



Merton CIL's Response to Merton Council's Draft Equality, Diversity, and Inclusion Strategy for January 2024 to March 2026

October 2023

Merton Centre for Independent Living (Merton CIL) is committed to addressing, in tangible ways, the marginalisation of Deaf and Disabled people. We think that the draft Equality, Diversity, and Inclusion Strategy (EDIS) for January 2024 to March 2026 provides an opportunity for the Council and local partners to work together to make Merton a more inclusive borough. We thank the Council for the opportunity to provide feedback.

Our Feedback on the Objectives Set Out in the Draft Strategy

1. We support fully the objectives set out in 1.7 and 1.13. In particular, we applaud the objective of 'developing strong partnerships with our Voluntary and Community Sector to work towards co-producing the delivery of services that increase access to services and opportunities that nurture Civic Pride' (1.7).

We believe that our members, service users, staff and Board of Trustees are well-placed to be involved in such co-production. Indeed, we have followed, with great interest, relevant developments at Hammersmith and Fulham Council, where a Disabled people's commission focused on how to remove the barriers faced by Disabled people in that borough by embedding a culture of co-production within the council, leading to at least seven council groups working with Disabled residents¹.

Likewise, we believe that our members, service users, staff and Board of Trustees can help the Council to 'improve understanding of the issues faced by local people and develop services to meet ... differing needs' and to 'improve [its] evidence base to inform ... decision making' (1.13).

¹ <https://www.disabilitynewsservice.com/successful-care-charging-campaign-led-to-huge-change-in-co-produced-policy/>

Accordingly, we were pleased that our question to Full Council on 13th September 2023 shows that the Council is open to working with us to explore the issue of adult social care charges:

Question from Pippa Maslin, Policy & Campaigns Manager to the Cabinet Member for Health and Social Care:

With reference to objective 1.13 (1) of the draft EDIS, are you open to working with Merton CIL to try to ensure that adult social care charges do not have a disproportionately negative impact on residents for whom essential disability-related expenditure already has an adverse effect on their financial security?

Reply:

Any review or refresh of our adult social care charges policies would require us to engage and consult with our community and we recognise the financial difficulties many people with disabilities face. We are of course open to working with our voluntary and community partners, in particular those who represent people with protected characteristics under the Equalities legislation.

Similarly, we are happy that our group of Access Champions, which consists of members united by the aim to make Merton more accessible, were consulted when Councillor Stephen Mercer and Honorary Alderman Peter Southgate's undertook their research for the June 2023 report on 'Public Toilet Provision in Merton'.

2. We note that in the section entitled 'A Snapshot of our Borough' (p.9), the only benefit statistic included under 'Economy and Environment' pertains to Universal Credit, which is just one of a raft of types of benefit, and that the statistics included under 'Health and Wellbeing' do not contain any reference to disability. Whilst we understand that the section is 'A

Snapshot', we think that it is worthwhile bringing these observations to the attention of the Council.

3. We note that the section entitled 'Access to Decent Housing' (p.14) does not make any reference to the need for more accessible housing for Disabled people. We urge the Council to make this an explicit consideration in their plan to 'build 400 more affordable homes on council-owned land' and to 'improve standards in social and private housing'. The London Plan has two particularly relevant targets: at least 90% of new build homes should be M4(2) units i.e. accessible and adaptable dwellings; at least 10% of new build homes should be M4(3) units i.e. wheelchair accessible or wheelchair adaptable dwellings. Data available online reveals that Merton has not met the M4(2) target since 2017/18 and has not met the M4(3) target since 2016/17. In 2016/17, 3% were M4(3)². In 2017/18, 23% were M4(2) and 3% were M4(3)³. In 2018/19, 60% were M4(2) and 5% were M4(3)⁴. In 2019/20, 72.55% were M4(2) and 7.84% were M4(3)⁵. In 2020/21, 27.42% were M4(2) and 1.94% were M4(3)⁶. In 2021/22, 12.93% were M4(2) and 8.75% were M4(3)⁷. And in 2022/23, 1.75% were M4(2) and 4.20% were M4(3)⁸.

4. We note that the section entitled 'Digital Inclusion' includes a Merton Mencap statistic pertaining to 'digital poverty' amongst Merton carers. We would like to draw the Council's attention to the latest [ONS data on internet users, showing that 19% of Disabled adults do not use the internet](#) and we urge the Council to bear this in mind when communicating information and delivering services. Some of our members and service users have reported difficulties in navigating the Council's website. And some have expressed frustration that they cannot access certain information and services at all because they are not internet users.

² https://www.london.gov.uk/sites/default/files/amr_14_final_20180927.pdf

³ https://www.london.gov.uk/sites/default/files/amr_15_final.pdf

⁴ <https://data.london.gov.uk/dataset/residential-approvals-of-accessible-dwellings>

⁵ <https://data.london.gov.uk/dataset/residential-approvals-of-accessible-dwellings>

⁶ <https://data.london.gov.uk/dataset/residential-approvals-of-accessible-dwellings>

⁷ <https://data.london.gov.uk/dataset/residential-approvals-of-accessible-dwellings>

⁸ <https://data.london.gov.uk/dataset/residential-approvals-of-accessible-dwellings>

5. With regard to Key Activity 2.2, we would like to express our interest in being part of the 'community representation' in the 'Standing Advisory Group on Equality, Diversity and Inclusion' (p.23).
6. With regard to Key Activity 2.3, we are pleased to see our organisation included in the list of organisations forming the Joint Consultative Committee (p.23).
7. We would like to express our interest in Key Activities 3.5 and 3.6, as we believe that our members, service users, staff and Board of Trustees have useful insights in this area. Although we no longer run a Hate Crime service, we have, since 2018 and with the help of Inclusion London and Stay Safe East, supported ten Deaf and Disabled People's Organisations (DDPOs) across London, with the following aims: (a) increase specialist support for Disabled survivors of violence/Hate Crime through the development of skilled Hate Crime advocates; (b) enhance prevention of Hate Crime by raising awareness and ensuring survivors are supported and recognised sooner; (c) improve quality of support through evaluation and communications policy work.
8. We have read the Executive Summary for the Full Council meeting on 13th September 2023, as we are aware of its relevance to the draft EDIS. We are pleased to see a focus on:
 - i. Reducing deprivation in the borough.
 - ii. Improving understanding of the borough's diversity and fostering better understanding between communities.
 - iii. Inclusion – including meeting the needs of Disabled people.
 - iv. Increasing the involvement of under-represented people in Council decisions.
 - v. Better reflecting the borough's diversity in Merton's employees.
 - vi. Measuring the accessibility of Council services.' (p.9-10)

We are also pleased to read that

'the Adult Social Care, Integrated Care and Public Health Directorate Plan for 2023/24 identifies a number of ... priorities specifically related to meeting the needs of disabled people' with the aim of 'increasing

independence and dignity' and 'increasing choice and control' (2.34, p.16)

and that the Council is aware of the impact of illegal footway parking on users of wheelchairs and mobility scooters (2.43 p.18) and the fact that some bus stops do not meet the requirements of Transport for London's Accessible Bus Stop Design Guidance (2.47, 2.48 and 2.49, p.18-19).

Likewise, we are pleased to read of funding for step-free access at Motspur Park train station, Tooting train station and Haydon's Road train station.

Our aforementioned group of Access Champions have already drawn attention to various access problems, such as illegal pavement parking, unsafe crossings, overgrown greenery, inaccessible green spaces, obstacles created by street furniture, and bins blocking pavements. We would encourage the Council to engage with the group.

9. We watched the Full Council meeting on 13th September 2023, as we were interested to hear the relevant discussion of the Strategic Theme of Nurturing Civic Pride. We were pleased to see various Councillors raise the following issues: the need for all train stations to have step-free access; the need for tactile paving in some public spaces; the need for a revival of the Community Toilet Scheme; the need for the reinstatement of public toilets at Morden Tube station, as well as the need for them to be accessible; the plea for the recommendations of Councillor Stephen Mercer and Honorary Alderman Peter Southgate's June 2023 report on 'Public Toilet Provision in Merton' to be adopted; the need for the improved accessibility of some public sports facilities; and the need to ensure that the Green Spaces team has accessibility training.

In conclusion, Merton CIL is delighted to see the possible introduction of the EDIS. The strategy's objectives are key to starting conversations which will hopefully lead to substantial change within our community. The strategy has the potential to provide the Council with the opportunity to embed lived experience in its decision-making processes and to move closer towards co-production with relevant social groups. We welcome the strategy's focus on intersectionality, as our members and service users are not a homogeneous group; rather, they experience intersecting issues which need to be addressed holistically.