Written evidence from Action on Hearing Loss (DEG0038)

About us
1. Action on Hearing Loss is the charity formerly known as RNID. Our vision is of a world where deafness, hearing loss and tinnitus do not limit or label people and where people value and look after their hearing. We help people confronting deafness, tinnitus and hearing loss to live the life they choose. We enable them to take control of their lives and remove the barriers in their way. We give people support and care, develop technology and treatments and campaign for equality.

2. Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

Summary
3. The key points Action on Hearing Loss is making in this submission are:
   - Employer attitudes to hearing loss remain a significant barrier to the workplace. Research commissioned by Action on Hearing Loss and conducted by YouGov has found that 35% of businesses would not feel confident to employ a person with hearing loss effectively. This is a significant barrier to closing the disability employment gap.
   - Hearing loss affects people throughout their lives but is especially prevalent for older workers. Our evidence shows that many people with hearing loss retire earlier than they would like. With an ageing workforce, due to increases to the retirement age, this problem is set to grow. Any strategy to reduce the disability employment gap must address this.
   - Businesses are not prepared to support an ageing workforce, which could exacerbate the disability employment gap. In our YouGov poll, 39% of business leaders stated that they disagreed that they are well-equipped to enable staff with hearing loss to stay productive in the workforce.
   - A lack of evaluation of the Disability Confident campaign means that we are unable to comment on the effectiveness of this flagship Government initiative. The lack of data for evaluation is a concern for Action on Hearing Loss.
• Access to Work remains ‘DWP’s best-kept secret’ among business (footnote 1). In our YouGov poll, 63% of all business leaders had never heard of Access to Work.
• The new Work and Health Programme must be designed to offer specialist, tailored support to people with hearing loss.

Introduction

4. Action on Hearing Loss welcomes the opportunity to submit evidence to the Work and Pensions Select Committee inquiry into the disability employment gap. This inquiry has come at a pertinent time as we have new evidence on employer attitudes to hearing loss based on a YouGov survey of businesses which took place in April 2016 (footnote 2).

5. Analysis of government data (the Labour Force Survey) by the Equality and Human Rights Commission showed that people with hearing loss are less likely to be in employment than people with no long-term health issue or disability; 65% of people with hearing loss are in employment, compared to 79% of people with no long-term health condition or disability (footnote 3). Potentially, there are many more people with hearing loss who have been prevented from accessing the workplace. In the sections below, we have set out our evidence and solutions on what needs to happen in order to close the disability employment gap.

6. In this submission, we have also included evidence on the support people with hearing loss require to access employment opportunities and the effectiveness of the Disability Confident campaign. We are aware that many of the issues which affect people with hearing loss can have an impact on all disabled people. Where relevant, we have used statistics from the Disability Charities Consortium blueprint for halving the disability employment gap. The blueprint has been submitted by Mind on behalf of the Disability Charities Consortium.

Employer attitudes to hearing loss

7. Our research shows that employer attitudes are the main barrier to employment for people with hearing loss. In 2014, our research

Footnote 2 Total sample size was 618 adults (aged 18+). Fieldwork was undertaken between 4th - 8th April 2016. The survey was carried out online. The figures have been weighted and are representative of all senior decision makers in GB businesses.
Footnote 3 Coleman, N., Sykes, W. and Groom, C. (2013) Barriers to employment and unfair treatment at work: a quantitative analysis of disabled people’s experiences, EHRC
showed that nearly eight out of ten (79%) people with hearing loss surveyed felt that employer attitudes were a barrier in the workplace (footnote 4). We have new evidence from the perspective of employers to suggest that employer confidence still hinders progress on improving the employment opportunities of people with hearing loss.

8. In our YouGov poll, just over a third (35%) of business leaders reported that they do not feel confident to employ a person with hearing loss effectively. When surveyed, just over half (55%) of people with hearing loss disagreed that employers are just as likely to employ a person with hearing loss as a person without hearing loss (footnote 5). These data suggest reticence to employing people with hearing loss. Other findings from the YouGov survey could shed some light on the possible causes: almost three-fifths (57%) of business leaders agree that there is a lack of support or advice available for employers about employing people with hearing loss. These statistics could indicate that the Disability Confident campaign has had a limited impact on improving employer confidence to employing people with hearing loss, but without any formal evaluation mechanism in place, this is difficult to assess.

9. **Recommendation:** We call on the Department for Work and Pensions (DWP) to conduct regular evaluation of the attitudes of employers to different disabilities, which includes hearing loss, in order to maximise and improve the impact of the campaign.

10. Action on Hearing Loss research in 2014 found that over two-fifths (41%) of people with hearing loss who had retired early said this was related to their hearing loss (footnote 6). The reasons they gave for retiring early (due to hearing loss) included difficulties in fulfilling day-to-day tasks, such as using the phone, or communication challenges with colleagues (footnote 7).

11. In line with Government policy, the retirement age is rising (footnote 8). At the same time, the number of people with hearing loss aged

Footnote 4 Arrowsmith L (2014), Hidden Disadvantage: Why people with hearing loss are still losing out at work, Action on Hearing Loss, London
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Footnote 6 Arrowsmith L (2014), Hidden Disadvantage: Why people with hearing loss are still losing out at work, Action on Hearing Loss, London
Footnote 7 Arrowsmith L (2014), Hidden Disadvantage: Why people with hearing loss are still losing out at work, Action on Hearing Loss, London
Footnote 8 State pension age timetables, available at:
over 60 will also increase from 2.5 million people today, to almost 3 million by 2035 (footnote 9). This means that the proportion of people with hearing loss in the labour market will increase and, potentially, more will retire earlier than they would prefer. Therefore, it will be even more important that employers feel confident they can retain staff who develop hearing loss while in employment.

12. In our YouGov poll, nearly two-fifths (39%) of business leaders disagreed that they are well-equipped to enable staff with hearing loss to stay productive in the workforce. This is a concerning statistic and could mean that more people with hearing loss leave work or take early retirement, which would exacerbate the disability employment gap. Failing to retain staff could also lead employers to lose highly skilled and experienced staff, creating additional costs in the recruitment and training of new staff. We would like to see the DWP take action to make employers aware that staff may acquire hearing loss while still working and provide them with information on where to find advice on how to support staff.

13. **Recommendation:** Action on Hearing Loss recommends that the DWP develops urgent plans to increase awareness of the ageing population in the workforce, with a focus on how employers can support their employees who develop a hearing loss while in employment.

**Steps required to halve the disability employment gap**

14. Action on Hearing Loss welcomes the government ambition to close the disability employment gap. By doing so, many people with hearing loss could be supported in the workplace, which enables them to participate more fully in society. However, we are conscious that there are significant challenges that must be overcome to halve the disability employment gap. In the context of the Office for Budget Responsibility's forecast of 900,000 new jobs over the next five years (footnote 10), and the disadvantages that disabled people often face in recruitment, it is difficult to see how the employment rate for disabled people can be increased by a million over this period without

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Footnote 9 This is calculated based on the most robust data on the prevalence of hearing loss among different age groups (from Adrian Davis, Hearing in Adults, 1995), updated for the most recent principal population projections for 2035 (See the ONS 2012-based national population projections at http://www.ons.gov.uk/ons/interactive/2012-npp/index.html and rounded to the nearest 500. For more information on the data used and the prevalence and impact of hearing loss see Action on Hearing Loss's Hearing Matters report at www.actiononhearingloss.org.uk/hearingmatters

Footnote 10 Table 3.6 in July 2015 Economic and Fiscal Outlook, OBR
a clear strategy around recruitment, retention and job creation. As explained in the section above, employer attitudes remain a barrier to people with hearing loss and this is not something that can be quickly remedied.

15. **Recommendation**: We call on the DWP to publish a detailed account of the steps it will take to halve the disability employment gap, which should include predictions and targets.

**Disability Confident**

16. Action on Hearing Loss recognises the work of MPs who have held Disability Confident events in their constituencies. However, we believe that the impact of these events is difficult to determine as there has been no method for monitoring their effectiveness. This concern was brought to our attention in a Westminster Hall debate on disability employment in January 2016. One MP explained that the Disability Confident event in his constituency lacked a coordinated approach from the DWP and other agencies. Although feedback on the event from businesses was positive, the MP commented that there was no mechanism in place to gather evidence on how the businesses had implemented good practice or how many disabled people had found employment as a result (footnote 11). We are aware that many MPs have held job fairs in their constituencies and this is a model which DWP could follow for the Disability Confident events.

17. **Recommendation**: We recommend that Jobcentre Plus collaborates with their local voluntary organisations and employers of all sizes at Disability Confident MP events, to identify local job vacancies and potential people with hearing loss to fill those roles.

Footnote 11 Hansard (2016), Westminster Hall debate on disability employment available at: [http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm160112/halltext/160112h0002.htm#160112h0002.htm_spnew30](http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm160112/halltext/160112h0002.htm#160112h0002.htm_spnew30)
Evaluation of the Disability Confident Campaign

18. Action on Hearing Loss believes that the lack of an evaluation mechanism of the Disability Confident Campaign is a cause for concern. There was an initial Government commitment to introduce one. In September 2014, the Government was asked through a Parliamentary Question how Disability Confident was being evaluated. It stated that:

“The effect of this spending has to date been measured in terms of the number of employers reached directly through the events (1,100) and the reach and impact of communications via no-cost channels such as social media…. Over the second year of the campaign, we will continue to build on the reach of communications, but will also assess specific, measurable, action taken by employers as a result of the campaign.” (Footnote 12)

19. However, in June 2015, in response to a written question on the number of people who have found work through Disability Confident the Government said:

“We are not able to measure the number of disabled people moving into employment as a direct result of it, but the campaign is an important contributor towards our commitment to halve the gap between the employment rates of disabled and non-disabled people.” (Footnote 13)

20. **Recommendation:** Action on Hearing Loss calls on the Government to commit to a substantive and worthwhile measure of the Disability Confident campaign.

Access to Work

21. The Access to Work scheme provides an important role in providing additional support to people with hearing loss in the workplace, in particular, people whose first language is British Sign Language (BSL) can use the grant to pay for communication support at work. People


with hearing loss make up the largest group of claimants (footnote 14). As the Committee itself highlighted in 2009, Access to Work is ‘DWP’s best-kept secret’ (footnote 15), and our evidence shows the positive impact it can have on people with hearing loss. A report by Action on Hearing Loss Cymru explains these benefits. One research participant described how six hours of communication support had helped her back to work after six months of sick leave, and has improved her life:

“Now I’ve got a communicator there to support me. Before I didn’t have anyone supporting me, now I enjoy working… suddenly I was able to understand what was going on at work.” (Footnote 16)

22. In 2014, we found that only 54% of people with hearing loss were aware of Access to Work (footnote 17). This indicates that many more people with hearing loss could benefit from an Access to Work grant. Therefore, a greater awareness of the scheme amongst this group would be an important step towards getting more disabled people into the workplace.

23. Even more concerning is the low number of employers who have an awareness of Access to Work. In our YouGov poll, we found that almost two-thirds (63%) of all business leaders had never heard of Access to Work. Jobcentre Plus staff must promote Access to Work to both people with hearing loss and to employers. We have concerns that the extra costs of employing a person with hearing loss could be seen as a deterrent. In the YouGov survey, over a quarter (27%) of business leaders agreed with the statement that it costs more to employ a person with hearing loss than to employ a person without hearing loss; nearly one-fifth (19%) stated they did not know. Research conducted by Action on Hearing Loss Cymru confirms this view. One Employment Adviser interviewed for the research said:

“For an employer to take on someone who is profoundly deaf is a huge thing.” (Footnote 18)
24. These data highlight the need to raise awareness of Access to Work among employers, to ensure they know that support is available.

25. **Recommendation:** Action on Hearing Loss recommends that Jobcentre Plus ensures all staff are knowledgeable of Access to Work in order to promote this scheme to potential claimants.

26. **Recommendation:** We recommend that the DWP embarks on a publicity campaign to address the challenge posed by the clear lack of awareness of the Access to Work scheme amongst both individuals and businesses.

**Introduction of a cap on Access to Work grants**

27. Action on Hearing Loss has concerns that the cap on Access to Work awards could disproportionately affect people with hearing loss and have an impact on their chances of finding or retaining work. The cap was introduced to new claimants from October 2015, but will apply to all recipients of the grant from 2018. Official statistics from DWP on the numbers of new claimants with hearing loss affected by the cap have yet to be released. DWP has told us, however, that 200 current claimants of the grant will be affected by the introduction of the cap and 180 of these people have a hearing loss. We have concerns that this could deter some employers, particularly small or medium size businesses, from recruiting or promoting people with hearing loss, as they may fear the additional costs.

28. **Recommendation:** Action on Hearing Loss recommends that the DWP evaluates the impact of the cap on Access to Work awards and states how it will respond to any negative outcomes.

29. Action on Hearing Loss welcomes the pilot for personal budgets for Access to Work, as they could allow people with hearing loss more flexibility around the services they choose. This is essential for a condition that requires support in a number of different ways. For example, a profoundly deaf person may require a BSL interpreter in one work scenario and a note-taker in another.

30. **Recommendation:** The DWP should conduct a comprehensive evaluation of the Access to Work personal budgets, once the pilot is complete, which pays attention to the experiences of people with hearing loss.

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Wales who despite everything can’t find work, Action on Hearing Loss Cymru
Effective employment support for disabled people

31. The new Work and Health Programme, which will replace the Work Programme and Work Choice in 2017, has the potential to improve employment outcomes for people with hearing loss. Its design should be centred around the personal employment outcomes of people with disabilities, rather than the current model of payment by results, which does not incentivise providers to support the people furthest away from the jobs market.

32. The current Work Programme has had limited success for people with disabilities. The Programme has only managed to support 15.4% of people with a ‘disability indicator’ on their record into work (95,000 from 616,000); and just 8.5% of those on ESA, for whom health and disability is the main barrier to work (22,000 from 256,000) (footnote 19). Although Work Choice has had better success rates, it has been limited in size. Work Choice is open to people whose needs cannot be met through other work programmes, Access to Work or reasonable adjustments. Of those who joined Work Choice, only 4% had a hearing and/or speech impairment (footnote 20).

33. **Recommendation:** The DWP should learn from experiences of the Work Programme and Work Choice and use this to develop an effective design for the Work and Health Programme.

34. We believe that DWP should also look at the evidence of existing specialist services, such as the Moving On service from Action on Hearing Loss Scotland, when developing the Work and Health Programme. The Moving On service, funded by The Big Lottery Fund Scotland, provides person-centred specialist support to 16-25 year olds who are deaf or have a hearing loss to take up work experience and move in to full-time employment, training or education. The service provides tailored and personalised support to people, delivered by Employment Advisers with a high level of BSL who understand the issues affecting people with hearing loss. The support provided by the service includes confidence-building, CV development, interview coaching, and working with employers to improve their deaf awareness.

Moving On has worked with people who were referred by Jobcentre Plus and has been able to provide specialist employment support in instances where a Work Programme or Work Choice provider has been unsuccessful. For example, we have provided on-going support to a profoundly Deaf BSL user participating in the Work Programme. One of Action on Hearing Loss Scotland’s Employment Advisers developed her CV and supported her to gain interview experience which enabled her to secure a job with the NHS. The Employment Adviser continued to work with the client to make sure she was fully supported in her new workplace. The client said she had had limited meetings with her Work Programme adviser and that, when a meeting had been scheduled, no interpreter was provided, as this quote shows:

“In my experience, many employers don’t understand the needs of deaf people. Reminding my potential employers that I can't do telephone interviews and I would need a BSL interpreter was very frustrating.”

We believe that employment support should be tailored to the requirements of regions around the country, as well as around the individual. There should be a wide variety of contracts available for the Work and Health Programme to allow the flexibility which would meet the requirements of employers, regardless of where they are based in the country, but most importantly, would give people with hearing loss the choice of providers which provide specialised employment support.

**Recommendation:** We recommend that Jobcentre Plus commission specialist employment support programmes at a local or devolved level to ensure people looking for work receive personalised support and can be matched to appropriate local employers where vacancies exist.

*May 2016*