)

The UK Parliament remains sovereign. However, powers have continued to be transferred in the Scotland Act 2012 and most recently the Scotland Act 2016. The more recent powers to be transferred relate to a new Scottish income tax, equal opportunities including a socio-economic duty and responsibility for employment tribunals. Additional new powers on tax and welfare benefits are also in the process of being transferred.

1. **Information about policies aimed at implementing and monitoring the Sustainable Development Goals**

The Sustainable Development Goals (SDGs) will be monitored in Scotland through the National Performance Framework (NPF), a single framework to which all public services in Scotland are aligned, working towards a Purpose and National Outcomes for Scotland.[[3]](#footnote-3)

The Community Empowerment (Scotland) Act 2015 places a duty on Scottish Ministers to consult on, develop and publish a set of national outcomes for Scotland.

Scottish Ministers must also regularly and publicly report on progress towards these outcomes and review them at least every five years. When setting the national outcomes, Scottish Ministers must have regard to the reduction of inequalities of outcomes which result from socio-economic disadvantage.

The work of ensuring the SDGs are integrated into the NPF is currently underway. Therefore we do not yet have any information on the how the rights of disabled people will specifically be considered. SHRC is, however, a member of the newly formed working group taking this work forward. It will share existing knowledge with this group on the benefits of taking a rights-based approach to this process, including wide and meaningful participation processes with rights holders, including disabled people.

Alongside this, the Scottish Government made a manifesto commitment to integrate Scotland’s National Action Plan for Human Rights (SNAP) with the NPF. In order to lay the groundwork to support the Scottish Government in this action, while developing the Monitoring Framework for SNAP, SHRC has made a conscious effort to align, where relevant, its monitoring timeframe, outcomes and indicators with those of the SDGs and the Scottish Government NPF. These connections were also made explicit to aid SNAP Action Groups’ understanding of where each Group’s actions could also support the implementation of the SDGs.

1. **Information about the legislative and policy framework concerning non-discrimination**

### The Equality Act 2010

The Equality Act 2010 (EA 2010) applies across Great Britain, including Scotland. It provides the legal framework to protect the rights of individuals and advance equality.

The EA 2010 applies to the provision of services and carrying out public functions, the disposal and management of premises, employment and education.

Disability is one of the nine protected characteristics in the EA 2010. A person must meet the definition of disability in the Act to be protected from unlawful discrimination.

A person has a disability, for the purposes of the EA 2010, if they have a physical or mental impairment and the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.[[4]](#footnote-4)

There are different forms of disability discrimination that are prohibited by the EA 2010:

* **Direct disability discrimination** is when a disabled person is treated less favourably than another person because of their disability. Non-disabled people are protected against direct disability discrimination **only** where they are perceived to have a disability or are associated with a disabled person.
* **Discrimination arising from disability** is when a disabled person is treated unfavourably because of something connected with their disability and the treatment is not a proportionate means of achieving a legitimate aim. This form of discrimination only applies to disabled people. No comparator is needed.
* **Indirect disability discrimination** is when an apparently neutral provision, criterion or practice puts disabled people at a particular disadvantage and it is not a proportionate means of achieving a legitimate aim.
* **Duty to make reasonable adjustments** is the requirement to take positive steps to ensure that disabled people can access services in the same way as non-disabled people. The failure to comply with a duty to make reasonable adjustments is unlawful discrimination.

The EA 2010 prohibits **harassment** related to disability and **victimisation** related to raising a complaint or providing information/ evidence of disability discrimination.

It is **unlawful for employers**, except in specific circumstances, **to ask questions about health or disability** before the offer of a job is made or someone is placed in a pool of people to be offered a job.

Since disability discrimination is asymmetrical (i.e. people are not protected from discrimination because they are not disabled) it is not unlawful to treat disabled people more favourably than non-disabled people.

The EA 2010 also permits **positive action** measures to improve equality for and between disabled people. Positive action is optional; it must be proportionate and can be taken:

* to overcome a disadvantage experienced by people with a particular disability
* to meet the particular needs of people with a particular disability, and
* where people with a particular disability have disproportionately low participation in an activity.

The EA 2010 also places an **equality duty on public authorities** and those who are not public authorities but exercise public functions.

Public authorities, in the exercise of all their functions, must have due regard to the need to:

* eliminate disability discrimination, harassment and victimisation
* advance equality of opportunity for disabled people and non-disabled people, and
* foster good relations between disabled people and non-disabled people.

### Specific equality duties

In Scotland, the Scottish Government has introduced **specific equality duties[[5]](#footnote-5)** to help listed public authorities meet the equality duty. The specific duties include:

* reporting progress on mainstreaming the equality duty
* publishing equality outcomes and reporting progress
* assessing and reviewing policies and practices
* gathering and using employee information
* publishing equal pay statements that include the authorities’ policy on equal pay for disabled employees and details of occupational segregation in relation to disabled employees
* considering award criteria and conditions in relation to public procurement, and
* publishing information in a manner that is accessible.

New regulations have recently been introduced adding another specific duty that is aimed at improving diversity on public boards.

### Enforcing non-discrimination

A disabled person who believes that they have been treated unlawfully in breach of the EA 2010 can bring civil proceedings in the relevant court or tribunal.

The Equality and Human Rights Commission is the regulatory body responsible for enforcing and promoting compliance with the EA 2010, including the public sector equality duty. The EHRC has a range of advice, promotion, research, enforcement and strategic litigation powers. In particular, the EHRC:

* has regulatory responsibility for promoting equality and for ensuring compliance with the EA 2010
* can take legal enforcement action such as carrying out inquiries, investigations and issuing unlawful act notices, and
* can provide legal assistance to the victims of discrimination, intervene in or institute legal proceedings and make applications to court for an interdict to prohibit a person from committing an unlawful act under the EA 2010.

The UK House of Lords Select Committee on the Equality Act 2010 and Disability recently looked at the provisions and implementation of the EA 2010 in relation to how it serves disabled people.[[6]](#footnote-6) Please see the EHRC submission for England and Wales for further information about the Select Committee’s findings.

### Scotland’s National Action Plan

SNAP has seven Outcomes which are grounded in the principles of a human rights-based approach (empowerment, participation, ability, accountability, non-discrimination and equality) all of which have relevance to improving the realisation of the rights of disabled people. While the principle of non-discrimination permeates all seven Outcomes, a particular emphasis is placed within Outcomes 6 and 7, which focus on the ability to enjoy quality public services that respect dignity, irrespective of who someone is or of where they live. They also focus on improved opportunities and life outcomes for everyone, while at the same time seeing an overall reduction in inequality of opportunity and outcomes in Scotland.

### Scottish Government CRPD Delivery Plan

The Scottish Government has consulted on its Draft CRPD Delivery Plan (2016-2020). The Draft Plan sets out the Government’s approach to implementing CRPD in Scotland and sets out the changes that it wants to achieve in areas such as transport, housing, health, education and justice. In the Draft Plan, the Government has committed to doing everything it can to ensure that disabled people are empowered to participate fully, communication is accessible and inclusive, and the barriers facing disabled people are known, understood and addressed.[[7]](#footnote-7) We understand that the final plan will be published in the summer.

1. **Information about access to the physical environment and housing**

Scottish Ministers have introduced building regulations to secure the health, safety, welfare and convenience of people in or around buildings, and of others who may be affected by buildings or matters connected with them. The regulations are mandatory, but the choice of how to comply lies with the building owner.

The Scottish Government has produced two Technical Handbooks (for domestic and non-domestic buildings)[[8]](#footnote-8) for the purpose of providing practical guidance on the requirements imposed by the building regulations. The mandatory Accessibility Standards are included in the Safety Standards. The building regulations in Scotland are enforced by local authorities.

Disabled people still face barriers to accessing the built environment and shared space. The most common barriers disabled adults experience when accessing buildings are: stairs; doors or narrow corridors; inadequate lifts or escalators; parking problems; lack of ramps/ handrails; footpath design and surfaces; difficulty with transport to the building; and lack of help or assistance.[[9]](#footnote-9)

There is a lack of accessible housing across Scotland and no mechanism that guarantees accessible housing for disabled people. The Scottish Housing Conditions Survey found that 62,000 households in Scotland require specially adapted baths or showers but do not have them, and that 17,042 wheelchair users in Scotland lack appropriate accommodation.[[10]](#footnote-10)

Disabled people are over-represented in social rented housing. However, they are often failing to find suitable accommodation and living in unacceptable conditions. The reasons for this are reported as the lack of accessible housing stock in the social housing sector and allocations policies that are perceived as being unfair.[[11]](#footnote-11) Disabled people have called on the Scottish Government to take steps to ensure that existing social housing stock is better used by introducing local and national registers of accessible housing[[12]](#footnote-12) and by requiring at least 10 per cent of new developments of 20 homes or more to be built to wheelchair accessible standards.[[13]](#footnote-13)

Disabled people in Scotland have serious concerns over the implications of Shared Surface and Shared Space design for disabled, blind and partially sighted people. Shared Space removes street signs, road markings and pavements and instead is a public space that is shared by pedestrians and vehicles. The concern is that some disabled people may be put at increased risk of injury and death by Shared Space street design.[[14]](#footnote-14)

1. **Information about access to transport**

The Office of Rail and Road is responsible for making sure that train and station operators in Britain have policies and practices in place that protect disabled passengers. If a train station is inaccessible, train operators must provide, without extra charge, an appropriate alternative accessible service to take disabled passengers to the nearest or most convenient accessible station from where they can continue their journey.[[15]](#footnote-15)

The UK Government Department for Transport and Transport Scotland have produced Design Standards for accessible railway stations.[[16]](#footnote-16)

The Scottish Rail Accessibility Forum[[17]](#footnote-17) brings together representatives of the Scottish rail industry and disability organisations to discuss and advise Transport Scotland on:

* the implications of proposals arising from Department for Transport on issues relating to disabled access
* how the rail sector in Scotland is able to support disabled people to use its services and how Transport Scotland can promote this
* developments relating to the Code of Practice on Train and Station Services for Disabled Passengers and Rail Vehicle Accessibility Regulations (RVAR)
* the continuing roll-out of the ‘Access for All’ funding stream, including the selection of stations for future development, and
* the development of the Transport Scotland programme of work relating to disabled access to rail services.

The Mobility and Access Committee for Scotland (MACS) was established by the Transport (Scotland) Act 2001 as an Advisory Public Body to give advice to Scottish Ministers on matters relating to the needs of disabled people in connection with transport. Members of the MACS include disabled people and the Convenor must be a disabled person. MACS provides advice on accessibility in relation to transport and works with private and public operators on planning and regulating transport facilities to ensure they are accessible.

The protection from disability discrimination in the EA 2010 does not apply to services involving transport by air. Under European law,[[18]](#footnote-18) disabled people have a right to access air travel and to assistance when flying to, from and within Europe. The regulations are enforced by National Enforcement Bodies in each Member State.

The Scottish Accessible Transport Alliance (SATA) has identified five main areas where there are significant barriers facing disabled people to available, accessible, affordable and acceptable transport services.[[19]](#footnote-19) These are:

1. The absence or infrequency of services, for example in isolated communities and rural areas, and those which are not interconnected.
2. Physical barriers that prevent them from getting access to transport services.
3. The affordability of transport services, despite concessions and discounts where these exist.
4. A lack of information needed by users and potential users of accessible transport services both in terms of the details provided and the way it is provided or communicated.
5. Attitudinal or psychological barriers that prevent or discourage disabled people from using transport services. This could involve the behaviour and attitudes of some transport staff or concerns that people have about using transport, such as fear of crime, abuse or attack.
6. **Information about access to information and communications**

The Independent Living in Scotland (ILiS) project (a long-term project funded by the Scottish Government) set up the Inclusive Working Group which included people with communication support needs, pan disability organisations and practitioners. This Group produced the Principles of Inclusive Communication – an information and self-assessment tool for public authorities.[[20]](#footnote-20) This tool includes ten indicators to support public authorities to apply the six principles of inclusive communication.

The Improvement Service (an agency of the Scottish Government) works with Scottish local authorities and their partners to improve the efficiency, quality and accountability of local public services. The Improvement Service supports the Principles of Inclusive Communication through its Public Service Improvement Framework (PSIF). The PSIF is a self-assessment framework used by 30 public authorities across Scotland. The PSIF includes the ten inclusive communication performance indicators.

1. **Information about access to support in education**

The Education (Additional Support for Learning) (Scotland) Act 2004 places duties on local authorities and other agencies to provide additional support where needed to enable any child or young person to benefit from school education. The Scottish Government published a Code of Practice[[21]](#footnote-21) to explain the duties on education authorities and other agencies. Education authorities and other agencies must have regard to the Code when carrying out their functions.

The legislation requires education authorities to make arrangements for the provision of independent mediation services to avoid or resolve disagreements between the local authority and parents or young people. The Additional Support Needs Tribunal hear appeals in relation to disputes about the provision of additional support needs. The Tribunal also deals with claims brought under the EA 2010 about disability discrimination in the provision of school education.

The Education (Disability Strategies and Pupils’ Educational Records) (Scotland) Act 2002 requires local education authorities and independent, grant-aided and self-governing schools to prepare and implement accessibility strategies to improve access to education for disabled pupils year on year. The duties are to improve access to the curriculum and access to the physical environment of schools, and to improve information and communication with disabled pupils. The Scottish Government has produced guidance on preparing accessibility strategies.[[22]](#footnote-22)

Disabled students or students with learning difficulties can apply for the Disabled Students Allowance (DSA). The DSA is money for higher education students to meet the extra costs or expenses they may have if they are disabled while studying that arise because of their disability. To obtain DSA, disabled students must meet the eligibility criteria. The allowance is made up of three main parts – the basic allowance, the large items allowance and the Non-Medical Personal Help Allowance (NMPH). Disabled students who have extra travel costs because of their disability can apply for travel expenses.[[23]](#footnote-23)

Despite positive legislation and support, disabled people in Scotland remain more likely to have no qualifications and are less likely to have participated in learning activities.[[24]](#footnote-24)

1. **Information about access to support in employment**

The UK Government Access to Work scheme[[25]](#footnote-25) operates in Scotland. The scheme can award a grant that will pay for practical support for disabled people to help them to start working, stay in work, move into self-employment or start a business. The grant depends on individual circumstances, it does not have to be paid back and does not affect social security/ welfare benefit payments.

In Scotland, disabled people continue to be significantly less likely to be in work than non-disabled people. In 2013, the employment rate for disabled people was 43.3 per cent compared to 80.3 per cent for non-disabled people. Between 2008 and 2013, the unemployment rate increased more for disabled people than for non-disabled people.[[26]](#footnote-26)

1. **Information about services to supported decision-making**

### Independent advocacy

A number of pieces of legislation and policy either give people a right to access independent advocacy or mention advocacy as a way to involve people. Principal among these is the Mental Health (Care and Treatment) (Scotland) Act 2003 which provides:

“Every person with a mental disorder shall have a right of access to independent advocacy; and accordingly it is the duty of—

(a) each local authority, in collaboration with the (or each) relevant Health Board; and

(b) each Health Board, in collaboration with the (or each) relevant local authority, to secure the availability, to persons in its area who have a mental disorder, of independent advocacy services and to take appropriate steps to ensure that those persons have the opportunity of making use of those services”[[27]](#footnote-27)

An equivalent right does not exist in relation to individuals with other types of disability.

Despite this right, there remain gaps in the provision of advocacy, both geographical and in terms of specific groups (for example, children and young people). In addition, the demand for advocacy outstrips supply, resulting in increased waiting times to access a service.[[28]](#footnote-28) The Mental Health (Scotland) Act 2015 introduced a duty on local authorities and Health Boards to provide information to the Mental Welfare Commission (responsible for monitoring operation of the legislation) as to how they have and will meet the duty set out above.[[29]](#footnote-29)

### Self-directed support (SDS)

The Social Care (Self-directed Support) (Scotland) Act 2013[[30]](#footnote-30) aims to empower disabled people to take as much control as they want in the process of obtaining good quality care and support and is premised on principles of increased choice, control, independence and dignity. The Act places a duty on local authority social work departments to offer people who are eligible for social care a range of choices over how they receive their social care and support. Self-directed support allows people, their carers and their families to make informed choices on what their support looks like and how it is delivered, making it possible to meet agreed personal outcomes. The support can range from services provided in the home, such as personal care, to those out of the home, such as support for education, employment, respite care, equipment and temporary adaptations.

The introduction of SDS has been supported by disabled people and their organisations in Scotland. A recent audit of local authorities’ progress in implementing SDS concluded that local authorities still have a substantial amount of work to do to fully implement SDS and recommended that they should work more closely with people who need support to develop their choices.[[31]](#footnote-31)

1. **Information about substitute decision-making**

The law in Scotland generally presumes that adults are capable of making personal decisions for themselves and of managing their own affairs. The Adults with Incapacity (Scotland) Act 2000 allows other people to make decisions on behalf of adults who are deemed to lack capacity to act or make some or all decisions for themselves, subject to safeguards being met. It protects people aged 16 or over who lack capacity to take some or all decision for themselves because of a mental impairment or an inability to communicate.

Certain decisions can never be made on behalf of a person who lacks capacity, for example consent to marriage or making a will. There are also restrictions on what another person can do on behalf of someone who lacks capacity, for example, a welfare guardian cannot place the person they are acting for in a mental hospital against their will or consent to certain treatment on their behalf.

The legislation requires anyone intervening in the affairs of an adult who lacks capacity to act in accordance with a number of overarching principles. This applies to decisions as to whether a decision-maker should be appointed on a person’s behalf, the scope of their decision-making powers and the decisions made by the appointed decision-maker. The principles are:

1. Any action or decision must benefit the person and only be taken when that benefit cannot reasonably be achieved without it.
2. Any action or decision taken should be the minimum necessary to achieve the purpose. It should be the option that restricts the person’s freedom as little as possible.
3. In deciding if an action or decision is to be made, and what that should be, account must be taken of the present and past wishes and feelings of the person, as far as this may be ascertained.
4. The views of others with an interest in the person’s welfare must be taken into account.
5. The person must be encouraged to use their existing skills and to develop new skills.

The Mental Welfare Commission (MWC) protects and promotes the human rights of people with mental health problems, learning disabilities, dementia and related conditions. It has responsibility for monitoring the implementation of the Adults with Incapacity (Scotland) Act 2000 and the Mental Health (Care and Treatment) (Scotland) Act 2003. In particular, the MWC monitors the implementation of the law and identifies any potential issues with the way in which the laws are being used.

Under the Adults with Incapacity Act (Scotland) 2000, the MWC has a role in making sure that Welfare Guardianship works in a person’s best interest and is in line with the principles of the Act. They write to every new private guardian and visit around 500 individuals a year on Welfare Guardianship to ensure that the law is working in their best interests.

Monitoring work by the MWC[[32]](#footnote-32) has identified that between 2013/14 and 2015/15:

* the number of existing guardianship orders rose by 7 per cent
* the number of new guardianship applications granted continued to rise, and
* although the number of indefinite guardianship orders has been falling, almost 50 per cent of the total orders were on an indefinite basis.

The Office of the Public Guardian in Scotland[[33]](#footnote-33) has a statutory responsibility to supervise people appointed to make financial or property decisions on behalf of an adult who lacks the capacity to make these decisions – Financial Guardianships or Power of Attorney. They also maintain a register of authorised individuals and have the power to investigate circumstances where the property or finances belonging to an incapable adult appear to be at risk.

1. **Information about support services for communication**

The British Sign Language (Scotland) Act 2015[[34]](#footnote-34) aims to promote the use of British Sign Language (BSL). It makes provision for the preparation and publication of national plans in relation to BSL and requires certain public authorities to prepare and publish their own BSL plans.

There are 70 BSL/English interpreters in Scotland registered with the Scottish Association of Sign Language Interpreters. They provide communication support to the estimated 12,500 Deaf BSL users in Scotland.[[35]](#footnote-35)

People who are deaf or have hearing loss may also need support from lip-speakers, electronic note-takers, deafblind interpreters or speech-to-text reporters. Until very recently there were no palantypists based in Scotland – now there is one. However, if this person is not available, and the service cannot be provided remotely, then additional costs of travelling from England are incurred.

1. **Types of service delivery arrangements**

As can be seen from the examples of independent advocacy and SDS above, there are a range of models of service delivery. SDS provides people with the choice to have services provided directly, to contract them themselves, or to have a mix of provision. A wide range of services are also contracted out to the third sector by local authorities and Health Boards, such as independent advocacy.

1. **Information about financial mechanisms to ensure affordability of support services**

In parallel to the Scottish Government’s CRPD Delivery Plan, the Convention of Scottish Local Authorities (COSLA), the representative organisation for 28 of 32 local authorities in Scotland, has published a Scottish Local Government Delivery Plan. It is intended to set out the contribution of local government to supporting the rights of disabled people in Scotland for the period from 2015/16 to 2018/19.[[36]](#footnote-36)

The plan contains 30 actions, including a commitment to address the issue of charging for social care. The Community Care and Health (Scotland) Act 2002 provides that free personal care is available to those aged 65 years and older living in their own homes and that payments towards nursing and personal care are available to those living in care homes. ‘Personal care’ means care which relates to the day-to-day physical tasks and needs of the person cared for (for example, eating and washing) and to mental processes related to those tasks and needs (for example, remembering to eat and wash). However, for those under the age of 65 who require care services, it is a matter for individual local authorities whether they use their legal powers to charge for services. From 2008 to 2011 the income that Scottish local authorities have generated from charging disabled people for social care services has increased by 15 per cent from £15.4 million per year to £18.2 million per year.[[37]](#footnote-37)

Current policy is based on a principle of co‐payment where, through state funding, local authorities provide free personal care for those aged over 65 and other additional services including day care, lunch clubs, meals on wheels, domiciliary services, laundry services, which are paid for jointly by the local authority and, if affordable, by people who use care services.

The campaign group, Scotland Against The Care Tax, has argued that although the income generated from charging for social care contributes to only three per cent of the cost of social care in Scotland, it accounts for up to 100 per cent of disabled people’s disposable income. This group claim that in one local authority people are paying as much as £600 per week for essential social care.[[38]](#footnote-38) They also note that charging policies can lead to people doing without essential care and support and putting themselves at risk because they need to use their income for heating or food and do not have enough to pay for social care services.[[39]](#footnote-39)

The COSLA Plan makes commitments to work alongside Disabled People’s Organisations towards greater consistency in charging policies across local authorities.

Cathy Asante (SHRC)

Laura Hutchison (EHRC)

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1. Section 57 (1) Scotland Act 1998 [↑](#footnote-ref-1)
2. Section 57 (2) Scotland Act 1998 [↑](#footnote-ref-2)
3. See [here](http://www.gov.scot/About/Performance/scotPerforms/NPFChanges) [accessed: 3 June 2016] [↑](#footnote-ref-3)
4. Section 6 (1) EA 2010 (a copy of the EA 2010 is available [here](http://www.legislation.gov.uk/ukpga/2010/15/contents)) [↑](#footnote-ref-4)
5. The Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 (available [here](http://www.legislation.gov.uk/sdsi/2012/9780111016718/contents)) [↑](#footnote-ref-5)
6. House of Lords Select Committee (2016), The Equality Act 2010: the impact on disabled people. Available [here](http://www.parliament.uk/business/committees/committees-a-z/lords-select/equality-act-2010-and-disability/publications/) [accessed: 3 June 2016] [↑](#footnote-ref-6)
7. Scottish Government (2015), UNCRPD Draft Delivery Plan 2016-2020 Consultation document, p.42. Available [here](http://www.gov.scot/Publications/2015/09/6979/downloads) [accessed: 3 June 2016] [↑](#footnote-ref-7)
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14. Inclusion Scotland (2016), Written submission in support of Petition PE01595: Moratorium on shared space schemes. Available [here](http://www.parliament.scot/GettingInvolved/Petitions/PE01595) [accessed: 3 June 2016] [↑](#footnote-ref-14)
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18. Regulation [EC] 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air. Available [here](http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32006R1107) [accessed: 3 June 2016] [↑](#footnote-ref-18)
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