

Cyflwynwyd yr ymateb i ymgynghoriad y Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol ar Anabledd a Chyflogaeth

This response was submitted to the Equality and Social Justice Committee consultation on Disability and Employment

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Ymateb gan: Tîm Cymorth Lleiafrifoedd Ethnig ac Ieuenctid Cymru | Response from: Ethnic Minorities and Youth Support Team Wales (EYST Wales)



Disability and Employment Consultation

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- Confirmation of whether you would prefer that your name is not published alongside your evidence: Yes
- Confirmation of whether you would like the Committee to treat any or all of your written evidence as confidential, with reasons for the request: No

Information used in this consultation response was obtained through consultation meetings. The cases referenced are those of minority ethnic clients who have received or continue to receive support from EYST, as well as members of minority ethnic communities.

What progress has been made to deliver the recommendations set out in the 'Locked Out' report and to reduce and remove barriers faced by disabled people who want to access Wales's labour market. Why progress to reduce the employment and pay disability gap has been so difficult to achieve.

- While home working has improved, there are instances where it was the best solution for a disabled individual, but due to the nature of their disability being invisible, their colleagues raised objections. In the interest of fairness and consistency, the line managers terminated the home working arrangement. Managers often lack the requisite knowledge about disability in the workplace and the adjustments that could be made. Unless you can self-advocate for yourself as an ethnic minority with a disability, it will be very difficult for adjustments to be made for you. The Access to Work scheme exists, but if you are unaware and have not done your own research, employers cannot supply you with the information. Employers can be very helpful when people apply for Access to Work as well.
- There are instances where disabled ethnic minority employees are highly skilled but are only able to work two days per week, which can lead to disputes with their employers. Their employers are attempting to persuade them to leave their positions because they are unwilling to make the necessary adjustments. This may be due to a lack of understanding among employers of the specific needs of ethnic minority people with disabilities, which may result in fewer adjustments being made for this group.

- The working from home recommendation as a reasonable adjustment, has not materialised for many clients.
- Some studies have demonstrated that certain ethnic minority communities tend to flourish when they become self-employed and establish their own businesses. If you are a disabled ethnic minority working in your own business or a family business, this could be a more favourable option. If you require adjustments, would you be able to access the necessary support?
- It is important to provide disabled ethnic minority individuals with the necessary support to set up the provided equipment. In some instances, assistance with the setup process was not provided. The individual, who worked in customer relations, experienced a temporary loss of income and required assistance from family members to complete the set-up process. Many employers are unaware of the extent of support their employees require, as well as the health and safety risks associated with remote working. In some cases, employers may not even have had contact with their employees.
- In terms of the pay gap, ethnic minority individuals already face significant challenges in progressing within the workplace. When additional adjustments are required due to disability, employers may perceive this as an onerous burden, further exacerbating the issue.
- It is notable that a significant proportion of ethnic minority individuals are employed in sectors or industries where the implementation of work adjustments may not be readily feasible. This is particularly evident in roles such as care work and taxi driving. In contrast to home working, are the necessary adjustments and equipment available for a disabled person in this sector? How can we verify the effectiveness of these adjustments?
- It is more challenging for ethnic minority individuals to speak up or request assistance at the appropriate time compared to other colleagues, unless it has been proven that they are unable to manage effectively without assistance. To avoid any potential discrimination, they avoid stating the obvious or provide a clear and concise explanation of the assistance required. For example, they would not even request a special seat when they find standing and sitting difficult. In terms of workforce data and support, ethnic minority individuals may be less likely to disclose their disability, which may be due a lower likelihood of diagnosis, particularly in cases of invisible disabilities. If they are not disclosing their disability, it may be challenging for them to contribute to the development of a workplace wellbeing policy. They may perceive that disclosing their disability could have a negative impact on their job.
- At one point, almost all members of a family were in receipt of PIP and/or carer's allowance. As a result, it was challenging for them to enter the employment market. One significant obstacle was the lack of internal resources within our organisation to liaise with external parties, such as the DWP or Maximus, on an individual basis to assist these individuals. Some local authorities

have an employment support person whose role is to work specifically with refugees. However, this is not a DWP-affiliated position. The employment support provided was not helpful as it was not tailored to the individual's needs. For example, one individual has a strong desire to work as a taxi driver but encounter obstacles such as the need to complete a knowledge test and submit various forms. The additional obstacle presented by his disability was compounded by the lack of available personnel to oversee the process on a one-to-one basis. This was left to EYST support workers to work with him on a one-to-one basis. His subsequent success as a taxi driver and off disability allowance is entirely attributable to the EYST support workers who spent considerable time with him to navigate the necessary procedures. In addition to language barriers, the lack of a partner organisation able to liaise with EYST to provide a specific individual service represents a significant obstacle.

- Another case in point is that of a client who has indicated that she engages in a significant amount of sewing for the purpose of creating garments for herself and her family. The college offered a course which she is unable to access due to a language barrier. Therefore, EYST support workers had to facilitate her registration with Business Support Wales, with a view to potentially registering her as a start-up business. This could assist the client in becoming self-sufficient and, for the first time in nearly five years, gainfully employed no longer needing disability allowance. However, this is only due to the EYST support workers' dedication in navigating the process with the contacts they have built up in Business Wales.
- The pandemic has led to increased social isolation among disabled individuals, both in the longer term and during the initial stages of the crisis. There was a significant reduction in transportation during the period of the pandemic. Consequently, access for disabled people was even more restricted than before the pandemic, and they are encountering significant challenges in re-entering the labour market.

How the social model of disability is being used to underpin employment and recruitment practices, and what barriers continue to exist throughout society that impact on access to work (i.e. transport, attitudes).

- Two visually impaired clients expressed interest in taking ESOL classes but were unable to do so deemed operationally difficult by the college. Thanks to the clients' perseverance and the assistance of the EYST support workers, they have successfully completed ESOL classes. It has been a challenging process for both clients, with one client having to travel for nearly two hours to reach the nearest class. We were informed that the client was unable to access the online

platform due to her visual impairment. However, there are alternative forms of technology that could have enabled her to participate, and this option was not made available. In regard to the ESOL classes for the visually impaired client, it was necessary for her to have access to a teaching assistant who also spoke Arabic. This was eventually put in place, but there was a long delay due to the organisation's lack of belief in the possibility of providing these classes.

- It has taken over two years for EYST support workers to receive approval for long cane training for one of their clients. The client will finally have her first training session, as the individual responsible for approving the training has been on secondment. The decision was then transferred to social workers, who, without conducting an assessment of the client, have determined that training is not a suitable option and that the client is unable to live independently. The client is highly capable and is able to forage stinging nettles in the forest for her chickens independently with support. One professional is the key holder for the services in question, which represents an institutional barrier. All the relevant societies, charities and organisations for the visually impaired confirmed that the decision was made by this one individual. The client is fully proficient in baking and catering and has a personal assistant in place, funded through the direct payment scheme. However, it should be noted that the service was not offered for a considerable period of time. The client now has seven hours a week to attend ESOL classes and go shopping. This has had a transformative impact on her life. However, we were awaiting the key holder to unlock the service.
- Due to concerns about potential job loss, they are unlikely to request further adjustments. As ethnic minority individuals, they face significant challenges in securing employment and may be reluctant to admit that they require support or are struggling to manage their role effectively. It is the responsibility of employers to ensure that they make it clear that they welcome applications from people with disabilities. It is important to ensure individuals that having a disability will not hinder an employee's progress.
- A lot of people in ethnic minority communities don't know their rights. Individuals with physical disabilities may be more inclined to assert their rights, whereas those with invisible disabilities may be less forthcoming due to a reluctance to disclose their condition to others.
- The language used in applications has an impact on people, regardless of whether they are disabled or not. This is particularly the case for those from ethnic minority communities. Language is an important aspect of the job description, criteria and application form. In particular, civil service roles often require specific behavioural or personal attributes, which may present a challenge for some ethnic minorities that have to translate the information. It is not detrimental to adapt the application form with information sections so that someone with visual impairment can hear the question read out or even rephrase

it in a more straightforward English language for clarity. For those new to the UK and the labour market, it can be challenging to understand certain language. For instance, the term 'problem solving' may be misinterpreted as a high level of complex problem solving, which could deter applicants.

- There is a social stigma attached to certain disabilities, with individuals often being discouraged from openly discussing their condition. This can particularly affect ethnic minority communities, where there may be a reluctance to acknowledge disabilities and a preference for keeping them hidden. Such an attitude can have a detrimental impact on an individual's confidence and ability to navigate the job market. When there is a discrepancy between societal acceptance and that of smaller communities, it can impede personal growth and development. If a person's parents or guardians are not encouraging them to engage in work or social activities, it can be challenging to enter the job market without parental support. EYST runs community engagement events for entire families to attend so that parents can support their children applying for jobs. From an early age, children are taught to refrain from disclosing their disability. For example, we are currently supporting a young woman. The mother has been encouraging her daughter to refrain from discussing her disability for over 25 years. The young woman in question recently visited our office and informed us that she is experiencing significant difficulties and she requested that we not disclose this information to her mother. This raises an important question: if individuals with disabilities are unable to identify and discuss their needs, how can they become independent adults capable of interacting with others, including potential employers, in a productive manner?
- A person with a disability noted that when others are aware of their disability, they are sometimes perceived as lacking capacity. She gave the example of a situation in which she had been quite insistent about her needs and the required course of action. In response, a colleague had approached and begun to speak in a manner that suggested she was unable to hear or understand.
- A person without a disability stated that they have had to explain to managers why their parent with learning disabilities keeps interrupting meetings when working from home and caring for their parent. It is also necessary to make adjustments for individuals who are caring for others with disabilities. In a customer-facing role, there was concern as to whether customers could hear the parent in the background, however, there are software solutions that can help mitigate background noise. It is also important to consider the impact of disability on non-disabled family members who are employed. Ethnic minority women often bear a disproportionate share of care responsibilities, and some families are reluctant to seek assistance from social care services due to stigma. This can have a negative impact on their employment prospects, as they may be hesitant to disclose their circumstances for fear of being perceived negatively by others.

- Non-disabled individuals from ethnic minorities communities do encounter situations where the use of simpler vocabulary and a slower speaking pace is used. However, when additional characteristics such as disability are present, these types of scenarios may become more prevalent. It would be beneficial to have a support group, such as those that meet bi-monthly or monthly. Similar to a designated fire marshal or safeguarding group, a group should be created with both disabled and non-disabled people. The group will provide support to colleagues who may require assistance with any issues that arise. Having colleagues who understand the specific challenges faced by colleagues with disabilities in the work environment can help to boost confidence. This group will provide a forum for sharing experiences and making suggestions to improve the workplace environment.
- If you are a recent migrant with an invisible disability, you may not be aware of the support available to you in the UK. Your country of origin may not have the diagnostic techniques to identify your disability, and you may not be aware of your disability and the opportunities to access work support that you could be eligible for.
- A further issue is that of cultural barriers. In this case, a client who had been employed was not granted the rights afforded to employees when she requested time off for the holy month of Ramadan. Instead, she was given just one day, which she was told to take in advance, even though the exact date of Eid was unknown. The employer was not accommodating of the employee's needs related to their religious practices. Some individuals with disabilities are unable to advocate for themselves, yet even when they are able to do so and seek their rights, the employer can continue to be unsupportive. The business is more concerned with protecting itself than improving its business practices.

How effective Welsh Government actions (e.g. the network of Disability Employment Champions and apprenticeships) have been in reducing barriers to employment and reducing the employment gap between disabled and non-disabled people, including the extent to which Welsh Government policies complement/ duplicate/ undermine those set by the UK Government.

- While the input has been beneficial, the challenge lies not in its source but in its ultimate destination. The Welsh Government formulates policies, which are then implemented by local authorities or third sector organisations. The challenge lies in how it has been implemented elsewhere and how it has been monitored. It is the responsibility of the relevant local authority or government department to

demonstrate accountability with regard to monitoring and implementation. For instance, policies aimed at diversifying the workforce. If they welcome applications from a diverse community but there are no diverse individuals residing in the area, it is likely that there will be no applications. They cannot be held accountable for that particular area, but for places like Swansea or Cardiff with larger populations, they need to be held accountable. To summarise a 20-page document into one page so that everyone knows, simplify documents so that they can be implemented more effectively.

- Many are unaware of the Network of Disability Employment Champions. Securing a suitable colleague at the Job Centre who is willing to provide assistance can greatly enhance the support available. However, in the absence of such a colleague, navigating the process without the desired level of assistance can be challenging.

Whether disabled people are accessing apprenticeships and if any further support is needed to ensure schemes are inclusive.

- It is frequently challenging to identify an employer willing to take on not just an apprentice, but a disabled apprentice, despite the potential for reasonable adjustments to be made to accommodate this. For instance, there was a candidate who suffered from severe epilepsy and seizures, which necessitated the presence of a support person throughout the workday. The client was applying for apprenticeships and was informed that it was not feasible to have a dedicated individual present in the room with her at all times. An EYST support worker was able to do this for 16 weeks, demonstrating that this is a viable option.
- It is evident that more needs to be done, particularly in the form of a stepping stone before an apprenticeship. This could take the form of a two- to six-week work placement or work experience, as it can be challenging for an individual to go straight into an apprenticeship. This allows individuals to gain experience before making a commitment, should they discover that it does not align with their preferences or that it is not a suitable role. This also prevents any potential waste of resources or time. An opportunity to gain experience without any associated guilt. For many, the prospect of undertaking a two-year apprenticeship without having a clear understanding of whether it is the right choice can be off-putting.
- It is not sufficient to make accessibility adjustments for ethnic minorities with disabilities. It is essential to ensure that the apprenticeship environment is also culturally inclusive.
- The apprenticeship programmes are available and people are currently being registered to them. However, we are experiencing a shortage of employers able

to employ any individual. This represents a systemic issue that presents a significant barrier for disabled individuals seeking employment. A further challenge is the difficulty in securing employment following the completion of an apprenticeship programme. Having a network of employers in place is an effective strategy for accessing apprenticeship programmes. It is a straightforward step that facilitates a seamless transition for individuals, regardless of their disability status, after completion of the apprenticeship. If you are neurodivergent and find it difficult to network, this could present a challenge unless someone is able to network for you on your behalf.

- It is not always easy to find apprenticeships in certain areas, such as automotive or mechanics. It is possible that the apprentice may be required to travel to a different town or city, therefore it is important to ensure that they have access to suitable transportation. If the apprenticeship programme does not provide support in other areas, it is challenging for clients to be registered in the area where they reside. This necessitates reallocation or travel. Consequently, the aforementioned factors contribute to the lack of accessibility and inclusivity of apprenticeship programmes for ethnic minority disabled individuals.
- It may be beneficial for disabled employees with medical routines in the morning to have time flexibility in the workplace. This could mean starting work later than 9 a.m. or having the option to finish work later than usual. It is important to create a safe and supportive environment for these employees to ensure they can complete their tasks without undue stress or pressure.
- One of the challenges we face is the rural location of our clients in Powys. For example, a funder in Powys invested significant effort in facilitating an apprenticeship opportunity for a specific client. The client was not disabled, but the underlying principle is the same. However, this entailed travelling to different towns, necessitating the acquisition of driving skills or the utilisation of multiple bus routes, which would considerably extend the journey time. It is possible that learning to drive may or may not present a problem for someone with a disability. The location of colleges in Powys presents a challenge for individuals seeking apprenticeship opportunities, as it requires travel to access the necessary education and to find suitable employment partners.

What further policy measures are needed to support disabled people, young disabled people and employers to increase participation rates and what can be learned from elsewhere.

- The issue is not that local businesses are reluctant to take on an apprentice, but rather the financial commitment is significant, and there are other challenges to consider. Many employers and self-employed individuals are reluctant to take on a trade apprentice due to the additional insurance costs and expenses involved. The aforementioned obstacles to local employers offering apprenticeships result in individuals aspiring to become electricians being unable to do so, due to their inability to fulfil the practical placement requirements. What measures can be taken to create an environment in which taking on an apprentice is financially beneficial for employers? It is necessary to reconsider legislation and regulations that create barriers for employers. One potential solution is to implement a cap on insurance company charges. Additionally, the government should explore ways to support employers facing these challenges and consider providing subsidies.
- It should be noted that age limitations on certain schemes may present a barrier if an individual does not fall within the specified age bracket for the scheme in question.
- The Disability Friendly Employer Scheme, run by the DWP, does not offer an incentive for employers who believe they are already disability friendly or lack the capacity to participate. This may encourage people with disabilities to feel more confident about being part of the organisation, which could lead to an increase in participation. For these schemes to be adopted by employers, there needs to be more than just recognition, awards or financial incentives. It is essential that employers view reasonable adjustments as a valuable opportunity rather than a burden. For instance, a disabled individual stated that as a reasonable adjustment, they required additional assistance with administrative tasks to enable them to fulfil their role effectively. This resulted in the support worker also providing input to enhance the individual's outcomes. As a result, the employer was able to benefit from the input of two individuals, rather than just one. In another case, an individual with a disability was employed, resulting in the DWP providing funding for the organisation to install automatic doors. These adjustments benefit the employer, creating a mutually beneficial situation. It may be beneficial for employers to watch short videos showcasing successful strategies.
- In terms of increased participation rates, the previous Jobs Growth Wales initiative, which provided remuneration for young people through Welsh Government funding, proved beneficial for many clients. It was a logical next step for EYST clients who had secured employment through Jobs Growth Wales. The employer was aware that they were taking on a candidate from our programme and that a portion of the wages was being paid from elsewhere.

What actions would support those who are currently unable to work to access voluntary opportunities (which could lead to future work opportunities).

- In some instances, individuals who have been offered voluntary placements have been situated in less advantageous positions, with limited scope for undertaking tasks that could enhance their future employability. When EYST had funding and a volunteer was working at the front desk, they were also able to gain customer service skills through AGORE Cymru level one, as they did not have to write extensive reports. Video-based learning and observation enabled the acquisition of customer service skills. It is essential that disabled people who are accessing voluntary opportunities are assisted in pursuing future work opportunities by obtaining qualifications or credits towards qualifications, thus enabling them to develop their careers and perceive the voluntary opportunity as a valuable investment. At EYST, volunteers are afforded a high degree of autonomy, but this only proves effective when volunteer coordinators are present to oversee their experience and ensure a positive outcome. Consequently, some of our disabled clients who are currently not in employment may be discouraged from pursuing voluntary opportunities due to the lack of a dedicated volunteer coordinator to guide them.
- It would be beneficial for the Welsh Government to investigate why a significant number of employers are requesting paid experience from applicants and not considering voluntary experience. For instance, EYST has had accountants offering their services on a voluntary basis. However, employers have not recognised this as valid experience. This presents a barrier for those currently unable to work who are seeking volunteer opportunities.
- Furthermore, the recruitment process presents a significant challenge for ethnic minorities, particularly those with limited experience. Many people who are interested in volunteering are seeking paid roles, but require voluntary experience beforehand. Some of the clients are professionals from abroad, but the lack of recognition of their qualifications in the UK presents a barrier to them being able to work in this country. As a result, they pursue volunteering opportunities, despite their considerable skills and professional experience. However, even after having their certificates converted, they still face difficulties in securing employment. It may take clients some time to adjust to the UK system, and volunteering is an excellent way to gain a foothold in the country.
- In the health sector, there is a voluntary opportunity which could ultimately lead to employment. If their work experience is valued as a volunteer and they have applied internally, they will be considered for employment. Consequently, if voluntary experience is regarded as a valid qualification, this would have removed many barriers for all concerned, as we have a number of clients already

engaged in voluntary work across a range of sectors. However, this voluntary experience is not currently recognised as a valid qualification.

- For the EYST Employment Project, we advise our clients to expand their professional networks, as we have found this to be an effective strategy for navigating challenges in securing employment and advancing their career. For neurodivergent individuals, networking may prove challenging despite possessing the requisite skills and talent for the role.