

Disability workforce reporting consultation

Consultation summary

This consultation explores the topic of workforce reporting on disability – both voluntary and mandatory – for large employers (250 employees and above).

About organisation

1. Whose views are you representing in this response?
 - a. **Governors, trustees and governance professionals of state schools in England**

2. What type of organisation or network does your response represent?
 - a. **A membership organisation. We are an independent, not-for-profit charity that aims to improve the educational standards and wellbeing of young people by increasing the effectiveness of governing boards and promoting high standards. We are expert leaders in school and trust governance, providing information, advice and guidance, professional development and e-learning.**

3. Whose views does your organisation or network represent? Please state whether members are individuals or organisations.
 - a. **We represent the views of governors, trustees and governance professionals at a national level and work closely with, and lobby, UK government and educational bodies.**
 - b. 3b. How many members does your organisation or network represent? Please select the most appropriate option
 - i. **1000+**

4. Where does your organisation or network operate? Please select one option.
 - a. **England**

5. What sector is the organisation or network in? Please select all that apply.
 - a. **Education**

6. What is your role in the organisation?
 - a. **Senior Advice officer**

Section A – Understanding the current landscape

1. Does your organisation currently collect information on the proportion of disabled people in your workforce? Please select one option below

Yes

2a. Do you agree or disagree that employers should collect disability workforce data? Please select one option below.

Agree

2b. Explain your answer to above question

By collecting and monitoring data on the number of employees with a disability and their overall experience, employers will be in a much stronger position to understand where action is needed to tackle the barriers faced by those with disabilities. For employers, it may also highlight a lack of diverse representation.

If reporting is to be a success, then employers will need to ensure their employees feel confident enough to disclose their impairment or condition. This will help create a more inclusive and open environment for those in the workforce with a disability as well as ensuring that data gathered on disability in the workplace is robust.

It will also help to build a more accurate picture of the diversity of the workforces of employers and organisations. This could also help to advance the inclusiveness of an organisation.

Section B- Benefits and barriers to disability reporting

7a. Do you think that greater transparency on disability in the workforce leads to more inclusive practices?

Yes

7b. Please explain your answer above and provide evidence where possible by typing in the box below.

For many workers with a disability, barriers in the workplace may mean that they are prevented from working at all, or that they are working in a way which leaves them feeling unsupported.

By encouraging employees to declare their disability or condition and monitoring how many individuals with a disability they employ, employers can start to develop a greater understanding of what more their organisation needs to do, and can begin to analyse the internal processes that work and those that require improving.

Greater transparency on disability in the workforce can lead to more inclusive practices. Implementation of such practices could have a positive impact on employee engagement, performance, attendance and retention. It could also make the employer a more attractive prospect to job seekers.

Depending on what data is collected and how, it may be possible for employers to review if any areas of the business in particular lack diversity. Collecting this data may also provide employers/organisations to take the necessary steps to make internal changes with the aim of being a more inclusive organisation.

8. Do you think that disability workforce reporting by large employers (250+ employees) should be voluntary or mandatory? Please select one option.

Mandatory

9a. What do you think the main benefits of a voluntary approach to disability workforce reporting are? Please type your answer in the box below.

It allows organisations more freedom on what they report on, how often etc. This means that employers/organisations can look at more than just how many people have a disability and could also look at other factors (e.g. in what roles or departments those with disabilities typically work in etc)

9b. What do you think the main risks of voluntary reporting are? Please type your answer in the box below.

The lack of regulation and enforcement could result in not effecting the change necessary to create more diverse and inclusive workplace practices.

There is a risk of inconsistencies if there are no standardised practices in relation to language, reporting mechanisms etc.

A voluntary approach would mean that there isn't a single platform or portal on which to report or publish data nor specific timeframe to do so, affecting the ability to build a clear and holistic picture of disability inequalities.

10. The research available indicates low uptake of the disability voluntary reporting framework. How could voluntary reporting be increased? Please type your answer in the box below.

Lack of awareness of the reporting framework amongst both employers and employees may explain low uptake. Therefore, the reporting framework could be more widely publicised. Further guidance on what steps employers can take if their results highlight areas of concern will also help make the process more meaningful and therefore employers may be more inclined to engage with it.

11a. What do you think the main benefits of a mandatory approach to disability workforce reporting are? Please type your answer in the box below.

A mandatory approach will highlight the importance of this subject and provide a more comprehensive and consistent picture amongst employers. If made public, this will also be a useful tool for others to use for example, current employees, prospective employees and the general public.

11b. What do you think the main risks of mandatory reporting are? Please type your answer in the box below.

The mandatory reporting of such data has the risk of suggesting that if organisations carry out this exercise, this is all that is needed to be done. This may then result in no further action being taken once the data has been collected and submitted. The risks of mandatory reporting is that this may be seen as a 'tick box' exercise. This may result in data being obtained and reported but no further action being taken. It must therefore be made clear that this is the starting point and the accompanying guidance should be clear on what other actions organisations can and should take to ensure that this is a worthwhile impactful activity.

12a. What do you think the main benefits of publishing disability workforce information are? Please type your answer in the box below.

Publication of disability workforce information will highlight this important subject. It will also enable key stakeholders such as existing and prospective employees, shareholders, customers and the general public to assess how diverse an organisation is. Reporting this data will also provide an organisation with a springboard to implement more inclusive practices.

12b. What do you think the main risks of publishing are? Please type your answer in the box below.

As mentioned previously there is a risk of treating it as a tick box exercise, resulting in employers/organisations only carrying out this exercise and not thinking beyond this.

Additionally, depending on what is published, it may not provide a comprehensive picture of the organisation and so have limited practical value.

Section C- Considering if mandatory disability workforce reporting were to be implemented

13a. Disability workforce reporting is intended to increase transparency and the recruitment, retention and progression of disabled people. Do you agree or disagree that the proportion of employees identifying as disabled is a useful statistic to report on? Please select one option below.

Yes

13b. Please explain your answer in the box below.

Having this baseline data will provide some information to employers about their workforce. Using this data, organisations will be able to review their practices in relation to recruitment, retention and progression and what support they may need to provide

Having a lack of employees with a disability or a high attrition rate of individuals with a disability would also highlight problems employers/organisations may not have been aware off.

Embedding disability workforce reporting is an indication to individuals that their workplace is supportive and committed to identify and helping employees with a disability.

13c. What, if any, statistic should be reported alongside or instead of the proportion of employees identifying as disabled? Please explain your answer below.

In so far as anonymity can be assured, reporting should be broken down into different groups to reflect the protected characteristics such as ethnicity as we know intersectional individuals may experience additional barriers and discrimination which is important to highlight.

It may also be worth reporting on:

- **Individuals that required reasonable adjustments and whether these were met**
- **What additional support or signposting individuals receive**

It would not be enough to report on just the disability status of employees as this would not provide any information on the working conditions and culture within the organisation and whether a person's disability was taken into account when designing/developing the working environment.

In order for this exercise to be as impactful as possible data collected should go beyond basic statistics and look at the daily and long term statistics of employees with a disability such as career progression opportunities.

14a. Do you agree or disagree that large employers (250+ employees) should use a standardised approach to collect disability workforce data if reporting became mandatory? Please select one option below.

Yes

14b. Please explain your answer in the box below.

Having a standardised approach would enable a direct comparison of the data from different organisations. It will also ensure that the same approach is taken by a new employer were someone to move employer.

Having a standardised approach will make it easier for employers to learn from each other and for other organisations (e.g. The Equalities and Human Rights Commission) to provide guidance and support if needed.

15. There are many ways that people are asked to self-identify as disabled. If large employers (250+ employees) were to use a standardised approach to data collection, which wording do you think should be used to ask employees if they identify as disabled? Please select all that apply.

- Do you consider yourself to have a disability or a long-term health condition (mental health and/or physical health)?
- Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more? And
- Does your condition or illness\do any of your conditions or illnesses reduce your ability to carry out day-to-day activities? (Wording from the Government Statistical Service)
- None - collection of data should not be standardised.
- I don't know
- **Other [provide explanation]**

The wording of the question should relate/refer the definition of a disability as per the Equality Act 2010, to ensure consistency and that the data gathered can be used more widely.

16. Not everyone who meets the criteria for disability as set out in the Equality Act 2010 identifies as disabled or feels comfortable disclosing this information to their employer. What measures or approaches could make data collection more inclusive of people who do not feel comfortable identifying as or disclosing disability? Please explain your suggestions below.

Having an inclusive culture can be helpful, as does ensuring that all staff take part in EDI training to build awareness and understanding. The data collection could also be anonymous and collected using methods that help retain this anonymity. Guidance could also be provided on who within an organisation is best placed to be tasked with this. For example, HR departments will often deal with personal and confidential information and so may be better placed to lead on this instead of line managers.

17. If large employers were required to collect disability workforce information and report it to another organisation, which organisation do you think they should report to? Please select all that apply.

Equality and Human Rights Commission (EHRC)

18a. Should large employers publish organisation-level disability workforce statistics? For example, the proportion of their workforce identifying as disabled. Please select one option below.

Yes

18b. If published, who do you think should publish this information? Please select all that apply.

The employer/organisation and the EHRC

Section D – Alternative approaches

19. What alternative approaches would you suggest to increase transparency, inclusion and employment of disabled people in the workplace?

- **Fair & inclusive recruitment processes**
- **EDI Training**
- **Building an inclusive culture**