

Consultation Response

Disability Workforce Reporting – Submitted 24 March 2022

Response on behalf of **Learning Disability Wales** to Disability Unit, Cabinet Office

Learning Disability Wales is a national charity representing the learning disability sector in Wales. We work with people with a learning disability and their families, Welsh Government, local authorities, disabled people's organisations and the voluntary sector to create a better Wales for all people with a learning disability.

Learning Disability Wales draws expertise from being the lead partner of the Engage to Change project. Funded by the National Lottery Community Fund, Engage to Change sets out to find employment for young people with a learning disability, autistic spectrum conditions, or specific learning difficulties aged 16-25 in Wales. It uses a supported employment methodology and job coaching.

Other project partners are: two supported employment agencies, **Agoriad Cyf** and **Elite Supported Employment**, and the **National Centre for Mental Health (NCMH)** at Cardiff University, our evaluation partners.

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Our response

Learning Disability Wales welcomes the opportunity to contribute to this consultation. As partners of the Engage to Change project one of our big areas of work is to support people with a learning disability into work. We will respond to selected questions in categories B - D of this consultation.

Section B: Benefits and barriers to disability workforce reporting

Do you think that greater transparency on disability in the workforce leads to more inclusive practices?

We believe that greater transparency in reporting disability in the workforce can be an important part of creating more equal and inclusive workplaces, but only as part of a broader strategy. Recording statistics on disabled

employees is important, but it's also important to note that these statistics are never simply a neutral expression of reality and simply recording how many people in a specific workplace identify as disabled tells us little about how inclusive a workplace is.

In the consultation document you report that the “disability employment gap” is 4.8% smaller than it was in 2013. This is one example of where statistics must be seen in context. The implication here is that this is due to greater inclusivity in the workplace. This is far from clear. Instead, having more disabled people in employment may be due to greater awareness of neurodivergences and other conditions in the general population, meaning that more people may be identifying as disabled. To be clear, this is unequivocally a positive development in so far that this might enable people who receive adult diagnoses to live better and more fulfilled lives. But it is worth pointing out that disability labels being more widely applied will mean that people with lower support needs might make a workplace seem more inclusive while disabled people with higher support needs might still be excluded. It is also worth pointing out that according [to ONS statistics 1.5 Million](#) UK residents (2% of the population) have reported experiencing symptoms of long covid. This is a significant increase in the overall number of disabled people in the UK. Given that there are an estimated 14.1 Million disabled people in the UK in general these developments will have had a significant effect on the disability employment gap and we are disappointed to see the statistic so uncritically presented.

Thus, while we do feel it important to gather statistics on disability, we also emphasise the need to always see these numbers in context.

Do you think that disability workforce reporting by large employers (250 or more employees) should be voluntary or mandatory?

We believe there should be an obligation on larger employers to become more inclusive towards disabled people.

Section C: Considerations if mandatory disability workforce reporting were to be implemented

Disability workforce reporting is intended to increase transparency and the recruitment, retention and progression of disabled people. Do you agree or disagree that the proportion of employees identifying as disabled is a useful statistic to report on?

As mentioned above we think that measuring the number of disabled people is important while also acknowledging that measurements are always limited in their usefulness and reliability.

In order to better understand the nature of disability discrimination in the workplace it is important to understand that disabled people are not a monolith. Instead, it's important to understand that people with different forms of impairments and differences face different levels of discrimination. People with a learning disability, for example, often face more significant barriers when trying to access employment. Equally, people of colour, people with marginalised genders or LGBTQ+ disabled people may face additional or different forms of discrimination than their peers.

We would therefore recommend developing a more nuanced measure to understand how different groups of disabled people fare in the workplace as well as a way to understand disability statistic in relation to other equalities issues. In doing this it is also very important to take [the social model of disability](#) into account which understands disability as arising out of a lack of accommodation within the social world. Any measurement that is implemented here must be developed with an understanding of these complexities.

Section D: Alternative approaches

What alternative approaches would you suggest to increase transparency, inclusion and employment of disabled people in the workplace? If you have any evidence to support this suggestion, please provide it.

As said above, measuring the number of disabled employees is only one part of a successful strategy. In addition to this, large employers should be required to also make sure that general accessibility measures are in place. Through our work within the [Engage to Change Project](#) we have demonstrated significant success with supported employment as a method to support people with a learning disability into paid employment. Large employers should be encouraged and enabled to make use of supported employment in order to increase the number of people with a learning disability they employ.

Likewise, the government should work with trade unions in order to strengthen the rights of disabled people in the workplace. It is clear that employers who have exploitative working conditions are also discriminatory towards their disabled employees. Thus, strengthening worker representation and rights more generally are important for supporting greater disability inclusivity.