# Image shows RNIB's logo

# RNIB’s Response to the Disability Unit’s Disability Workforce Reporting Consultation

March 2022

## About RNIB

The Royal National Institute of Blind People (RNIB) is the UK’s leading sight loss charity and the largest community of blind and partially sighted people. As part of our work, we deliver employment services to help people with sight loss retain work and provide support and advice to employers looking to recruit or retain someone with sight loss.

## Section B: Benefits and barriers to disability workforce reporting

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

RNIB welcomes the opportunity to share our views with the Government. We think disability workforce reporting should be mandatory and needs to be brought in alongside measures to educate employers to ensure their practices and workplace environments are inclusive and accessible for blind and partially sighted people (see Section D).

Overcoming barriers to employment is one of the biggest challenges faced by people with sight loss, with only one in four registered blind and partially sighted people of working age in employment [1]. Despite improvements in technology and innovations like screen readers and smartphones, this figure has not changed in a generation.

We support the Disability Employment Charter and think the Government should require all employers with more than 250 employees to publish data annually on: the number of disabled people they employ as a proportion of their workforce; their disability pay gap; and the percentage of disabled employees within each pay quartile.

We want mandatory reporting to be approached in a way that is not threatening or intimidating for employers. We want to understand how many blind and partially sighted people employers currently employ and show employers how they can improve this and underscore there is support available, including from RNIB (see Section D).

[1] Slade, Edwards, 2015. My Voice 2015. RNIB. Available from <http://www.rnib.org.uk/myvoice>

### What do you think the main benefits of a mandatory approach to disability workforce reporting are?

Mandatory disability workforce reporting could play an important step in closing the disability employment gap if brought in alongside measures to upskill employers to ensure their practices and workplace environments are inclusive and accessible (see Section D). For example, the statistics could show the proportion of disabled people on low pay. It could help employers, and others, recognise where improvements can be made to ensure employment processes, practices and workplace environments are inclusive for blind and partially sighted people. This has the potential to help employees with sight loss by creating a work environment in which they feel more confident to be open about their disability at work - creating a culture that enables staff to disclose a disability.

Organisations such as RNIB can help to publicise any improvements employers make in the number of people with sight loss they report, to improve the profile of these employers and encourage more applicants to apply for work.

### What are the main risks?

We are aware it can be difficult for some employees to disclose their sight loss, fearing that employers would view their sight loss negatively and force them to leave. There will be employees who feel unable to disclose their disability who will not be represented in the data.

To help inform our consultation response, we spoke to blind and partially sighted people about their views on disability workforce reporting. Quoted below are the views shared by one partially sighted woman:

“Staff will be under pressure to disclose when there are a lot of issues around disclosure. Several of my friends and colleagues don’t disclose because they are nervous of the reception they will get.”

“If someone is going into precarious employment, they may not want to disclose because of this fear issue. One of my colleagues worked for me for a year through an agency. Although everyone says nicely it is a week’s notice, officially I can give the agency a phone call and within an hour she can be dismissed. If you’ve got to work under those terms, you’re going to be very scared of disclosing.”

Employers can address this by improving the culture within their place of work (please see Section D). We particularly recommend employers ensuring there are clear pathways for employees with sight loss to raise concerns.

### What do you think the main benefits of publishing disability workforce information are?

We are aware of the success of the mandatory reporting on the gender pay gap and believe publishing disability workforce information could be an important step in closing the disability employment gap. For example, the statistics could show the proportion of disabled people on low pay. This could highlight to employers what needs to change and where improvements can be made.

We are also aware that employers can be competitive. Mandatory reporting is a good way to show who is making changes and improvements to how they employ people with disabilities, which will help encourage other employers to do the same and improve their practices.

**What do you think the main risks are?**

It could increase pressure on some disabled employees, who do not feel comfortable disclosing their disability.

“If an individual discloses it’s not necessarily what the organisation will do to them but their line manager and maybe if they are in a big team how their colleagues will respond.”

Depending on what data is collected, there is also a risk an employer could be deemed to be inclusive and promoting an accessible workplace purely because they have a high number of disabled employees. This might not necessarily be the case, highlighting the need to collect further data such as the disability pay gap and retention levels.

## 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?

We agree that the proportion of employees identifying as disabled is a useful statistic to report on and think it should include all employees, including those on short term and zero-hour contracts.

We would welcome specific reporting around sight loss. RNIB’s recent survey showed the disability employment gap for blind and partially sighted people is around double that for other disabled people [2]. This is gap is widening, but instead needs to be closed. We think the data should be broken down by disability to ensure there is no hidden disadvantage suffered by those with disabilities that employers are less confident in appointing. This will allow fair comparisons to be made.

It is also important that individuals with more than one impairment, or condition, should be able to say so. Of 80,000 registered blind and partially sighted people of working age, 65 per cent have at least one other disability; 40 per cent have at least two other disabilities. A challenge we have found with the Labour Force Survey is that it only highlights employment rate by “main disability”. This potentially obscures many blind and partially sighted people who have multiple disabilities, or health conditions, from the employment figures.

[2] Employment facts and stats 2020.RNIB.Available from <https://www.rnib.org.uk/professionals/knowledge-and-research-hub/research-reports/employment-research>

### What, if any, statistic should be reported alongside or instead of the proportion of employees identifying as disabled? Please explain your answer.

We support the Disability Employment Charter and think the Government should require all employers with more than 250 employees to publish data annually on: the number of disabled people they employ as a proportion of their workforce; their disability pay gap; and the percentage of disabled employees within each pay quartile.

Under the Equality Act, employers have a legal duty to make reasonable adjustments for their employees. However, our research tells us that people who are blind or partially sighted are still not receiving adequate provision. Our recent research showed that 23% of employers said they were not willing to make adaptations to employ someone with a visual impairment despite legal obligations under the Act [3]. We think it is important for employers to also report the number of reasonable adjustments they have made annually.

Data also needs to capture retention levels and the progression of disabled employees, as well as the types of contracts they are on.

[3] Slade, Edwards, and Crawley, 2020. Employment for blind and partially sighted people in 2019. RNIB. Available from <https://www.rnib.org.uk/professionals/knowledge-and-research-hub/research-reports/employment-research>

### Do you agree or disagree that large employers (250 or more employees) should use a standardised approach to collect disability workforce data if reporting became mandatory?

We agree a standardised approach should be used to ensure consistency. Fair comparisons can then be made to measure closing the disability employment gap.

### There are many ways that people are asked to self-identify as disabled. If large employers were to use a standardised approach to data collection, which wording do you think should be used to ask employees if they identify as disabled?

As outlined above, we think it is important that the data is broken down by disability to ensure there is no hidden disadvantage suffered by those with disabilities that employers are less confident in appointing.

In order to identify blind and partially sighted employees, it is important for a common definition of sight loss to be agreed between sight loss organisations and the Government. One specific challenge we experience is a lack of clarity in definitions of sight loss, resulting in differing interpretations of data. For example, the Labour Force Survey uses a subjective definition of sight loss and identifies a wide range of people with sight loss, including those who are not registered blind or partially sighted and those who would not meet the World Health Organisation’s definition of partial sight. As a result, the Government’s understanding of the employment of blind and partially sighted people and ours is very different.

We would welcome the opportunity to develop and establish clear and agreed definitions of sight loss alongside sight loss organisations and the Government. RNIB’s data team is available to advise and support with this.

### Not everyone who meets the criteria for disability as set out in the [Equality Act 2010](https://www.equalityhumanrights.com/en/advice-and-guidance/disability-discrimination) identifies as disabled or feels comfortable disclosing this information to their employer. What measures or approaches could make data collection more inclusive of people who do not feel comfortable identifying as or disclosing disability? Please explain your suggestions.

Employees should be able to anonymously disclose their disability and complete a form online or by telephone which is hosted by a third party not linked to the employer.

It is also important the reason for collecting the data is clearly explained to employees, and the narrative is framed around improving inclusion and diversity in the workforce. It is also important the findings are reported back to employees, including any progression employers make.

To help inform our consultation response, we spoke to blind and partially sighted people about their views on disability workforce reporting. Quoted below are the views shared by one partially sighted woman:

“If people feel safe, secure and like the organisation they will want to disclose because they will feel it will make a difference.”

In order to create a culture in which disabled people feel able to disclose their disability, mandatory reporting needs to be brought in alongside measures to educate employers to ensure their practices and workplace environments are inclusive and accessible for blind and partially sighted people (see Section D).

“I am very open about my vision impairment. I wouldn’t say I am safe, but I feel secure in my role and where I am at. For a lot of other people on their journey through their career they have to weigh up if they disclose, how vulnerable does that make them.”

### If large employers were required to collect disability workforce information and report it to another organisation, which organisation do you think they should report to?

We think employers should report to the Department for Business, Energy and Industrial Strategy (BEIS) and the data should be published on its new online employer advice hub as outlined in the National Disability Strategy.

It is also important the DWP supports Disability Confident employers to report on disability workforce statistics, as this is not currently in place.

### Should large employers publish organisation-level disability workforce statistics? For example, the proportion of their workforce identifying as disabled.

We think large employers should publish organisation-level disability workforce statistics to help ensure they recruit disabled people and provide supportive and inclusive work environments.

### If published, who do you think should publish this information?

The Department for Business, Energy and Industrial Strategy (BEIS) should publish the data on the new online employer advice hub that was announced in the National Disability Strategy.

## Section D: Alternative approaches

### What alternative 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.

Alongside mandatory disability workforce reporting, there needs to be greater focus on addressing attitudes in the workplace and educating employers to ensure their practices and workplace environments are inclusive and accessible for blind and partially sighted people, including for employees who develop sight loss.

A recurring challenge for blind and partially sighted people is that information such as job adverts, information on training schemes, and forms is rarely in an accessible format. The lack of materials available in large print or braille restricts the number of jobs some blind and partially sighted people can apply for. Under the Equality Act, employers have a legal duty to make reasonable adjustments for their employees. However, our research tells us that people who are blind or partially sighted are still not receiving adequate provision. Our recent research showed that 23% of employers said they were not willing to make adaptations to employ someone with a visual impairment despite legal obligations under the Act [4].

Our research also found misconceptions about employing someone with sight loss, with half of employers thinking there may be additional health and safety risks in the workplace for the employee if they were to employ a blind or partially sighted person [5]. Our research also highlighted that one-third of people with sight loss who are not in work said the biggest barrier to them getting a job was the attitude of employers [6].

RNIB provides specific support for employers to help improve inclusion in the workplace, to which the Government could direct employers. RNIB has a [whole area on our website dedicated to this](https://www.rnib.org.uk/employers-and-businesses/employing-blind-or-partially-sighted-person), and can work directly with employers to help them improve their recruitment and retention practices in relation to staff with sight loss.

Employers should also be encouraged to align their working practices to the [RNIB Visibly Better Employer quality standard](https://www.rnib.org.uk/employers-businesses-and-partners/employing-blind-or-partially-sighted-person/visibly-better-employer-quality-standard). The Visibly Better scheme examines how inclusive an employer’s practices are for both existing staff with sight loss and potential future applicants, provides recommendations for improvement, and, after implementation of suggested changes, awards the employer Visibly Better Employer status.

For many blind and partially sighted people, Access to Work is highly-valued, and support through the scheme is crucial to their prospects of finding and retaining employment. However, RNIB has for years shared blind and partially sighted users’ criticisms of the process with the Government, in particular frustrations with the assessment process, and long delays between applying for Access to Work and the purchase or provision of equipment. In the case of a new job, that delay prevents people from starting work, and is frustrating for employers who want a new recruit to start work as soon as possible.

Last Autumn we spoke to blind and partially sighted people about their experiences of employment support as part of our response to the Government’s Health and Disability Green Paper. Quoted below are some of the opinions people with sight loss shared:

“I think Access to Work is an excellent benefit for both employers and employees. However, my experience is that the process of making the application and renewals is very long, with significant evidence required and forms to be completed. I also find the process to claim back costs is very time consuming and is not very accessible - I have to complete paper forms by hand, meaning that I am unable independently to submit my claims, and my line manager has to provide a physical signature on the form to confirm that I have worked the days for which I am claiming taxi fares. I think an online solution would be significantly easier for both myself and my line manager.”

“Access to work enables me to the job as well as anyone else.”

Another area of concern shared by blind and partially sighted people is that assessors lack specialist knowledge of sight loss issues. Our recent survey found that 43% of blind and partially sighted people thought Access to Work advisors did not have good knowledge and understanding of sight loss and the support and adjustments they need.

“Access to Work is a fantastic service, but most of the advisers seem to have no knowledge of sight loss and just how much technology can assist.”

“Last time I received equipment to help with my job I didn’t feel I was properly assessed. They asked me what I thought I needed, which I could only base on previous experience. Some of the equipment wasn’t suitable and there may have been other things that may have been useful which I wasn’t aware of.”

We recommend DWP ensures regular specialist sight loss training of assessors in order to deliver support that meets all of an individual’s needs, and to stay up-to-date with new equipment and aids, the most common of which include:

* large screen mobile phones
* large computer screen and keyboard
* a signal cane to help navigate the journey to and from work
* video magnifier
* text reading and voice recognition software
* changes in lighting such as up lifter lamps
* large print copies of documents
* Windows accessibility options, such as using black text with white writing.

We recommend the training includes use of the ‘[Understanding Sight Loss for Professionals](https://www.rnib.org.uk/employers-and-businesses/employing-blind-or-partially-sighted-person/recruitment-professionals)’ E-Learning training that has been designed in partnership with RNIB and the DWP Training Provision.

Blind and partially sighted people and their employers should be given greater power and opportunity to choose the provider of an Access to Work assessment from a pool of expert third parties, who can provide guidance on support and adjustments that would help people with less well-understood disabilities in the workplace.

Access to Work also needs to be better promoted. Blind and partially sighted people and employers are often unaware of the scheme, which is sometimes referred to as ‘the Government's best kept secret’. A survey by the Centre for Social Justice found just 25% of employers knew about the scheme. Our experience also tells us that awareness of Access to Work is low amongst blind and partially sighted people seeking work. Access to Work is key to supporting employers to recruit disabled people and should be promoted to employers more widely. RNIB also recommends that BEIS and DCMS should include reference to Access to Work in their business guidance as standard.

Many blind and partially sighted people rely on volunteering pathways into employment, with voluntary work shown to be an excellent ‘starting point’ in developing employment skills. As well as benefits of the work itself, it is often linked to meaningful practice and the development of other skills such as mobility, using IT, and confidently discussing sight loss with work colleagues. We recommend extending Access to Work support to formal volunteering placements as part of the tailored support provided through work and health programmes to help open up job opportunities for blind and partially sighted people.

To improve employer understanding of disability issues and Access to Work, the Government should also work with the CIPD to include diversity and inclusion training as part of the core aspects of their qualifications, to help improve HR professionals’ knowledge.

[4] Slade, Edwards, and Crawley, 2020. Employment for blind and partially sighted people in 2019. RNIB. Available from <https://www.rnib.org.uk/professionals/knowledge-and-research-hub/research-reports/employment-research>

[5] Ibid.

[6] Ibid.