

# Employment policy statement

## July 2019

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## 1. Introduction

This policy statement outlines the main issues facing people who are deaf or have hearing loss in the labour market. We outline factors that impact the employment opportunities of people with hearing loss and deafness and set out what action needs to be taken by employers; colleagues of people with hearing loss; government; Action on Hearing Loss; health and social care professionals; and people with hearing loss or deafness themselves.

We use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including those who are profoundly deaf and use sign language.

## 2. Background

The labour market presents several barriers for the five million people of working age<sup>1</sup> with hearing loss. Poor experiences in the workplace are a particular issue. Our recent survey shows that:

- Over half of respondents (55%) have felt unfairly treated at work because of their hearing loss.
- One in three (35%) have felt bullied at work because of their hearing loss.
- A fifth (18%) of respondents have had an employer who has implied or suggested that they would be better off not continuing to work.
- Two-thirds (65%) have felt isolated at work because of their hearing loss.
- Eight in 10 (79%) have felt stressed at work because of their hearing loss.
- Eight in 10 (78%) said their hearing loss has negatively impacted social interactions with colleagues at work.<sup>2</sup>

Considering this evidence, it's not surprising that over half (54%) of respondents have at some point not told people at work about their hearing loss for fear of the repercussions. This suggests that many people with hearing loss aren't receiving the support they need in the workplace since their employer might not be aware that they need any.

People with hearing loss also have poorer outcomes financially: the Ear Foundation calculated that, on average, people with hearing loss are paid £2,000 less per year than the general population.<sup>3</sup>

Getting into work also remains a problem. The employment gap between those with hearing loss and those without a long-term health issue or disability has narrowed over the years but it still remains. There are estimates about what the gap is. Recent figures show that 75% of people of working age with hearing loss are in employment, compared with 80% of people with no long-term health issue or disability.<sup>4</sup> These statistics are based on respondents in the Annual Population Survey who say that hearing loss is their *main health condition*. In comparison, the Equality and Human Rights Commission (EHRC) uses data from the same survey but classes hearing loss as those who say that

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<sup>1</sup> Generally, we use the working age definition used by the [Office for National Statistics \(ONS\), which is 16-64](#). However the statistic: '5 million people of working age' is based on the age range 17-69 as these data are not available in the 16-64 age range.

<sup>2</sup> Action on Hearing Loss (2018), [Survey of Workplace Experiences](#)

<sup>3</sup> The Ear Foundation, (2014) *The Real Cost of Adult Hearing Loss: Reducing its impact by increasing access to the latest hearing technologies*. Nottingham: The Ear Foundation.

<sup>4</sup> ONS (July 2016 to June 2017), Annual Population Survey.

their condition or illness *reduces their ability to carry out day-to-day activities*. Because of this, the EHRC's figure for those with hearing loss, aged 16-64, in employment (in 2015-16) was 36.4%<sup>5</sup>; much lower than 75%.

We also know from our employment services that those who use sign language as a first language can face the most substantial barriers to accessing employment and therefore the employment gap is likely to be larger for this group. We discuss this further in section 3.3.

In addition to problems getting into work, people leaving the workforce early is also a problem. Our evidence shows that people are choosing to retire early due to their hearing loss: 60% of respondents in our latest survey said that they'd retired early and, of those people, 56% said that hearing loss was a factor in their decision to retire early.<sup>6</sup>

As well as the cost to the individual, barriers to and in employment for people with hearing loss present a huge cost to society. Estimates suggest that the UK economy (in 2013) lost £24.8 billion in potential economic output because too many people with hearing loss were not in work<sup>7</sup>. With 5 million people of working age with hearing loss, there is also a huge talent pool which is not being fully utilised. By 2031 the UK economy will lose £38.6bn per year in potential economic output.

When support is given, hearing loss needn't be a barrier to people carrying out – and excelling in – most jobs. We want peoples' deafness or hearing loss to not limit their ability to access and thrive in employment.

### 3. Factors impacting getting into and thriving in work

#### 3.1. Employers

Employers play a crucial part in helping people with hearing loss get into work and thrive once in it. According to evidence, however, understanding of hearing loss among employers is not widespread. Our research shows that, among employers, there is a lack of confidence to hire people with hearing loss and a perceived lack of information and advice available on employing people with hearing loss.<sup>8</sup> The following sections outlines our recommendations for employers.

##### 3.1.1. Recruitment

Our evidence suggests that employees aren't telling organisations about their hearing loss when they apply. In our survey about workplace experiences nearly half (44%)<sup>9</sup> of respondents have applied for a job and not disclosed their hearing loss. Half (51%) of these respondents said this was because they feared being seen as incompetent. If jobseekers aren't getting the support they need at the application stage then they will likely be at a disadvantage. As well as encouraging candidates to seek support at recruitment stage, employers also need to make their recruitment processes accessible to those with hearing loss. Our research suggests however that adjustments in interviews are not always being made.<sup>10</sup> **Employers should read our guide for employers on how to make recruitment processes accessible and implement these changes where necessary.**

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<sup>5</sup> <https://www.equalityhumanrights.com/en/being-disabled-britain-supporting-data>

<sup>6</sup> Action on Hearing Loss (2018), [Survey of Workplace Experiences](#)

<sup>7</sup> International Longevity Centre (ILC) UK, 2013. Commission on Hearing Loss: Final report. London: ILC-UK.

<sup>8</sup> Cook, L. (2017) *Working for Change: Improving attitudes to hearing loss in the workplace*. Action on Hearing Loss

<sup>9</sup> Action on Hearing Loss (2018), [Survey of Workplace Experiences](#)

<sup>10</sup> Action on Hearing Loss (2018), [Survey of Workplace Experiences](#)

### 3.1.2. In work

Over half (54%) of people in our survey said they've put off telling people at work about their hearing loss.<sup>11</sup> A similar story emerges as recruitment: two-thirds (60%) of people have kept their hearing loss from people at work as they thought they would be seen as incompetent. Further, two in five (42%) said they didn't tell anyone as they thought that reasonable adjustments wouldn't be able to be made. Indeed, of those respondents who have always told people at work about their hearing loss, nearly two-fifths (37%) say they've had a time when reasonable adjustments haven't been made. In light of this evidence, **employers need to make it clear that adjustments can be made for people with hearing loss to encourage employees to seek support. Appropriate adjustments then need to be provided.**

One way that employers could address hearing loss at work is by considering it as part of an ageing workforce strategy. There are around 9.4 million people in work aged 50-74 in the UK<sup>12</sup> and 2 in 5 (42%) of over-50-year-olds have hearing loss.<sup>13</sup> This means that the likelihood of people developing hearing loss in work is quite high, particularly as the state pension age is rising.<sup>14</sup> With such a high number of people with hearing loss in the workplace it is worrying that our evidence shows that people are retiring early due to their hearing loss<sup>15</sup>. Employers are therefore likely losing highly trained, valuable members of staff. But currently studies shows that there is a lack of preparation among employers to address the ageing workforce<sup>16</sup>. **We call on employers to consider how to prepare for the ageing workforce by implementing the recommendations made in our employers' toolkit.**

Another approach that employers can take to address hearing loss and disabilities more generally is by giving parity to these issues compared to other areas in the diversity and inclusion sphere. A survey by Russell and Reynolds Associates showed that disability is currently the lowest area of consideration in terms of equality and diversity, with almost all organisations surveyed (92%) saying they include gender in their definitions of diversity and inclusion, whereas seven in 10 (70%) said they include disability within the definition.<sup>17</sup> Employing people with hearing loss isn't only about recruiting and retaining valuable employees, it's creating truly equal and diverse workplaces. A simple way that employers can promote equal places of working for people with hearing loss, then, is to **ensure that all employees understand that their workplace values diversity and inclusion. This message should be communicated as soon as someone joins an organisation.**

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<sup>11</sup> Ibid.

<sup>12</sup> <https://www.gov.uk/government/news/employment-minister-calls-on-businesses-to-create-more-opportunities-for-older-workers>

<sup>13</sup> Action on Hearing Loss (2015), [\*Hearing Matters: why urgent action is needed on deafness, tinnitus and hearing loss across the UK\*](#)

<sup>14</sup> <https://www.ageuk.org.uk/information-advice/money-legal/pensions/changes-to-state-pension-age/>

<sup>15</sup> Action on Hearing Loss (2018), [\*Survey of Workplace Experiences\*](#); Centre for Ageing Better (2018), Health warning for employers: supporting older worker with health conditions.

<sup>16</sup> Cook, L. (2017) *Working for Change: Improving attitudes to hearing loss in the workplace*. Action on Hearing Loss; DWP (2017), [\*Employer experiences of recruiting, retaining and retraining older workers\*](#).

<sup>17</sup> [\*Russell and Reynolds Associates, cited in KPMG \(2018\), Leading from the front: disability and the role of the board\*](#)

## Working for Change Campaign

Action on Hearing Loss launched our Working for Change<sup>18</sup> campaign in January 2017 as a response to our research that showed that employer attitudes was identified by respondents as the biggest barrier to employment.<sup>19</sup> As part of the campaign we are supporting employers so that they can best help their employees with hearing loss. Included in this work is an information guide for employers with all the information relevant in one place on our website.

### 3.2. Colleagues

Colleagues, in addition to employers, are not always well equipped to help their co-workers with hearing loss. Our evidence also suggests that people are being stigmatized by colleagues at work due to their hearing loss. Our research found that a sizeable portion of respondents with hearing loss have felt bullied at work (35% said this) because of their hearing loss.<sup>20</sup> This finding is mirrored in evidence from Scope which found that over half (53%) of people they surveyed experience bullying or harassment in the workplace<sup>21</sup>.

In addition to feeling stigmatised, a big problem identified by our survey respondents is that their co-workers aren't communicating effectively with them.<sup>22</sup> It's not surprising, then, that two-thirds (65%) of survey respondents feel isolated at work. Further, being unable to communicate effectively with colleagues could damage career prospects. For example, effective contributions to meetings can be essential in some workplaces and our qualitative evidence shows that this is an area of work that people struggle with, due to unsupportive colleagues:

*"No matter how many times I explain that meetings are useless to me if everyone talks at once, inevitably there is always a point where this happens. Or people just "brainstorm" and shout out ideas and I find it very hard to keep up and therefore contribute."*<sup>23</sup>

Instilling an understanding of the impacts of hearing loss among customer facing colleagues is also good for business. By understanding the needs of customers with hearing loss, organisations can better capitalise on the purple pound; the spending power of disabled people and their families, which is estimated to be £249 billion in the UK.

**Colleagues need to understand the impacts of hearing loss and understand how to better communicate with someone with hearing loss. They can do this through looking at our employers' toolkit.**

<sup>18</sup> <https://www.actiononhearingloss.org.uk/you-can-help/campaigns-and-influencing/working-for-change/>

<sup>19</sup> Arrowsmith (2014), *Hidden Disadvantage: Why people with hearing loss are still losing out at work*, Action on Hearing Loss, London

<sup>20</sup> Action on Hearing Loss (2018), *Survey of Workplace Experiences*

<sup>21</sup> <https://www.scope.org.uk/press-releases/disabled-people-fear-losing-jobs>

<sup>22</sup> Action on Hearing Loss (2018), *Survey of Workplace Experiences*

<sup>23</sup> Ibid.

### 3.3. Government support

The UK Government's key strategy in terms of disability and employment is the Improving Lives Command Paper<sup>24</sup>. In this, the government lays out its plans to see an additional 1 million more disabled people in work over the next 10 years. Their plans are set out over 3 key areas, which they want to both join up and improve: the welfare system, the workplace, and the healthcare system.

We welcome the plan to see an additional 1 million more disabled people in work. To ensure that this is monitored effectively, **government should provide annual updates on how they are progressing to get 1 million more disabled people into work.** This update should be broken down by sector as this would enable Action on Hearing Loss to focus support for employers in sectors where people with hearing loss are particularly underrepresented. The annual updates should also provide figures for UK regions, as well as condition specific figures.

However, the National Audit Office (NAO) also reported on the government's progress in reducing the disadvantages that disabled people and people with health problems face in getting and keeping jobs.<sup>25</sup> In this report, they raised doubts about whether this goal was sufficient to measure the success of the Government's efforts. **We would like, therefore, to see the government use other measures, aside from the 1 million more disabled people into work, as a method of measuring progress.**

It is recognised in the Command Paper that certain policy areas explored are devolved to Scotland, Wales and Northern Ireland. Where there are differences between countries, relevant to Action on Hearing Loss' work, they are noted in this document.

Scotland has its own disability employment action plan, with the aim of halving the disability employment gap in Scotland, which at the moment is 37.4 percentage points.<sup>26</sup> Currently Northern Ireland and Wales do not have their own strategies.

We set out our position on several areas that are included in the Command Paper:

#### 3.3.1. Access to Work

Access to Work (AtW) is a UK government scheme, covering Great Britain, designed to help people who are disabled to overcome any difficulties they may experience, as a result of their disability, when either looking for work or carrying out their job. The scheme provides a grant to pay for practical support and specialist equipment in the workplace.<sup>27</sup> AtW is available in England, Scotland and Wales<sup>28</sup>. A different, but very similar, system (also called Access to Work) operates in Northern Ireland<sup>29</sup>.

There are a range of ways that people with hearing loss can use AtW to support them in the workplace. This includes using the scheme to provide communication support, for example a sign language interpreter or Speech to Text reporter, or to access specialist equipment such as a personal listening device or hearing loop system. We are aware of several issues which are impacting the effectiveness of the grant.

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<sup>24</sup> Department for Work and Pensions (2017), [Improving Lives: The Future of Work, Health and Disability](#)

<sup>25</sup> [National Audit Office \(2019\), Supporting disabled people to work.](#)

<sup>26</sup> <https://www.gov.scot/publications/fairer-scotland-disabled-people-employment-action-plan/>

<sup>27</sup> <https://www.nidirect.gov.uk/articles/employment-rights-and-disability-discrimination-act>

<sup>28</sup> <https://www.gov.uk/access-to-work>

<sup>29</sup> <https://www.nidirect.gov.uk/articles/access-work-practical-help-work>



## **Awareness of AtW**

We've found that both employees and employers are not always aware of the AtW scheme and how it can provide support. Our survey of employers showed that almost two-thirds (63%) had never heard of AtW<sup>30</sup> and our survey of employees showed that of those respondents in work or looking for work, over a third (36%) had not heard of the AtW scheme<sup>31</sup>. This confirms the description of the scheme as "the Government's best kept secret."<sup>32</sup>

In their Command Paper<sup>33</sup>, the UK Government said they will promote AtW as part of their initiative to bring together advice and information in a central place for employers. The Scottish Government also launched a campaign to encourage more business owners to recognise the benefits of employing staff with disabilities, of which AtW promotion was a part.<sup>34</sup> Our view is that this is not enough. Action on Hearing Loss will continue to raise awareness of the scheme via our Working for Change campaign. However, **to reach as many people as possible, promotion to employers and employees needs to be more widespread from government than is currently outlined in the Improving Lives Paper.**

We also have anecdotal evidence that Work Coaches aren't always highlighting AtW to their clients. This is worrying. **All public sector frontline staff, who discuss employment with service users with hearing loss, should share details of AtW.**

## **Knowledge of technology among AtW assessors**

Improvements in technology have meant that there are even more ways of supporting someone with hearing loss. However, technology is not a 'fix-all' solution and currently assessors do not always understand this. For example, we've had reports that assessors have recommended remote sign language interpreting in place of in-situ interpretation when it hasn't been appropriate, such as being used during sensitive conversations.

AtW assessors are also not always well informed of the latest products and who they can best assist. We are aware of such situations such as a profoundly deaf sign language being recommend a Roger Pen. We are also aware of assessments taking place in which the assessor has shown a lack of knowledge about the interoperability of devices (including hearing aids), leading to flawed recommendations. **It is therefore important that assessors are properly trained to understand hearing loss and the full range of technological solutions that are available. Either that or assessors should consult experts in the technology to confirm whether or not it's suitable for the person with hearing loss.**

Even if assessors are able to become more knowledgeable about assistive technology available, we understand that it might not always be clear whether certain adjustment recommendations will work in practice. **Assistive technology through AtW should be able to be trialled and then returned if unsuitable.**

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<sup>30</sup> Cook, L. (2017) *Working for Change: Improving attitudes to hearing loss in the workplace*. Action on Hearing Loss

<sup>31</sup> Action on Hearing Loss (2018), [Survey of Workplace Experiences](#)

<sup>32</sup> Sayce, L. (2011) *Getting in, staying in and getting on: Disability employment support fit for the future*. DWP.

<sup>33</sup> Department for Work and Pensions (2017), [Improving Lives: The Future of Work, Health and Disability](#)

<sup>34</sup> <https://www.dailyrecord.co.uk/news/scottish-news/scottish-government-launch-campaign-promote-10774524>

## Cap on Access to Work grants

In 2015 the UK government introduced a cap on AtW awards in Great Britain set at 1.5 times the average wage which in 2016/2017 was £42,100.<sup>35</sup> Action on Hearing Loss does not agree with a cap as we believe that every person with hearing loss should be supported in work. Action on Hearing Loss, along with other organisations, including Deaf AtW and the UK Council on Deafness (UKCoD), campaigned to either remove or raise the cap. As part of this campaign, a survey by Deaf AtW found that the impact would be greatest on those who depend on an amount that is higher than the cap. For example, nearly half (48%) of respondents who were already capped said they did not attend meetings or training that they should attend as part of their job because of the cap<sup>36</sup>. Further, nearly two thirds (60%) said they wouldn't apply for promotions in the future because they were worried that they wouldn't have enough communication support with the cap<sup>37</sup>.

This campaign was partially successful and in March 2018 the government announced that they would be raising the cap to double average earnings, which in 2018 is £57,200. It will be up-rated annually, in line with rises in average earnings. **The government has said that it will closely monitor the impact that the cap is having. Action on Hearing Loss and UKCoD have said they will do the same and continue to work with the government to ensure people with hearing loss are getting the support they need through the scheme.**

## AtW and unpaid work

AtW can be used for unpaid work experience, either self-arranged or through government supported internships or apprenticeships. This is welcome as we know through our support services that unpaid work experience or volunteering is often the first step to finding paid work, particularly for those furthest away from the job market. However, AtW cannot be used for volunteer placements and the current guidance on unpaid work experience is also too restrictive. For example, to obtain AtW support for self-arranged work experience, an assessor is advised to consider whether the employer will have a vacancy for a paid role at the end of the work experience or whether the employer has said they would be willing to offer an interview for a paid role to the work experience candidate.<sup>38</sup> We believe putting a burden on employers to provide this proof could deter them from giving the jobseeker with hearing loss the experience. Moreover, AtW policy dictates that work experience must last between 2-8 weeks. Our employment services say that many employers will only give work experience of a week. **The government should therefore allow AtW support for ad hoc work experience, even where no permanent role exists. Work experience of a week should also be acceptable.**

### 3.3.2. Disability Confident

Disability Confident is a UK Government initiative which aims to help employers recruit and retain disabled people. There are three levels of the scheme:

1. Disability Confident Committed. An employer needs to agree to the Disability Confident commitments. They also need to commit to offer a disabled person an opportunity within their organisation.<sup>39</sup>

<sup>35</sup> This applied for all countries in Great Britain – not Northern Ireland. There is no cap in Northern Ireland.

<sup>36</sup> Deaf AtW (2017) Survey of Deaf AtW users affected by the cap.

<sup>37</sup> Ibid.

<sup>38</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/711675/access-to-work-staff-guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/711675/access-to-work-staff-guide.pdf)

<sup>39</sup> DWP, Level 1: [Disability Confident Committed guidance](#), July 2017



2. Disability Confident Employer – the employer needs to show they are actively looking to attract and recruit disabled people, and they support disabled people in their organisation.<sup>40</sup>
3. Disability Confident Leader – the employer is independently validated in whether they meet the criteria of this third level. They must also show that they are encouraging and supporting other employers to become Disability Confident.<sup>41</sup>

So far 11,262 employers have signed up for the scheme.<sup>42</sup>

Although we welcome the scheme, there is currently no evaluation measure of it. Without one, it is very difficult to understand how the campaign is affecting employer behaviour and the number of disabled people who have found work, or been supported to remain in the workplace as a result of the initiative. The government commissioned a survey of participating employers,<sup>43</sup> but this is not a robust evaluation. **We urge the government to expedite plans to robustly evaluate the scheme and for timings and plans to be shared with the public. We would also like to feed into how the scheme is evaluated.**

Disability Confident is also poorly resourced. For example, Action on Hearing Loss Scotland staff have been asked by the DWP to provide free communication support at local Disability Confident events organised by the DWP in partnership with MPs. We are also aware that MPs have had to contribute towards the payment of these events. This should not be happening. Further resource should be allocated to Disability Confident, so that events can be resourced effectively and by the DWP.

Further resource would also mean that a more rigorous approval process could be implemented. Currently, DWP do not check submissions to the scheme. By making the process more robust, this would ensure that disabled people could be certain that an employer who is Disability Confident means that the organisation is adhering to certain requirements.

Although it is good to see so many businesses signing up for Disability Confident, more could be done to encourage more employers to join the scheme. This is particularly the case in Northern Ireland, where, according to latest figures, only 4 employers have signed up.<sup>44</sup> Currently, promotion of the scheme seems to be through events delivered by DWP, in addition to ad hoc social media coverage. **The DWP should continue to promote the scheme, but develop it so that it achieves a wider reach, with an immediate focus on Northern Ireland.**

### 3.3.3. Hub for employers

From our research, we know that there is a need for an information hub for employers, which will give them the confidence to employ people with disabilities. Such a hub would primarily be an on-line resource, providing a portal to a wide array of information and advice. In particular, we would like to see a hub that has the following elements:

- **Detailed information about making reasonable adjustments for each disability or health condition.** Current information on offer, for example in the joint DWP CIPD guide for line managers, is not condition specific. While we welcome such guides, we know that employers

<sup>40</sup> DWP, [Level 2: Disability Confident Employer guidance](#), July 2017

<sup>41</sup> DWP, [Level 3: Disability Confident Leader guidance](#), July 2017

<sup>42</sup> <https://www.gov.uk/government/publications/disability-confident-employers-that-have-signed-up>

<sup>43</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/755667/disability-confident-scheme-summary-findings-from-a-survey-of-participating-employers.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755667/disability-confident-scheme-summary-findings-from-a-survey-of-participating-employers.pdf)

<sup>44</sup> *ibid*

often need condition specific information in order to feel comfortable employing someone with a disability or health condition. For example, our survey of business leaders<sup>45</sup> found that two-fifths (39%) don't feel well-equipped to enable staff with hearing loss to stay productive in the workforce. And nearly three in five (57%) agreed that there is a lack of support or advice available for employers about employing someone with hearing loss.

- **A telephone or email advice service for employers.** We have anecdotal evidence that employers like personalised support and so this service would fulfil this need. Advisers would need to be trained so be able to give practical, tailored advice, to employers. If the Fit for Work helpline provides this tailored support, then this service could be used, rather than a new helpline needing to be established.
- **Detailed information about the impacts of having a particular disability or health condition.** We know from qualitative responses in our survey of people with hearing loss,<sup>46</sup> that people at work feel their colleagues and managers do not understand how hearing loss affects them.
- **General guidance disability employment and an explanation of the relevant legal obligations on employers.** Too many employers are unsure of their basic legal obligations towards staff and candidates, the hub therefore needs to offer guidance on the law and information on the factors to be considered when dealing with disability.
- **The Disability Confident scheme, Fit for Work, and any other employer facing government initiatives, should be integrated into the hub to create a one-stop-shop for employers. Access to Work should also be advertised prominently on the hub.** We know that many employers have not heard of Access to Work, Disability Confident, or Fit for Work.<sup>47</sup> Therefore, having one place which employers have to access all employment support would both make publicising these initiatives easier and would enhance the user experience of employers accessing support.

We urge the government to look at the Australian Government's website<sup>48</sup> for employers and disabled people which features the elements we discuss above.

If the Government does create such a resource for employers then it needs to ensure that it effectively marketed to reach employers. The hub needs to be publicised so that it becomes the default resources that all employers, but particularly SMEs who are likely to be without internal support, turn to when they need advice to support disabled candidates and employees.

Other organisations have made similar recommendations and in 2017's Command Paper the government pledged to start by "researching and identifying potential solutions with employers this year."<sup>49</sup> They also said they would work in partnership to develop and promote this initiative. The government have yet to share information about the progression of the hub and when it might be completed. **We urge the government to expedite the implementation of a hub for employers. Further, Action on Hearing Loss would like to input information into the hub.**

### 3.3.4. Government data

The annual population survey provides useful statistics for informing policy recommendations in this area by looking at the employment outcomes for people with 'difficulty hearing'. However, **we would**

<sup>45</sup> Cook (2017) *Working for Change: Improving attitudes to hearing loss in the workplace*, Action on Hearing Loss, London

<sup>46</sup> Action on Hearing Loss (2018), [Survey of Workplace Experiences](#)

<sup>47</sup> In a survey of employers by [ComRes for Leonard Cheshire](#), it was found that 60% of employers had heard of Fit for Work, 58% had heard of Access to Work and 29% had heard of Disability Confident

<sup>48</sup> <https://www.jobaccess.gov.au/node/28181>

<sup>49</sup> Department for Work and Pensions (2017), [Improving Lives: The Future of Work, Health and Disability](#), P26

**like to see the government provide a further breakdown in the statistics so that different levels of hearing loss are accounted for. In particular we would like to see employment figures for those who are profoundly Deaf and use sign language as a first language.** We know from our employment services that sign language users can face large barriers to employment and so to produce the most helpful policies, insights into this group are essential.

### **3.3.5. National Insurance contribution holiday**

The government briefly included an objective in the Improving Lives Command Paper to consider how to implement a national insurance contribution holiday as an incentive for employers. No more information was stated in the paper and therefore **we urge the government to release more information and produce a report into how this might work in practice, including the likely impact that it would have on employers employing more disabled people.**

### **3.3.6. Jobcentres**

People with hearing loss tell us that jobcentres do not always offer tailored support to people who are deaf or have hearing loss and this hinders the service they receive. Specific issues are outlined below.

#### ***Communication with jobseekers***

Jobcentre Plus are not always communicating with people using their preferred method. Although it is welcome that there are a variety of ways to make initial contact with Jobcentre Plus (such as online, textphone, telephone, and video relay service), staff inconsistently record information about hearing loss and the access requirements of individuals. Our service users have reported that they have missed phone calls, misheard details of an interview or missed the opportunity to be referred for employment support. In our research one participant working in the health field described the difficulties with communication she and one of her clients had encountered at the Jobcentre:

“I had a client who was deaf and there was a problem with her benefits and we went down to the Jobcentre together and explained it and they said you had to use the phone. So I explained we can’t use the phone because we’re both hearing impaired and we’re not able to use those phones. They didn’t know what to do with us.”<sup>50</sup>

Providing the wrong communication support, or no support at all, is both stressful for an individual and also incurs unnecessary costs for Jobcentre Plus. We believe that DWP should look to the example of the Accessible Information Standard introduced in NHS England to provide good practice on meeting the communication needs of people with hearing loss. The Accessible Information Standard stipulates that bodies under the standard's remit must ask about their needs; record them, share the information with others who need it and ensure that those needs are met. **We urge the government to implement a similar standard for Jobcentres.**

#### ***Work coaches***

Work Coaches are front-line DWP staff based in Jobcentres in Great Britain. Their role is to support claimants into work by providing personalised advice, using knowledge of local jobs. They help all claimants, not only those with a health condition or disability. Anecdotal evidence from our

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<sup>50</sup> Boyce, T (2015), *Able, ready to work ... and deaf: The real stories of deaf people across Wales who despite everything can't find work*. Cardiff, Action on Hearing Loss Cymru

beneficiaries, as well as evidence from Citizens Advice, suggests that Work Coaches aren't always able to determine a service user's support needs or challenges with work.<sup>51</sup> There are two predominant issues which cause this: large caseloads and insufficient knowledge of how someone's condition impacts them and therefore how they can be best supported. Each of these issues is discussed below.

Caseloads of Work Coaches are too large and are set to rise even further and therefore they do not have the time to give intensive support which we know works (see our employment services case study box below). The most recent figures show that a Work Coach is responsible for a caseload of around 85 unemployed claimants but after the full roll out of universal credit, this is set to rise to 373 claimants per Work Coach.<sup>52</sup> **More Work Coaches will need to be deployed so that they can effectively meet the needs of claimants.**

In-depth knowledge of how conditions impact jobseekers is essential for Work Coaches. They should either have this knowledge themselves or be able to easily access it. This is so they can deliver personalised support which is what many people with hearing loss using employment support need, as we have found through our employment services (see case study overleaf). However, current training and support for Work Coaches will likely not give them what they need to obtain the knowledge required. Work Coaches undertake a three-week training course ahead of starting the role. They also have additional training which aims to build skills of empathy, active listening and helping people respond resiliently to challenges and overcome fixed beliefs about their abilities.

The Government does recognise that Work Coaches will need advice about how to support disabled people beyond this training. This is why they have implemented Disability Employment Advisors (DEAs) and, previously, Community Partners<sup>53</sup>. The government plans for there to be 500 DEAs whose role will focus on building Work Coaches' confidence and expertise on disability.<sup>54</sup> Although we welcome this increase in DEA numbers and the introduction of Community Partners, we are concerned that these numbers will not be enough for the amount of Work Coaches there are. Citizens Advice have also stated that these numbers will likely not be enough to mean that Work Coaches are giving effective advice.<sup>55</sup> To provide tailored support **the government needs to implement further impairment specific training to Work Coaches or consider how they can acquire this information through other means.**

One way of supporting Work Coaches, as also called for by Citizens Advice,<sup>56</sup> is for DWP to provide an **online advice tool, developed by health professionals, disability and advice organisations. The tool would allow Work Coaches to gain information about the impacts of disabilities and health conditions so that then suggest appropriate interventions.** The tool could be maintained by Disability Employment Advisors. This would mean that DEAs can focus on the most complex cases and Work Coaches can get easy access to advice about disabilities.

As noted above, our employment services offer intensive, personalised support. We have found this to be an effective way of supporting people with hearing loss, particularly profound hearing loss, who often have low skills and confidence, into work. See the case study overleaf for further information. **If Work Coaches are unable to provide the level of support provided by organisations such as**

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<sup>51</sup> Citizens Advice (2017) [Response to the Improving Lives Green Paper](#)

<sup>52</sup> National Audit Office (2018), [Rolling out Universal Credit](#).

<sup>53</sup> Community Partners were people with personal and professional experience of disability whose aim was to work with Jobcentres to build their capability, largely through providing first-hand insight into the issues that individuals with a health condition face. Funding expired for Community Partners in 2019.

<sup>54</sup> Citizens Advice (2017) [Response to the Improving Lives Green Paper](#), P29

<sup>55</sup> Citizens Advice (2017) [Response to the Improving Lives Green Paper](#)

<sup>56</sup> Citizens Advice (2017) [Response to the Improving Lives Green Paper](#), P12

**Action on Hearing Loss, to help jobseekers who need this support, then the government should commission condition specific services to do this.**

### **Case study: Action on Hearing Loss' employment services**

Action on Hearing Loss has employment services based in Northern Ireland, Wales, Scotland, and Southampton, England. These provide support for jobseekers and employees who have hearing loss and work with employers and training providers to ensure their recruitment processes are fully accessible for people who are deaf or have hearing loss.

Our experience through our Specialist Employment Services is that tailored and intensive support, by trained employment specialists who are able to communicate effectively with people who are deaf or have hearing loss, delivers positive work outcomes more successfully than the generalist service approach. For example, during 2016/2017, 38% of those who were registered on our Northern Ireland programme were supported into employment and 49% of those who were registered on the same programme were supported into work placements.

#### **Sign language skills of support staff**

Most of our support staff, who work with clients are deaf or can use sign language. This is an important feature which engenders trust. It is also a more cost effective approach as having staff that can communicate directly with deaf people reduces the need for providing communication support. BSL interpreters typically cost £35-£45 an hour.

#### **The job search and application process**

The first stage of the personalised process is to assess the individual with hearing loss. The initial meeting that follows the assessment can take several hours as the individual may have little experience of applying for jobs, or the world of work, and they may also lack confidence. The support can include how and where to look for work – the Specialist Employment Advisor will sit at the computer with the individual and talk them through how to search.

The individual will also be supported to complete an application form as they may not be able to communicate clearly in written English. If they are shortlisted our service is able to support them through the process and even engage with the employer at this stage, giving the employer the opportunity to understand hearing loss and the needs of the individual. Colleagues from the service may also attend the interview with the individual.

#### **Supporting clients once in work**

Once the individual has secured a role, our Employment Service continues to support both the employee and the employer, and is always on hand to take questions from both sides. As individuals may have little work experience our specialist employment service will explain work terminology such as 'annual leave', or 'line manager', to the individual. They'll also highlight aspects of work such as the importance of good time-keeping, which is fundamental to retaining a job.



### ***Jobcentre staff's awareness of other services***

The advisors from Action on Hearing Loss' employment services have proved successful in supporting deaf clients into work. Part of their success has been to build close relationships with local Jobcentre Plus staff in order to identify people who may benefit from using the service. This means that staff at local Jobcentres have a good understanding of the specialist employment service and can make timely referrals where appropriate.

Anecdotal evidence from our services suggests that Jobcentre Plus might not always be aware of other services which could help jobseekers with hearing loss. We believe that for individuals to receive the right support at the right time local **Jobcentre Plus staff must develop close relationships with other local bodies such as the local authority and GPs. They must also be aware of specialist services, such as Action on Hearing Loss' employment services.**

#### **3.3.7. Work and Health programmes**

The Work and Health programme provides support to those in England and Wales with health conditions or disabilities in finding and keeping a job. Job seekers undertake the support on a voluntary basis unless they have been unemployed for over two years and then it's compulsory. Five service providers were chosen to deliver the programme across six regions in the UK and Wales. Under devolution, Manchester and London will select their own providers.<sup>57</sup>

The budget for the Work and Health Programme is devolved to Scotland. Two programmes have been set up using this budget: 'Work First Scotland' and 'Work Able Scotland'. The aims of both these programmes are similar to the Work and Health programme but they are purely voluntary.

Our employment services in England have found that agencies, who have contracts under the Work and Health Programme to provide specialist employment services, are not as good as they could be at meeting the needs of those with hearing loss. It has also been difficult to locate these agencies. If they are able to be identified, these services are not always pro-active in identifying and working with people with hearing loss. **We urge these commissioned agencies to ensure that they are meeting the needs of service users with all conditions, sub-contracting to condition specific services where necessary. Government can ensure this happens by making this a condition in service provider contracts.**

We also support the [Disability Charity Consortium \(DCC\)](#) in their call for employment support to be voluntary and disabled people should be able to choose if and how they want to engage with it without conditionality or the threat of sanctions. The DCC's members have found that disabled people are often required to engage with ineffective or inappropriate support with the threat of benefit sanctions, should they not comply. This means that the job-seeker is left with two choices: one, receive inappropriate mandatory support which may have an adverse effect on their job seeking. Or two, be sanctioned which can mean they focus on this rather than job seeking.

#### **3.3.8. Education, skills and training**

Having an education and training system that is accessible to people with hearing loss is a vital element of getting into and thriving in employment. The problem starts when children with hearing loss are in school. There is currently an attainment gap between children with hearing loss and children with no special educational needs. In 2016, over half (56%) of deaf young people in England

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<sup>57</sup> <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7845#fullreport>



didn't achieve two A-levels or equivalent technical qualifications, compared to just a third (35%) of children with no special educational needs.<sup>58</sup> The National Deaf Children's Society leads on work in this area.

Post-16 training and skills development are also important. Often this can be an important factor in gaining employment. Therefore **government support should focus on securing training for people with hearing loss, which could lead to employment.** The case study below demonstrates how powerful training can be.

#### **Case study: training which contributes towards gaining employment**

23-year old Sam is deaf, has a learning disability and a stammer. Apart from a three-week temporary job, he'd been on jobseekers allowance since finishing college in 2013. He said: 'I was attending interviews but not getting any work and I was very frustrated.'

Matt Skinner, Specialist Employment Support Advisor at Action on Hearing Loss, explained Sam's story further:

"Sam had been unsuccessful in job applications so far and was keen to enhance his CV in the hospitality industry. I arranged for him to attend a five-week food hygiene and hospitality training course. He then went on to take a first aid course, attend a 'get into retail' taster day at Marks and Spencer and completed a two-week placement at the Swalec Stadium, which led to some paid summer work."

### **3.4. Health and Work**

#### **3.4.1. Work as a health and social care outcome**

The link between work and health is well documented<sup>59</sup> and both spheres impact each other. Health professionals are an important touchpoint to find out about government support. However, our research suggests that health professionals are not always considering employment outcomes for people with hearing loss, or are not signposting to appropriate sources of support for employment. Only one in ten (10%) respondents in our survey said they heard about Access to Work from their audiologist, and only 1% were given information on the scheme from their GP.<sup>60</sup> It is positive, therefore, that there is a drive in the Improving Lives Paper to encourage healthcare professionals to see work as a health outcome. This will likely improve the rate of health professionals giving employment support advice, such as promoting AtW.

There are several ways that the government is promoting this aim including co-designing a new consensus statement with health professional representatives and conducting further research into how to embed work as a health outcome.<sup>61</sup> Other strategies and plans that advise services to consider patient's employment needs are:

<sup>58</sup> Department for Education (2016), [Level 2 and 3 attainment by age](#) 19 in England.

<sup>59</sup> Goodman, N (2015), *The Impact of Employment on the Health Status and Health Care Costs of Working-age People with Disabilities*, Lead Centre

<sup>60</sup> Arrowsmith (2014), *Hidden Disadvantage: Why people with hearing loss are still losing out at work*, Action on Hearing Loss, London

<sup>61</sup> Department for Work and Pensions (2017), [Improving Lives The Future of Work, Health and Disability](#), p37

- NICE guidelines: Hearing loss in adults: assessment and management.<sup>62</sup>
- The Action Plan on Hearing Loss by NHS England and the Department of Health.<sup>63</sup>
- NHS England's Commissioning framework for adult audiology services.<sup>64</sup>

Further NHS England In collaboration with Action on Hearing Loss, produced a guide for employers.<sup>65</sup> The aim of this guide is to help deliver the recommendations in the Action Plan on Hearing Loss. Further, the UK Government has said it will be working with Public Health England and others to develop a suite of employer toolkits to help them keep their workforce healthy. No further information about these toolkits has been given. **We would therefore welcome further information to be released about this and for hearing loss to be included in these toolkits.**

Commissioned services should also consider how to help someone into work or stay at work. **Commissioners should use the formal processes, incentives and sanctions set out in the NHS Standard Contract to set high standards for providers and ensure that commissioned services consider work outcomes.**<sup>66</sup>

Although we welcome work being recognised as a health outcome, it is important that social care is included in this definition. The Command Paper does not go as far as it could do in establishing that social care in addition to health services should help people into and remain in work. We therefore urge the government to ensure that people with hearing loss have access to the social care interventions they need to get into and stay in employment. **This requires the government to work with social care professionals and local authorities to ensure people are signposted to social care services, such as lip-reading classes, that can help them manage their hearing loss in the workplace.**

### 3.4.2. Occupational Health

Occupational health (OH) is a branch of medicine that focuses on the physical and mental wellbeing of employees in the workplace.<sup>67</sup> The government is keen to develop the occupational health offer and wants employers to act on occupational health advice.<sup>68</sup> Qualitative interviews conducted by Action on Hearing Loss suggest that larger employers have or would contact their occupational health departments as a first port of call if someone developed a hearing loss at their organisation. However, participants said that advice given by occupational health can be vague and unhelpful. Therefore, the government's ask for employers to act on OH professionals' advice may not be realised. **Further research needs to be conducted by Action on Hearing Loss to establish any potential knowledge gaps among occupational health professionals however our evidence so far suggests that health professionals should upskill to provide appropriate advice.**

<sup>62</sup> NICE (2018), Hearing loss in adults: assessment and management <https://www.nice.org.uk/guidance/ng98/evidence/full-guideline-pdf-4852693117>

<sup>63</sup> NHS England (2015, p.23), Action Plan on Hearing Loss <https://www.england.nhs.uk/wp-content/uploads/2015/03/action-plan-hearing-loss-upd.pdf>

<sup>64</sup> NHS England (2016), Service Specifications in the Commissioning Services for People with Hearing Loss: A Framework for Clinical Commissioning Groups. See outcomes in 2.2. <https://www.england.nhs.uk/wp-content/uploads/2015/03/HLCF-Service-Spec-CP-CR.docx>

<sup>65</sup> <https://www.england.nhs.uk/wp-content/uploads/2017/09/hearing-loss-what-works-guide-employment.pdf>

<sup>66</sup> The NHS Standard Contract is used by commissioners when commissioning healthcare services. <https://www.england.nhs.uk/nhs-standard-contract/2017-19-update-may/>

<sup>67</sup> <https://fitforwork.org/blog/the-role-of-occupational-health/>

<sup>68</sup> Citizens Advice (2017) [Response to the Improving Lives Green Paper](#), P43

## 4. Other relevant activity

### 4.1. Charity consortiums

#### 4.1.1. Disability Charity Consortium

Members of the Disability Charity Consortium (DCC) are: Action on Hearing Loss, Disability Rights UK, Leonard Cheshire, Mencap, Mind, The National Autistic Society, RNIB, and Scope. The consortium is made up of CEOs group, a policy leads group, and an HR group. The CEOs group meets with the Minister for Disabled People, Health and Work a few times a year. The policy group meets with the Office for Disability Issues, as well as any other relevant departments, once a quarter. At this meeting, the agenda for the CEOs and Minister meeting is put together. The HR group feeds into the other two groups.

#### 4.1.2. Disability Agenda Scotland

Members of Disability Agenda Scotland (DAS) are: Action on Hearing Loss Scotland, Capability Scotland, ENABLE Scotland, RNIB Scotland, Scottish Association for Mental Health (SAMH), and Sense Scotland.

#### 4.1.3. Mutual objectives

Many objectives in this policy statement align with DCC and DAS's policy statements. Aside from these, the DCC has other objectives which will also support and recommend that the government action:

- **The government as an employer**

In the Improving Lives command paper, the government outlined their intention for the Civil Service to be an exemplar of good practice which includes learning from and working with employers in the private sector.<sup>69</sup> The government also launched their diversity and inclusion strategy: 'A Brilliant Civil Service.'<sup>70</sup> In this there are several commitments around employing disabled people. **The government departments should publicly report annually on progress made on these commitments. It should also work with charities, such as Action on Hearing Loss, to embed their recommendations on how to become an inclusive employer.**

- **Public Procurement**

In the Improving Lives Command paper, DWP set out that it will work with suppliers to encourage them to become Disability Confident. It is our view that encouragement will not be enough for suppliers to change their behaviour. The Civil Service as a whole has a potentially powerful role in influencing their large supply chain of suppliers. To do this most effectively, **all Departments should include clauses on the inclusive recruitment of disabled people into their contracts with suppliers. They should build requirements into contracts for members of their supply chain to improve employment opportunities for disabled people and drive best practice.**

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<sup>69</sup> Department for Work and Pensions (2017), [Improving Lives The Future of Work, Health and Disability](#), p28

<sup>70</sup> Civil Service (2017) [A Brilliant Civil Service: becoming the UK's most inclusive employer. The Civil Service Diversity and Inclusion Strategy](#)

## 5. Recommendations

### Employers should:

- Read our guide for employers on how to make their recruitment processes accessible to those with hearing loss and action these tips.
- Make it clear to employees that adjustments can be made for people with hearing loss to encourage people to seek support.
- Make appropriate adjustments in the workplace for employees with hearing loss. This includes helping employees gain Access to Work assistance if needed.
- We call on employers to consider how to prepare for the ageing workforce by implementing the recommendations made in our employers' toolkit.
- Ensure that all employees understand that their workplace values diversity and inclusion. This message should be communicated as soon as someone joins an organisation.

### Colleagues of people with hearing loss should:

- Take steps to understand the impacts of hearing loss and understand how to better communicate with someone with hearing loss. Reading our communication tips<sup>71</sup> is a good place to start.

### The government should:

#### *Statistical updates and metrics*

- Through their statistical updates, DWP should annually update on their progress towards getting one million more disabled people into work. This should include breakdown of condition type, UK region, and sector of the economy.
- We urge the government to use other metrics, aside from the 1 million more disabled people into work, as a method of measuring progress.

#### *Access to Work*

- Promote Access to Work (AtW) to employers and employees more widely than is outlined in the Improving Lives Paper. This includes making sure that all public sector front line staff are making customers aware of the scheme.
- Ensure that AtW assessors are properly trained to understand hearing loss and the full range of technological solutions that are available to support them. Either that or assessors should be able to easily consult those with knowledge of the technology.
- Closely monitor the impact that the AtW is having. This includes those who were previously claiming above the current cap rate but also those who have joined the scheme since the cap was introduced and may be making negative adjustments- such as lowering working hours - to fit under the cap.

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<sup>71</sup> <https://www.actiononhearingloss.org.uk/live-well/communicate-well/communication-tips/tips-for-hearing-people/>

- The government should allow AtW support for ad hoc work experience even where no permanent role exists for the work experience. Work experience of one week should also be acceptable.
- Assistive technology through AtW should be able to be trialled and then returned if unsuitable.

#### *Disability Confident*

- Expedite plans to robustly evaluate the scheme and for timings and plans for this to be made available.
- Expedite the implementation of a disability information hub for employers and consult Action on Hearing Loss and other charities on the content.
- Further resource should be allocated to Disability Confident, so that events as part of the scheme can be resourced effectively.
- The DWP should continue to promote the scheme, as well as develop this promotion so that it achieves a wider reach.

#### *Jobcentre Plus and the Work and Health Programmes*

- Put policies in place so that customer facing Jobcentre Plus staff are aware of the preferred communication methods of people who are deaf or have hearing loss and that they use this systematically whenever contact is made with an individual.
- To help achieve this the government should implement similar steps as are in the NHS England's Accessible Information Standard.
- Increase their awareness of other organisations that can help customers in the local area, such as condition specific services.
- Implement further impairment specific training to Work Coaches or consider how they can acquire detailed information about disabilities through other means. An online advice tool for Work Coaches would also be beneficial. The government should consult Action on Hearing Loss if a tool is developed.
- If Work Coaches are unable to provide the level of support provided by organisations such as Action on Hearing Loss, to help jobseekers who need this support, then the government should commission condition specific services to do this.
- All government employment support should be voluntary and disabled people should choose if and how they want to engage with it without conditionality or the threat of sanctions.

#### *Employer incentives, Fuller Working Lives, and employment statistics*

- Produce information about how the national insurance contribution holiday might work in practice, including the likely impact that it would have on employers in hiring more disabled people.
- Release further details of how and when actions in the Fuller Working Lives strategy are being taken forward.
- DWP should provide a further breakdown in their employment statistics to expand the 'hearing loss' variable to include people whose first language is sign language.

- Government departments should publicly report annually on progress made on the commitments it's made in its 'A Brilliant Civil Service' strategy. It should also work with charities, such as Action on Hearing Loss, to embed their recommendations on how to become an inclusive employer.
- All government departments should include clauses on the inclusive recruitment of disabled people into their contracts with suppliers.

**Commissioners of health and social care services should:**

- Use the formal processes, incentives and sanctions set out in NHS England's Standard Contract to set high standards for providers and assure that commissioned services consider work outcomes.<sup>72</sup>

**Health and social care professionals should:**

- Ensure they consider how hearing loss might impact a patient in their workplace and give appropriate advice about how to best manage it, such as using a piece of assistive technology as funded by Access to Work.

**Local authorities should:**

- Ensure people are signposted to social care services, such as lip-reading classes that can help them manage their hearing loss in the workplace.

**Action on Hearing Loss will:**

- Monitor the impact of the AtW cap, along with UKCoD.
- Conduct research to establish potential knowledge gaps among occupational health professionals about how to support people with hearing loss in the workplace.
- Conduct research among people of working age with hearing loss to explore how Action on Hearing Loss can best support people to get into and thrive in employment.
- Provide an online guide for employers which will set out all the information around recruiting and retaining people with hearing loss.
- Promote our Working for Change campaign with employers, to raise awareness of the issues presented in this policy statement.
- Ensure that evidence from our research and policy team feeds into Action on Hearing Loss' training offering for employers.
- Conduct further research among our beneficiaries to understand how we can best support them into work and once in work.
- We will continue to work with the Disability Charity Consortium and Disability Agenda Scotland to campaign on pan-disability issues.

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<sup>72</sup> <https://www.england.nhs.uk/nhs-standard-contract/2017-19-update-may/>



**People with hearing loss or deafness could consider:**

- Making Action on Hearing Loss aware of any good or bad practice in the workplace, so that the charity can better advocate for change.
- Reading materials that we produce as part of our Working for Change campaign and provide any feedback.
- Reading our website material on [your rights at work](#).