

The Equality and Social Justice Committee, Disability Employment Inquiry, August 2024

Written evidence submitted by:

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We are two academic researchers who have a longstanding shared interest in disability inequality in the labour market and, as members of Disability@Work, a collaboration of four academics, we seek to make this research available to policymakers.¹ Our expertise is particularly in relation to applying quantitative data analysis to large-scale data to provide nationally representative evidence on disability-related gaps in labour market outcomes in the UK. We have previously submitted evidence to the Westminster Work and Pensions Committee Disability Employment Gap (DEG) Inquiries (2016, 2021 and 2024).² Building on these previous submissions, we are pleased to present evidence for Wales in this submission, which we set into the broader UK context. We make several recommendations based on this evidence to ensure disability gaps in the labour market are more accurately and widely monitored in the future. We believe that data on disability which is accurate and meaningful, and is measured consistently over time and between organisations, is fundamental to future understanding, the evaluation of changes in policy and practice, and monitoring national progress. It should therefore be a priority for government in supporting labour market equality for disabled people.

Executive Summary

Our submission makes the following key points:

1. Trends in the Disability Employment Gap (DEG)

- We argue there has been a narrowing trend in the DEG in the UK and Wales between 2014 and 2019 but less clear trends in the DEG since the pandemic.
- We provide evidence of rising prevalence of disability among the working-age population. This increases the importance of addressing disability-related gaps in the labour market. It also confounds a positive interpretation of the narrowing pre-pandemic trend in the DEG.

2. In-work disability gaps

- We argue that a more complete understanding of the DEG and disability-related inequality in the labour market is possible by considering disability gaps across a wider range of indicators, including hours, pay (the disability pay gap (DPG)) and the nature of work.
- We present evidence on disability gaps in pay, hours, and job satisfaction between workers in comparable jobs.

¹ Further information, including more detailed information in relation to the evidence presented here, is available at: www.disabilityatwork.co.uk.

² The reviews made a series of recommendations based on our oral and written evidence: <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/work-and-pensions-committee/disability-employment-gap/written/32826.html>, <https://committees.parliament.uk/writtenevidence/16287/pdf/> and <https://committees.parliament.uk/writtenevidence/129317/pdf/>.

3. *A priority for government should be to improve data collection and monitoring of disability-related labour market inequality*
- We recommend a movement away from the exclusive focus on employment and the DEG to a more comprehensive set of measures as part of a national monitoring of disability labour market inequality. These include disability prevalence, the employment loss due to disability and disability gaps at work.
 - We argue that to narrow the DEG, DPG and other disability-related gaps at work, measurement and monitoring of disability inequality at a national level needs to be complemented by a consistent framework of organisational (employer) monitoring. This will only be achieved by a government-led national disability measurement project.

Context

The gap in employment rates between disabled and non-disabled people of working-age, the disability employment gap (DEG), is large and enduring in the UK. This is the measure of disability-related employment inequality recommended in the Black Review (Black, 2008). In 2015, the Government pledged ‘to halve the disability employment gap [and] transform policy, practice and public attitudes so that hundreds of thousands more disabled people who can and want to be in work find employment’ (Conservative Party Manifesto, 2015). However, in light of the failure to make much progress on this target, it downgraded its ambition in 2017 to increase the number of disabled people in work by 1 million by 2027. We have been very critical of this change and the focus on an absolute measure, which depends on the economic cycle as well as the number of disabled people and, at the time, was likely to be met on the basis of prior trends alone.³ We argue that policymakers should focus on the DEG, a relative measure of disability inequality, the meaning of which is not distorted by macroeconomic trends.

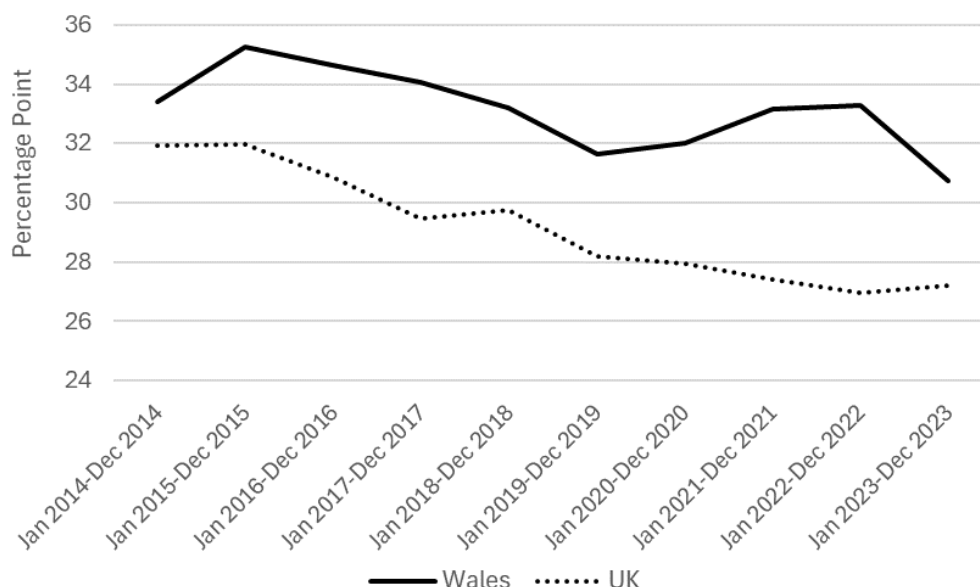
Employment rates by disability status are typically estimated from the Labour Force Survey (LFS), a nationally representative household survey undertaken by Government. This survey forms the basis of data for the Annual Population Survey (APS) which contains a sample boost for Wales, and supports more accurate regional comparisons in relation to disability.⁴ In Figure 1 we plot the trend in the DEG between 2014 and 2023 (the longest period over which we have consistent information on disability) in Wales and the UK.⁵ The DEG is consistently higher in Wales than in the UK, and whilst the trend in both cases has been downwards the narrowing has been stronger in the UK than in Wales. However, we argue that UK government claims of policy effectiveness in the period prior to the pandemic were overstated since the fall in the DEG was likely to be at least partially a result of increasing disability prevalence (see below). Analysis since 2019 suggests that the narrowing trend in the DEG has stalled.

³ For details see: <https://www.disabilityatwork.co.uk/wp-content/uploads/2017/12/changetargetsvwmj.pdf>

⁴ All the data analysed in this submission are obtained from Nomis: www.nomisweb.co.uk.

⁵ In terms of UK regions, the DEG in Wales is more similar to the North West, Scotland, North East and Northern Ireland. The DEG is lowest in the South East, South West, East and London. None of the qualitative patterns we identify and highlight in the submission are, however, driven by the inclusion of London, East and the South East in the UK average. Focusing instead on the ‘Outer UK’ (see Davies *et al.*, 2011) which excludes these regions given their relatively favourable economic conditions still results in a higher DEG in Wales of about 2.3 percentage points.

Figure 1: DEG UK and Wales 2014-2023, APS



Notes: Authors calculations based on APS data on the economic activity of people with Equality Act disability. Sample is aged 16-64. APS 2014-2023.

Despite widespread evidence of a sizeable and persistent DEG in the UK, our understanding of its drivers remains relatively limited. Evidence from existing surveys shows it is largely unexplained by the other personal characteristics that disabled people hold (Jones, 2006), including, for example, well-established differences in the average age or educational attainment between disabled and non-disabled people, leaving a potentially important role for factors unobserved in survey data, including employer discrimination.

In relation to the latter, recent UK analysis by Armenak *et al.* (2024) uses an experimental (correspondence study) approach whereby otherwise comparable hypothetical CVs are submitted by disabled and non-disabled applicants to real world job vacancies and employer responses monitored to test for evidence of employer discrimination. The evidence suggests that hiring discrimination against disabled wheelchair users in the post-pandemic labour market is occupation specific, being evident for financial accounts assistants but not certified accountants despite both occupations being selected for having minimal physical requirements. The research further finds no evidence that enhancing qualifications and skills among job seekers reduces disability discrimination in hiring.⁶ The extent of disability discrimination is however found to relate to the characteristics of jobs, being greater for roles involving teamwork and customer/client contact suggesting that actual or perceived coworker or customer discrimination contribute to disability-related hiring gaps. The research also finds no evidence that discrimination is lower among employers promoting themselves as equal opportunities employers and vacancies with the potential for remote work. These findings are consistent with previous criticism of the government Disability Confident accreditation scheme (Hoque and Bacon, 2024) and question recent government emphasis on remote work as an effective channel for reducing the DEG.

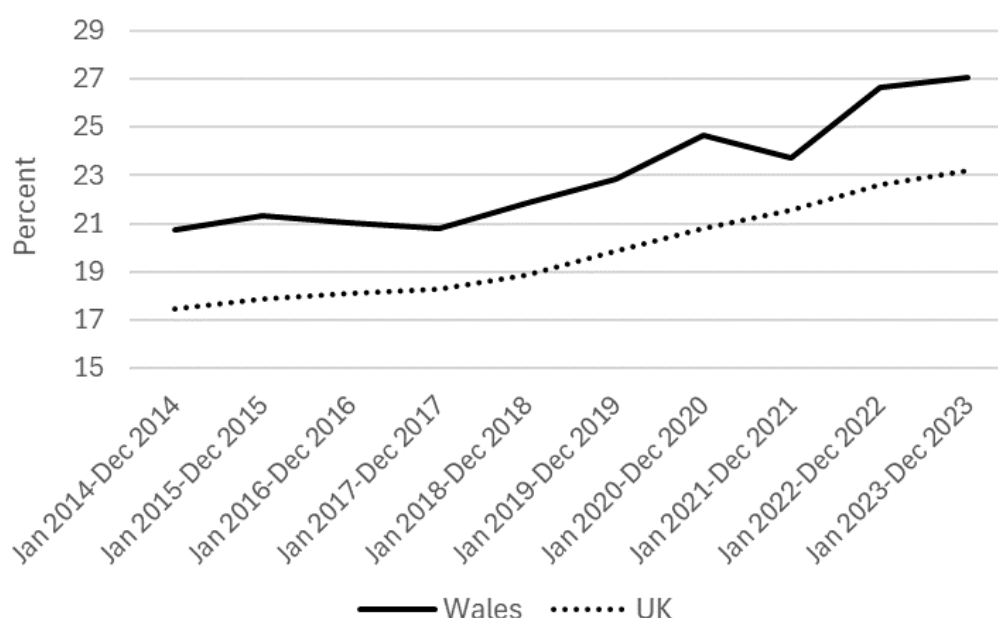
⁶ Further details of the project are available at: committees.parliament.uk/writtenevidence/129255/pdf/.

1. Disability measurement

Disability is typically measured using an activity-limiting definition of disability that is, the presence of a long-term health problem (defined as lasting 12 months or more) which affects day-to-day activities. It is designed to be consistent with 2010 Equality legislation. As a self-reported measure, it is sensitive to legal and social norms.

The definition and prevalence of disability in survey data underpins our understanding of disability gaps in labour market outcomes. A rising trend in disability among the UK working-age population was evident in the APS prior to COVID-19 but has become more pronounced since then. Figure 2 plots disability prevalence in the APS (as measured by the proportion of the working-age population classified as disabled according to the Equality Act definition) for Wales and the UK. It shows that disability prevalence is higher in Wales (27.1% in 2024) than the UK (23.2% in 2024).⁷ In both cases disability prevalence has been on an upward trend since 2014. The extent of increase is sizeable (30.4% in Wales and 32.9% in the UK).

Figure 2: Disability Prevalence 2014-2023, APS



Notes: Authors calculations based on APS data on the economic activity of people with Equality Act disability. Sample is aged 16-64. APS 2014-2023.

The most likely explanation for the rise in disability prevalence at least prior to COVID-19, is the broadened social interpretation of disability as awareness and acceptability of disability has grown. The increase in disability prevalence is unlikely to reflect changes in underlying health and functional impairment and/or their impacts on activity-limitation. Rather it is likely the result of changes in recognition, acceptance, law, policy and practice. This ‘cultural effect’ potentially confounds the ability of the DEG to measure progress on disability equality or the outcome of policy innovations. To measure and account for this, we recommend further data collection to measure disability using multiple definitions, including measures based on functional limitations which

⁷ The corresponding figure for ‘Outer UK’ is 24.9%.

capture more medical (objective) components of disability that can be used to understand why (Equality Act) disability prevalence has changed. This would fit best practice internationally. For example, the UK could use the questions recommended by the Washington Group on Disability Statistics.⁸

Changes in the composition of disability, such as in terms of the type and severity of disability will also affect trends in the DEG. Here we highlight two consistent findings:

- (1) The DEG is well-established to be larger for those whose main condition is a mental rather than physical health problem.⁹ This is true even after accounting for differences in other observable personal characteristics, for example age and education, consistent with differences in the probability of employment relating to the nature of disability *per se* (Jones, 2011; Jones 2022). This additional disadvantage associated with mental compared to physical health problems also extends to hourly pay.
- (2) The DEG also increases with the severity of disability, including measures of severity based on the presence of multiple health problems or self-reported limitation (limited ‘a lot’ versus ‘a little’). Again, this is not simply a consequence of differences in other personal characteristics between those with different severities of disability, consistent with severity itself having an additional role (Jones, 2011; Jones 2022). The pattern further also extends to pay (Jones, 2022).

Given this, it is particularly important to note that the rising prevalence of disability has coincided with changes in its composition. This has included an increase in disabilities due to mental health problems.¹⁰ We therefore recommend that the monitoring of disability-related employment inequality needs to extend to include, and more carefully consider, disability prevalence and the heterogeneity of disability.

The total impact of disability on employment has not declined.

An alternative measure of the employment impact of disability is given by the combination of disability prevalence and the DEG and can be interpreted as the total employment loss in the labour market as a result of disability. Figure 3 presents a measure of the product of prevalence and the DEG (prevalence x DEG) which we advocate as a supplementary indicator. Even over the period of narrowing of the DEG until 2019, the combined measure, the (prevalence x DEG), does not show evidence of narrowing in either Wales or the UK.¹¹ Instead, pre-COVID-19, the total employment loss as a result of disability remained fairly constant at about 5.6 percentage points for the UK and 7.2 percentage points for Wales.¹² This suggests that the rise in disability prevalence and likely decline in average severity as more people report disability for cultural reasons might have contributed to the narrowing DEG in Figure 1 and questions the extent to which the relative employment prospects of the disabled population in 2014 would be superior in 2019 as is often inferred by the narrowing DEG. Post-COVID-19 the rise in disability prevalence is not matched by a

⁸ See http://www.cdc.gov/nchs/washington_group/wg_questions.htm.

⁹ Mental health problems are defined to include depression, bad nerves or anxiety; severe or specific learning difficulties; mental illness or suffer from phobias, panics or other nervous disorders.

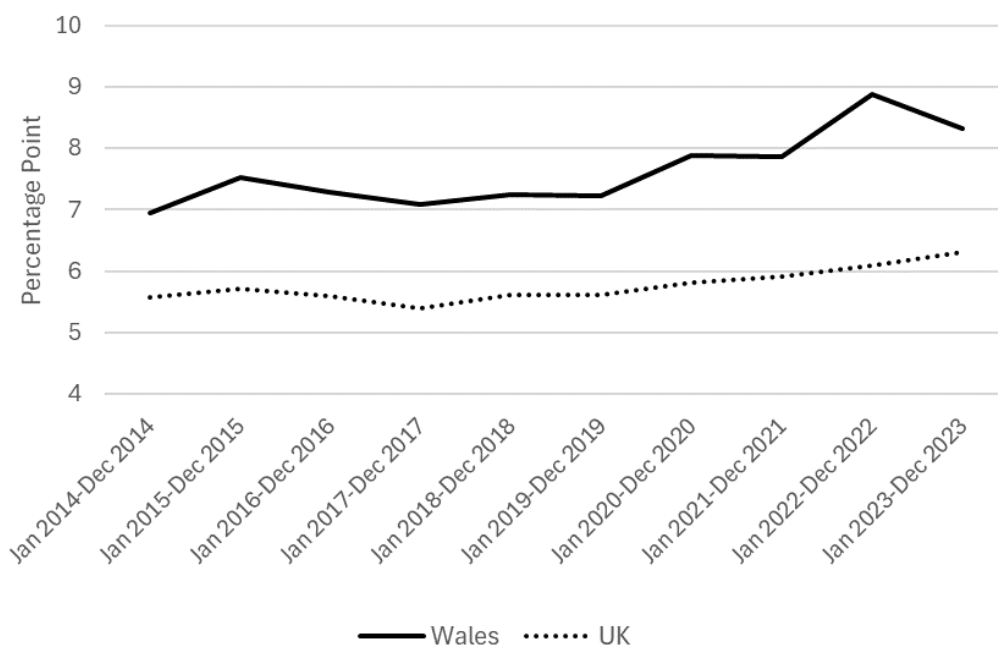
¹⁰ Recent work by the Health Foundation and the Resolution Foundation (2024) has highlighted the contribution of mental health problems (depression, anxiety or bipolar disorder) to rising disability prevalence among young people (particularly those aged 18-24).

¹¹ For a more detailed analysis see: <https://www.disabilityatwork.co.uk/wp-content/uploads/2020/08/Briefing-Note-disability-measurement-.pdf>.

¹² The corresponding figure for ‘Outer UK’ is 6.3 percentage points.

fall in the DEG, which results in the total employment loss due to disability rising in Figure 3.¹³ One potential explanation is that the rise in prevalence post-COVID-19 is driven by more severe functional restrictions such that average disability severity increases. The recent increase in the total impact of disability has prompted new focus and concern about the impact of disability on labour supply shortages and the performance of the macroeconomy (see Haskel and Martin, 2022, for example). This rising trend in the total employment impact is also more pronounced in Wales than in the UK. In this context it is useful to consider other likely implications including the consequences for the government budget of the associated rise in disability-related welfare recipients.

Figure 3: DEG x Prevalence 2014-2023, APS



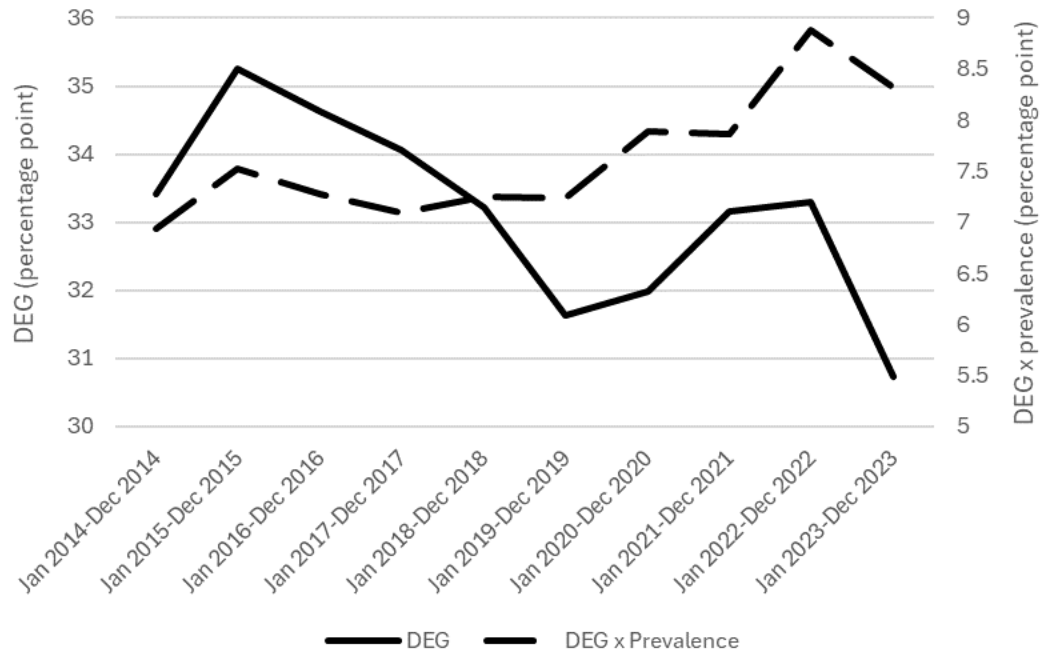
Notes: Authors calculations based on APS data on the economic activity of people with Equality Act disability. Sample is aged 16-64. APS 2014-2023.

In terms of assessing progress, including in relation to policy effectiveness, the contrast between inferences based on the DEG and the measure of total employment loss, which takes into account of rising disability prevalence can be most easily illustrated in Figure 4, which plots the two measures simultaneously for Wales. Over the period 2014-2023 the downward trend in the DEG (measured on the left-hand axis) can be contrasted to the rising trend in the DEG x prevalence measure (measured on the right-hand axis). The same pattern is also evident for the UK.¹⁴

¹³ This is consistent with recent attention on the rise in inactivity due to long-term sickness post COVID-19 (see for example: [A U-shaped legacy • Resolution Foundation](#))

¹⁴ See [Home - Disability at Work](#).

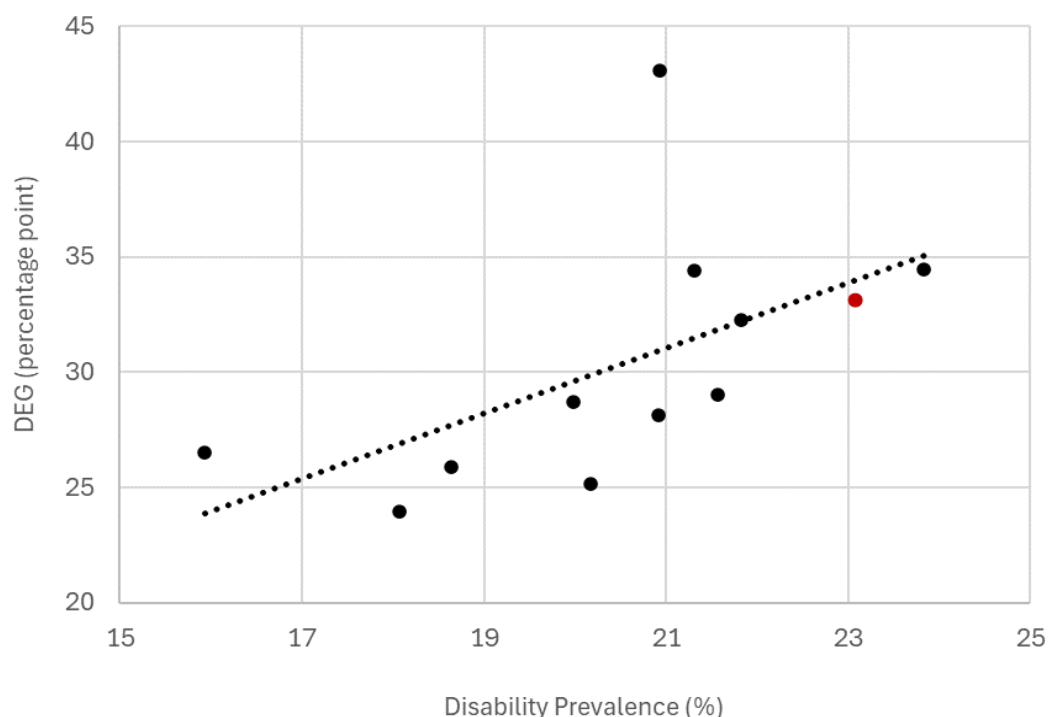
Figure 4: DEG and DEG x Prevalence in Wales 2014-2023, APS



Notes: Authors calculations based on APS data on the economic activity of people with Equality Act disability. Sample is aged 16-64. APS 2014-2023.

Since there is a positive correlation between the prevalence of disability and the DEG at the regional and local level, the two effects are reinforcing, leading to greater variation in the employment loss across areas than indicated by the DEG. By way of illustration, in comparison to the UK, Wales has a greater prevalence of disability which magnifies the impact of the higher DEG since it affects a greater proportion of the working-age population. Figure 5 presents a regional illustration by plotting disability prevalence by the DEG for the 12 standard regions of the UK. Wales is highlighted in red. The line of best fit, which is indicated by the dashed line clearly shows the positive relationship between regional disability prevalence and the DEG which leads to the reinforcing effect on total employment. Even if we exclude Northern Ireland, which is somewhat of an outlier with a particularly large DEG, the positive relationship remains.

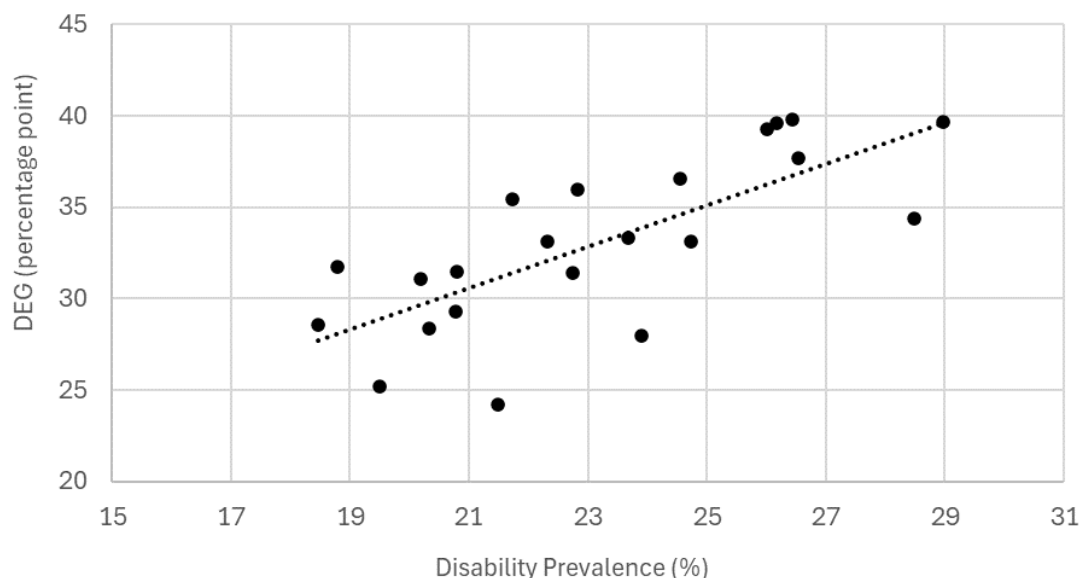
Figure 5: Scatterplot of Regional Disability Prevalence and the DEG in the UK, APS



Notes: Authors calculations based on APS data on the economic activity of people with Equality Act disability. Sample is aged 16-64. Figures reflect the average between 2014-2023. Each point denotes a region of the UK. Wales is highlighted in red. The dashed line is the line of best fit.

Importantly, the same pattern exists at a local level (see Figure 6). That is local areas in Wales with a high prevalence of disability also tend to have a high DEG. This results in the employment loss due to disability being much larger in some local areas including Blaenau Gwent, Merthyr Tydfil, Neath Port Talbot and Rhondda Cynon Taff where it has been 10 percentage points or more between 2014-2023. This contrasts with losses of less than 6 percentage points in the Vale of Glamorgan, Monmouthshire, Ceredigion, Cardiff and Gwynedd over the same period. Recognition of this spatial variation supports the case for differentiation in the intensity of policy interventions.

Figure 6: Scatterplot of Local Area Disability Prevalence and the DEG in Wales, APS



Notes: Authors calculations based on APS data on the economic activity of people with Equality Act disability. Sample is aged 16-64. Figures reflect the average between 2014-2023. Each point denotes a local authority in Wales. The dashed line is the line of best fit.

2. In-work disability gaps

We continue to argue that the intense focus on the probability of employment offers a partial and incomplete understanding of labour market inequality for disabled people. Our research over several decades has shown disability-related inequality extends to outcomes among those in employment. These are important in their own right but they are also key to understanding and addressing the DEG.

We illustrate our argument using a select group of in-work indicators.

(1) In addition to a DEG there is a disability gap in hours worked, with disabled workers on average more likely to work part-time (Jones, 2007). While part-time employment can form an important way of accommodating disability at work and thus facilitate employment for those who would otherwise not work, it means the disability gap in total employment hours is larger than the simple DEG (measured by the number of people). As such, the impact of disability on employment is under-estimated by focusing on employment levels alone.

(2) There is a sizeable disability gap in hourly earnings, with disabled employees in the UK earning on average between 10 and 15% less than non-disabled employees. About half of the pay gap can be explained by differences in personal and job characteristics between disabled and non-disabled workers, leaving a substantial unexplained gap (Jones *et al.*, 2006). Recent work suggests the hourly pay gap has, if anything, widened over the last decade, is most prominent higher up the earnings distribution, consistent with a ‘glass ceiling’, and is larger on average in the public compared to the private sector (Jones, 2023). The historical neglect of the disability pay gap (DPG) in the UK stands in particular contrast to public, academic and policy interest in the gender pay gap. In this respect we note the contrast in Wales, with the elimination of the DPG by 2050 a National Milestone. Nevertheless, the lack of more widespread attention severely limits our understanding of the drivers of the DPG.

(3) There is a disability gap in wellbeing at work as measured, for example, by job satisfaction and perceptions of fairness of managers (Jones 2016; Hoque *et al.*, 2017). These measures likely capture a wide range of job characteristics, including but also extending beyond pay. Again, the evidence suggests this is not fully explained by the nature of jobs held by disabled relative to non-disabled workers (Jones 2016; Hoque *et al.*, 2017). Such evidence is important not least because subjective measures like job satisfaction have previously been found to relate to workplace performance and worker quits.

(4) The economic cycle. Our previous evidence based on nationally representative data showed that disability gaps in in-work indicators widened in the UK during the Great Recession (Jones *et al.*, 2021).¹⁵ Disabled employees were significantly more likely than non-disabled employees to report outcomes such as increased workloads, work reorganisation, a wage freeze or cut, and restricted access to paid overtime and training as a result of the recession, even after controlling for personal, job and workplace characteristics.

(5) Remote work. As part of analysis of the impact of COVID-19 on disability labour market inequality, Jones (2022) showed that prior to COVID-19 disabled workers were slightly more likely than non-disabled workers to work at home even in the same job, consistent with this being a reasonable adjustment. However, she also shows that disabled workers were less likely to benefit from the rise in homeworking during COVID-19, consistent with earlier evidence from the US that disabled employees are less likely to work in the high skilled jobs which have the higher potential for remote working (Schur *et al.*, 2020).

(6) Self-employment.¹⁶ Rates of self-employment have traditionally been higher for disabled relative to non-disabled workers in the UK, particularly for solo self-employment (Jones and Latreille, 2011). This may be the outcome of both negative ‘push’ and, more positive, ‘pull’ factors. There is evidence of both factors, including that the flexibilities offered by self-employment are used by disabled people as a mechanism through which to accommodate their disability at work. In this respect, self-employment is potentially important in facilitating work for those who otherwise might not be able, thereby contributing to reduce the DEG. However, there is currently limited evidence on differences in the nature of, and success in, self-employment between disabled and non-disabled people. This is critical to establish the extent to which self-employment is a sustainable form of employment and a mechanism through which the quality of life and wellbeing of disabled people can be improved.

In what follows we make two core recommendations to strengthen evidence-based government policy in relation to labour market equality for disabled people. These focus on national monitoring by government, and government support of organisational monitoring, essential if employers are to improve disability equality policy and practice.

3. Future national monitoring

Collecting and reporting on disability and disability-related outcomes at the national level allows understanding and scrutiny of progress in relation to disability equality. It is essential that such

¹⁵ For more information see: <https://www.disabilityatwork.co.uk/research-areas/in-work-disability-gaps/all-in-it-together-the-impact-of-the-recession-on-disabled-people/>

¹⁶ This forms a brief summary of our evidence to the Work and Pensions Select Committee on self-employment and the gig economy inquiry [SGE0021 - Evidence on Self-employment and the gig economy \(parliament.uk\)](#)

information is collected consistently and accurately, and that the statistics generated are interpreted meaningfully. In this respect disability measurement, prevalence and the DEG need to remain at the fore of attention and analysis by ONS needs to understand the consequences, and therefore minimise the impact of, discontinuities.¹⁷ There is a real risk that, as with prior changes to the LFS (in 1998, 2009 and 2013), the main source of data on disability in the UK will not be comparable pre- and post- its forthcoming transformation.

In addition to more robustly measuring disability and the disability-related employment impact (see Section 1) by undertaking comparisons of the DEG across surveys and measures, monitoring and adjusting for disability prevalence and new data collection in relation to functional measures of disability from which to benchmark and understand the rising prevalence, we recommend the government extend its focus beyond employment levels (see Section 2). First, we recommend that the government monitor employment flows, that is, rates of entry and exit from employment to better understand the underlying dynamic patterns of recruitment and retention. These give rise to changes in the stock of employment but have distinct implications for policy. However, we also recommend the government extend its monitoring to in-work indicators consistent with a growing body of evidence on the range of dimensions of disability inequality in the labour market which are neglected by government policy. Not only are these measures important in their own right but they contribute to the recruitment and retention of disabled people and hence the DEG.

Given the availability of these measures in existing large and representative surveys, we recommend that a basket of indicators around disability and work are monitored, which cover disability prevalence and the experience of work, to provide a more comprehensive picture of disability inequality in the labour market and broader foundation for policy.¹⁸

4. Organisational monitoring and reporting¹⁹

We have long argued that employers play a critical role in determining labour market equality for disabled people, a role historically insufficiently recognised in government policy. The recent draft Equality (Race and Disability) Bill announced in the 2024 King's Speech at the State opening of Parliament suggests a major change in this regard, with the proposed extension of Gender Pay Gap Reporting to disability. However, in the majority of organisations disability is not currently measured or monitored. This means there will be significant practical challenges in the implementation of organisational disability reporting. Monitoring workforce disability is, however, essential if employers are to assess the need for, or impact of, their policies and practices on disability inequality, or meet their obligations under the Equality Act. The existing information deficit is not sufficiently appreciated. There is a clear need for a lead from government to address it, with potential for organisations to learn from national best practice in disability measurement and monitoring.

¹⁷ See Baumberg *et al.* (2015) for a discussion of the sensitivity of disability measures to definition and survey methods.

¹⁸ While in 2019 the ONS started to address the dearth of evidence on disability in the UK (see <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/improvingdisabilitydataintheuk/2019>), including providing evidence on the DPG, the absence of inclusion of broader measures in government policy limit the extent to which they will be addressed. The ONS analysis also rightly highlights the need for a programme of work to address issues in the measurement of disability.

¹⁹ Wass and Jones (2023) provide a more detailed and comprehensive discussion. See also [Disability@Work-submission-to-the-Disability-Workforce-Reporting-Consultationfinal.pdf](https://disabilityatwork.co.uk/wp-content/uploads/2023/06/Disability@Work-submission-to-the-Disability-Workforce-Reporting-Consultationfinal.pdf) (disabilityatwork.co.uk) for our evidence to the disability workforce reporting consultation.

The introduction of the *Voluntary Reporting on Disability, Mental Health and Wellbeing* framework, which recommends monitoring disability prevalence among the workforce provided a useful starting point, but requires significant amendment if it is to provide a platform for mandatory disability reporting.²⁰ The most important and immediate change that is required is the integration of organisational and national measurement by ensuring a consistent Equality Act definition of disability is applied by organisations.²¹ This not only ensures consistency between national and employer monitoring but in applying a common definition of disability it facilitates comparability *between* organisations. The latter is key if organisational reporting of the DPG is to be effective and, if the government is to use such information, for example, as part of strengthening Disability Confident to include objective outcomes or integrating disability equality into Public Procurement in line with the Social Value Act.²² Indeed, accurate and consistent measurement of disability is a pre-requisite for the development of organisational measures of disability inequality e.g. in relation to recruitment and retention, or pay and job satisfaction gaps, from which employers can track progress and evaluate changes in practice.

Given the complexities in measurement, organisations need clear guidance and support from government to collect meaningful and comparable statistics on organisational disability inequality. In short, while co-produced with organisations, organisational measurement must be a government-led national project. The government can also act as a role model employer illustrating best practice in this regard. The benefits of such approach in terms of raising the profile of disability gaps within organisations and in providing useful data for understanding the role of organisations, currently not identified in any contemporary nationally representative UK survey on disability, should not be underestimated.²³ Indeed, such data would enable the government to explore how individual organisations contribute to the national employment of disabled people, and whether the DPG is predominately a within (that is, it exists for disabled and non-disabled employees with the same employer) or between (that is, it reflects that disabled employees typically work for different employers than non-disabled employees) employer phenomenon.

Such a nationally designed and implemented organisational measurement framework would also serve as a template to monitor disability in other contexts, including activities supporting employment, such as in terms of access to training or finance. Indeed, it is key in providing reliable data to answer questions raised in this inquiry, such as the uptake of apprenticeships. Indeed, more generally, used alongside qualitative evidence, a framework for measuring disability would provide a foundation for consistent nationally representative evidence on the social, political and economic experience of disability, support the evaluation of changes in policy and practice, and the monitoring of progress in relation to many of the broader recommendations set out in the ‘Locked Out’ report.

We therefore recommend the government provides clear guidance to employers on measuring and reporting disability among their workforce on the basis of the 2010 Equality Act, that they

²⁰ For a more detailed discussion of the changes we recommend to the voluntary reporting framework, see: <https://www.disabilityatwork.co.uk/wp-content/uploads/2020/04/Recommendations-for-revision-of-the-voluntary-reporting-framework.pdf>

²¹ We recommend that organisations use the harmonised definition and LFS questions to achieve this.

²² For recommendations in relation to Disability Confident see: <https://www.disabilityatwork.co.uk/wp-content/uploads/2019/11/disability@work-Disability-Confident-level-3-briefing-paper.pdf>

²³ The last nationally representative survey of employers containing information on employee disability, the Workplace Employment Relations Survey (WERS) was undertaken in 2011.

adopt best practice as an employer and embed these measures in government policy to encourage widespread monitoring and reporting of disability equality by employers.²⁴

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²⁴ Our recommendation is clearly aligned to *Criteria 1 (Gathering evidence systematically and comprehensively)* of the recent Independent report exploring the effectiveness of organisational equality and diversity practices [Report on the Inclusion at Work Panel's recommendations for improving diversity and inclusion \(D&I\) practice in the workplace - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/report-on-the-inclusion-at-work-panel-recommendations-for-improving-diversity-and-inclusion-d-i-practice-in-the-workplace).

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