

Written evidence from RNID (DEG0120)

About Us

RNID is the charity making life fully inclusive for deaf people and those with hearing loss or tinnitus. We fund research to find a cure for hearing loss – driving the development of new technology; campaign to change public perception and policy for deaf people and those with hearing loss or tinnitus; and provide practical information and support.

Up until November 2020 we were known as Action on Hearing Loss and our most recent engagement with the Committee and its individual members took place under that name.

Summary

Our recommendations in this submission are:

- We call on the ONS to collect data on the employment status of people with hearing loss broken down into groups, including the provision of a figure for those who use BSL as their primary language.
- The Government should signpost to its existing (albeit limited) resources on disability employment and work with expert organisations, like us, to provide further guidance on how to overcome or mitigate the additional barriers social distancing creates. This guidance should be promoted alongside guides to support disabled staff working remotely from home.
- We believe that the Government should look closely at the JobAccess services provided by the Australian Federal Government as a potential model to support employers to recruit, retain and develop disabled staff.
- We urge both the Select Committee and the Government to look at alternative forms of employment support for disabled people from across the UK – as well as international comparisons.

- Our research has identified gaps in the current provision of in-work support to deaf people. We believe that the Government should consider extending the provision of in-work support to deaf and disabled people to fill these gaps – either through direct provision of making funding available to specialist organisations. In doing so the emphasis should be on empowering people with lived experience to have the resource and confidence to self-advocate and provide peer support. The focus of this support should be:
 1. Support so that people can raise deaf awareness themselves in the workplace.
 2. Emotional support to help with the impact of having a hearing loss or deafness at work and give people more confidence to be open about their hearing loss, so they can get the support they need.
 3. Information about the assistive equipment and communication support available and how to access it.
- RNID believes that the Government should provide an Employers' Information Hub on Disability – providing legal information, setting out employers' obligations to disabled staff and providing condition specific information – including on reasonable adjustments – to give organisations the

confidence they need to employ disabled people. This hub should broadly reflect the Job Access service provided by the Australian Federal Government.

- Whilst we welcome the reason behind the creation of the Disability Confident scheme we are sceptical that it is having a meaningful beneficial impact on the employment prospects of disabled people. We would therefore like to see the scheme subject to a detailed evaluation process. The results of such an evaluation should then be used as the basis for further decisions on whether to reform, replace or expand Disability Confident.
- We urge the government to implement a means for Jobcentres to record the communication preference of its clients – following the lead of the Accessible Information Standard within the English NHS.
- When delivering services remotely the DWP and its providers need to ensure that they are discussing the individual's access needs with them and they offer flexibility in terms of platform used and the provision of adjustments. Assessors and advisors should have first-hand knowledge of the barriers that their customers face and where this isn't possible then they should receive training and advice so that they can implement deaf and disability awareness communication techniques in the delivery of remote services.
- We would like to see powers within the Access to Work scheme which require employers to meet their cost-share requirements as a part of their obligation to make reasonable adjustments.
- We call on the Government to stop referring to a National Strategy for Disabled People and to instead bring forward a National Disability Strategy. We also want the Government to be clear what the purpose of the strategy will be: is it an ambitious document setting out a clear agenda to improve the lives of disabled people, or is it a more discursive Green Paper which is intended to start a public consultation on these issues?
- We call on the Cabinet Office and the Minister for Disabled People to set out an engagement plan that includes on and offline discussions with disabled people in advance of the publication of the National Strategy for Disabled People.

Background - the employment prospects of deaf people

We know from data collected through the Labour Force Survey that deaf people are less likely than the non-disabled population to be in employment. According to the most recent figures amongst those who reported difficulty with their hearing as their main health conditions 61% were in employment and 39% were not in employment.¹ Although, as we have noted below, we believe this figures masks the differing outcomes for those with different levels of hearing loss.

Our research has also shown that deaf people are likely to lose out on the social benefits of work even where they do secure employment². In a survey we conducted of people with hearing loss at the end of 2017 we found that of our respondents:

- 79% have felt stressed at work because of their hearing loss or deafness
- 65% have felt isolated because of their hearing loss or deafness
- 46% felt their career opportunities have been negatively impacted by their hearing loss
- 30% have felt bullied at work because of their hearing loss

¹ HC Deb, 4 Nov, written answer UIN 109307, Employment: Hearing Impairment

² RNID, Working for Change Survey Results Report, October 2018, available on request

We also know many people with hearing loss do not disclose their condition at work, concealing it from colleagues or their line manager. Nearly half (44%) of the respondents to our survey have applied for a job and not disclosed their hearing loss.³ Over half (51%) of respondents have been concerned that the employer would think they wouldn't be competent at the job whilst nearly one in five (17%) thought they would be treated unfairly at work.

Given this data we urge the Committee to go further than considering whether or not enough is being done to support deaf and disabled people into work. There also needs to be a focus on creating inclusive workplaces in which deaf people can both fulfil their potential and benefit from the social benefits of employment.

Progress so far and impact

What is the economic impact of low employment and high economic inactivity rates for disabled people? Are some disabled people (for example, young disabled people or people with different health conditions) more at risk of unemployment or economic activity than others?

We do not believe that the ONS currently collects the required data in order to make an informed judgement about the employment opportunities of different people within the group identified within the Labour Force Survey as having 'difficulty in hearing'. When we refer to deaf people we use that to capture anyone with a hearing loss – from those who have what is clinically defined as a 'mild' hearing loss (defined as 25-40db, and means that someone may not be able to hear speech in a noisy environment) to those with a profound hearing loss (hearing at 90+db) and those who would consider themselves culturally Deaf and use British Sign Language as their primary language.

It is logical to assume that people with different levels of hearing loss face different challenges and barriers to entering the workplace. We also assume that BSL users would face most challenges – not least because they might require the provision of a BSL interpreter, a highly paid professional form of support, and prospective employers are unlikely to be aware of the support which Access to Work can provide.⁴

Already within the Labour Force Survey there is some data to show the different impact that hearing loss has on an individual's employment prospects. The headline figure, cited by the Government, shows that 61% of people who consider *difficulty in hearing* as their main health condition are in employment.⁵ The ONS also collects – but does not routinely publish – employment figures for those who describe their main health condition as hearing loss and also say answer 'yes' to the follow-up question '*Does your condition or illness reduce your ability to carry out day-to-day activities*'. The latest figures we have for this group of people is around four years old and is not a direct comparator to the 61% statistic mentioned above, however it shows that only 36% of this group were in employment.⁶

These statistics show a remarkable divergence between the prospects of those with a hearing loss. We believe that better statistics for those with different levels of hearing loss would provide a clearer picture of the barriers that deaf people face in the workplace. More importantly it would help identify groups with greater needs and allow Government schemes to consider where targeted support should be offered.

³ Ibid

⁴ In 2016 we commissioned a poll from YouGov which found that 63% of *business leaders* across Britain had not heard of the Access to Work scheme.

⁵ <https://questions-statements.parliament.uk/written-questions/detail/2020-10-30/109307>

⁶ The Equality and Human Rights Commission: Being Disabled: A journey less equal, The data on employment rates can be found in supporting table in table EG2.2 on [this page](#).

Recommendation: We call on the ONS to collect data on the employment status of people with hearing loss broken down into groups, including the provision of a figure for those who use BSL as their primary language.

What has been the impact of the coronavirus pandemic on disabled peoples' employment rates?

Given that unemployment is a lag factor which shows up later than other forms of economic data we are not yet clear on the impact that this crisis has had on disabled people, including deaf people. The Government did not include any equalities monitoring within the furlough scheme and therefore we cannot say whether deaf and disabled people have been disproportionately targeted by this scheme. We have received some anecdotal feedback to suggest that people with hearing loss feel they have been disproportionately affected by both the furlough scheme as well as redundancy. This has come into us through our Information Line and through interactions we have had with our followers on social media.

We would however note that whilst the ONS published the findings of the Labour Force Survey monthly it only publishes the outcomes for disabled people quarterly. This means that if employment is a lag factor then it will take even longer for government and other policy makers to build a picture of the impact the Coronavirus pandemic has on disabled people.⁷

On 12th May the UK Government issued guidance to workplaces in England setting out how to work safely during the coronavirus pandemic with a view to reopening a number of workplaces.⁸ The Government produced fourteen guides covering different types of workplaces. These contained advice which would impose noticeable barriers for some people with deafness and hearing loss. Relevant advice which could make working life harder for people with hearing loss includes:

- people work back-to-back rather than facing each other
- physical barriers are erected between workstations
- face masks can help reduce transmissions; and
- people to be stationed two meters apart.

When these guidance documents were first issued they made no reference to disability or the need to make reasonable adjustments for disabled people. This was a mistake and meant that at a time when many organisations were consulting the guidance, rearranging the workplace and conducting their Covid risk assessment they were not being forced to consider the needs of disabled staff. We welcome the fact that subsequent updates have stated the need to ensure that employers continue to make reasonable adjustments to support disabled employees. However the guidance documents offer no further information on how this can be done, nor does it signpost to existing support for employers on the law relating to disability employment or the practical support which already exists.

It should also be noted that the number of people working from home has nearly quadrupled since the imposition of the lockdown and that this will also create new and different access requirements for people living with hearing loss. For many people the increased use of telephone and video conference will create barriers and mean that they will need new adjustments.

⁷<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/labourmarketstatusofdisabledpeoplea08>

⁸ Department for Business, Energy & Industrial Strategy and Department for Digital, Culture, Media & Sport, Working safely during coronavirus (COVID-19), first published 12th May 2020, revised on multiple occasions since.

We believe that the failure to provide information about the impact of Covid guidelines and homeworking to employers has been a mistake. As employers have had to re-organise their workplaces overnight it needed to be simple and easy for them to understand how to support deaf and disabled staff.

This guidance is still being updated regularly and it is likely that further Covid-secure changes to the workplace and an increase of blended working, where people mix office and home working as we return to something like normal, will create new barriers for disabled people – and employers will have further need for advice and support to continue to make new re-adjustments.

Recommendation: The Government should signpost to its existing (albeit limited) resources on disability employment and work with expert organisations, like us, to provide further guidance on how to overcome or mitigate the additional barriers social distancing creates. This guidance should be promoted alongside guides to support disabled staff working remotely from home.

Providing support

Where should lead responsibility for improving disabled peoples' employment rates sit (for example, DWP; Business, Energy and Industrial Strategy; Health and Social Care)?

In placing the Disability Unit within the Cabinet Office Equalities Hub the Government correctly identified that cross-Government coordination is needed to improve the lives of disabled people, including in the workplace. The employment prospects of disabled people rely on a wide range of factors including Transport, social care, education, employment support, the development of assistive technology and NHS services. However we believe that the DWP and the Minister for Disabled People should retain responsibility for managing this cross-government activity and be held accountable on closing the disability employment gap.

What international evidence is there on “what works” in supporting disabled people into, and in work, and how applicable is this to the UK?

In our answer to a subsequent question we set out the case for the creation of an Employers' Disability Information Hub – an initiative which we believe could be largely based on the JobAccess service currently provided by the Australian Federal Government.⁹

As well as looking at international evidence on “what works” we would encourage both the Select Committee and the Government to look at alternative domestic schemes which outperform Government initiatives. We would encourage a comparison between the difference in the provision of specialist employment support services that occurs between Government contracted programmes such as the Work and Health programme and those programmes which have been funded through the European Structural Fund – often administered by devolved Governments.

One example of this comes from our JobSense employment programme which operates in Wales.¹⁰ JobSense is an employment service that has been set up to support people aged over 25 in Wales, who are Deaf, have a hearing loss and/or sight loss, to find paid work or to move closer to finding work by gaining work experience, a qualification or a work relevant certificate. The scheme benefits from a number of conditions which are distinct from the support provided under the Work and Health Programme. The

⁹ <https://www.jobaccess.gov.au/home>

¹⁰ For further information see: <https://rnid.org.uk/information-and-support/local-support-services/get-help-with-finding-a-job/jobsense-employment-service/>

funding for JobSense isn't on a strict payment-by-results basis which puts overwhelming focus on securing employment for individuals in a relatively short timeframe. The scheme also allows the service to make an assessment of how long we want to work with each individual client.

These conditions have a number of importance implications. The model behind JobSense allows the service to engage with people with greater needs who are furthest away from the labour market – often people who have been economically inactive rather than unemployed.

The scheme acknowledges the benefits to both society and the individual of helping them make progress prior to reaching the labour market, for example undertaking volunteering activities or securing qualifications. Finally the scheme also benefits from more specialised provision, our staff working on the scheme understand the barriers that deaf people face and can therefore make tailored suggestions to meet the individual needs. This often isn't the case with Government specialist employment schemes which often rely on generic providers or a unsystematic process of secondary contracting which means many people are left without specialist support.

As much as the details of the scheme are important (and relevant to the question on the Work and Health programme below) the point is also that there are alternative support mechanisms and schemes which assist disabled people across the UK and the Government can and should learn from them.

Recommendation: We believe that the Government should look closely at the JobAccess services provided by the Australian Federal Government as a potential model to support employers to recruit, retain and develop disabled staff.

Recommendation: We urge both the Select Committee and the Government to look at alternative forms of employment support for disabled people from across the UK – as well as international comparisons.

What is the right balance between in and out of work support, and is DWP getting the balance right? What more should the Department look to provide?

Through our research we have identified a number of gaps within the current framework of in-work support that is provided to deaf people. Across 2019 we undertook qualitative and quantitative research to identify what people find difficult at work, the support they have already received for the workplace, and what support people feel they need.

Just over two-fifths (42%) of people who took the survey said they have not tried to seek support for their hearing loss or deafness at work. The most common reasons for not seeking support are that people aren't aware that support is available or they don't know where to look for support.

The types of information most needed by respondents are information on educating colleagues and managers so they can better support them (44% gave this response), information on types of equipment, adjustments, or communication support that is available (44%), and how to access funding for adjustments (38%).

The top three types of services or support needed are support to manage the stress and anxiety of having a hearing loss in the workplace (37%), access to funding for assistive equipment (33%), and support from a colleague or manager (26%).

People told us they feel that the most beneficial types of support to help feel more confident being open about their hearing loss at work would be knowing colleagues had received training or advice about working with people with hearing loss (53%), and training and advice for themselves about how to be more confident in the workplace (42%).

Over half of respondents (55%) would be confident in delivering some type of deaf awareness activity. The two activities people would be most comfortable doing are sharing their experience of having a hearing loss with the organisation (60%) and putting up hearing loss and deaf awareness tips in the workplace (60%).

We believe our research demonstrates that in-work supportive does not need to be paternalistic or something that is done 'to' or 'for' deaf people by either the Government or employers. In work support schemes need to have a greater focus on empowering deaf people to provide support to their colleagues – both those with hearing loss and those without – so that they can become their own ambassadors for deaf awareness. We believe that the establishment of staff networks focused on hearing loss and disability – which often takes place in large progressive employers – could have a real benefit to the in-work support for deaf people.

Recommendation: Our research has identified gaps in the current provision of in-work support to deaf people. We believe that the Government should consider extending the provision of in-work support to deaf and disabled people to fill these gaps – either through direct provision of making funding available to specialist organisations. In doing so the emphasis should be on empowering people with lived experience to have the resource and confidence to self-advocate and provide peer support. The focus of this support should be:

- 1. Support so that people can raise deaf awareness themselves in the workplace.**
- 2. Emotional support to help with the impact of having a hearing loss or deafness at work and give people more confidence to be open about their hearing loss, so they can get the support they need.**
- 3. Information about the assistive equipment and communication support available and how to access it.**

How can DWP better support employers to take on and retain disabled employees, and to help them progress in work?

How effective is the Disability Confident scheme?

Throughout our social research the biggest barrier identified to the employment prospects of deaf people has always been employer attitudes. The perception that employers do not understand deafness and hearing loss and the impact that this has on individuals within the workplace. We also know that this is not just a perception from deaf people. In 2017 we commissioned polling from YouGov which asked business leaders a series of questions about hearing loss in the workplace¹¹. This polling found that:

- Over a third (35%) of GB business leaders do not feel confident about their business employing a person with hearing loss.
- 57% of businesses agree that there is a lack of support or advice available for employers about employing people with hearing loss.

¹¹ RNID, Working for Change: Research Report, January 2018, available on request

- The Access to Work scheme is often described as the Government’s best-kept secret and our new research agrees with this – nearly two-thirds (63%) of businesses have not heard of Access to Work.
- Over two-fifths (42%) of GB business leaders say they lack confidence when it comes to knowing how to communicate with a person with hearing loss in their organisation.
- A quarter (25%) of GB business leaders agree that people with hearing loss are a health and safety risk in the workplace.

In our qualitative research to compliment this polling we found that employers wanted to do the right thing by disabled staff and prospective staff. ‘Fear’ was a word that often came up, employers didn’t know how to discuss disability and were afraid of saying the wrong thing.¹² Indeed, we found that a misunderstanding of the Equality Act was preventing line managers from having a conversation about hearing loss with their deaf staff.

We believe that there is a substantive gap in the provision of information to employers about disability – as highlighted by our research. We have therefore supported the creation of an Employer’s Information Hub on Disability. We believe that this service should provide employers with ready access to information such as:

- A summary of the relevant employment and Equalities legislation
- Condition specific information and advice
- Guidance on reasonable adjustments
- Signposting to further support

Information on a website would not remove the need for more tailored support – such as the support of Occupation Health services or other personalised workplace assessments. But we do believe that this would provide a broad and cost-effective mechanism for providing employers with greater support, particularly for smaller employers without the support of HR departments and specialist professionals who understand disability.

As we noted in our earlier answer, the JobAccess service provided by the Australian Federal Government is a model we believe the UK Government should seek to replicate.

We have always welcomed the premise of the Disability Confident scheme and, as our research above sets out, we believe the Government is right to prioritise schemes aimed at improving employers’ understanding of disability, including deafness. However, we have had increased doubts about the effectiveness of the scheme and whether it is making a meaningful difference in the employment opportunities for disabled people. Anecdotally we are also aware that many deaf people are not aware of the scheme or that it has replaced the Two-Ticks scheme, which was recognised by many disabled people.

Although we welcome the scheme, there is currently no evaluation measure for it. In November 2018 the Government commissioned research on the effect that signing-up to the Disability Confident scheme has had on employers’ recruitment and retention attitudes and practices with regards to disabled people. This showed that the most common relevant activity undertaken by Disability Confident organisations was to promote internally and externally that they were members of the scheme.¹³

¹² Ibid

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755667/disability-confident-scheme-summary-findings-from-a-survey-of-participating-employers.pdf p.9

43% of organisations that have signed up to the Disability Confident scheme said that they have not recruited any disabled people.¹⁴

Without a substantive evaluation of the scheme it is very difficult to understand how the campaign is affecting employer behaviour and the number of disabled people who have found work, or been supported to remain in the workplace as a result of the initiative – although the limited data we have is not encouraging. The government has indicated it will evaluate disability confident, but this has not yet happened. We believe this is too late and that learnings should be gathered and incorporated into the scheme as soon as possible. We urge the government to expedite plans to evaluate the scheme and for timings and plans to be shared with the public.

Recommendation: RNID believes that the Government should provide an Employers' Information Hub on Disability – providing legal information, setting out employers' obligations to disabled staff and providing condition specific information – including on reasonable adjustments – to give organisations the confidence they need to employ disabled people. This hub should broadly reflect the Job Access service provided by the Australian Federal Government.¹⁵

Recommendation: Whilst we welcome the reason behind the creation of the Disability Confident scheme we are sceptical that it is having a meaningful beneficial impact on the employment prospects of disabled people. We would therefore like to see the scheme subject to a detailed evaluation process. The results of such an evaluation should then be used as the basis for further decisions on whether to reform, replace or expand Disability Confident.

What improvements should DWP make to the support it offers to unemployed disabled people via Jobcentre Plus?

People with hearing loss tell us that jobcentres do not always offer tailored support to people who are deaf or have hearing loss and this hinders the service they receive. Jobcentre Plus are not always communicating with people using their preferred method.

Although it is welcome that there are a variety of ways to make initial contact with Jobcentre Plus (such as online, textphone, telephone, and video relay service), staff inconsistently record information about hearing loss and the access requirements of individuals. Our service users have reported that they have missed phone calls, misheard details of an interview or missed the opportunity to be referred for employment support. In our research one participant working in the health field described the difficulties with communication she and one of her clients had encountered at the Jobcentre:

"I had a client who was deaf and there was a problem with her benefits and we went down to the Jobcentre together and explained it and they said you had to use the phone. So I explained we can't use the phone because we're both hearing impaired and we're not able to use those phones. They didn't know what to do with us."

Providing the wrong communication support, or no support at all, is both stressful for an individual and also incurs unnecessary costs for Jobcentre Plus. We believe that DWP should look to the example of the Accessible Information Standard introduced in NHS England to provide good practice on meeting the

¹⁴ Ibid, p.10

¹⁵ Australian Government, Job Access – Driving Disability Employment <https://www.jobaccess.gov.au/employers>

communication needs of people with hearing loss. The Accessible Information Standard stipulates that bodies under the standard's remit must ask about their needs; record them, share the information with others who need it and ensure that those needs are met.

Recommendation: We urge the government to implement a means for Jobcentres to record the communication preference of its clients – following the lead of the Accessible Information Standard within the English NHS.

The coronavirus pandemic continues to make it difficult to offer in-person support. What evidence is there of “best practice” in supporting disabled people remotely—either in or out of work? How can DWP put this into practice in services such as Access to Work and the Work and Health Programme?

Since the start of the coronavirus pandemic we have been aware of the problems that many deaf people have experienced in access to remote services across society. We have provided a range of guidance on the use of video calling platforms, covering the accessibility features within each platform¹⁶ as well as the behaviour change and deaf awareness which we all need to demonstrate to make these services inclusive.¹⁷ We would hope that this guidance has value for people providing employment support services to deaf people during this pandemic.

We believe that the “best practice” for delivering assessments remotely is underpinned by some of the same principles as face-to-face appointments, although too often we know that these principles weren't applied previously. In particular it is crucial that assessments are provided by a specialist with knowledge of hearing loss and the adjustments and technologies that are available, and that the client is empowered to co-produce their own support and not to have solutions imposed upon them.

Recommendation: When delivering services remotely the DWP and its providers need to ensure that they are discussing the individual's access needs with them and they offer flexibility in terms of platform used and the provision of adjustments. Assessors and advisors should have first-hand knowledge of the barriers that their customers face and where this isn't possible then they should receive training and advice so that they can implement deaf and disability awareness communication techniques in the delivery of remote services.

Enforcement and next steps

Are “reasonable adjustments” for disabled people consistently applied? How might enforcement be improved?

Our research has shown that reasonable adjustments are not consistently provided to deaf people. This inconsistency goes across a person's working life, with respondents to our 2017 survey highlighting the failure to make reasonable adjustments at various stages. For example, of those who told a prospective employer about their hearing loss, 43% felt they had never or hardly ever received reasonable adjustments. At the other end of their careers we also found that many people take early retirement in part because of their hearing loss and 20% of this group told us that their employer's failure to make reasonable adjustments was a factor in their decision.

¹⁶ <https://rnid.org.uk/information-and-support/hearing-loss/living-with-hearing-loss/communication-tips/>

¹⁷ <https://rnid.org.uk/2020/12/how-video-conferencing-apps-compare-for-accessibility/>

Our information line receives a number of enquiries from people who believe they have been denied access to reasonable adjustments, and we often find that there aren't adequate forms of support for them to receive personalised advice. We often refer people to the Equality Advisory and Support Service, but we are not sure that this provides people with the support that they need to challenge a failure to make reasonable adjustments.

One area where we believe progress on enforcement could be made very easily is in relation to Access to Work. Access to Work is designed to provide support beyond a reasonable adjustment. As part of the assessments for Access to Work many packages include an element of cost share – which means that Access to Work has said that employers should contribute financially as part of their obligations to make reasonable adjustments. However, where employers refuse to do so there is no immediate or simple resolution in place and the applicant is often left without the support they need.

In 2019 we ran a survey of working age people with hearing loss which found that just under a quarter (23%) of respondents who had applied for AtW but had not received adjustments, said they did not receive them because their employer was asked to share the cost of the adjustments but would not pay their share. Focus group participants and open responses to our survey also highlighted this issue:

"My employer was asked to share the cost of the adjustments and they would not pay this"

"I find work can be helpful until it's going to cost them, like installing loop systems."

We think it is wrong that individuals are left without support because employers aren't willing to fulfil their cost share obligations within Access to Work.

Recommendation: We would like to see powers within the Access to Work scheme which require employers to meet their cost-share requirements as a part of their obligation to make reasonable adjustments.

What would you hope to see in the Government's National Strategy for Disabled People?
How should DWP look to engage disabled people and the organisations that represent them in formulating the Strategy?

RNID has been engaged with the Cabinet Office on the creation of the National Strategy for Disabled People, work we have undertaken as part of the Disability Charities Consortium.¹⁸ Whilst we appreciate the engagement we have had with the Cabinet Office we do have a number of concerns about the development of the strategy – around the lack of engagement with disabled people, the name of the strategy and a fundamental concern that the Strategy will not be 'the most ambitious disability plan in a generation'¹⁹ as promised by the Prime Minister. It is unclear if the Government intends to publish something that could legitimately be described as a strategy, or a more discursive Green Paper which would be the start of a conversation towards the creation of a strategy.

We believe that a National Strategy *for* Disabled People sets the wrong tone by implying the strategy is something that will be done for disabled people, who will themselves be passive recipients on the

¹⁸ The Disability Charities Consortium (DCC) brings CEOs and policy leads from the UK's national disability organisations together to work with Government to ensure disabled people's experiences are reflected in UK policy making. The DCC organisations are: Scope, Leonard Cheshire Disability, Disability Rights UK, National Autistic Society, Mind, Mencap, Sense, Royal National Society for Blind people (RNIB), Royal National Society for Deaf people (RNID), and Business Disability Forum (BDF).

¹⁹ For example see, <https://twitter.com/borisjohnson/status/1334415569051918336?lang=en>

document. We believe that changing the title to National Disability Strategy would be an important way of signalling that the Strategy is inclusive. It would also signal that disability is an issue that affects everyone – it is for all of us to take responsibility for the barriers society creates.

We have not yet seen evidence of the Cabinet Office engaging in substantive consultation with disabled people on the Strategy.

We also urge the Cabinet Office to consider the needs of the digitally excluded in the creation of the National Strategy for Disabled People, despite the fact that this has become harder to achieve during the Coronavirus pandemic. Research from the regulator Ofcom has shown that only 67% of disabled people and 69% of those with hearing loss have internet access, compared to 92% of the non-disabled population.²⁰ This research also demonstrates that financially less well-off disabled people are more likely to be digitally excluded; precisely the people that need the most from the forthcoming disability strategy.

We are aware that the Cabinet Office are preparing to run online surveys to support the creation of the Strategy and we have assisted them to facilitate online roundtable discussions on this subject. We also appreciate that face-to-face engagement with the digitally excluded will be much harder within the current pandemic, but if this strategy is to meet the needs of all disabled people then it has to consider the specific problems encountered by the digitally excluded.

Recommendation: We call on the Government to stop referring to a National Strategy for Disabled People and to instead bring forward a National Disability Strategy. We also want the Government to be clear what the purpose of the strategy will be: is it an ambitious document setting out a clear agenda to improve the lives of disabled people, or is it a more discursive Green Paper which is intended to start a public consultation on these issues?

Recommendation: We call on the Cabinet Office and the Minister for Disabled People to set out an engagement plan that includes on and offline discussions with disabled people in advance of the publication of the National Strategy for Disabled People.

²⁰ https://www.ofcom.org.uk/data/assets/pdf_file/0024/132963/Research-summary-hearing-impairment.pdf

