A guide to reporting on disability employment

SCOPE = Equality for disabled people

Contents

Introduction

More and more businesses are recognising the value of reporting on their diversity data, and using the insight gathered from reporting to make changes to their working practices. Disability information and data needs to be included and Scope is here to help you.

In November 2018, the Government published a Voluntary Reporting Framework[1] to support employers to report information on disability, mental health and wellbeing in the workplace, including information on disabled people they employ and further information on how they recruit and retain disabled people.

Scope is often asked by employers what else they should report on that will provide them with useful insight which can be used to help them become more inclusive organisations.

We have developed this guide to provide employers like you with advice and information on how to report on a range of disability measures. It is aimed at larger employers with more than 250 employees. Smaller employers might also find this guide useful. However, extra care must be taken to make sure staff are not identifiable in public data.

Scope recommends:

Employers with more than 250 employees should collect, analyse and publish information about the experiences of their disabled employees.
This guide is here to help you navigate how.

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1 Voluntary Reporting on disability, mental health wellbeing: A framework to support employers to voluntarily report on disability mental health and wellbeing in the workplace
https://www.gov.uk/government/publications/voluntary-reporting-on-disability-men-tal-health-and-wellbeing

Summary

Disabled people are under-represented in today's workforce, with just half of disabled people in employment. However, there are more than one million disabled people who aren't in work who would like to work.

At Scope, we know from the employers we work with that having a diverse workforce brings many benefits to businesses. We also know that unleashing the talent of Britain's 14 million disabled people will support a thriving economy. If a workforce reflects the range of perspectives within the local community, it will be better suited to meet the needs of its customers.

Many large firms already gather data on the diversity of their employees such as gender, ethnicity and sexuality to inform recruitment strategies and working practices and recognise the benefits of doing so. But it is far less common for employers to collect disability data.

At Scope we firmly believe that what gets measured gets done. By monitoring representation of your workforce and by measuring the experiences of disabled candidates and employees, businesses will become better equipped to attract this untapped talent pool.

This practical guide sets out how you as employers can measure and report on the experiences of your disabled employees at work, to both understand and improve the experiences of the workforce. Drawing on insights gained through discussions with both disabled people and employers, it explains how best to gather this data.

Reporting on your disability data is important, as it will enable you to gather data on the number of disabled people who work in your business and any barriers they may face. This will provide you with the evidence to lobby internally for changes to any working practices that present a barrier to any disabled employees. It will make your business more attractive to disabled jobseekers, giving you a greater pool of talent from which to choose your potential employees from.

Following the publication of the voluntary reporting framework, reporting is clearly now seen by Government as a good thing for employers to be doing. This guide will help you report on the disability section of the framework.

There are three areas we think you should focus on when reporting on your disability data.

1. Gathering the right data

For reporting to succeed, you will need to gather data that will help you fully evaluate the experiences of your disabled employees. We recommend that you gather data on:

- The number of disabled people you employ
- Information on the number and quality of adjustments you have offered
- A comparison between the average earnings of your disabled staff and the average earnings of your non-disabled staff
- The number of disabled people you employ in each pay bracket.

2. Improving workplace culture

A key challenge will be around capturing this data in the first place - nearly half of disabled people worry about sharing their impairment or condition at work[2].

The key for you to overcome this challenge will be to explain to disabled people why you are collecting this information and how this information will be used by you to help support them do their job. Get this right, then you will have started to create the right conditions for your disabled staff to open up about their impairment or condition at work, and you will be able to gather the data needed for this measurement framework to be a success. Our Let's Talk report provides further advice on what you can do to encourage more of your staff to talk about their impairment or condition at work.

3. How you publish information

By publishing your disability data, you will be able to demonstrate to disabled employees and potential employees that you are serious about creating an inclusive environment in your organisation. But, for you to see these benefits, you will need to ensure that the information you publish about your disabled employees is easily accessible to all.

2 Scope (2017), Let's Talk: Improving conversations about disability at work

What is the state of play with disability employment?

Key statistics

Disabled people continue to face challenges in employment compared with their non–disabled peers.

- Just half of disabled people are in work, compared with 80 per cent of non-disabled people[3].

- Working disabled people face a pay gap of 13 per cent for men and 7 per cent for women[4].

- Disabled people are under-represented in senior roles. Only 8 per cent of people who hold higher managerial roles are disabled, compared with 92 per cent of non-disabled people[5].

- Disabled people are nearly three times more likely to leave the labour market than non–disabled people[6].

This is due to barriers which exist in the workplace for disabled people, such as entrenched employer attitudes, availability of the option of flexible working, and availability of frequent and accessible public transport.

Closing the disability employment gap within your workforce

Good employers know that when their workforce matches the customers they serve and is representative of society, they reap the benefits of a more productive workforce and a more profitable business. But what should 'good' look like in relation to disability?

The difference between the number of disabled and non-disabled people in work, highlighted in the key statistics section above, known as the disability employment gap, is 30 per cent[7]. The Government has committed to get one million more disabled people into work by 2027[8]. At Scope, we think that the best way for employers to help ensure this aim is not only met, but exceeded, is to focus on reducing your own disability employment gap. Reporting plays an essential part in this.

Currently, disabled people make up roughly 11 per cent of the UK workforce[9]. If the disability employment gap were halved, disabled people would make up 15 per cent of the workforce[10]. If the disability employment gap didn't exist, disabled people would make up 18 per cent of the workforce[11].

3 Scope analysis of ONS (August 2017) Labour Force Survey
4 Equality and Human Rights Commission (2017) Disability Pay Gaps https://www.equalityhuman-
   rights.com/sites/default/files/research-report-107-the-disability-pay-gap.pdf
5 Scope analysis of the Labour Force Survey: April to June 2027 (ONS, 2017)
6 Scope analysis of the Life Opportunities Survey: Waves 1 to 3, 2009 to 2014 (ONS, 2016)
7 Scope analysis of the ONS (May 2018) Labour Force Survey
8 Department for Work and Pensions (2017),
   Improving Lives: The future of work, health and disability https://www.gov.uk/government/
   publications/improving-lives-the-future-of-work-health-and-disability
9 Scope analysis of the ONS (June 2017) Quarterly Labour Force Survey
10 Ibid
11 Ibid

The Government's Voluntary Reporting Framework

In November 2018, the Government published its Voluntary Reporting Framework on disability, mental health and wellbeing. The Framework aims to support employers with more than 250 employees to voluntarily report on disability in the workplace, as well as on mental health and wellbeing. It consists of two sections that ask employers to capture data about the proportion of disabled people in their workforce and information about recruitment and retention practices.
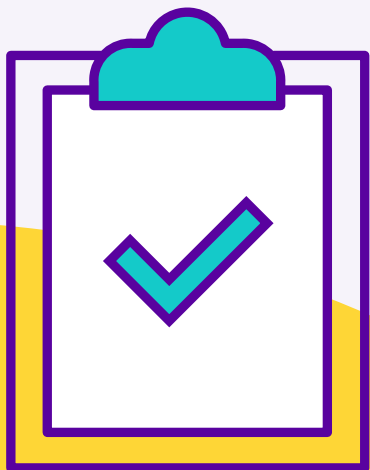
Why is reporting a good thing for your business?

Why should you gather disability data?

Collecting and reporting on your disability data will enable you to identify how many staff identify as disabled and how their experiences compare with other staff. Reporting can help identify:

- ✓ levels of satisfaction
- ✓ how many disabled staff have progressed through your business, and if there are any barriers to them doing so
- ✓ the effectiveness of adjustments
- ✓ what areas of the business are underrepresented.

This insight will then provide you with the evidence you need to make the case internally to make any changes to become a more inclusive organisation.

Many employers already collect this data internally. But not everyone takes advantage of this valuable insight to improve workplace practices. While even fewer still review such data at executive or board level, or even publish it. As a result, businesses are wasting an opportunity to both change internal practices that will benefit their disabled employees, and tell prospective recruits and customers about how well it treats and supports its disabled employees. Scope has estimated that the collective spending power of disabled people and their families, known as the purple pound, is £265 billion.

Realising new benefits for your business

By gathering and reporting on disability data, you will be able to understand where your disabled employees face barriers at work and use this evidence to inform your plans to become more inclusive organisations. This will benefit your disabled employees by creating a working environment that makes them feel more confident to be open about their disability at work.

Furthermore, by working to remove any barriers faced by disabled people to finding work or in the workplace itself, you increase your chances of attracting more disabled candidates as well as retaining your disabled workers. A diverse workforce which better reflects the general population will help you better understand a potential customer-base.
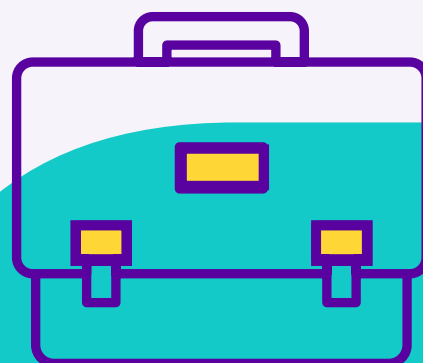
What are the benefits of publishing data for your organisation?

Publicly reporting on your disability data will provide a number of benefits for you:

- ✓ **Shows commitment to making an inclusive workplace:** Reporting will enable you to show disabled people that you are committed to making your workplace an inclusive environment for disabled people to work in and that you take a proactive approach to supporting them to do their job. Disabled people who took part in a series of focus groups on this subject told us they would believe an employer is more inclusive if they reported on their disability data.

- ✓ **Help attract a wider pool of talent:** Through reporting and using the data to become a more inclusive employer for disabled people to work in, you will make your business more attractive to disabled jobseekers. Increasing the number of disabled candidates for vacancies at your company will enable you to choose the very best candidate for the job from a wider pool of applicants, whose talent will allow you to enhance the work that you do.

- ✓ **Create products which are accessible:** Having more disabled workers will also give your organisation the opportunity to create products or services that can be accessed by disabled people. Scope has estimated that the collective spending power of disabled people and their families, known as the purple pound, is £265 billion.

- ✓ **Compare your performance with competitors:** Reporting can also provide you with the opportunity to compare your performance with results from other organisations, both within their sector or against similar sized companies.

- ✓ **Demonstrate to wider stakeholders your commitment to inclusivity:** Releasing your disability data will provide you with the opportunity to demonstrate to your partners how you are using staff data to become a more inclusive organisation and how this piece of work is having a positive impact in the workplace. One employer we spoke to told us that releasing their disability data has enabled them to demonstrate to their supply chain partners the positive value they are bringing to the local communities they are operating in.

- ✓ **Help retain staff:** If you use reporting as a catalyst to make changes internally to benefit disabled workers, then it can also help you retain your disabled staff. As a result, this will help reduce the amount of time and money you spend on recruitment. Spending less time on recruitment and onboarding a new staff member will help to improve productivity. You will also have more staff with an institutional memory and knowledge of your business and the environment you work in.

What to report on

Representation of disabled staff

To identify how many of your staff are disabled, you will need to formally ask staff if they consider themselves to have an impairment or condition.

At Scope, we get asked many times by employers about how they should word their question asking their staff if they are disabled. And we always reply that asking about disability doesn't need to be complicated.

First, you will need to think about how you define disability.

The Equality Act 2010 states that someone is disabled if they "report a long-standing illness, disability or impairment which causes substantial difficulty with day-to-day activities". This is the legal definition of disability - using this as a basis for your question would allow you to accurately capture whether an employee is disabled within the boundaries of the law.

But the definition of disability is more complicated than the legal definition allows. Many disabled people do not feel that they are disabled because of their impairment or condition, as the definition in the Equality Act states. Instead, they believe that they are disabled because of the barriers they encounter in their everyday lives, including at work.

As many disabled people do not consider themselves as having an impairment or condition based on a limited legal definition, more and more organisations, such as Scope, do not define disability using the Equality Act. We, and other inclusive organisations, base our definition of disability on an approach known as the social model of disability. This approach argues that people are disabled by barriers in society, and focuses on removing those barriers.

Key advice on what a question on disability based on the social model of disability should look like:

- Do you consider yourself to have a disability, impairment or condition?

Basing any question you use to ask if your workers are disabled on the social model of disability will help draw out how to remove the barriers disabled people face. By removing these barriers, we offer disabled people more independence, choice and control.

Key advice on what to consider when asking this question:

- Include examples about the types of impairment and condition which may meet the definition in your question
- Give individuals, who have more than one impairment or condition, the option to say so
- Communicate the reasons why you are collecting this data, and what you are going to be doing with it.

Reasonable Adjustments

As employers, you are required to provide reasonable adjustments for disabled employees and candidates.

We know that for many disabled people, reasonable adjustments are essential to doing their job effectively. Scope research has found that 21 per cent of disabled people, and 25 per cent of disabled people with high support needs said that flexible working or modified hours have helped them at work[12].

Disabled people with employment experience who took part in research for this focus group told us that knowing an employer would be proactive in asking candidates and staff about the support they need and quickly making reasonable adjustments is a real priority for them.

This means there is a need for you to demonstrate that you understand your role as an employer in providing reasonable adjustments and support to employees, and have experience in delivering reasonable adjustments effectively.

One way for you to show this is to provide data on the number of reasonable adjustments you provide to disabled employees.

Unfortunately, this only provides a limited amount of information and wouldn't provide a complete picture of your record on reasonable adjustments.

Instead, we recommend collecting more informative data such as the number of approved reasonable adjustment requests and satisfaction rates. This will allow you to demonstrate to disabled people that you take supporting them in the workplace seriously. It will also provide you with the necessary data to review if your reasonable adjustments policy is supporting disabled people to do their job.

Key advice for monitoring and analysing employee information

We would recommend that large employers monitor and analyse management information about:

- Adjustments requests, including the proportion of requests which are agreed to
- The time required in end-to-end case management
- Whether a follow-up meeting was completed with the employee
- Satisfaction rates among staff who have used the process, as well as for adjustments and support provided at recruitment. This will ensure you are demonstrating to disabled jobseekers that you are open and proactive about adjustments during the application process.

12 Scope analysis of the Life Opportunities Survey: Wave 1, 2009 to 2011 (ONS, 2011)

Disabled people have told us they are more likely to have a more positive opinion of an employer if that organisation took a proactive approach to providing reasonable adjustments for disabled people. Publishing your adjustments data will show disabled jobseekers that you are an employer who takes arranging reasonable adjustments seriously.

Doing this will in turn help your business to attract a wider talent pool of disabled workers and job seekers that will enable you to benefit from a more diverse and talented workforce.

Key advice to enable you to demonstrate to disabled people that you share this approach:

- As part of a reporting document, publish a statement setting out your approach detailing how you as an employer provide reasonable adjustments to disabled staff. If possible, include a case study of a successful adjustment.

Progression and pay

Disabled people are keen to progress in work like anybody else. But, many disabled people are also concerned that their impairment or condition will be held against them when going for more senior roles within an organisation. Data about the proportion of disabled people in senior roles can help to build an understanding about opportunities to progress within a company for them.

Looking at the relative likelihood of disabled workers being promoted can be particularly interesting. It can also act as a catalyst to support disabled people in the workplace by identifying any barriers to disabled people progressing in your company.

Having this evidence will enable you to make any necessary changes to make it easier for disabled people to progress within your organisation. Better opportunities to progress will then make it easier for you to retain your disabled employees and to continue to benefit from their talents.

Some employers have told us that, although they would like to gather data on progression, this information can be hard to collect using their HR software systems. If this is the case in your business, we would recommend that you collect and publish data detailing the breakdown of disabled people at each pay bracket.

Key advice for reporting on progression and pay:

- Large employers should monitor and publish data about representation of disabled employees as a proportion of the workforce at each pay bracket.

Average earnings

Some disabled people told us that they would be interested to learn about a potential employer's disability pay gap. However businesses have told us about some of the potential issues they might encounter when collecting this information.

We wants to make sure that this framework is practical and simple for you to use. So instead we suggest you collect information on the average earnings of your disabled and non-disabled employees.

By collecting data on the average salary of your disabled staff and comparing it with the average amount your non-disabled employees earn, you will be able to identify if your disabled workers are earning less than your non-disabled workers. If the data then shows there is a disability pay gap, then you have the evidence to start to identify how to close it.

Key advice on salary data:

• Large employers should collect and publish the mean and median average earnings of their disabled and non-disabled staff.

How to create the right conditions for gathering disability data

Improving workplace culture

Scope research has shown that nearly half of disabled people have worried about sharing information about disability at work[13].

Employers have told us that one of their biggest challenges in understanding the experiences of disabled employees is that staff are not filling in the forms or surveys that would provide that information.

To overcome this problem, employers need to create a culture in your company where disabled people feel comfortable talking about their disability.

So how can you start creating this environment? Being honest about why you are collecting this information is a good place to start.

A key reason given by disabled people as to why they do not declare their disability to their employer is that they do not know what their employer will do with this information, who it will be shared with, and what support or advice may be available to them. Our Let's Talk research project found that for many disabled people, this means that identifying as disabled at work can feel like a high-stakes gamble[14].

Being open about the purpose of collecting this information and developing an offer of support for any employee who declares their disability is therefore a must.

Other things employers could do to build trust amongst your employees are listed below.

Key advice on how to build trust and confidence in data collection amongst disabled staff:

- Clearly explain to employees the purpose of collecting this data
- Use anonymous methods, such as staff surveys, alongside formalised data captured through HR software
- Develop an offer of support for disabled staff which is visible and clearly communicated. This could include a mentoring scheme or a staff network
- Deliver an internal communications campaign, using events, blogs and films as a platform for disabled employees to share their experiences
- Use disability equality training to drive a shift in workplace culture that will make it more acceptable for staff to talk about disability.

Our Let's Talk report and Work With Me business guides are good places to start for further advice and guidance, and have some great ideas and more information on how you can proactively change your workplace culture.

13 Scope polling of 1004 disabled people 25 to 31 July 2017
14 Scope (2017), Let's Talk: Improving conversations about disability at work https://www.scope.org.uk/Scope/media/Documents/Publication%20Directory/SC0125-Let-27s-talk-Leigh-Day-Report-Rebrandnew.pdf

Getting data collection right

We have found that some people are more comfortable in identifying as disabled in an anonymous way, such as through a staff survey.

But monitoring progression and pay gaps can be automated if this information is shared through more formal routes, such as HR records.

For these reasons, we recommend that you use formal identifiable approaches along with anonymous surveys to capturing disability data.

By using both methods together, you can ensure that you are still capturing data about your disabled employees even if data capture is poor through one method. This will also allow disabled staff to choose their preferred route to providing information to their employer.

Key advice about data collection:

- Employers should monitor and analyse data about disability shared through formal methods, such as HR systems
- Alongside this, employers should include questions about disability within anonymous staff surveys.

Businesses need to have a strong idea of who they are attracting, and whether there are barriers disabled people would face through the recruitment process.

Our research has found that disabled candidates are significantly less likely to talk to an employer about their impairment or condition before they have been employed[15]. We have also found that the likelihood of sharing information about disability at work increases significantly once employees have passed an initial probationary period[16]. So, you should bear in mind that data collected at the application stage is unlikely to fully reflect the proportion of applicants or new staff.

Key advice:

- Monitor and analyse data about the proportion of candidates who are disabled and use this to shape recruitment strategies
- Ensure that further opportunities to share information about disability are available to staff following recruitment and probationary periods.

Exploring opportunities to monitor progression of disabled staff with your HR software providers

Employers have told us that they would struggle to collect some of the data this guide recommends gathering, due to their HR software not providing them with the option to record this information.

15 Scope polling of 1000 disabled adults 31 May to 8 June 2017
16 Scope polling of 501 disabled adults 20 to 28 December 2016

We recognise that this is a serious barrier to you collecting the data you want to report on. To overcome this problem, we would suggest you identify what data you can and can't collect using your current HR software provider. If you can't record any of the data we suggest in this guide that you collect, then you should either:

- Raise with your HR software provider the limitations of their software for gathering disability data. If enough employers do this, HR companies will start to realise the importance of making these changes, and begin to plan for these upgrades.
- Include disability reporting in your business requirements when you put out a tender for your procurement process for a new HR software package.

Collecting data online or using a computer system

A key learning we took from gathering our disability data was around the challenges of gathering data from staff electronically who do not use a computer as part of their job. An example of this includes encouraging staff who work in retail to fill out an online diversity form.

Employers have also referred to this as a challenge to gathering data about their disabled staff.

Although we haven't persuaded all Scope staff to complete our monitoring form, there were a number of things we did to try that helped to boost our response rate, including:

- Making it easier for retail staff to complete our online HR monitoring form, by making the form accessible via a mobile device or a tablet.
- Alternative ways of promoting to retail staff the importance of completing our online diversity form.
- Speaking to our internal communications team or senior members of staff to find out what the best ways of reaching each section of our employees.
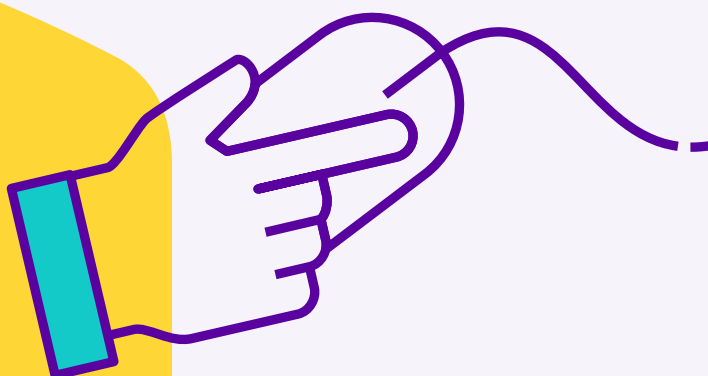
Approach to publishing information

We want this framework to be a useful tool for disabled people. And you will want to use your data to tell disabled people about the great work you are doing to make your organisation an inclusive place for them to work. But if these two aims are to be realised, then it is important that you publish your disability data on your website.

A good place to do this would be in your annual report. By following this approach, your data becomes more easily accessible to your target audience. It also demonstrates both a commitment to transparency and a willingness to achieve real progress. It will also make it clear to disabled candidates and employees that your organisation will take a proactive approach to delivering adjustments and support. This will help make your organisation more attractive to disabled jobseekers.

You can also use your annual report to publish further information on how you recruit and retain disabled people. This may include organisational policies, support available, network groups, progression, workplace adjustments and employee engagement scores. The Government's voluntary reporting framework recommends you publish this alongside your disability data.

Key advice for publishing your data:
- Large employers publish your disability data in the careers section of your website.

Further information and support

At Scope, we are keen to support you to report on your disability data, as well as to provide advice on how to become more disability friendly organisations. Our Inclusive Workplace Network team will provide you with a range of tools, advice and one-to-one support to help you become a more inclusive organisation.

Our Work With Me guide provides employers with advice on attracting and retaining disabled people in your organisation.

Our Work With Me website, run jointly with Virgin Media, also contains helpful resources for employers who want to become more inclusive employers. And, while you are there, why not sign our pledge to commit to thinking and acting differently about disability in the workplace.

Our Let's Talk report summarises the research we undertook with disabled people on their experiences of discussing their disability at work. It also features recommendations on how employers can encourage their disabled staff to talk about their impairment or condition at work.

Keep in touch

Our policy team would love to hear from you if you have any questions about anything mentioned in this guide or if you want to update us on how you are getting on with reporting on your disability data.

About Scope

We're Scope, the disability equality charity. We won't stop until we achieve a society where all disabled people enjoy equality and fairness. We provide practical advice and emotional support to disabled people and their families whenever they need it most. We use our collective power to change attitudes and end injustice. And we campaign relentlessly to create a fairer society.

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