



HM Government



Disability Unit

Disability workforce reporting

This consultation begins on 16 December 2021

This consultation ends on 25 March 2022

Disability workforce reporting

A consultation produced by the Cabinet Office.

It is also available at

<https://www.gov.uk/government/consultations/disability-workforce-reporting>

About this consultation

- To:** This consultation is aimed mainly at large employers, representative organisations for large employers, trade unions, disabled people and disabled people's organisations.
- Duration:** From 16 December 2021 to 25 March 2022
- Enquiries (including requests for the document in an alternative format) to:** Disability Workforce Reporting Consultation, Disability Unit
10 Victoria Street
London
SW1H 0NB
Tel: 07749 722203 or 07922 384293
Email: duplications@cabinetoffice.gov.uk

How to respond:

This consultation includes an online survey version, which can be found at the following link: <https://equalityhub.citizenspace.com/disability-unit/disability-workforce-reporting-consultation>

You can also reply by post or email. Please send your response by 25 March 2022.

If you respond by post, please send to the following address:

Disability Workforce Reporting Consultation,
Disability Unit
10 Victoria Street
London
SW1H 0NB

If responding by email, please send to the following email address: duplications@cabinetoffice.gov.uk

Additional ways to feed in your views:

We are holding a series of stakeholder meetings. For further information please email duplications@cabinetoffice.gov.uk or ring 07749 722203.

Response paper:

A response to this consultation exercise is due to be published by 17 June 2022 at: <https://www.gov.uk/government/consultations/disability-workforce-reporting>

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Foreword



Our National Disability Strategy, published in July 2021, set out over 100 wide-ranging practical actions to improve the everyday lives and opportunities for disabled people.

The strategy focuses on the issues that disabled people have told us matter most, across all aspects of life.

It can be no surprise that prominent amongst these is to have the same opportunities as anyone else to find a good job with a supportive employer and to be able to progress.

I get this completely. The sense of independence, financial security and personal fulfilment that comes with a good job, for anyone who can and wants to work, is of huge value and importance.

Beyond the benefits for individuals and families, so much talent and potential is too often wasted now. Making the most of disabled people's skills is not just good for

employees but also for businesses, with evidence that a more diverse workforce leads to improved financial returns.¹

Yet, despite concerted action, the employment gap for disabled people, whilst reducing, has remained frustratingly high and enduring.

It is a complex challenge that needs tackling in a wide variety of ways. Many of the actions we are taking through the National Disability Strategy will help. For example, our steps to make transport more accessible, to extend education opportunities, and to challenge and change unhelpful perceptions of disabled people in society wherever these exist - and of course, the targeted steps we are taking on employment.

Among these was a commitment to consulting on workforce reporting on disability for large employers - and I am delighted to be launching this consultation. Supportive workplaces, where disabled people feel actively valued and able to be open if they wish about additional needs and any issues they may face, are vital to progress. It is also important that employers have the information required to create inclusive workplaces.

We know that views differ on how best to achieve these aims. Through this consultation we want to better understand current good practices and the case to go further than the voluntary approach adopted to date.

1 McKinsey (2015) <https://www.mckinsey.com/business-functions/organization/our-insights/why-diversity-matters>

I would urge anyone with useful information to share and/or views to respond.

A handwritten signature in black ink, appearing to read "Chloe Smith", with a horizontal line underneath it.

Chloe Smith

Minister for Disability, Health and Work

Introduction

This document fulfils the National Disability Strategy commitment to consult on workforce reporting for large employers (250 employees and above) on disability. The consultation is being led by the Disability Unit, in the Cabinet Office, and responds to calls to improve data and transparency on disability in the workforce.

Through this consultation, the government is exploring how best to increase transparency and reporting practices that support the cultural changes required to build a more inclusive society. Reporting on disability within a workforce has the potential to provide an important baseline from which employers can assess the impact of their inclusive practices on the recruitment and retention of disabled people. How we establish this baseline, however, requires careful consideration.

This consultation includes questions on current practice and how workforce reporting on disability might be stepped up, exploring both voluntary and mandatory reporting practices. We are keen to hear from both employers and disabled employees (and their representative groups).

This document is made up of 3 parts:

- part 1 asks for information about you or your organisation, and all respondents should complete this

- if you are responding from the perspective of an employer, please then answer the questions in part 2
- if you are responding from the perspective of an employee, please answer the questions in part 3

We will use responses to build an evidence base about:

- current reporting practices, and what works well
- the case for and against implementing a mandatory approach to reporting
- how a mandated approach to reporting, if adopted, might be implemented in practice
- if there are alternative approaches that could also be taken to enhance transparency and increase inclusive practices

The consultation is open to organisations and people across the UK, but its primary focus is on Great Britain (England, Scotland and Wales). This is because employment and equality issues are fully devolved in Northern Ireland. A Welsh language summary and consultation paper is available at <https://www.gov.uk/government/consultations/disability-workforce-reporting>.

Background

The National Disability Strategy includes a wide range of practical actions aimed at making tangible improvements to the everyday lives of disabled people, focused on the issues that disabled people have told us matter most. Amongst these, many disabled people highlight the importance of being able to get a good job and to progress in their careers.

The government agrees that the disability employment gap is unacceptably high at 28.4%. Whilst this is a decrease of 4.8% since 2013, the gap remains far too big. Alongside the impact this has on the day-to-day lives of many disabled people, it represents a pool of untapped skills and talent that is being wasted for our society and our economy.

A number of measures have helped to deliver the progress made so far. Discrimination against disabled people has of course long been unlawful², and under the Equality Act 2010 employers have an obligation to make reasonable adjustments for disabled employees³.

The Disability Confident scheme, which covers over 11 million paid employees, works with employers to help organisations recognise and make the most of the talents disabled people bring, by giving them the knowledge,

2 [Equality and Human Rights Commission: Disability Discrimination](#)

3 [Equality Act 2010, Section 20: Reasonable Adjustments](#)

skills and confidence they need to attract, recruit, retain and progress disabled people.

This sits alongside a broad suite of actions across government, many set out in the National Disability Strategy, which provide targeted support and advice for both individuals and employers.

Disability workforce reporting

We recognise the role that transparency and reporting can play in helping employers to implement the cultural changes needed to build inclusive environments.

Following publication of the ‘Thriving at Work’ independent review (2017)⁴, the Department of Work and Pensions (DWP) worked with large employers and expert partners to develop a voluntary reporting framework.

The voluntary reporting framework helps organisations to record and voluntarily report information on disability, mental health and wellbeing in the workplace. It is aimed at employers with 250 or more employees, but is also available to smaller employers. A central aim has been to increase transparency to make workplaces across the UK more welcoming, supportive and open environments in which everyone can thrive, irrespective of a disability.

Employers are not currently asked to inform the government whether or not they are using the voluntary reporting framework, and evidence around its use is

⁴ [Stevenson and Farmer \(2017\), ‘Thriving at Work: The Stevenson / Farmer review of mental health and employers’](#)

limited. However research published by the Chartered Institute of Personnel and Development⁵ in April 2021 found that only 21% of respondents were aware of the framework. Of these, 37% had adopted at least part of the framework. 54% of SMEs who were aware of the framework said that they had no plans to adopt it.

During development of the National Disability Strategy, some stakeholders argued that mandating reporting on disability for large employers has the potential to improve workplaces and outcomes for disabled people through increased transparency. Others shared concerns around mandatory approaches, highlighting challenges for employers and the potential for unintended consequences that would go against the intended aims of such a policy. Unintended consequences might include employees feeling under pressure to disclose disability or identify as disabled when they do not want to. Another concern is that publication of a single statistic may misrepresent the work being done by an employer to create inclusive environments.

Through this consultation we want to explore the issue of disability workforce reporting further, seeking views that will shape our future approach. It will seek views and gather evidence in 4 main areas:

1. Understanding the current landscape
2. Benefits and barriers to disability workforce reporting

5 [Chartered Institute for Personnel and Development \(2021\), 'Health and Wellbeing at work'](#).

3. Considerations if mandatory disability workforce reporting was implemented
4. Alternative approaches

Terminology

Disabled people: The Equality Act (2010) defines disabled people as people with physical and mental conditions that have a ‘substantial’ and ‘long-term’ negative effect on their ability to do normal daily activities. In this consultation, ‘disabled people’ also includes people with chronic illnesses that have a substantial and long-term impact on every-day life, and people who identify as neurodiverse.

Disabled person led organisation: These are organisations that are run and controlled by disabled people.

Neurodiversity: Neurodiversity recognises diversity in people’s brains and how brains and minds function. People who are neurodiverse include people with autism, Asperger’s syndrome, dyslexia and dyscalculia.

Protected characteristics: The Equality Act sets out a number of characteristics that it is unlawful to discriminate on the basis of. These characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy, race, religion or belief, sex, and sexual orientation.

Questionnaire

Part 1 - Information about you/your organisation

This section seeks information about you or your organisation. It will be used to check that we have received responses from across our target audiences. Demographic information will allow us to better understand trends across respondents, and to consider equality impacts in any future policy decisions.

If you are responding as an employer or employer representative organisation or network, please go to Section A.

If you are responding as an employee or employee representative organisation or network, please go to Section B.

Section A: Employer demographics

1. What type of organisation do you represent? (Tick one box)
 - employer
 - employer representative organisation or network
 - other _____

Please provide the organisation's name:

If you would like to receive updates on this consultation, please provide an email address or address here:

2. How many employees or members does your organisation have?

- 1 - 24
- 25 - 249
- 250 - 999
- 1000+

3. Where does your organisation operate? (Tick one box)

- England
- England and Wales
- Great Britain (England, Wales and Scotland)
- UK (England, Wales, Scotland and Northern Ireland)
- International (UK and other countries)
- Other _____

4. What sector is your organisation based in? (Tick one box)

- Public sector

- Private sector
- Voluntary sector
- Other _____

5. What industry is your organisation based in? (Tick all boxes that apply)

- Agriculture and forestry
- Construction
- Education and research
- Energy and mining
- Entertainment
- Finance and banking
- Health and social care
- Hospitality and retail
- Information technology
- Legal
- Leisure and tourism
- Manufacturing
- Recruitment and human resources
- Transportation and logistics
- Other _____

6. Does your organisation currently collect diversity workforce data on a voluntary basis for the following? (Tick all boxes that apply)

- Age
- Disability
- Ethnicity
- Sex or gender
- Nationality
- Religion or belief
- Sexual orientation
- Other _____
- Unsure

7. What is your role in the organisation? (Tick all boxes that apply)

- CEO or equivalent
- Head of network
- HR professional
- Diversity and Inclusion professional
- Other _____

Section B: Employee demographics

1. Whose views are you representing in this response?
(Tick one box)

- the views of an employee representative organisation or network
- my own, as an employee or other individual

If you would like to receive updates on this consultation, please provide your name, and email address or address here: _____

For employee representative organisations or networks:

2. What type of organisations or networks does your response represent? (Tick all boxes that apply)

- Disabled people led organisation
- Disabled staff network
- Trade union
- Other _____

3. a. Whose views does your organisation or network represent? Please state whether members are individuals or organisations.

b. How many members does your organisation or network represent?

- 1 - 24
- 25 - 249
- 250 - 999
- 1000+

4. Where does your organisation or network operate?
(Tick one box)

- England
- England and Wales
- Great Britain (England, Wales and Scotland)
- UK (England, Wales, Scotland and Northern Ireland)
- International (UK and other countries)
- Other _____

5. What sector is the organisation or network in? (Tick all boxes that apply)

- Agriculture and forestry
- Construction
- Education and research
- Energy and mining
- Entertainment

- Finance and banking
- Health and social care
- Hospitality and retail
- Information technology
- Legal
- Leisure and tourism
- Manufacturing
- Recruitment and human resources
- Transportation and logistics
- Other _____

6. What is your role in the organisation?

- CEO or equivalent
- Head of network
- Trade Union representative
- HR professional
- Diversity and Inclusion professional
- Other _____

For employees and other individuals:

2. a. Which of the following descriptions do you identify with? (Tick all boxes that apply)

- Disabled
- Neurodiverse
- Deaf
- Having one or more physical or mental health conditions or illnesses lasting or expected to last for 12 months or more
- None of the above
- Other _____
- Prefer not to say

b. Do you identify as having conditions or illnesses that affect you in any of the following areas? (Tick all boxes that apply)

- Vision (for example blindness or partial sight)
- Hearing (for example deafness or partial hearing)
- Mobility (for example walking short distances or climbing stairs)
- Dexterity (for example lifting and carrying objects, using a keyboard)
- Learning or understanding or concentrating

- Memory
- Mental health (for example depression, anxiety, post-traumatic stress disorder)
- Stamina or breathing or fatigue
- Socially or behaviourally (for example autism spectrum disorder (ASD) which includes Asperger's, or attention deficit hyperactivity disorder (ADHD))
- None of the above
- Prefer not to say
- Other _____

3. Where do you mostly work? If you are currently not in work, please indicate where you live most of the time. (Tick one box)

- England
- Northern Ireland
- Scotland
- Wales
- Other _____

4. What is your ethnicity? Please choose the option that best describes your ethnic group or background.

White

- English, Welsh, Scottish, Northern Irish, British

- Irish
- Gypsy or Irish Traveller
- Roma
- Any other white background

Mixed or multiple ethnic groups

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other mixed or multiple ethnic background

Asian or Asian British

- Bangladeshi
- Chinese
- Indian
- Pakistani
- Any other Asian background

Black, Black British, Caribbean or African

- Caribbean
- African
- Any other Black, Black British, Caribbean or African background

Other ethnic groups

- Arab
 - Other ethnic group
-

- Prefer not to say

5. What is your religion? (Tick one box)

- No religion
 - Christian (including Church of England, Catholic, Protestant and all other Christian denominations)
 - Buddhist
 - Hindu
 - Jewish
 - Muslim
 - Sikh
 - Any other religion
-

- Prefer not to say

6. How old are you? (Tick one box)

- 24 years or under
- 25 to 34 years
- 35 to 44 years
- 45 to 54 years

- 55 to 65 years
- Over 65 years
- Prefer not to say

7. What is your sex? (We will ask about gender next)
(Tick one box)

- Female
- Male
- Prefer not to say

8. Is the gender you identify with the same as your sex registered at birth?

(Tick one box)

- Yes
- No, enter gender identity

- Prefer not to say

9. Which of the following best describes your sexual orientation? (Tick one box)

- Straight or heterosexual
- Gay or lesbian
- Bisexual
- A-sexual

- Other sexual orientation
-

- Prefer not to say

10. What was the occupation of your main household earner when you were about aged 14? This question provides an indication of socio-economic background.

(Tick one box)

- Modern professional & traditional professional occupations such as: teacher, nurse, physiotherapist, social worker, musician, police officer (sergeant or above), software designer, accountant, solicitor, medical practitioner, scientist, civil / mechanical engineer
- Senior, middle or junior managers or administrators such as: finance manager, chief executive, large business owner, office manager, retail manager, bank manager, restaurant manager, warehouse manager
- Clerical and intermediate occupations such as: secretary, personal assistant, call centre agent, clerical worker, nursery nurse.
- Technical and craft occupations such as: motor mechanic, plumber, printer, electrician, gardener, train driver
- Routine, semi-routine manual and service occupations such as: postal worker, machine

operative, security guard, caretaker, farm worker, catering assistant, sales assistant, HGV driver, cleaner, porter, packer, labourer, waiter/waitress, bar staff

- Long-term unemployed (claimed Jobseeker's Allowance or earlier unemployment benefit for more than a year)
- Small business owners who employed less than 25 people such as: corner shop owners, small plumbing companies, retail shop owner, single restaurant or cafe owner, taxi owner, garage owner
- Prefer not to say
- Other _____

Part 2 - Employer perspectives

We welcome contributions from all employers and employer representative organisations and networks in this section. We are particularly interested in hearing from large employers (over 250 staff) and business representative groups.

There is a duty on public authorities to consider how their policies and decisions affect people who are protected under the Equality Act 2010. In responding to this consultation, please highlight any equalities impacts across protected characteristics (see page 9) in your answers.

Section A: Understanding the current landscape

We want to understand how and what information is currently collected by employers on disability in the workforce, the impact to business, and the behaviours it causes.

1. Does your organisation currently collect information on the proportion of disabled people in your workforce?
(Tick one box)
 - Yes (continue below)
 - No (move to page 28)

- I don't know, or this is not relevant as I am responding on behalf of a representative organisation or network (move to page 23)

If yes:

2. a. What information does your organisation collect?
(Tick all boxes that apply)

- Proportion of disabled people in the workforce
- Proportion of staff requesting reasonable adjustments
- Condition types of staff members
- Proportion of disabled staff working at different levels in the organisation
- Proportion of disabled staff on career progression schemes
- Pay of disabled people comparative to non-disabled staff
- Performance markings of disabled staff comparative to non-disabled staff
- Other _____

b. How is this information collected? (Tick all boxes that apply)

- By anonymous survey

- By open survey
- Using existing HR systems and processes
- Other _____

c. How long has your organisation collected this information for? (Tick one box)

- Less than 1 year
- Between 1 to 5 years
- More than 5 years
- I don't know
- Other _____

3. a. Do you know if your organisation uses the [disability voluntary reporting framework](#)⁶? (Tick one box)

- My organisation does use it
- My organisation does not use it
- I don't know if my organisation uses it

b. If your organisation does use the framework, how useful is it ? (Tick one box)

- Very useful
- Average
- Not very useful

⁶ <https://www.gov.uk/government/publications/voluntary-reporting-on-disability-mental-health-and-wellbeing>

- I don't know
- Other _____

c. Please explain your answer.

4. Is there a cost to your organisation for collecting this data? (Tick one box)

- None or negligible
- Some, but not a lot
- Significant
- I don't know
- Prefer not to say

5. How does your organisation use workforce information on disability in your organisation? (Tick all boxes that apply)

- To inform recruitment practices
- To inform diversity and inclusion initiatives
- To inform talent management practices
- To track progress made on diversity and inclusion initiatives
- I don't know how this information is used
- Other _____

6. a. Does your organisation publish disability workforce data externally? (Tick one box)
- Yes
 - No
 - I don't know
- b. If yes, where does your organisation publish this? (Tick all boxes that apply)
- On your website
 - In publicly available reports on diversity and inclusion
 - Other _____

If no:

2. a. What is your organisation's reason for not recording or reporting on disability in the workplace? (Tick all boxes that apply)
- It is not a legal requirement
 - It is too time consuming
 - No systems in place currently to collect this data
 - Too few or too many employees
 - It is too difficult to implement
 - Do not believe there are many benefits to collecting this

I don't know

Other _____

b. Please explain your response.

3. a. Is your organisation aware of the disability voluntary reporting framework? (Tick one box)

Yes

No

I don't know

b. If yes, does your organisation find it useful? (Tick one box)

Very useful

Average

Not very useful

Other _____

c. Please explain your answer.

Section B: Benefits and barriers to disability workforce reporting

This section seeks to better understand perceived benefits and risks involved in disability workforce reporting, both voluntary and mandatory.

Please explain and provide evidence for your answers where possible.

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

- Yes
- No
- I don't know

b. Please explain and provide evidence where possible.

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

- Voluntary
- Mandatory
- Other _____

9. a. What do you think the main benefits of a voluntary approach to disability workforce reporting are?

- b. What do you think the main risks are?
10. The research available indicates low uptake of the disability voluntary reporting framework. How could voluntary reporting be increased?
11. a. What do you think the main benefits of a mandatory approach to disability workforce reporting are?
- b. What do you think the main risks are?
12. a. What do you think the main benefits of publishing disability workforce information are?
- b. What do you think the main risks are?

Section C: Considerations if mandatory disability workforce reporting were to be implemented

This section explores issues requiring careful consideration if disability workforce reporting were to be made mandatory through legislation.

The information you provide here will be considered in the broader context of answers to sections A and B, where you were asked to set out the benefits and risks of voluntary and mandatory reporting processes.

13. a. 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? (Tick one box)

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- I don't know
- Other _____

b. Please explain your answer.

c. What, if any, statistic could be reported alongside or instead of the proportion of employees identifying as disabled? Please explain.

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

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- I don't know

b. Please explain your answer.

15. There are many ways that people are asked to self-identify as disabled. If large employers 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? (Tick all boxes that apply)

- 'Do you consider yourself to have a disability or a long-term health condition (mental health and/or physical health)?' Wording from the voluntary reporting framework
- 'a. Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?' and 'b. 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 _____

16. What could support large employers to implement disability workforce reporting in consistent and effective ways? For example, would tools or guidance help consistency across organisations and sectors, and if so what could these look like.

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? (Tick all boxes that apply)

- Central government
- A disabled person led organisation
- A regulatory body
- None - there should not be centralised collection of this information
- Other _____

18.a. Should large employers publish organisation-level disability workforce statistics? For example, the proportion of their workforce identifying as disabled. (Tick one box)

- Yes
- No
- I don't know

b. If published, who do you think should publish this information? (Tick all boxes that apply)

- The employer
- Central government
- A disabled person led organisation
- A regulatory body

I don't know

Other _____

Section D: Alternative approaches

Mandatory workforce reporting is one means to increase transparency on disability in the workforce, with the aim to improve information and achieve more inclusive practices. We are interested to hear your views on other initiatives that might have the same outcomes.

19. What alternative approaches would you suggest to increase transparency, inclusion and employment of disabled people in the workplace? If you have any evidence to support this suggestion, please provide it.

Part 3 - Employee perspectives

We welcome contributions from all interested parties from an employee perspective in this section. We are particularly interested in hearing from disabled people, disabled people led organisations, disability staff networks, and trade unions.

There is a duty on public authorities to consider or think about how their policies or decisions affect people who are protected under the Equality Act 2010. In responding to this consultation, please highlight any equalities impacts across protected characteristics (see page 9) in your answers.

Section A: Understanding the current landscape

We want to understand how and what information is currently collected by employers on disability in the workforce, and the behaviours it causes.

1. Does your current or did your previous employer collect information on the proportion of disabled people in their workforce? (Tick one box)
 - Yes (continue below)
 - No (move to page 39)
 - I don't know or this is not relevant as I am answering as a representative organisation or network (go to page 29)

If yes:

2. What information does your employer collect? (Tick all boxes that apply)

- Proportion of disabled people in the workforce
- Proportion of staff requesting reasonable adjustments
- Condition types of staff members
- Proportion of disabled staff working at different levels in the organisation
- Proportion of disabled staff on career progression schemes
- Pay of disabled people comparative to non-disabled staff
- Performance markings of disabled staff comparative to non-disabled staff
- I don't know
- Other _____

3. Do you know if your employer uses workforce information on disability for any of the following reasons? (Tick all boxes that apply)

- To inform recruitment practices
- To inform diversity and inclusion initiatives
- To inform talent management practices

- To track progress made on diversity and inclusion initiatives
- I don't know how this information is used
- Other _____

4. a. Does your employer publish your disability workforce data externally? (Tick one box)

- Yes
- No
- I do not know

b. If yes, where does your employer publish this? (Tick all boxes that apply)

- On their website
- In publicly available reports on diversity and inclusion
- I don't know where this information is published
- Other _____

5. a. Do you agree or disagree that your employer should collect disability workforce data?

(Tick one box)

- I strongly agree that they should
- I agree that they should

- I do not agree that they should
- I strongly disagree that they should
- I don't know

b. Please explain your answer.

If no / unsure:

2. a. Do you agree or disagree that employers should collect disability workforce data? (Tick one box)

- I strongly agree that they should
- I agree that they should
- I do not agree that they should
- I strongly disagree that they should
- I don't know

b. Please explain your answer.

Section B: Benefits and barriers to disability workforce reporting

This section seeks to better understand perceived benefits and risks involved in disability workforce reporting, both voluntary and mandatory.

Please explain and provide evidence for your answers where possible.

7. a. Do you think that greater transparency on disability in the workforce leads to more inclusive practices? (Tick one box)
- Yes
 - No
 - I don't know
- b. Please explain your answer and provide evidence where possible.
8. Do you think that disability workforce reporting by large employers (250+ employees) should be voluntary or mandatory? (Tick one box)
- Voluntary
 - Mandatory
 - Other _____
9. a. What do you think the main benefits of a voluntary approach to disability workforce reporting are?
- b. What do you think the main risks are?
10. The research available indicates low uptake of the disability voluntary reporting framework. How could voluntary reporting be increased?
11. a. What do you think the main benefits of a mandatory approach to disability workforce reporting are?
- b. What are the main risks?

- 12.a. What do you think the main benefits of publishing disability workforce information are?
- b. What do you think the main risks are?

Section C: Considerations if mandatory disability workforce reporting were to be implemented

This section explores issues requiring careful consideration if disability workforce reporting were to be made mandatory through legislation.

This information will be considered in the broader context of answers to sections A and B, where you were asked to set out the benefits and risks of voluntary and mandatory reporting processes.

- 13.a. 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? (Tick one box)

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- I don't know

Other _____

b. Please explain your answer.

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

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

Strongly agree

Agree

Disagree

Strongly disagree

I don't know

Please explain your answer.

15. There are many ways that people are asked to self-identify as disabled. If large employers 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? (Tick all boxes that apply)

'Do you consider yourself to have a disability or a long-term health condition (mental health

and/or physical health)?' Wording from the voluntary reporting framework

- 'a.Do you have any physical or mental health conditions or illnesses lasting or expected to last 12 months or more?' and 'b. 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 _____

16. Not everyone who meets the criteria for disability as set out in the [Equality Act 2010](#)⁷ 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.

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? (Tick all boxes that apply)

⁷ <https://www.equalityhumanrights.com/en/advice-and-guidance/disability-discrimination>; <https://www.legislation.gov.uk/ukpga/2010/15/section/6>

- Central government
- A disabled person led organisation
- A regulatory body
- None - collection of data should not be standardised
- I don't know
- Other _____

18.a. Should large employers publish organisation-level disability workforce statistics? For example, the proportion of their workforce identifying as disabled. (Tick one box)

- Yes
- No
- I don't know

b. If published, who do you think should publish this information? (Tick all boxes that apply)

- The employer
- Central government
- A disabled person led organisation
- A regulatory body
- I don't know
- Other _____

Section D: Alternative approaches

Mandatory workforce reporting is being considered as one way to improve transparency on disability in the workforce and support more inclusive practices. We are interested to hear your views on other initiatives that might have the same outcomes.

19. What alternative would you suggest to increase transparency, inclusion and employment of disabled people in the workplace? If you have any evidence to support this suggestion, please provide it.

Thank you for participating in this consultation exercise.

Contact details and how to respond

For information about how we treat your personal data when you respond to our consultation, please see the **Privacy Notice at Annex A**.

Please send your response by 25/03/22 to:

Disability Workforce Reporting Consultation, Disability Unit
10 Victoria Street
London
SW1H 0NB

Tel: 07749 722203 or 07922 384293

Email: duplications@cabineoffice.gov.uk

Complaints or comments

If you have any complaints or comments about the consultation process you should contact the Cabinet Office at the above address.

Alternative format versions

Alternative formats of this consultation available online at the following link: <https://www.gov.uk/government/consultations/disability-workforce-reporting> by emailing duplications@cabineoffice.gov.uk or by writing to the above address.

Alternative formats include: Audio, Braille, Large print, Easy read, Web Accessible version, Online survey version, and a Welsh translation.

Confidentiality

If you want the information that you provide to be treated as confidential, please explain to us why you regard the information you have provided as confidential. We will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Cabinet Office.

Annex A – Privacy Notice for Cabinet Office consultations

This notice sets out how we will use your personal data, and your rights. It is made under Articles 13 and/or 14 of the General Data Protection Regulation (GDPR).

Your data

Purpose

The purpose for which we are processing your personal data is to obtain the opinions of members of the public, parliamentarians and representatives of organisations and companies about departmental policies, proposals, or generally to obtain public opinion data on an issue of public interest.

The data

We will process the following personal data (where given): name, address, email address, job title, and employer, as well as opinions.

We will also process additional biographical information about respondents or third parties where it is volunteered.

Legal basis of processing

The legal basis for processing your personal data is that it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller. In this case that is

consulting on policies or proposals, or obtaining opinion data, in order to develop good effective policies.

Sensitive personal data is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

The legal basis for processing your sensitive personal data, or data about criminal convictions (where you volunteer it), is that it is necessary for reasons of substantial public interest for the exercise of a function of the Crown, a Minister of the Crown, or a government department. The function is consulting on policies or proposals, or obtaining opinion data, in order to develop good effective policies.

Recipients

Where individuals submit responses, we may publish their responses, but we will not publicly identify them. We will endeavour to remove any information that may lead to individuals being identified.

Responses submitted by organisations or representatives of organisations may be published in full.

Where information about responses is not published, it may be shared with officials within other public bodies in order to help develop policy.

As your personal data will be stored on our IT infrastructure it will also be shared with our data processors who provide email, and document management and storage services.

We may share your personal data where required to be law, for example in relation to a request made under the Freedom of Information Act 2000.

Retention

Published information will generally be retained indefinitely on the basis that the information is of historic value. This would include, for example, personal data about representatives of organisations.

Responses from individuals will be retained in identifiable form for 3 calendar years after the consultation has concluded.

Where personal data have not been obtained from you

Your personal data were obtained by us from a respondent to a consultation.

Your rights

You have the right to request information about how your personal data are processed, and to request a copy of that personal data.

You have the right to request that any inaccuracies in your personal data are rectified without delay.

You have the right to request that any incomplete personal data are completed, including by means of a supplementary statement.

You have the right to request that your personal data are erased if there is no longer a justification for them to be processed.

You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

You have the right to object to the processing of your personal data where it is processed for direct marketing purposes.

You have the right to object to the processing of your personal data.

International transfers

As your personal data is stored on our IT infrastructure, and shared with our data processors, it may be transferred and stored securely outside the European Union. Where that is the case it will be subject to equivalent legal protection through the use of Model Contract Clauses.

Contact details

The data controller for your personal data is the Cabinet Office. The contact details for the data controller are: Cabinet Office, 70 Whitehall, London, SW1A 2AS, or

0207 276 1234, or publiccorrespondence@cabinetoffice.gov.uk.

The contact details for the data controller's Data Protection Officer are: Data Protection Officer, Cabinet Office, 70 Whitehall, London, SW1A 2AS, or dpo@cabinetoffice.gov.uk.

The Data Protection Officer provides independent advice and monitoring of Cabinet Office's use of personal information.

Complaints

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, or 0303 123 1113, or casework@ico.org.uk. Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

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Any enquiries regarding this publication should be sent to us at Disability Workforce Reporting Consultation, Disability Unit

10 Victoria Street, London, SW1H 0NB

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