

**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**

**DE22**

**Ymateb gan: Sefydliad Cenedlaethol Brenhinol Pobl Fyddar a Thrwrm eu Clyw |  
Response from: Royal National Institute for Deaf People (RNID)**

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## Senedd Equality and Social Justice Committee Disability and Employment Inquiry – RNID response

Submitted to: [SeneddEquality@senedd.wales](mailto:SeneddEquality@senedd.wales)

### Intro to RNID

The Royal National Institute for Deaf People (RNID) is the national charity representing the 12 million people who are deaf, have hearing loss or tinnitus across the UK – including more than 900,000 people in Wales. Alongside the communities we represent, we campaign to make society more inclusive for everyone.

Employment is a key focus area for RNID<sup>1</sup>. We want to see deaf people, and people with hearing loss and tinnitus achieve, retain, and thrive in employment, on an equal basis to others. We also know that access to fair and secure employment can have a significant positive impact on our communities, not just for financial independence and earning potential, but also personal health and wellbeing, social connections, and personal development and learning.

Below is our response to the Senedd Equality and Social Justice Committee's Inquiry on Disability Employment. If you have any questions or would like to discuss our response below further, please get in touch via the contact details at the end of our submission.

### Key messages:

- We welcome the subject matter of this consultation; addressing the challenges that deaf people and people with hearing loss face in the labour market is an increasingly urgent issue. Wales is already the UK nation with the highest economic inactivity rate and poor health and disabilities are the main cause of economic inactivity in Wales.<sup>2</sup> In the context of post-pandemic recovery and the cost-of-living crisis, this climate is even more challenging.
  - One in three people in Wales have hearing loss, that amounts to more than 900,000 people. Wales also has the largest proportion of people aged over 70 compared to other UK nations, and with the prevalence of age-related hearing loss, this is an increasing concern.
  - We know that hearing loss can have a significant negative impact on people if unmanaged or if they are left without support; people with hearing loss are more likely to experience isolation and depression,<sup>3</sup> as well as wider implications on health, wellbeing, employment and social engagement.
  - Despite the limited data on the experiences of deaf people and people with hearing loss in Wales, RNID analysis of 2021 census data found that one in three (38%) of BSL users of working age are economically inactive,

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<sup>1</sup> For further details of our strategic programmes see: [Our work - RNID](#)

<sup>2</sup> Learning & Work, Which way now for employment support? February 2024 [Which way now for employment support in Wales? - Learning and Work Institute](#)

<sup>3</sup> RNID, Hearing Matters, 2020, <https://rnid.org.uk/wp-content/uploads/2020/05/Hearing-Matters-Report.pdf>

highlighting how they are further from the labour market than people with hearing loss more widely, and the general population.<sup>4</sup>

- The lack of data on the experience of deaf people, BSL users and people with hearing loss in the labour market impedes our understanding of the specific challenges our communities face, as well as our ability to monitor the impact of support schemes. We need better data to adequately reflect the experiences of our communities in Wales and the divergent experiences within the category of 'hearing loss' or 'difficulty hearing' as is often recorded.
  - **The committee should call for ONS to improve data collection on disabled people that allows us to better understand their experiences within employment, and better reflects variations and differences in experience both between and within different disabilities and health conditions – e.g. people with hearing loss and BSL users.**
- We welcome the establishment of the Disability Rights Taskforce in response to the 'Locked Out' report and its aim to develop a Disability Action Plan for Wales. We have been a member of the Taskforce since September 2023, including on the Employment and Income Working Group. **We endorse the recommendations put forward by this working group, in particular:**
  - **The call for the development of an Employer Information Hub hosted by Business Wales, to build on the guidance and information for employers on employing disabled people. Further information on this recommendation is included in our full response.**
  - **Moves to explore the possibility of expanding on or strengthening the Disability Confident scheme in Wales. We took part in the initial focus group discussing how a Disability Confident Wales + scheme could take shape and tackle some of the challenges and weaknesses of the UK Government run scheme. Again, we expand on this recommendation in our full response.**
- This consultation comes at an important moment in the context of the changing relationship between the Welsh and UK Government. Most employment support in Wales is funded either by the UK Government, through Jobcentre Plus and DWP or the UK Shared Prosperity Fund commissioned programmes, or the Welsh Government, provided by commissioned programmes, local authorities, colleges and civil society organisations. This means that there is a mixed approach to the delivery and commissioning of services available to people in Wales, and certain key levers affecting disabled people's employment – such as disability benefits, the Access to Work scheme, mandatory workforce and pay reporting, and the Disability Confident scheme, are still reserved. Historically, significant differences in approach between the two governments has affected progress in Wales, and the pace of change has been slow, for example due to significant Access to Work backlogs. Not to mention the differences in rhetoric toward disabled people who are economically inactive, which has, at times, been received by disabled people as hostility. However, the new Government in Westminster has committed to

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<sup>4</sup> RNID analysis of 2021 census data.

ensure disabled people have full rights to equal pay, as well as introducing disability pay gap reporting to tackle inequality.

- These new commitments highlight an opportunity to reset the relationship with UK Government when it comes to disability employment. **Alongside progressive and meaningful interventions in Wales, the Welsh Government needs to press UK Government to meet its pay gap commitments, as well as commitments to tackle the Access to Work backlog, to ensure lack of progress at a UK level is not undermining progress in Wales.**
- Welsh Government must improve integration of employment support services in Wales, to ensure that, regardless of who is the service funder, commissioner or provider, that there is consistency in experience for deaf and disabled people accessing and benefitting from employment support programmes.

#### Recommendation summary:

1. The committee should call for ONS to improve data collection on disabled people that allows us to better understand their experiences within employment, and better reflects variations and differences in experience both between and within different disabilities and health conditions – e.g. people with hearing loss and BSL users.
2. The committee should support the recommendations of the Disability Rights Taskforce Employment and Income Working Group, in particular, the calls for:
  - a. The call for the development of an Employer Information Hub hosted by Business Wales, to build on the guidance and information for employers on employing disabled people. Further information on this recommendation is included in our full response.
  - b. Moves to explore the possibility of expanding on or strengthening the Disability Confident scheme in Wales. We took part in the initial focus group discussing how a Disability Confident Wales + scheme could take shape and tackle some of the challenges and weaknesses of the UK Government run scheme. Again, we expand on this recommendation in our full response.
3. The committee must press Welsh Government to reset its relationship with UK Government to ensure lack of progress at a UK level does not undermine progress in Wales. This must include urging UK Government to meet its disability pay gap commitments as well as commitments to tackle the Access to Work backlog.
4. The committee should call on Welsh Government to ensure better integration of employment support services in Wales, to ensure that, regardless of who is the service funder, commissioner or provider, that there is consistency in experience for deaf and disabled people accessing and benefitting from employment support programmes.

Inquiry questions:

1. **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.**
  1. The employment rate for disabled people is lower than the for the general population, and the rate in Wales is lower than the UK average. Data published by ONS in June 2024 shows that the employment rate for disabled people in Wales was at 51% at the year ending March 2024. This compares to a rate of 81.9% for non-disabled people.
  2. Poor health and disabilities are the main cause of economic inactivity in Wales, with 146,000 people, or 7.7% of the working age population economically inactive due to long-term health conditions or disabilities in Wales, according to Learning & Work. This is compared to 5.5% in England and 6.9% in Scotland.<sup>5</sup>
  3. The 'Locked Out' report highlighted some of the key issues affecting disabled people, including deaf people, in employment, such as the barriers presented by employer attitudes and the lack of appropriate reasonable adjustments being made in employment.
  4. However, while there was strong recognition of the barriers Deaf people and BSL users experience throughout the report – in particular the need for recognition of Deaf BSL users' language and culture and its importance – the level of detail on our communities' experience in the labour market specifically is minimal. This will in part be due to the lack of reliable data about people with hearing loss, deaf people and BSL users' experience in gaining and retaining employment.
  5. As highlighted above, we do not believe that the ONS currently collects the data needed to make an informed assessment of our communities' employment opportunities. People who are deaf or have hearing loss are broadly categorised within the Labour Force Survey as having 'difficulty hearing'. The latest UK-wide data indicates that the employment rate for those who select 'difficulty in hearing' as their main condition stands at 74.7%, while for those who list it as a main or secondary health condition, the figure stands at around 45%. However, this does not allow us to understand the significant variations in experience that are likely to exist within this group.
  6. Despite minimal data, RNID analysis of the 2021 census allowed us to gain a better picture of the experience of deaf BSL users within employment. We expected this group to be further from the labour market, and census data shows the employment gap is particularly stark; more than one in three (38%) of deaf BSL users of working age in Wales are currently economically inactive because they are long-term sick or disabled.<sup>6</sup>
  7. It is logical to assume that people with different levels of hearing loss face different challenges and barriers to the workforce; as we can see from the census data, this is particularly extreme for deaf BSL users, but that does not mean that barriers faced by people with different degrees of hearing loss are not significant.

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<sup>5</sup> Learning & Work, Which way now for employment support? February 2024 [Which way now for employment support in Wales? - Learning and Work Institute](#)

<sup>6</sup> RNID analysis of the 2021 Census data

This is why it is crucial that the right data is collected, to give us a full picture. We believe that better data on the life chances of BSL users would empower government to provide better support.

8. With the prevalence of age-related hearing loss (presbycusis), and Wales's ageing population, this is becoming an increasingly urgent issue that must be addressed.
9. In response to the 'Locked Out' report:
  - i. RNID welcome the establishment of the DRT, of which we have been members since September 2023.
  - ii. Welcome the introduction of the disability discrepancy unit to ensure there is strengthened evidence to tackle inequality in Wales, that reflects the unique and intersecting characteristics of disabled people. We look forward to seeing the published outcome of the Evidence Unit's work with the Disability Rights Taskforce Co-Chairs later this year, and hope that this will ensure a strong evidence-base to underpin the recommendations put forward by the Taskforce. We also understand that the Unit is developing a specification for feedback on barriers to employment for disabled people, which will hopefully sit alongside the findings of this inquiry and inform recommendations to improve the lives of deaf and disabled people. **Once this specification has been published as well as the findings of this inquiry a clear and targeted plan for addressing gaps/barriers should be developed with a set timeframe for delivery.**
  - iii. We also understand that the Unit is exploring whether more granular detail on pay gaps by protected characteristics including disability can be published. This is intended to overcome some of the limitations of the Annual Population Survey analysis. If our recommendation above to break down the 'difficulty hearing' category further is adopted, this could have significant positive implications for evidence-based and impactful policy-making to address economic inequalities in society. **The Committee should make clear its support for this work and ensure that any outcomes of this project are embedded into both the Committee's, and Welsh Government's, ways of working going forward.**
10. However, despite these positive commitments from Welsh Government, we cannot ignore the challenging context for improving disability employment. Wales was a beneficiary of significant EU funding, in particular, the European Social Fund (ESF) with the set purpose of funding intervention through social inclusion, education, and importantly, employment. This funding supported a wealth of projects across Wales aimed at eradicating poverty and reducing inequality, including projects that supported disabled people into employment. One of these schemes is Jobsense, which RNID delivered in East Wales alongside a consortium of organisations until 2023.<sup>7</sup>
  - i. Jobsense is an employment service, still delivered in West Wales and the Valleys which supports people over the age of 25 who are Deaf, have hearing loss and/or sight loss, to gain qualifications, experience and move closer to finding work. The project takes a dual approach; working with both individuals

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<sup>7</sup> RNID, Jobsense employment service in Wales - [JobSense employment service in Wales - RNID](#)

with sensory loss to support them to move closer to work, and employers to support them to successfully recruit people with sensory loss by helping break down barriers within the workplace and recruitment process, and advising them on other available support. This support is provided by specialist employment advisors who work 1-1 with jobseekers, and employers, many of whom have a wealth of experience working with people with sensory loss, or have lived experience themselves.

11. While funding has been replaced for some of these programmes which continue to be delivered in Wales, many were forced to close due to withdrawal of funding or lack of certainty over the future of funding.
12. While the UK Government introduced the replacement UK Shared Prosperity Fund, the structure, objectives and administration of the funding has changed, and there is still a lack of transparency and certainty for service providers, third sector and other community organisations, on funding structures and plans for future funding and commissioning.
13. The impact of the end of this funding on disabled people, including deaf people and people with hearing loss, in accessing employment support, is yet to be fully assessed, but this should be monitored closely and learnings taken on board for the design and funding of future support.
14. **We would urge the committee to recommend a full impact evaluation of the loss of funding of employment support programmes that previously benefitted disabled people, for example Jobsense in East Wales, in order to understand:**
  - i. The extent to which employers and individuals with sensory loss are missing out on support due to loss of, or changes to funding.
  - ii. Gaps in existing employment support provision as a result of this loss – e.g. has the loss of funding led to more general employment support rather than more specific, condition focused support, or a loss of support in certain geographic areas.
  - iii. The extent to which learnings from these programmes have been taken on board and inform current or new employment support for disabled people.



### Recommendation summary:

1. Once the findings of the Evidence Unit and Disability Discrepancy Unit's work with Disability Rights Taskforce co-chairs is published, the Committee should ensure this is taken on board alongside the findings of this committee inquiry, and used to develop a clear, targeted plan for addressing the gaps/barriers highlighted, with a set timeframe for delivery.
2. The Committee should support the work of the Evidence Unit to explore publishing more detail on pay gaps for people with protected characteristics, and ensure that any outcomes of this project are embedded into both the Committee's, and Welsh Government's, ways of working going forward.
3. We would urge the Committee to recommend a full impact evaluation of the loss of funding of employment support programmes that previously benefitted disabled people in order to understand:
  - a. The extent to which employers and individuals with sensory loss are missing out on support due to loss of, or changes to funding.
  - b. Gaps in existing employment support provision as a result of this loss – e.g. has the loss of funding led to more general employment support rather than more specific, condition focused support, or a loss of support in certain geographic areas.
  - c. The extent to which learnings from these programmes have been taken on board and inform current or new employment support for disabled people.

## 2. 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).

1. When it comes to barriers to employment for deaf people and people with hearing loss, they are two-fold:
  - i. There are work-specific barriers which pose a major challenge. This includes employer attitudes and understanding, workplace deaf awareness culturally and among colleagues and managers, the need to make adjustments or provide additional support, and recruitment processes.
    1. Significant changes are needed to make workplaces more accessible to people who are deaf and have hearing loss, and employers must be better supported to be deaf aware and understand the reasonable adjustments and adaptations that can be made to support deaf staff or staff with hearing loss and tinnitus.
    2. Previous RNID research found that the two most common barriers to deaf employees and employees with hearing loss accessing support are employers not having the knowledge to help (57%), and employers being reluctant to help (37%). Almost a third (30%) of those surveyed also said that employers did not know what help was available.



3. Public polling also found that over a quarter (26%) of people would feel uncomfortable being told to manage someone who was deaf or had hearing loss.<sup>8</sup>
- ii. Structural and societal barriers that affect deaf people and people with hearing loss accessing work. This includes access to health and social care, as well as challenges with public transport, education and training, and wider public attitudes.
  1. Health is another strategic focus of RNID, and we know that access to health and social care is a significant barrier for our communities, who often face physical, digital and language barriers to accessing the care they need, affecting their health and employment prospects as well as numerous other aspects of their life.
    - a. We have been campaigning for Welsh Government to review and significantly revise and strengthen the All Wales Standards for Accessible Information and Communication for People with Sensory Loss. These set out the Standard of care and access people with sensory loss should expect in healthcare settings, both digitally and in person. Despite these first being published in a health circular in 2013, implementation has been poor, and the Standards have failed to address the patient safety issue of people with sensory loss' barriers to accessing health care.
    - b. Welsh Government have now committed to review and revise these Standards, and we are currently working with them alongside other stakeholders to implement a new action plan to strengthen and expand the Standards, roll them out across NHS Wales and develop a stronger model for implementation and compliance.
    - c. While we welcome the commitment from Welsh Government, we are still a long way from the outcomes needed to improve access to health for our communities. Improving the Standards and access to health for people who are deaf, have sensory loss or are disabled will have benefits, not just for individual health and wellbeing, but for addressing barriers to employment and wider participation in public and social life.
    - d. **We would urge the committee to support this work and urge Welsh Government to ensure it is effectively resourced and integrated to achieve the desired outcomes for deaf people and people with hearing loss.**
    - e. However, beyond access, we also know that significant healthcare waiting lists are affecting access to employment for people who could and want to work. There are currently just under 10,000 people on the waiting list for adult hearing aids through NHS audiology, a number which has significantly risen since the beginning of the pandemic, with more than 4,000 of those waiting more than the Welsh Government

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<sup>8</sup> RNID, Deaf Awareness research, 2023 <https://rnid.org.uk/2023/05/massive-shift-needed-to-improve-publics-deaf-awareness/>

target of 14 weeks. Many audiology departments across Welsh health boards also missed out on additional resource to tackle the pandemic backlogs. Welsh Government must urgently address this issue, and recognise the impact waiting lists are having on people with hearing loss being able to enter the workforce, and stay in it.<sup>9</sup>

- i. **The Committee should pressure the Welsh Government to urgently tackle these waiting lists and highlight the wider impact of long waiting lists on disabled people's health, wellbeing and employment prospects. Welsh Government must ensure that health boards are adequately resourced to tackle waiting lists, and that funding to tackle hearing aid and other audiology waiting lists is ring-fenced.**
- f. This demonstrates why a cross-Government approach to tackling inequality for disabled people is essential – without tackling wider and societal factors affecting disabled people's access to employment, specific disability employment interventions will be limited.

**Recommendation summary:**

1. **We would urge the Committee to support the Welsh Government's work to review, revise and strengthen the All Wales Standards for Accessible Communication and Information, and urge Welsh Government to ensure it is effectively resourced and integrated to achieve the desired outcomes for deaf people and people with hearing loss.**
2. **The Committee should pressure the Welsh Government to urgently tackle hearing aid and other audiology waiting lists and highlight the wider impact of long waiting lists on people with hearing loss and disabled people's employment prospects, as well as wider health and wellbeing.**

3. **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.**
  1. We welcome the Welsh Government's commitment to ending the disability pay gap. In 2021, Wales had the narrowest gap of the four UK nations, but this still stood at 11.6%, demonstrating that there is still much further to go.<sup>10</sup>
  2. We welcome the existence of disabled people's employment champions – while we have had limited engagement with them to date, we know that employer attitudes are one of the most significant barriers facing deaf people and people with hearing loss in employment. Therefore, direct engagement with employers to

<sup>9</sup> Stats Wales, Audiology services waiting times, updated August 2024  
<https://statswales.gov.wales/Catalogue/Health-and-Social-Care/NHS-Hospital-Waiting-Times/audiology-services/waitingtimes-by-weekswaiting-service-site-month>

<sup>10</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilitypaygapsintheuk/2021>

equip them with the skills and knowledge to improve their employment of disabled people is a helpful intervention. In particular, with one of the Champions being deaf and a BSL user, we hope that means increased representation for the needs of deaf people and BSL users in employment.

- i. However, more transparency on the work of Disability Employment Champions would be helpful to understand the impact of their outreach and support of businesses, and what the tangible result of engagement is for the employment of disabled people.
  - ii. **The committee should urge Welsh Government to regularly report on the impact of Disability Employment Champions' engagement with employers, and what tangible results this is having on improving employment practices to breakdown barriers to deaf and disabled people, and on the recruitment and retention of deaf and disabled employees.**
3. However, while direct work with employers is important, deaf people, BSL users and people with hearing loss also need direct support to access the labour market.
4. The 2023 final evaluation of Jobsense looked at the challenges and successes of the programme, and one of its outcomes was that participants with sensory loss often experienced significant levels of anxiety about the move into work, communication barriers in navigating the system, and required confidence building and development of trust in available support. This highlighted the importance of direct support to people with sensory loss seeking employment, in addition to engagement with employers to improve accessibility.
5. Jobsense was successful in its model meeting the needs of participants seeking support to find work, and employers' seeking support to improve accessibility.
6. There were some additional learnings from the project evaluation in East Wales which we would urge the committee to consider in developing its recommendations following this inquiry:
  - i. As above, the project evaluation highlighted the increasing need for participants with sensory loss to access support with their wider lives outside of work during the project. In addition to the specific issues accessing employment, participants needed support navigating things like disability benefits and understanding how changing employment might impact their income, as well as public transport challenges when physically accessing work. The evaluation also highlighted the importance of the cost-of-living crisis and its impact on people's lifestyle and employment choices.
  - ii. For some deaf BSL users who have a different primary language, language barriers are the biggest barrier to employment rather than their sensory loss – highlighting the importance of interventions being seen through multiple, intersecting lenses of both disability and language. This means that some BSL users can face discrimination in trying to access help and support, understanding what a job requires, expressing desires and needs, and their ability to communicate with others within a job.
  - iii. There needs to be consideration of how targets are set in the design of future employment support to ensure that these don't inadvertently prioritise certain interventions over others. It was reported that targets sometimes led to the

scheme focusing on people who were already closer to the labour market, who may gain employment sooner. While these results were positive, it may have affected the projects' reach to those most in need of support.

- iv. There needs to be greater promotion of Access to Work amongst people with sensory loss, as well as more resource to tackle the significant backlog.
    1. RNID have been working with the Department for Work and Pensions (DWP) to develop Adjustments/Access to Work Planners which allow individuals to record information on their needs and required support in a way that prevents them from having to consistently repeat this information, and allows the smoother transition of this knowledge. The aim for the planner is for it to contribute to smoother Access to Work applications, renewals and changes. A couple of planners, including one targeted at education leavers who are first entering employment, have already been launched, but we have also supported work on a planner specifically for BSL users, which we hope will be launched in the near future.
  - v. In the post-pandemic climate in particular, issues were reported around less secure employment being offered to people through the scheme. Labour market changes were reflected in this employment scheme and likely among others, which impacted measurement of quality of employment. This also highlighted the need for better flexibility in the benefits system, as there was significant fear among potential participants about moving from benefits onto paid employment, for fear of not being able to reclaim if the job didn't work out.
  - vi. Evidence from Jobsense staff highlighted that existing government services did not have the knowledge, experience or service model best equipped to specifically support people with sensory loss, highlighting the importance of lived experience, specialist training and/or condition-specific understanding among those who deliver more general employment support.
  - vii. Employers who took part in the scheme reported positive impacts of having people with sensory loss in their company; for customers, for other staff, for company performance as well as their broader diversity efforts. There was also some evidence of procedural changes made due to raised awareness within companies.
7. In light of the learnings from the Jobsense East Wales evaluation, we make the following recommendations to the committee:
- i. **To significantly improve the integration of existing employment support programmes for disabled people with wider public services, including the NHS and local authorities, to improve referral and ensure a holistic approach to support.**
  - ii. **To recognise the importance of wider advice and support services – for example on disability benefits, cost-of-living, transport etc - alongside employment support, and ensure employment support programmes are linked to or at least signpost to appropriate advice that is tailored to and accessible for deaf and disabled people.**
  - iii. **Encourage Welsh Government to explore this within the Welsh Benefits Charter to improve understanding and awareness of benefit entitlement.**

- iv. **Call on Welsh Government to improve deaf awareness in Welsh workplaces, and explore how this and wider disability awareness and understanding can be embedded in the Welsh Government's Fair Work priorities.**
  - v. **Urge Welsh Government to ensure that target-setting for future employment support schemes for disabled people does not inadvertently disincentivise support for those further from the labour market. Considering a dual target, that effectively measures the different degrees of progress for people closer to or further from the labour market, could promote more effective outcomes.**
  - vi. **Ensure employment support programmes are closely tied to the Welsh Government's Fair Work agenda, supporting disabled people into quality employment.**
8. As highlighted in the introduction, we believe this is an important moment in resetting the relationship with UK Government to better deliver for disabled people when it comes to employment support and the relationship with benefits. We believe there is a role for Welsh Government to complement or go beyond existing schemes, but also to directly work with UK Government to improve schemes and ensure they have their desired impact.
9. Below we have highlighted how we feel that existing UK Government policies, including Access to Work and the Disability Confident Scheme, must be strengthened and improved to ensure they have the desired impact of increasing employment rates among disabled people.
- i. **Access to Work** – While Access to Work is a crucial scheme for allowing disabled people to access employment, current, significant wait times are undermining the support provided through the scheme, and this is having a substantial detrimental impact on those that the scheme intends to support.
    - 1. While the length of time people are currently waiting for Access to Work support is our main concern, as of July 2024, more than 46,000 applications were outstanding.
  - ii. Urgent reform is needed to Access to Work in order to ensure it meets the needs of both disabled people and employers. Our previous research highlighted that assistive equipment and communication support is the most valuable (63%) form of support for deaf people and people with hearing loss in employment.
  - iii. We welcome recent developments within Access to Work to improve the service; as previously mentioned, we have supported DWP with the development of Adjustments Planners, and engaged on the online portal which has the potential to significantly improve user experience – however, while it is envisioned that processing times may decrease, we still lack the data needed to assess improvements brought about by the digital service.<sup>11</sup> Further improvements to AtW are needed in both the short and long term.
  - iv. Short term, we want to see Government:

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<sup>11</sup> UK Parliament, Questions for Department for Work and Pensions, 11 January 2024 - <https://questions-statements.parliament.uk/written-questions/detail/2024-01-08/8289>

1. Provide additional investment to enable AtW to work as intended and urgently clear the backlog.
  2. Increase the number of AtW advisors, with a focus on recruiting disabled people and those with lived experience to improve assessments and ensure they deliver the right outcomes.
  3. Review training for assessors and advisors to ensure it meets the needs of deaf and disabled people accessing support through the programme. This should include stronger information and guidance on reasonable adjustments and up-to-date information on assistive technology.
  4. Review the communication campaign in order to understand how to better boost awareness of AtW to both employers, and disabled people who are eligible for support, and work closely with devolved Governments to ensure this awareness is consistent across the UK.
  5. Automatically extend packages of support until renewals can be processed to ensure no claimants are left without support.
  6. Publish a clear timeframe for when improvements to AtW can be expected, including the introduction of further upcoming planned Adjustments Passports.
  7. Introduce provisional awards for job-seekers so they are able to demonstrate to prospective employers that they will be able to access the assistive technology and other support they need in order to fulfil their role, and reduce any delays or uncertainty.
- v. Long-term, we would urge the Government to improve, develop and expand the current programme to support more people, in more ways. Including:
1. A new communication and awareness campaign for jobseekers and employers, designed, funded and implemented based on the findings of the short-term communications review.
  2. Co-produce and establish a standard of service delivery for AtW. This should be made publicly available so that deaf and disabled jobseekers are aware of the standard of service they should receive.
  3. Develop and publish guidance for disabled people and employers on recruiting and employing support workers.
  4. Enable jobseekers to be provided with in-principle awards, allowing them to demonstrate to potential employers the support they will have access to, while going through the job search process, reducing uncertainty.
  5. Extend the remit of the programme to make it available for jobseekers undertaking work related activity, or volunteering, as a means of preparing for work.
- vi. **Disability Confident** – We welcome the broad aims of the Disability Confident scheme to give employers the techniques, skills and confidence they need to recruit, retain and develop people with disabilities and long-term health conditions; as well as the acknowledgement that employer attitudes are the biggest barrier to disabled people finding work. However, we have concerns about its limited impact, and significant improvements are needed.
- vii. Existing evidence on the limitation of Disability Confident highlights the need for a system that places greater expectations on employers alongside



providing better support for individuals. The current programme lacks ambition, as well as robust auditing or assessment. We would urge the UK Government to prioritise reform of Disability Confident, to focus on the experience and outcomes of disabled people in the workplace, combined with insight of the Business Leaders Group. Our recommendations include:

1. Reviewing the criteria for different levels and strengthening the expectations of employers.
  2. New metrics to measure the programme based on the experience of disabled employees.
  3. Emphasis on progression through the programme – employers should have their accreditation removed if they do not progress to levels two or three within three years.
  4. Set requirements for employers on minimum thresholds for the proportion of workforce that is disabled.
- viii. As members of the Disability Rights Taskforce, we support the recommendations of the employment and income working group calling for Welsh Government to explore an addition to the Disability Confident scheme, coproduced with disabled people's organisations, trade unions, Welsh employers who have achieved leadership status in the existing scheme and other stakeholders. This Disability Confident Wales+ scheme would ideally build upon the existing UK Government scheme, but incorporate Welsh values of social partnership, fair and decent work and other commitments to equality and wellbeing. The current scheme does not encourage employers to progress through the different levels, and there is little evidence to demonstrate the meaningful impact this is having on disabled employees. A Welsh addition could look at further incentives for Welsh employers, and work closely with Disability Employment Champions.
- ix. The Disability Rights Taskforce employment and income working group also highlighted the need for disabled people to be represented and meaningfully engaged in the work of the Social Partnership Council in order to ensure its recommendations and outcomes reflect disabled people's experiences and priorities in employment.



Recommendation summary:

1. The committee should urge Welsh Government to regularly report on the impact of Disability Employment Champions' engagement with employers, and what tangible results this is having on improving employment practices to breakdown barriers to deaf and disabled people, and on the recruitment and retention of deaf and disabled employees.
2. The Committee should urge Welsh Government to build on the learnings of the Jobsense East Wales final evaluation:
  - a. To significantly improve the integration of existing employment support programmes for disabled people with wider public services, including the NHS and local authorities, to improve referral and ensure a holistic approach to support.
  - b. To recognise the importance of wider advice and support services – for example on disability benefits, cost-of-living, transport etc - alongside employment support, and ensure employment support programmes are linked to or at least signpost to appropriate advice that is tailored to and accessible for deaf and disabled people.
  - c. Encourage Welsh Government to explore this within the Welsh Benefits Charter to improve understanding and awareness of benefit entitlement.
  - d. Call on Welsh Government to improve deaf awareness in Welsh workplaces, and explore how this and wider disability awareness and understanding can be embedded in the Welsh Government's Fair Work priorities.
  - e. Urge Welsh Government to ensure that target-setting for future employment support schemes for disabled people does not inadvertently disincentivise support for those further from the labour market. Considering a dual target, that effectively measures the different degrees of progress for people closer to or further from the labour market, could promote more effective outcomes.
  - f. Ensure employment support programmes are closely tied to the Welsh Government's Fair Work agenda, supporting disabled people into quality employment.
3. The Committee must call on Welsh Government to work directly with the UK Government to tackle some of the urgent issues affecting disabled people in employment as highlighted above. These include:
  - a. Urgently tackling the Access to Work backlog, as well as reforming and expanding the scheme.
  - b. Reform the Disability Confident scheme to place greater expectations on employers, better support for individuals, more incentives to progress through the scheme and more robust and widely used monitoring and reporting systems.

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

N/A

5. 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.

1. A cross-Government approach is needed to address the disability employment gap. This is essential as the employment prospects of disabled people rely on a wide range of factors, including transport, social care, health, education, employment support, access to benefits, the development and use of assistive technology, and access to essential services.
2. There are still worrying gaps in the provision of in-work support for deaf people. **We would like to see Welsh Government extend the provision of in-work support, either through direct provision or making funding available to specialist organisations. The emphasis should be on empowering people with lived experience to have the resource and confidence to self-advocate and provide peer support. This support should allow people to:**
  - i. **Raise deaf awareness in the workplace.**
    1. Access the emotional support needed to help with the impact of hearing loss or deafness at work and give people the confidence to be more open about this and the support they need.
    2. Research we carried out in 2019 found that 42% of people surveyed did not try to seek support for their hearing loss or deafness at work.
    3. The top type of support that our respondents said they needed (37%) was support to manage the stress and anxiety of having hearing loss in the workplace.
    4. More than half (53%) of respondents also told us that knowing colleagues had received training or advice about working with people with hearing loss would help them to feel more confident being open about their hearing loss at work.
  - ii. **Access information and guidance on assistive equipment and communication support that may help them, as well as support using it.**
3. As members of the Disability Rights Taskforce, we endorse the recommendations of the Employment and Income working group, in particular, the recommendations to:
  - i. **Develop a Wales addition to the Disability Confident+ scheme as highlighted above, to improve the ambition of the scheme in Wales and rebuild disabled people's confidence in it. A Wales scheme would embody Welsh Government values of fair and decent work and the commitment to a real living wage. The scheme would also link to a central objective of the Welsh Government; socially responsible public procurement. Any Wales addition must emphasise progression through the programme and ensure that the views and experiences of disabled people are central to assessments of the scheme's effectiveness.**

1. In the current context, with the potential to reset the relationship with UK Government, it may be possible to lobby for these improvements to be made at a UK level rather than a Wales addition; this would be something Welsh Government would need to discuss with the DWP and Government in Westminster.
- ii. **For a Disability Employer Hub to be developed and hosted through Business Wales, providing a central portal of advice, guidance, resources and examples to support employers to employ disabled people.** Our previous research found that the two most common barriers to deaf employees and employees with hearing loss accessing support are employers not having the knowledge to help (57%), and employers being reluctant to help (37%). Almost a third (30%) of those we surveyed also said employers didn't know what help was available.<sup>12</sup> The Hub should also signpost to other support programmes and funding schemes, and should reflect the full pathway of recruiting, retaining and supporting disabled employees of all ages, including those who become disabled or develop hearing loss within the workforce. The content of this hub should be co-produced with disabled people and regularly reviewed/updated.
- iii. This should build on existing resources available through Business Wales (included below), as this information still seems to be limited. And importantly, this new hub should be kept 'live' and reflect changing information.
- iv. [Disabled People's Employment | Business Wales Skills Gateway \(gov.wales\)](#)
- v. [Disabled People's Employment | Business Wales \(gov.wales\)](#)
- vi. [Employers Guide to Employing Disabled People - EN.pdf \(gov.wales\)](#)
4. We would also like to see Welsh Government learn lessons in the development of future employment support, which should place the needs of disabled people at the centre. **We want Welsh Government to:**
  - i. **Fully assess the impact of the loss of ESF funding on employment support for disabled people and map the gaps in provision to inform future support.**
  - ii. **Ensure lessons from previous employment support programme evaluations, including Jobsense for example, are taken on board and inform the design of future support.**
  - iii. **Create and implement new employment programmes specifically for disabled people, particularly those furthest from the labour market and with higher support needs.**
  - iv. **Ensure that people with lived experience of disability are employed to deliver this support, including knowledge and understanding of the barriers affecting people who are deaf or have hearing loss.**
  - v. **Improve integration between employment support programmes and other public services that act as gateway services, for example NHS, Jobcentre, local authorities. Ensure that these gateway services are equipped with appropriate training and understanding of the needs of disabled people in employment, and there can be effective joint-working across multiple agencies.**

<sup>12</sup> RNID, Deaf Awareness research <https://rnid.org.uk/2023/05/massive-shift-needed-to-improve-publics-deaf-awareness/>

- vi. Ensure that any future support for disabled people adopts a personalised model that is tailored, specialist and targeted, and where disabled people can still draw on support after they have found work. This should include:
1. A voluntary approach to attracting participants
  2. Vocational profiling of all participants to identify their aspirations, learning needs, barriers and skills development
  3. Personalised support for all participants
  4. Holistic one stop shop advice to help participants tackle multiple barriers to work
  5. Jobs brokerage' with local employers to identify potential jobs/work experience for participants to access
  6. In-work support for participants once they enter work.

**Recommendation summary:**

1. The Committee should call on Welsh Government extend the provision of in-work support, either through direct provision or making funding available to specialist organisations. The emphasis should be on empowering people with lived experience to have the resource and confidence to self-advocate and provide peer support. This support should focus on:
    - i. Raising deaf awareness in the workplace.
    - ii. Support access to information and guidance on assistive equipment and communication support that may help them, as well as support using it.
  2. The Committee should explore how Welsh Government could develop a Wales addition to the Disability Confident Scheme to improve the ambition and outcomes of the scheme in Wales, and ensure it embodies the Welsh Government's values of fair work.
  3. Develop a Disability Employer Hub to be hosted through Business Wales, providing a central portal of advice, guidance, resources and examples to support employers to employ disabled people.
  4. The Committee must ensure lessons are learnt from previous employment support schemes to improve future development, which places the needs of disabled people at the centre. This includes:
    - i. Fully assessing the impact of the loss of ESF funding on employment support as well as wider changes to structures of funding for employment support.
    - ii. Create and implement new employment programmes specifically for disabled people, particularly those furthest from the labour market and with higher support needs.
    - iii. Ensure that people with lived experience of disability are employed to deliver this support, including knowledge and understanding of the barriers affecting people who are deaf or have hearing loss.
    - iv. Improve integration between employment support programmes and other public services that act as gateway services, for example NHS, Jobcentre, local authorities. Ensure that these gateway services are equipped with appropriate training and understanding of the needs of disabled people in employment, and there can be effective joint-working across multiple agencies.
    - v. Ensure that any future support for disabled people adopts a personalised model that is tailored, specialist and targeted, and where disabled people can still draw on support after they have found work.
6. **What actions would support those who are currently unable to work to access voluntary opportunities (which could lead to future work opportunities).**
1. The 2023 evaluation of the Jobsense programme highlighted the importance of volunteering as a stepping stone towards employment, particularly for people with more complex needs. For those who are new to the labour market, or returning after a long time, the opportunity to adjust to and familiarise with work environments can be invaluable, particularly in the context of needing further support or workplace adjustments.

2. Mapping of these voluntary opportunities should take place to ensure they are included in employment support programmes, and that those offering or accessing voluntary opportunities receive the same level of support.
3. Voluntary opportunities that are offered should also be monitored to ensure there is progress from these staging points, using it as an opportunity to identify challenges that still need to be addressed, and better tailor support.
4. In addition, we are calling on UK Government to expand the Access to Work scheme to apply to voluntary opportunities, to ensure that deaf people and people with hearing loss are able to take them up on an equal basis to non-disabled people, and benefit from the opportunity to gain experience before formal employment.

### Recommendation summary:

1. The Committee should recognise the importance of voluntary opportunities in moving disabled people closer to the labour market, and ensure this is reflected in employment support. This must include:
  - a. Mapping voluntary opportunities within employment support, and providing support for those accessing voluntary opportunities.
  - b. Monitoring voluntary opportunities to ensure progress towards paid employment.
2. The Committee to call for UK Government to expand the Access to Work scheme to voluntary opportunities, or work with Welsh Government to explore whether the scheme could be expanded within Wales.

### Full recommendations:

1. The committee should call for ONS to improve data collection on disabled people that allows us to better understand their experiences within employment, and better reflects variations and differences in experience both between and within different disabilities and health conditions – e.g. people with hearing loss and BSL users.
2. The committee should support the recommendations of the Disability Rights Taskforce Employment and Income Working Group, in particular, the calls for the development of an Employer Information Hub, and to explore the possibility of extending the Disability Confident scheme in Wales. Both of these are expanded on below in recommendations X and Y.
3. The Committee must press Welsh Government to reset its relationship with UK Government to ensure lack of progress at a UK level does not undermine progress in Wales. This must include urging UK Government to meet its disability pay gap commitments as well as commitments to tackle the Access to Work backlog.
4. The Committee should call on Welsh Government to ensure better integration of employment support services in Wales, to ensure that, regardless of who is the service funder, commissioner or provider, that there is consistency in experience for

deaf and disabled people accessing and benefitting from employment support programmes.

5. Once the findings of the Evidence Unit and Disability Discrepancy Unit's work with Disability Rights Taskforce co-chairs is published, the Committee should ensure this is taken on board alongside the findings of this committee inquiry, and used to develop a clear, targeted plan for addressing the gaps/barriers highlighted, with a set timeframe for delivery.
6. The Committee should support the work of the Evidence Unit to explore publishing more detail on pay gaps for people with protected characteristics, and ensure that any outcomes of this project are embedded into both the Committee's, and Welsh Government's, ways of working going forward.
7. We would urge the Committee to recommend a full impact evaluation of the loss of funding of employment support programmes that previously benefitted disabled people in order to understand:
  - a. The extent to which employers and individuals with sensory loss are missing out on support due to loss of, or changes to funding.
  - b. Gaps in existing employment support provision as a result of this loss – e.g. has the loss of funding led to more general employment support rather than more specific, condition focused support, or a loss of support in certain geographic areas.
  - c. The extent to which learnings from these programmes have been taken on board and inform current or new employment support for disabled people.
8. We would urge the Committee to support the Welsh Government's work to review, revise and strengthen the All Wales Standards for Accessible Communication and Information, and urge Welsh Government to ensure it is effectively resourced and integrated to achieve the desired outcomes for deaf people and people with hearing loss.
9. The Committee should pressure the Welsh Government to urgently tackle hearing aid and other audiology waiting lists and highlight the wider impact of long waiting lists on people with hearing loss and disabled people's employment prospects, as well as wider health and wellbeing.
10. The committee should urge Welsh Government to regularly report on the impact of Disability Employment Champions' engagement with employers, and what tangible results this is having on improving employment practices to breakdown barriers to deaf and disabled people, and on the recruitment and retention of deaf and disabled employees.
11. The Committee should urge Welsh Government to build on the learnings of the Jobsense East Wales final evaluation:
  - a. To significantly improve the integration of existing employment support programmes for disabled people with wider public services, including the NHS and local authorities, to improve referral and ensure a holistic approach to support.
  - b. To recognise the importance of wider advice and support services – for example on disability benefits, cost-of-living, transport etc - alongside employment support, and ensure employment support programmes are linked to or at least



signpost to appropriate advice that is tailored to and accessible for deaf and disabled people.

- c. Encourage Welsh Government to explore this within the Welsh Benefits Charter to improve understanding and awareness of benefit entitlement.
  - d. Call on Welsh Government to improve deaf awareness in Welsh workplaces, and explore how this and wider disability awareness and understanding can be embedded in the Welsh Government's Fair Work priorities.
  - e. Urge Welsh Government to ensure that target-setting for future employment support schemes for disabled people does not inadvertently disincentivise support for those further from the labour market. Considering a dual target, that effectively measures the different degrees of progress for people closer to or further from the labour market, could promote more effective outcomes.
  - f. Ensure employment support programmes are closely tied to the Welsh Government's Fair Work agenda, supporting disabled people into quality employment.
12. The Committee must call on Welsh Government to work directly with the UK Government to tackle some of the urgent issues affecting disabled people in employment as highlighted above. These include:
- a. Urgently tackling the Access to Work backlog, as well as reforming and expanding the scheme.
  - b. Reform the Disability Confident scheme to place greater expectations on employers, better support for individuals, more incentives to progress through the scheme and more robust and widely used monitoring and reporting systems.
13. The Committee should call on Welsh Government extend the provision of in-work support, either through direct provision or making funding available to specialist organisations. The emphasis should be on empowering people with lived experience to have the resource and confidence to self-advocate and provide peer support. This support should focus on:
- a. Raising deaf awareness in the workplace.
  - b. Support access to information and guidance on assistive equipment and communication support that may help them, as well as support using it.
14. The Committee should explore how Welsh Government could develop a Wales addition to the Disability Confident Scheme to improve the ambition and outcomes of the scheme in Wales, and ensure it embodies the Welsh Government's values of fair work.
15. The Committee should recommend Welsh Government develop a Disability Employer Hub to be hosted through Business Wales, providing a central portal of advice, guidance, resources and examples to support employers to employ disabled people.
16. The Committee must ensure lessons are learnt from previous employment support schemes to improve future development, which places the needs of disabled people at the centre. This includes:
- a. Fully assessing the impact of the loss of ESF funding on employment support as well as wider changes to structures of funding for employment support.

- b. Create and implement new employment programmes specifically for disabled people, particularly those furthest from the labour market and with higher support needs.
  - c. Ensure that people with lived experience of disability are employed to deliver this support, including knowledge and understanding of the barriers affecting people who are deaf or have hearing loss.
  - d. Improve integration between employment support programmes and other public services that act as gateway services, for example NHS, Jobcentre, local authorities. Ensure that these gateway services are equipped with appropriate training and understanding of the needs of disabled people in employment, and there can be effective joint-working across multiple agencies.
  - e. Ensure that any future support for disabled people adopts a personalised model that is tailored, specialist and targeted, and where disabled people can still draw on support after they have found work.
17. The Committee should recognise the importance of voluntary opportunities in moving disabled people closer to the labour market, and ensure this is reflected in employment support. This must include:
- a. Mapping voluntary opportunities within employment support, and providing support for those accessing voluntary opportunities.
  - b. Monitoring voluntary opportunities to ensure progress towards paid employment.
18. The Committee to call for UK Government to expand the Access to Work scheme to voluntary opportunities, or work with *Welsh* Government to explore whether the scheme could be expanded within Wales.

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For further information, please contact:

Polly Winn  
External Affairs Manager for Wales, RNID

