

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

DE24

Ymateb gan: RNIB Cymru | Response from: RNIB Cymru



Equality and Social Justice Committee

Inquiry into Disability and Employment

Consultation Closing Date: 9th September 2024

Background

Disability is defined by the Equality Act 2010 as a physical or mental impairment that significantly and long-term adversely affects a person's ability to carry out normal day to day activities". For the purpose of this inquiry, this definition encompasses medical disorders, learning disabilities, neurodivergence and other conditions.

Terms of reference

The terms of reference for the inquiry are:

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.

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).

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.

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

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.

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

RNIB Cymru Response

About RNIB Cymru

RNIB Cymru is the largest sight loss charity in Wales, and we provide support and services to blind and partially sighted people, as well as their families, friends, and carers, to help improve lives and empower people to live well with sight loss and retain independence. We work in partnership with public, private and third sector bodies across Wales to deliver projects, training, and services and give information, advice, and guidance. We raise awareness of the issues that blind and partially sighted people face every day and challenge inequalities through campaigning for social change and calling for improvements to services. Whether you have full, some, little or no sight, everybody should be able to lead independent and inclusive lives.

Context

Sight Loss Stats in Wales

There are an estimated 112,000 people in Wales living with sight loss (3.5 per cent of the population). It is predicted that this number will increase by a fifth (19 per cent) to 133,000 in less than ten years and double by 2050. There are 20,000 people with sight loss within the working age bracket of 18-64, with 4,200 people registered as blind or partially sighted.¹

Employment for Blind and Partially Sighted People

RNIB's report 'Employment for Blind and Partially Sighted People in 2019'² explores blind and partially sighted people's experiences of employment. It highlights the frequently reported challenges, barriers and issues people with sight loss face when seeking work, being recruited and onboarded, trying to remain in employment and when accessing support. The research shows that:

- Only one in four registered blind and partially sighted people of working age are in employment.
- The employment rate for blind and partially sighted people is the same as it was in 1991, and there has been no overall change in a generation.
- Blind and partially sighted people are significantly less likely to be in employment than the UK average.

¹ [RNIB Cymru Impact Report, 2022-2023](#) RNIB Cymru, 2023

² [Employment for Blind and Partially Sighted people in 2019](#) RNIB 2020

- People with sight loss need to have a degree in order to have a similar chance of being in employment than people in the general population with no qualifications.

Educational attainment is a big indicator of whether blind and partially sighted people are in work and how they progress and develop in their role. People with sight loss holding higher level qualifications were less likely to be economically inactive than those who did not have qualifications. People with sight loss are less likely to be in employment than the rest of the UK population, across every comparable qualification level. The largest gap is for those people who leave education with no qualifications. 44% of blind and partially sighted people with a degree are employed but this drops to 8% for those with no qualifications.³

The nature of work that is available and accessible is also a key indicator of the employment gap. Based on analysis of the Labour Force Study from 2020 to 2022, the majority of those with difficulty seeing (the term used in the study) in employment were employed by a private firm or business, with jobs more likely to be in roles associated with public admin, education, health, banking and finance and least likely associated with construction, energy, agriculture, forestry or fishing. This trends towards roles being more professional and administrative and less manual and industrial.⁴

Job Seeking, Recruitment and Onboarding with Sight Loss

Jobseekers with sight loss most frequently say that their sight loss has stopped them reaching their potential, with 84% of this group reporting feelings of missed potential. More than half of blind and partially sighted people who were in work (54%) said that they had at least some negative experiences in the past when applying for jobs. This includes nearly one-third of people (30%) whose experience of looking for work was entirely negative.

Looking for work can be a visual process as it often involves searching for and reading job adverts online, in trade publications, or on noticeboards in local areas. Therefore, if job adverts are not in alternative or accessible formats, then blind and partially sighted people are at a disadvantage from the beginning. Many job applications are now done solely online, through various digital platforms and portals, which do not always have accessibility built in.

³ [Employment for Blind and Partially Sighted People in 2019](#) RNIB 2020

⁴ [Employment for People with Sight Loss in 2022: Secondary Analysis of the Labour Force Survey](#) RNIB 2024

They can be difficult to navigate and complete due to small font sizes, poor colour contrast, poor formatting with mobile or tablet devices, lack of screen reader compatibility or complex processes such as uploading attachments. There is also a societal need to be more digitally present to gain an advantage with job searching, with the rise of online digital platforms like Indeed and social networking such as LinkedIn, but although there have been great strides to make technology more accessible, there is still a digital divide.

People with sight loss are twice as likely to be digitally excluded the general population. If current trends continue, over the next six years, nearly all people across the UK will be online, yet it will take an additional eight years before nearly all people with sight loss are online.⁵

Disclosing an impairment or disability during the process of applying for a job, potentially before or at an interview due to the need to request adjustments, can be a very personal decision filled with anxiety and trepidation about how the employer may react. A common saying amongst jobseekers with sight loss is that every interview constitutes two parts – being interviewed for the role and being interviewed about sight loss. Most interviewees report that they spend a lot of the time educating potential employers around reasonable adjustments, assistive technology, and schemes like Access to Work.

Interviews can also be challenging as it can be difficult for people with low or no vision to read any non-verbal clues, such as nodding or gesturing. Prospective employers often also expect eye contact and view it as a signal of focus, engagement or intention, and can misconstrue a lack of eye contact as disinterestedness or evasiveness. Virtual interviews can also be difficult if steps are not taken to make them accessible and inclusive.

The approach an employer takes to onboarding a blind or partially sighted employee can also impact on their experience and the length of time they stay in that role. People with sight loss often report encountering issues despite being interviewed, recruited or onboarded by an employer signed up to the Disability Confident scheme. This includes inaccessible processes, such as receiving communications and documents that are not compatible with screen reader technology. Other people report that employers have limited knowledge or understanding of how as a person with sight loss would do their job, or the reasonable adjustments available, including support through Access to Work.

⁵ [Sight Loss and Technology Briefing: How blind and partially sighted people can bridge the digital divide](#) RNIB 2021

Staying in Employment

For those who have established employment, it crucial that steps are taken to support the employee to retain their role after experiencing sight loss. Just over a quarter of registered blind and partially sighted people said they had left their last job due to the onset of sight loss or the deterioration of their sight. But many people tell us that they could have continued in their job with the right support.

If sight loss is experienced suddenly and a leave of absence to seek medical advice and treatment is needed, then a phased return to work can be achieved in conjunction with in-work support, such as occupational health services and employee assistance programmes. As mentioned previously, support can also be provided through Access to Work and the RNIB Employment team.

For some people who experience sight loss and lose skills that are pivotal to their role, such as driving or piloting, then continuing with their roles may not be possible. Re-deployment, job carving, or re-training may be the next steps that needs to be taken. When learning to work in a new job or new sector, it is important that tailored support is available and people with sight loss in Wales can access schemes and programmes, such as JobSense, Elite Supported Employment, and / or PRIME Cymru, which can help disabled people return to work. Currently, there is a postcode lottery across Wales for this type of support, with some people only able to access programmes and schemes that are in their local area despite remote access being available through Zoom and Teams.

Barriers

Employer Attitudes and Practices

Under the Equality Act (2010), employers have a legal duty to make reasonable adjustments for their employees. However, our research tells us that people who are blind or partially sighted are still not receiving adequate provision.

- 23 per cent of employers said they were not willing to make adaptations to employ someone with a visual impairment despite legal obligations under the Act.
- Our research also found misconceptions about employing someone with sight loss, with half of employers thinking there may be additional health

and safety risks in the workplace for the employee if they were to employ a blind or partially sighted person.

- One-third of people with sight loss who are not in work said the biggest barrier to them getting a job was the attitude of employers.⁶

The UK Government's All-Party Parliamentary Group (APPG) on Eye Health commissioned YouGov to carry out a poll on employer attitudes in November 2023.⁷ They found:

- 48 per cent of businesses surveyed didn't have accessible recruitment processes.
- 47 per cent didn't know where to find funding to help cover the extra costs of practical support for employees who are blind or partially sighted, such as the government's Access to Work Scheme.

In general, larger employers considered themselves better equipped to be able to provide adjustments or practical support to blind or partially sighted employees or candidates. However, blind and partially sighted people are less likely to be employed by the Public Sector (according to the Labour Force Survey). Amongst all employers, confidence of current accessibility measures was low and only 38% of employers agreed that they knew where to find information and support on making adaptations. This demonstrates the importance of raising awareness of how to better support blind and partially sighted people at work.

Support and Services

RNIB Employment Services

RNIB supports as many blind and partially sighted people as possible to stay in work and believes that sight loss should not equal job loss. Through the Helpline, RNIB can be contacted by customers who need advice and information about searching for work or changing careers. Employment advisors can offer practical advice and help develop basic skills needed to write CVs and boost confidence before interviews. RNIB provides innovative and comprehensive solution for employers, which includes an unbiased work-based assessment upon referral, a procurement service across the range of assistive technology equipment, software, and training for employers and

⁶ [Employment for Blind and Partially Sighted People in 2019](#) RNIB 2020

⁷ [APPG Inquiry on employers Attitudes and the Employment of Blind and Partially sighted People](#) APPG Eye Health and Vision Impairment, 2024

employees as well as advice on installation and configuration of assistive technology.

RNIB also provides more specific support for employers to help improve inclusion in the workplace. The Visibly Better Employers quality standard helps employers improve practices in relation to their recruitment and retention of staff with sight loss. The scheme examines how inclusive an employer's workplace and processes are for both existing staff with sight loss and potential future applicants, provides recommendations, and, after implementation of suggested changes, awards the employer Visibly Better Employer status.

Internships and Work Placements

RNIB's See Work Differently work placement scheme is an employment initiative for people with sight loss who are not in work. The aim is to help people secure the first rung on their career ladder or return to work following a career break. These are paid placements for a fixed term and are generally for fourteen hours per week. As well as this, RNIB has partnered with Thomas Pocklington Trust to create a new initiative called Get Set Progress internships, which give opportunities for jobseekers with sight loss to find employment through a paid internship scheme. The uptake of these schemes has been positive and showed there is a demand for people seeking out experiences that will help, but due to both schemes being new, there is no evaluative data available yet as to how successful participants are at finding work after the end of the placement or internship.

Benefits, Welfare and the Access to Work scheme

For those needing financial assistance while looking for work, the first port of call is the JobcentrePlus, as run by the Department for Work and Pensions (DWP). These local centres offer resources to help people find work or claim benefits, such as Universal Credit, or support still active legacy benefits associated with work, such as Jobseeker's Allowance or Employment Support Allowance. The system is bureaucratic and complex and is not designed with the nuanced needs of sensory impairments in mind.

A lack of specialist knowledge and understanding about sight loss means that one of the most common frustrations amongst blind and partially sighted people is the attitude of JobcentrePlus staff, DWP assessors, and Access to Work advisors. In a 2021 survey undertaken by RNIB in response to the UK

Government's Health and Disability Green Paper,⁸ 61 per cent of respondents said job coaches and 43 per cent said Access to Work advisors did not have good knowledge and understanding of sight loss and the support and adjustments blind and partially sighted people need.

We have heard many reports of JobcentrePlus staff sending jobseekers with sight loss based in Wales to wholly inappropriate job interviews. For example, one blind man from Brecon was told to interview for the role of a bus driver, and if he did not go then he would be sanctioned. Another person from Pontyclun has told us that they were initially denied reasonable adjustments by their local JobcentrePlus to have an appointment at a time that their sighted companion could be present.

This is not only demoralising and negatively impacts the mental health of those who go through the process, but so much of it is a waste of time and resources, which could be better allocated to proactively supporting people with sight loss into meaningful work. There is a clear need for frontline staff to receive in-depth visual awareness training when assessing the needs of job seekers and employees with sight loss. This will enable them to provide expert, efficient and effective advice and guidance. This should include use of the 'Understanding Sight Loss for Professionals' e-Learning training that has been designed by RNIB for potential use in the DWP training provision.

Access to Work Issues

One of the most concerning issues over the last few years is how the Access to Work scheme has been failing to operate as it should. Access to Work provides funding and grants for crucial support, such as specialist equipment and support workers, for many blind and partially sighted workers. However, for over two years people with sight loss have faced unacceptable delays in accessing the support they need through the scheme. The scheme is incredibly valuable in enabling blind and partially sighted people of working age to become economically active and independent. However, far too many people with sight loss are waiting too long to receive the Access to Work support they need, putting jobs at risk.

Recently, customers with sight loss have been told there is a six month wait in the processing of some applications, with the total number of outstanding applications exceeding 46,000 in July 2024.⁹

⁸ [RNIB Response to UK Government's Health and Disability Green Paper.](#), RNIB 2021

⁹ ATW Stakeholder Forum, Meeting Notes, July 2024

For those who have been awarded a grant from Access to Work, there are significant delays in processing claims and providing payments. This causes distress, frustration, and anxiety when needing to pay support workers and expenses such as taxi costs. We have heard many cases whereby people have lost support workers due to lack of timely payments and taxi firms have stopped offering services due to the accrual of invoices.

There is a distinct lack of consistency in awarding claims and a lack of detailed information available on how the process works, leading to confusion by both applicants and assessors, and each re-application can follow a completely different approach or criteria to the last.

The DWP needs to urgently take decisive and comprehensive action to tackle the delays, so blind and partially sighted people facing long delays can access vital support in a timely manner. Fixing Access to Work is critical for enabling more blind and partially sighted people to stay in or get into long term employment.

Accessible Workplaces and Transport

Vision impairments affect the ability to drive, so blind and partially sighted people rely more on walking journeys or public transport to get around independently, or else will need a dedicated driver to take them to and from work every day.

Public transport needs to be accessible and reliable for blind and partially sighted people to have the confidence to use it. If there are frequent cancellations or delays, then this will affect their punctuality and may jeopardise their employment. If bus and train services are very limited in certain areas, do not run to places of high-volume employment e.g. retail and business parks, then relying on buses and trains to get to work will not be an option for blind and partially sighted people. Taxis may become the main way to get to and from work, this is also dependent on whether taxis are available, especially in rural areas, whether taxis are also accessible and can accommodate larger guide dogs, whether there are no issues with guide dog refusals, and whether there are any clashes with taxis contracted for school runs. Walking routes also need to be safe to use and clutter free, from doorstep to destination, for getting to work on foot to be an option.

Places where people work also need to be suitable for employees with sight loss. Features like lifts instead of stairs can be preferred by guide dog owners,

and good, consistent lighting levels throughout, good contrast on walkways, accessible toilets and break areas, and accessible ways to clock in or out ensure that blind and partially sighted people are capable and confident of being in a workplace. Ensuring that there is understanding amongst colleagues that employees with sight loss work differently and may need quieter spaces in which to listen to audio materials or utilise speech to text software is important. Making sure that team building, or after-work gatherings are inclusive and do not always include activities that will exclude blind and partially sighted colleagues all contributes to inclusivity and removal of attitudinal barriers.

Disability Confident Scheme and Disability Reporting

The Disability Confident scheme is a voluntary UK-wide scheme designed to support employers to recruit and retain disabled people and to change attitudes towards disability. However, we know many people with sight loss still face barriers despite being employed by a Disability Confident employer. There needs to be accountability and credible performance measures to ensure that Disability Confident employers recruit disabled people and provide supportive and inclusive work environments. To achieve this, there should be a new emphasis on progression through the programme. Employers on Level One should have their accreditation removed if they have not moved to Levels Two or Three within a set time.

With the success of mandatory reporting on the gender pay gap, publishing disability workforce information could be an important step in closing the disability employment gap and disability pay gap that exist between disabled people and the wider workforce. This should be brought in alongside other measures, such as upskilling employers to ensure their practices and workplace environments are inclusive and accessible. It would also be good practice if reporting on disability workforce data was broken down by impairment or condition to understand unique barriers to employment for different groups. The experiences of disabled employees also need to be collected and monitored.

Summary

It is notable that the majority of people with sight loss feel that their vision impairment has stopped them from reaching their potential at work. This feeling of missed potential was true for research participants regardless of employment status or other demographic factors.

A myriad of factors and long-standing societal barriers have prevented many blind and partially sighted people from taking the career path of their choice, or has led to them leaving job roles earlier than desired.

Wales will need to create a more sustainable and resilient economy in the face of the climate emergency, geo-political uncertainty, and seismic technological changes. It will also need to be ambitious enough to factor in accessibility and inclusivity at its core in order to create an equitable economy. An ambitious Wales would seek to ensure there is equality of opportunity for blind and partially sighted people to find meaningful employment of their choosing. By embedding the social model of disability throughout the nation, it could lead to a dismantling of some of the long-standing barriers.

RNIB Cymru Case Study: Losing Sight of My Career

At RNIB Cymru we hear varied stories from our supporters about their experiences of employment. Whilst sight loss is a spectrum and everyone has unique challenges, the following account from one of our new volunteers is very typical of how people who have established career paths and then experience sight loss later in life face an uncertain future of retaining employment.

When George Plumridge was at school, and subsequently college, he felt drawn to working with young people, and embarked on studying Education Studies at university in London. He graduated in 2014 and decided to embark on a career in teaching. However, after his sight levels deteriorated suddenly as a result of a condition he was born with, called Retinitis Pigmentosa, he decided to leave his teaching job in London to move to Wales.

When it came to applying for jobs, George wasn't in a position where he was willing to disclose his eye condition yet, but he was grappling with the challenges that sight loss was bringing. He had interviews for teaching roles, and "I walked into a chair and couldn't see what was written on pieces of paper. I laughed it off by saying that he had forgotten my glasses, but inside I was dying." George was dealing with high levels of embarrassment and anxiety, due to suppressing his own feelings about accepting his sight loss. But he was able to get work through an agency and was able to enjoy what he could do.

George went to Moorfields Eye Hospital and was certified as Severely Sight Impaired, and he opted to be registered with his local authority. At this point he didn't know anything about what options were available to support with

employment, hadn't heard of Access to Work and wasn't even sure in his own mind that a blind person was capable of being a teacher. His first disclosure of sight loss resulted in the teaching agency ignoring him from that point on, and when he spoke to the Headteacher at the school where he had a placement, "they said sorry, but you will no longer be able to work here." At thirty-two, George thought his longed-for career was over.

He still needed to have some kind of income and so he went to the local JobcentrePlus to apply for Income-related Jobseekers Allowance. His first experience was, in his own words, awful. "They gave me an appointment at a time when my partner wasn't able to attend with me and support me, I asked them if I could change the appointment time so that my partner could attend, and I was told that wasn't possible. I told them I needed someone to physically support me with the appointment, by driving me and taking me in and I asked them for a reasonable adjustment. They were incredibly hesitant to accommodate me, and it took some time before I was able to get through to them. When I finally had my first appointment I was with my partner and the staff member only looked at and spoke to my partner and referred to me in the third person. At one point they said 'why is he applying for Jobseekers Allowance when he's blind? What job can he do? He would be better off applying for Employment Support Allowance [where there is no expectation for the disabled person to work].'"

George was deeply upset and unsatisfied with this encounter so decided to escalate this to a Manager but there was a lack of direct access for resolving complaints. The system seemed overcomplicated. "I eventually spoke to the Manager at the Jobcentre, who apologised, but then went on to ask me why I had started an application for Employment Support Allowance, because by doing so it would take longer to sort out an application for Jobseekers Allowance. I was only following the directions from the assessor and felt blamed for doing the wrong thing." This was a real low point and George felt he had no idea what to do next.

But one thing he did was decided to call RNIB and ask for help, and they referred him to the Employment Services, which offers people advice and resources when looking for work. The Employment Advisor informed him of an internship scheme called Get Set Progress, being run by RNIB in conjunction with Thomas Pocklington trust (a sight loss organisation based in England). So, George applied for it and was given a placement as an Information Support Officer with the Nystagmus Network. Whilst getting back into work boosted his mental health and financial situation, this role has also helped him

in accepting his sight loss and enabled his passion to be directed in a meaningful and useful way. Now, after an extremely low point, he is actively looking forward to a fulfilling long-term career in the sight loss sector.

When asked about the barriers he has encountered in his many years of working and not working with sight loss, George responds that the attitudes of others has been the biggest barrier. The lack of knowledge has been astonishing, and it is not lost on him as a teacher that the National Curriculum doesn't teach enough about vision impairments, from information about eye conditions, to eye health support pathways, to how blind and partially sighted people can live independent lives.

When trying to find out information, George struggled after sight loss as websites are not always accessible. The Disability Confident scheme does not give him confidence – “extra support is needed to make sure that applications, and recruitment and interviews are inclusive.” When reflecting on disclosing his vision impairment he notes his personal insecurity. “It was as if I felt a bit stupid for having a visual impairment, half of people will just not understand it.” Confidence building is key and meeting ambitious people who have lower levels of vision has been a vital step in rebuilding his hopes for employment. George notes that what has really worked in his internship role is that his workplace understands accessibility, which has helped him to feel comfortable. Access to Work adaptations and requirements are already in place, such as large monitors, tablets, etc. There is also accommodation for low confidence, with support and training available. George needs to travel to London occasionally for his work placement and has had very positive experiences of using public transport and Passenger Assistance available, and travelling independently has also boosted his confidence and his family's perception of what he can achieve.

To sum up, George feels that “education and awareness are both vital and the word ‘disability’ needs to be much more mainstream. Mentoring scheme and dedicated training for workers with sight loss would massively aid personal development. If I can recommend one thing, it would be putting how to live with a disability, with a vision impairment, on the curriculum.”

RNIB Cymru Recommendations

We are calling on Welsh Government to address the long-standing barriers that blind and partially sighted people face to seeking or retaining employment.

Addressing Workplace Attitudes

We call on the Welsh Government to:

- Place a greater focus on addressing attitudes in the workplace and educating employers to ensure their practices and workplace environments are inclusive and accessible for blind and partially sighted people, including for employees who develop sight loss.
- Ensure employers have an up-to-date and fit for purpose workplace reasonable adjustments policy and flexible working policy.
- Run a widespread awareness and educational campaign on the support available for employers, disabled workers and disabled jobseekers.
- Complete and implement RNIB's Visibly Better Employers quality standard and Visibly Better Spaces certification.

Job Opportunities

We call on the Welsh Government to:

- Ensure funding for agencies, programmes, or schemes that support disabled jobseekers is evenly distributed across Wales and fund opportunities or schemes to re-train job seekers new to sight loss that are economically inactive.
- Partner with third sector organisations to find opportunities to create apprenticeships and internships to support blind and partially sighted jobseekers into work.
- Incentivise employers to employ under-represented groups by setting targets for numbers of jobs or apprenticeships on publicly funded projects as a condition of funding.
- Use public spending power to achieve additional social ends through the incorporation of additional social objectives into the procurement process.

References

RNIB Cymru Impact Report 2022-2023, RNIB Cymru, 2023

Employment for Blind and Partially Sighted People in 2019, RNIB, 2020

Employment for People with Sight Loss in 2022: Secondary Analysis of the Labour Force Survey RNIB 2024

Sight loss and technology briefing How blind and partially sighted people can bridge the digital divide, RNIB, 2021

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See differently

Inquiry Data, APPG Eye Health and Vision Impairment, 2024
RNIB Response to UK Government's Health and Disability Green Paper,
RNIB, 2021

ATW Stakeholder Forum Minutes, July 2024

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