



## **SUBMISSION TO THE DISABILITY WORKFORCE REPORTING CONSULTATION**

**March 2022**

### **Introduction**

In response to the Disability Workforce Reporting Consultation announced in the *National Disability Strategy* in July 2021, we outline below the steps we believe the government should take on this matter. We argue that *mandatory disability employment reporting should be introduced for all firms with 250 or more employees*. This should require employers to report data to the government on the number of disabled people they employ as a percentage of their workforce using a standardised metric, and for the government to then publicise this data. As well as having important benefits in its own right, this is also a crucial first stage in enabling employers to measure other in-work disability-related gaps (in pay, for example). We also argue that successful disability reporting requires: *consistency* of measures and methods; *compliance* with legislation and regulation; and high levels of *coverage* (the three Cs). Below, we outline the benefits of disability employment reporting, and then provide advice on how each of the three C's can be achieved. We also consider how a range of concerns that have been raised regarding disability employment reporting might be addressed.

### **The benefits of disability employment reporting**

Disability employment reporting has the potential to engender transformative change. The government is fully aware of this, having outlined the benefits of reporting in the introduction to its framework for *Voluntary reporting on disability, mental health and wellbeing*,<sup>1</sup> which it launched in November 2018. This argues that transparent reporting can help employers: “Improve employee engagement and retention, with consequent gains for performance and productivity”; “Better understand the experiences of disabled people”; “Better monitor internal progress in building a more inclusive environment”; and “Access a wider pool of talent and skills through promoting inclusive and disability-friendly recruitment, retention and progression policies”. In short, requiring employers to collect and report data on the proportion of their workforce who are disabled will help to place disability on the boardroom agenda, thus encouraging a greater focus within organisations on the recruitment and retention of disabled people. This in turn will enhance workforce diversity and help employers attract and retain a wider talent pool, thereby helping them to address labour and skills shortages.

The transparent publication of a high-profile statistic in a standard format would also enable employers to benchmark their position and progress against industry or regional averages, and against best practice organisations. In addition, it would signal to government which employers are making exceptional contributions towards its target to reduce the disability employment gap. For the public, it would illustrate the employers that have taken effective action to increase workforce diversity, and importantly for disabled job applicants it would signal the employers that are most likely to hire and retain them. More generally, as for gender

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<sup>1</sup> <https://www.gov.uk/government/publications/voluntary-reporting-on-disability-mental-health-and-wellbeing>

pay gap reporting, transparent and mandatory reporting through a centralised and searchable portal would raise the profile and awareness of disability equality in the UK, and emphasise and legitimise data collection on disability by employers for equality monitoring purposes.

More broadly, consistent and comparable evidence on disability employment across employers will allow for greater government understanding and dissemination of employer best practice. By identifying the organisations that have achieved the best disability employment outcomes, it would then be possible to explore the approaches and practices adopted within these organisations that have led to the achievement of these outcomes. The government could then seek to disseminate these approaches and practices more widely across the economy, thereby further raising disability employment levels.

Disability employment reporting thus needs to be a government-led national project. Organisational measurement and reporting procedures need to be co-produced with employers, but ultimately government co-ordination is required to support employers by ensuring standardised methods of data collection and definitions, and promoting high organisational and employee response rates. Without a government-led mandatory approach coupled with appropriate guidance, few organisations will measure, collect and analyse data on disability. For those that do, the likelihood is that the value of the data will be undermined by non-standard, non-aligned definitions and ad-hoc data collection.

Therefore, to be effective, it is essential the design of the reporting system adheres to the three Cs: *consistency* of measures and methods; *compliance* with legislation and regulation; and high *coverage*. To achieve the first two Cs (consistency and compliance), we argue the system would need to require employers to use a standardised question to identify disabled people within their workforce, and a standardised data collection method. To achieve the third C (coverage), the system would need to be mandatory, as this is the most efficient and effective means of achieving the required level of coverage. The following section addresses the first two Cs (consistency and compliance) while the subsequent section addresses the third C (coverage).

### **Achieving consistency and compliance: a standardised question and data collection method**

We argue that to ensure consistency and compliance, it is essential the disability employment reporting system uses both a standardised question and also a standardised data collection method. We address both of these points below.

#### *A standardised question*

When asking their employees about their disability status, we argue that all employers should be required to use a standardised question from which they should not be permitted to deviate. This would help ensure the data collected are comparable across employers. Analysis of national data demonstrates that differences in question wording can yield differences in reported disability, hence if different employers use different wording it would not be possible to compare the figures across employers with any degree of certainty, or develop national, regional or sectoral averages for benchmarking purposes.<sup>2</sup> Data on disability is more difficult to measure and to collect than data on other protected characteristics such as gender given it is a complex and multi-faceted concept with legal, social, cultural and functional components.<sup>3</sup>

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<sup>2</sup> Bajekal, M., Harries, T., Breman, R. and Woodfield, K. (2004). Review of disability estimates and definitions. DWP In-house Report 128.

<sup>3</sup> Wass, V. (2016) chapter 2 in Fevre et al. (2016) *Closing disability gaps at work* <https://www.disabilityatwork.co.uk/2016/11/06/closing-disability-gaps-at-work-deficits-in-evidence-and-differences-in-experience/>

It is also not fixed over time and is affected by changing impairment and/or environmental factors. Further, the hidden nature of many impairments, and the stigma which attaches to a disability identity, can lead to non-disclosure and/or mismeasurement. For all these reasons, it is essential that the government support employers by requiring them to use a question based on a workable, recognised and standardised definition of disability.

As such, we argue the question that should be used for the purposes of disability employment reporting is the *Labour Force Survey (LFS) question*. This question is consistent with the definition of disability in the Equality Act. The LFS is the government's main source of national disability statistics, and is used to monitor its national disability employment commitments. In seeking to harmonise the measurement of disability, the government has increasingly required national surveys to use this measure. The LFS asks respondents: "Do you have any physical or mental health conditions or illnesses lasting or expecting to last 12 months or more?". If respondents answer in the affirmative, they are asked the follow-up question: "Does your condition or illness reduce your ability to carry out day-today activities?" (Yes, a lot; Yes, a little; Not at all). Respondents answering "Yes, a little" or "Yes, a lot" are defined as disabled.

The advantages of using this measure are fourfold

- i. It has already been pilot- and quality-tested by the ONS to ensure its validity as a method by which to measure disability. It is therefore the best generic question available for the purposes of disability reporting.
- ii. As it is consistent with the definition of disability in the *Equality Act 2010*, using this question for the purposes of disability employment reporting would provide employers with the information they need to help them assess their fulfilment of statutory obligations with regard to disability discrimination and the provision of reasonable adjustments.
- iii. The data collected via employer reporting will be more comparable to national estimates and external (e.g. industry) benchmarks.
- iv. The LFS question contains aspects of the social model of disability, given the follow-up question ("Does your condition or illness reduce your ability to carry out day-today activities?") invites respondents to reflect on whether it is obstacles or barriers in society that result in their condition or illness having limiting effects, rather than assuming their condition or illness has limiting effects per se. Alternative questions such that in the framework for *Voluntary reporting on disability, mental health and wellbeing* lack this social model component and are less preferable for this reason. The voluntary reporting framework question is also problematic as it includes the term 'disability', which the ONS finds will deter respondents with health conditions or impairments who do not identify as disabled from answering in the affirmative.

We appreciate there is likely to be considerable debate over how the question should be worded, given different organisations may call for the particular impairments on which they focus to be reflected within the question. For example, mental health charities may suggest the question needs to identify the proportion of the workforce with mental as opposed to physical health conditions or illnesses. This may have the important benefit of drawing attention to the national prevalence of mental health conditions or illnesses, and focus employer attention on this issue among their workforce. However, other charities will make similar appeals of equal merit. Since it would not be feasible to develop a universal standard question that includes all impairments in detail, any temptation to try to incorporate a wide range of impairments into the question should be resisted. This is consistent with the focus on 'disability' as a protected characteristic and the national policy focus on the overall disability employment gap, which does not differentiate between impairments (notwithstanding differences in employment rates by impairment). We anticipate that establishing aggregate figures is one step in a process aimed at helping the needs of all disabled individuals.

### *A standardised data collection method*

Turning to the method by which the data should be collected, we argue that *a standardised data collection method should be used*. This is essential in ensuring consistency between employers. Different data collection methods are likely to produce substantial variation in the reported figures. For example, anonymous staff surveys are likely to attract a higher response and disability rate than declaration to the organisation's human resource function, which even if effectively implemented (with employee information being retained as confidential) has a higher risk of non-response and non-disclosure of disability. Hence, if different employers use different data collection methods, their figures will be inconsistent and non-comparable.

Our recommended data collection method would be for employers to collect data on an annual basis (which is important given the non-static nature of disability) using a standard government form that cannot be altered or changed. This mirrors the approach taken in the US under *Section 503 of the Rehabilitation Act of 1973*, which requires employers with federal government contracts to report the percentage of disabled workers in their workforce to the Office of Federal Contract Compliance Programs within the Department of Labor. In asking employees about their disability status, employers are required to use a standard form (form CC-305). Employees are asked on this form to provide their name and employee ID number. We would advocate a similar approach in the UK. As such, the information collected on employees' disability status would not be anonymous, but employers would be expected to treat it as confidential. As in the US, we would also advocate that the form explains to employees why they are being asked to complete it (i.e. it is a legal requirement for the employer to ask them to do so, the data will be extremely useful in enabling the employer to understand its disabled workforce, and it will help engender future improvements in supporting them).

While we appreciate the complexity of non-anonymous reporting, we argue that it has several major benefits. First, it would enable employers to identify employees who have rights under the Equality Act and help inform disputes at Employment Tribunals regarding whether employees had directly informed their employer with regard to physical or mental health conditions. Second, the information gathered could be used to facilitate the assessment of disability gaps in other outcomes (including pay – see below).

However, it would be essential within a non-anonymised system for employers to find ways to ensure employees feel sufficiently comfortable to declare their disability status. Central to this is that employers should be required to ensure that information on employees' disability status is treated confidentially. However, it is likely that disabled employees will have greater faith in the confidentiality of the system where the employer has developed positive, supportive, and high-trust relationships with them. Disability employment reporting may, therefore, have the positive effect of encouraging employers to develop such relationships, given that a failure to do so risks disabled employees not declaring their condition or illness, which in turn could lead to negative reputational effects for the employer as a result of appearing reluctant to employ disabled people.

However, this in turn highlights the importance of non-response rates in interpreting disability employment statistics. It would be anticipated that non-response rates would be higher in less supportive environments, in which disabled people would not wish to disclose their disability, or the data collection is viewed with greater general suspicion or disinterest, hence reducing the percentage of employees providing information on disability. Non-reporting rates should therefore also be reported alongside the disability workforce prevalence rate.

Reporting on the above basis will achieve the first two Cs: consistency and compliance. Adherence to standard measures and reporting methods in a national framework within which

guidelines and requirements are laid down by the government will deliver comparability between organisations and over time, thus allowing meaningful national, regional and sectoral averages to be calculated, against which employers could benchmark their progress. It will also enable the identification of employers that have achieved the best outcomes, thereby facilitating greater understanding of best practice approaches from which other organisations would be able to learn.

### **Achieving coverage: why organisational reporting should not be voluntary**

The national benefits of organisational reporting derive from consistent, compliant collection and reporting by the highest possible number of (and preferably all) large employers. It is for this reason that disability employment reporting by employers should be introduced on a mandatory basis. This will facilitate the achievement of the third C – coverage.

Currently, employer reporting on disability is voluntary. Without a central register, there is no way of knowing the extent of employer reporting, or of employer engagement with the government’s voluntary reporting framework. Internet searches suggest few employers have published voluntary reports, and statistics on disability monitoring from the Workplace Employment Relations Survey (WERS) 2011 and from the CIPD in 2022 also suggest that levels of reporting are low. For example, in the CIPD data only 4% of FTSE 100 companies reported on disability.<sup>4</sup> There are several reasons why a lack of employer engagement with voluntary reporting might be anticipated. The first relates to the quality of the data produced. Unless all employers report their data in a consistent manner, it will not be possible to ascertain industry or sectoral averages for benchmarking purposes. As such, other than for the purposes of internal monitoring, the data will be of little value to employers. Second, voluntary reporting signals to employers that the government views reporting as a low priority, hence it is likely to generate a far more modest employer response and lower public awareness and scrutiny relative to a mandatory approach. Given this, it is unsurprising that reporting has remained a low organisational priority, and employer engagement with the voluntary reporting framework has been limited.

However, the experience of mandatory gender pay gap reporting provides an indication of what is likely to happen to the coverage of disability employment reporting should it become mandatory. The figures on gender pay gap reporting were very low prior to the introduction of legislation, with just six organisations, prior to legislation, reporting this gap on a voluntary basis.<sup>5</sup> Yet in the first year of statutory gender pay gap reporting (2018-19), there was 100 per cent employer compliance, with 48 per cent publishing action plans.<sup>6</sup> There are no reasons to assume that employers would be any less responsive to the introduction of mandatory disability employment reporting – as with gender pay gap reporting it would likely quickly become seen by employers as ‘business as usual’.

Also notable is that several employers have stated their support for disability employment reporting in principle but have yet to introduce it themselves, as they are waiting to see whether the government introduces a mandatory system. They do not wish to implement their own system in advance of this given the possibility they will then need to amend it later on to comply with a government-mandated system. This further suggests there is considerable employer understanding of the benefits of disability employment reporting, and that

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<sup>4</sup> CIPD (2022) FTSE 100 Firms Failing to Report Meaningful Diversity Data <https://www.peoplemanagement.co.uk/news/articles/ftse-100-firms-failing-report-meaningful-diversity-data-CIPD-study-finds>

<sup>5</sup> Millner, S. (2021) “Ethnicity pay gap: Why the UK needs mandatory reporting”, *The Conversation*. May 24<sup>th</sup>.

<sup>6</sup> Government Equalities Office (2018) Gender Pay Gap Information Regulations 2017 Summary of reported data for 2017/18. GEO-RR-005.

employers will be receptive to the introduction of a system that provides clear implementation guidelines.

### **Practical difficulties are not insurmountable**

There will undoubtedly be certain practical difficulties involved in implementing disability employment reporting. However, it is worth emphasising that several public and private sector employers already report a range of disability employment metrics, thus illustrating that reporting is entirely operationalisable. These include EY, Clifford Chance and Capita. The BBC, ITV, Channel 4, Channel 5, and Sky have all signed up to “Diamond”, which is a system for tracking on- and off-screen diversity. Channel 4, for example, has sought to develop a culture in which employees feel comfortable to be open about their disability, and self-reported disability prevalence at Channel 4 is now 11.5%.<sup>7</sup> In NHS England, the Workforce Disability Equality Standard (WDES) requires NHS employers to report ten specific measures that compare the workplace and career experiences of disabled and non-disabled employees. These metrics are then used to develop and publish action plans, and to enable employers to measure year-on-year progress towards greater disability equality.<sup>8</sup> Annual standardised workforce reporting in the civil service and government departments also identifies the proportion of their workforce who declare themselves disabled, and this is reported by pay and grading levels.<sup>9</sup> It is also a statutory obligation for universities to report on workforce disability prevalence to the Higher Education Statistics Agency, which publishes these data.<sup>10</sup> CIPD research suggests that over three quarters of organisations already have all or at least some of the infrastructure in place to facilitate organisational reporting.<sup>11</sup> This demonstrates that disability employment reporting is entirely feasible from a practical perspective. The challenge, therefore, is to disseminate these existing pockets of good practice towards reporting, via a standardised mandatory system, more broadly across the economy.

Concerns are sometimes raised that employers operating internationally may not have the necessary systems in place to be able to implement mandatory reporting, given their HR systems are designed to cover their whole workforce (which may span a number of countries) rather than just the UK. However, these companies, if they have 250+ employees in the UK, will have already implemented gender pay gap reporting (given it is a mandatory requirement for them to do so). This shows they have the necessary systems in place to facilitate UK-based reporting, and will be able to transpose the UK-specific administrative software systems they have developed for gender pay gap reporting to form the basis of an administrative system for the purposes of disability employment reporting. Also, multinational organisations in the UK operate under Equality Act legislation and already need to apply the Act’s definition of disability for the purposes of accommodation, reasonable adjustment and anti-discrimination. This further suggests they are likely to have already developed UK-focused disability equality systems and procedures, which they will be able to extend in introducing disability employment reporting.

Other employers have noted that employees may be reluctant to disclose health conditions or illnesses if their roles are subject to medicals as part of routine job capability checks. If such medicals and checks are genuine occupational requirements, and are thoroughly reviewed to ensure they do not unreasonably disadvantage disabled individuals from fulfilling their roles,

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<sup>7</sup> <https://www.disabilityatwork.co.uk/wp-content/uploads/2019/12/Proposal-for-transparent-reporting.pdf>

<sup>8</sup> <https://www.england.nhs.uk/about/equality/equality-hub/wdes/>

<sup>9</sup> <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/publicsectorpersonnel/bulletins/civilservicestatistics/2018#proportion-of-disabled-civil-servants-increases>

<sup>10</sup> <https://www.hesa.ac.uk/data-and-analysis/sb256/figure-6>

<sup>11</sup> CIPD/ YouGov survey 2019, reported in: <https://www.centreforsocialjustice.org.uk/wp-content/uploads/2021/03/CSJJ8819-Disability-Report-190408.pdf>

this should not deter appropriate declarations of health conditions or illnesses that may otherwise remain undisclosed. Indeed, a reluctance to declare and/or low disability prevalence rates in such roles will alert employers to potential discrimination in medicals and job capability checks, and encourage the review of such procedures to help ensure the widest range of roles in the organisation are available for disabled people.

### **Leveraging disability employment reporting data to enhance other government disability employment initiatives**

A further benefit of mandatory disability employment reporting is that, if implemented following the procedures outlined above (i.e., allowing for comparability of data across employers), it could also be used to extend other current government policy initiatives.

For example, the data could be used to facilitate the introduction of a more outcome-based assessment criterion for Disability Confident accreditation. This might involve employers seeking accreditation being required to demonstrate they meet a minimum threshold regarding the number of disabled people they employ as a percentage of their workforce. Given its consistency and comparability across employers, the data produced for the purposes of disability employment reporting could be used to demonstrate whether the employer has met this threshold. Hence, mandatory disability employment reporting would enable Disability Confident to move to an outcome-based assessment criteria without creating any additional bureaucratic burden for employers. The importance of mandatory reporting in facilitating meaningful reform of Disability Confident is recognised in the update on the Disability Confident review's findings and recommendations, which states "We recognise, that there was appetite for the scheme to be more outcome focused and we will consider this following the findings from the Disability Workforce Reporting Consultation".<sup>12</sup>

The comparability of the data across employers would also facilitate reform to the *Public Services Social Value Act* [2012]. This seeks to leverage organisational commitment to employ disabled people through public sector procurement. The Act allows government departments to use a social value model to assess and score prospective suppliers. An extension to the Act, launched in 2021, requires that all major procurements across all government departments 'explicitly evaluate' social value (where appropriate), rather than 'just consider' it.<sup>13</sup> The extension requires that social value accounts for a minimum of 10% of the bid and suggests a range of objectives and target groups which qualify under social value. The employment of disabled people is an explicit criterion (alongside climate change, Covid-recovery, employee wellbeing and community integration), though no definition of disability or metric for reporting is provided.<sup>14</sup> Instead, employers' bids are judged on whether they engage in activities that "demonstrate action to increase the representation of disabled people"; "support disabled people in developing new skills relevant to the contract, including through training schemes that result in recognised qualifications"; and "influence all stakeholders through the delivery of the contract to support disabled people". A more meaningful approach would instead involve employers reporting in their bids the number of disabled people they employ as a percentage of their workforce, with bids from employers employing a proportionately higher number of disabled people being rated more highly. The introduction of mandatory reporting would provide the necessary data to allow for bids to be evaluated in this manner.

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<sup>12</sup> DWP (2022) Disability confident review

<sup>13</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/921437/PPN-06\\_20-Taking-Account-of-Social-Value-in-the-Award-of-Central-Government-Contracts.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921437/PPN-06_20-Taking-Account-of-Social-Value-in-the-Award-of-Central-Government-Contracts.pdf)

<sup>14</sup> In contrast the US voluntary self-identification of disability form CC-305 which supports US federal government section 503 of the Rehabilitation Act of 1973 specifies the definition of disability and the reporting metric.

Beyond the public sector, many organisations seek to manage reputational risk in their supply chains through the requirement for suppliers to demonstrate adherence to fair employment standards. Comparable data on disability employment will enable organisations to demonstrate their performance on fair employment with regard to disability during tender and inspection process by business customers.

### **Extending reporting to the disability pay gap**

If mandatory disability employment reporting is introduced in accordance with the procedures outlined above (i.e. the data are non-anonymised), this will provide employers with data on the specific individuals within their organisation who identify as disabled. This would in turn allow them to calculate their disability pay gap. Regarding gender pay gap reporting, the government has argued that it “is a key part of building a country that works for everyone”, and that it breaks down barriers to employment and career progression, thus creating “a more modern workforce”.<sup>15</sup> We argue that this rationale applies equally to employers reporting their disability pay gap. It is notable that the initial evidence on the effects of the gender pay gap regulations in narrowing employer gender pay gaps has been positive.<sup>16</sup> There are no reasons to expect the introduction of disability pay gap regulations would not have similar effects on the disability pay gap (which is currently estimated to be between 10-15% in the UK).

Data from WERS on workplace-level equality practices across protected characteristics demonstrates the prevalence of disability pay gap monitoring is currently low, with 3% of employers (1.4% in the private sector) reviewing relative pay by disability.<sup>17</sup> This in itself highlights the importance of disability pay gap reporting becoming mandatory. Disability pay gap reporting would also be relatively straightforward for employers to introduce from a technical and administrative perspective if implemented after or in tandem with non-anonymised disability employment reporting, given this would provide employers with the data they need to link individuals’ disability status to their pay data within human resource records.

However, one concern that has been raised regarding disability pay gap reporting is that it punishes employers that are taking positive steps to hire more disabled people.<sup>18</sup> Employers hiring disabled people in greater numbers are likely to hire them into lower organisational levels or on lower pay grades (with the potential for them to move upwards through the organisational hierarchy over time). Given this, they are likely to have larger disability pay gaps than employers that have not attempted to increase the number of disabled people they employ. However, it would also be anticipated that employers would provide a narrative alongside their disability pay gap figures, which would provide them with an opportunity to explain instances where pay gaps have arisen as a result of positive steps having been taken to hire disabled people into the organisation.

It would also be possible to develop a hybrid metric that takes into account both the employer’s disability employment levels and their disability pay gap. This would involve dividing the disability pay gap by the percentage of employees who are disabled within the organisation,

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<sup>15</sup> <https://www.gov.uk/government/news/gender-pay-gap-reporting-goes-live>

<sup>16</sup> See, for example, Blundell, J. (2021) Wage responses to gender pay gap reporting requirements, Centre for Economic Performance Discussion Paper No.1750.

<sup>17</sup> Wass, V. and Jones, M. (2022) “Organisational disability measurement and reporting in the UK”, in Beatty, J., Hennekam, S. and Kulkarni, M. (eds.) *The De Gruyter Handbook of Disability and Management*, forthcoming.

<sup>18</sup> Work and Pensions Committee (2021) *Disability Employment Gap: Second Report of Session 2021–22*. <https://committees.parliament.uk/publications/7005/documents/72950/default/>

with lower scores representing more positive outcomes.<sup>19</sup> Therefore, an organisation with a disability pay gap of 10% but a disability prevalence rate of just 5% would receive a combined score of  $10/5 = 2$ . However, an organisation with a larger disability pay gap of 20% but a disability prevalence rate of 15% would receive a (more favourable) score of  $20/15 = 1.33$ . This combined score would enable employers' disability employment prevalence to be taken into account in interpreting their disability pay gap data.

### **Support for the proposals outlined above**

Our assessment is that the measures outlined above have significant potential to improve disabled people's employment outcomes and experiences of work in the UK. As such, Disability@Work call on the government to introduce mandatory disability employment reporting in a way that meets the requirements, and has the benefits, of the three Cs approach. We also call on the government to use the metrics to reform other government initiatives such as Disability Confident and the *Public Services (Social Value) Act* [2012], and to use the data generated by the introduction of mandatory disability employment reporting to introduce mandatory disability pay gap reporting.

The measures outlined above are also reflected within the new Disability Employment Charter,<sup>20</sup> launched in October 2021, of which Disability@Work is a founder member. Over 80 organisations have backed the Charter, including virtually all of the country's large disability charities (including Leonard Cheshire, Scope, Sense, RNIB, RNID, National Autistic Society, Mencap); national bodies such as the Business Disability Forum and Disability Rights UK; trade unions including UNISON and Unite; and employers including Primark, PageGroup, the Post Office, and Publicis Groupe. This demonstrates the broad platform of support for the proposals we outline above from across a wide range of stakeholders.

We hope this information is helpful. Please do not hesitate to contact us if you require further information on our submission.

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For further details of our research on disability, go to: [www.disabilityatwork.co.uk](http://www.disabilityatwork.co.uk)

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<sup>19</sup> See also Wass and Jones (2022).

<sup>20</sup> [www.disabilityemploymentcharter.org](http://www.disabilityemploymentcharter.org)