**Women and Equalities Committee inquiry on the National Disability Strategy**

**Written evidence submitted by the Disability Charities Consortium**

**July 2022**

**1. About Disability Charities Consortium**

1.1 The Disability Charities Consortium (DCC) brings Chief Executives and policy leads from the UK’s leading influential not-for-profit disability organisations together to work with Government to ensure disabled people’s experiences are reflected in UK policy making. The DCC members are Business Disability Forum (BDF), Leonard Cheshire, Mencap, Mind, National Autistic Society, Royal National Institute for Deaf people (RNID), Royal National Society of Blind people (RNIB), Sense, and Scope.

**2. Summary**

2.1 The DCC welcomed the first announcement of a strategy for disability policy when the Prime Minister first committed, in 2020, to producing “the most ambitious endeavour on disability in a generation.” We support the actions committed to in the National Disability Strategy document. In its intent, the National Disability Strategy is a clear positive step towards improving the lives of disabled people across key areas such as employment, education, and housing, but many of the barriers that exist in these areas are still deeply entrenched. While remaining cautious that the actions are primarily short term and a broader strategy is required to meet that ambition and deliver what disabled people really need, the actions in the Strategy are welcomed and we are keen to see them implemented.

2.2 The publication of the Strategy was therefore considered a first step or “down payment” in the government’s ambition to create a more equal and inclusive society. As the Strategy’s first anniversary approaches, it is imperative government meaningfully engages with Disabled People’s Organisations (DPOs), disabled people, as well as groups like DCC. This review should identify successes and shape its ongoing implementation, to ensure greater progress is made and the momentum is maintained.

2.3 The risk of momentum being stalled is greater given the outcome of the Judicial Review, currently being appealed, which stated the strategy failed lawfully to consult disabled people and others. This has meant several commitments put forward in the Strategy are currently paused. Most notable is the establishment of an Extra Costs Taskforce, which was due to have been completed by Summer 2022.

2.4 The DCC contributed to the development of the initial Strategy and continues to engage with the Disability Unit (DU) to support its implementation. This requires the National Disability Strategy to be developed into a clearer long-term strategic vision, backed up by measurable targets for success. The Strategy must meaningfully engage with disabled people, have greater accountability built in, and funding to underpin its targets. This is even more important as the Strategy’s launch coincided with the Covid-19 pandemic, which disproportionately impacted on all areas of disabled people’s lives. This makes learning from and building upon the experiences from that period all the more important.

2.5 Our key recommendations to ensure the ambitions set out in the initial National Disability Strategy are reached:

* The DU needs to engage directly with DPOs and disabled people through a range of accessible media channels and direct platforms, with co-design of needs becoming an integral way of working and measuring success.
* We need a strategy with a longer-term vision, with clear milestones that can be annually measured, and accurately capture the impact the strategy is having on disabled people’s lives.
* Work towards these milestones should a be true cross government endeavour. The DU and the Minister for Disabled People should be properly resourced and accountable for this to happen, and the role of Ministerial Champions strengthened to push through positive change.
* Greater multi-year funding should also be identified to allow departments to deliver on actions they hold ownership of and support ongoing cross government working and planning.

**3. How was the National Disability Strategy developed? How have stakeholder contributions informed the strategy?**

3.1 The government’s plan to create a National Disability Strategy was announced in February 2020. Due to the early phases of the pandemic, the DU did not start substantive development work on the strategy until late summer 2020. The DCC’s involvement with the strategy’s development began in September 2020 through workshops held with the DU on emerging thematic areas. At the same time monthly meetings were run until the Strategy’s launch, which were held between the Minister for Disabled People, the DU, and DCC Chief Executives and policy leads. DCC co-chairs also engaged regularly with DU officials, whose perspective from their position in the Cabinet Office was helpful in providing oversight and influencing other departments.

3.2 Throughout this engagement, the DCC sought to lay out a clear vision of what its members felt the Strategy should include to truly deliver meaningful change for disabled people, and act as a critical friend when providing feedback on the DU’s developing thinking on the Strategy’s content. A focus on the former led to the production of DCC’s ‘Manifesto for an inclusive National Disability Strategy’ which was shared with government in January 2021.[[1]](#footnote-1)

3.3 The manifesto laid out six key themes the DCC felt needed to be embedded across the strategy: changing perceptions, enforcement, procurement, consultation and engagement, a focus on transitions into adulthood, and improved data on disabled people’s lives. These themes cut across nine areas of focus such as employment and products and services, where persistent barriers affecting disabled people’s lives were identified and needed to be tackled.

3.4 DCC Chief Executives were invited to read a draft of the strategy in May 2021. Feedback shared with government was that it lacked ambition and simply indicated what the government was already doing, or planned to do in the immediate future, across these areas rather than bringing them together underneath an overarching long-term vision and a coherent strategic direction for disability policy.

3.5 Concern was also raised on the potential to fulfil the Strategy without strong underpinning of funding, meaningful year on year targets, and well-resourced cross-government oversight for its delivery. Finally, before its launch in July 2021 a further meeting took place with the then Minister for Disabled People and DCC Chief Executives to discuss these shared concerns.

3.6 While engagement with the DCC was positive over the course of the Strategy’s development, this engagement did not always translate into influence and input into the overarching vision of the Strategy and its content. It was also felt by some DCC members there was an overreliance on the regular meetings held with the DCC and the DU to gather feedback rather than these fitting into a wider framework for engagement which included going out to representative groups, organisations, and disabled people. In particular, the DCC consistently raised the point that the DU should be engaging with Disabled People’s Organisations as well as the DCC and its members.

**4. How will the National Disability Strategy help disabled people to enjoy equal living standards and life opportunities to those without disabilities?**

4.1 In its intent, and if able to be implemented, the National Disability Strategy is a clear positive step towards improving the lives of disabled people across key areas such as employment, education, and housing, but many of the barriers that exist in these areas are still deeply entrenched. The short-term actions of the Strategy must continue to be built upon to make true progress towards equality in living standards and life opportunities for disabled people.

4.2 A positive step for a revised strategy would be to include strategic focus on equal and inclusive access to products and services, and ensuring disabled people have equal access as non-disabled people. This would require reform to the Equality Act so that it is more easily enforceable, alongside greater resourcing of the Equality and Human Rights Commission (EHRC) so that it can challenge and support organisations to become more accessible. The burden should not always fall on disabled people to challenge individual businesses to become more accessible, but they must be better supported when doing so. In addition, businesses should automatically be building accessibility into their buildings and services and face fines and legal action from the EHRC if they are not accessible.

**5. What progress has been made on the strategy so far? How quickly can some of the short-term goals be met?**

5.1 In total, the Strategy contains over 120 actions aiming to have at least started by Summer 2022, but many are on hold pending a possible appeal of the Judicial Review. A number of these actions have been met in so far as they are sufficiently funded and have been launched or rolled out already. For example, increasing places on the Intensive Personalised Employment Support (IPES) programme by 25% from August 2021 and piloting Access to Work Adjustments Passports to help disabled graduates’ transitions from education to employment.

5.2 Especially given the uncertainty on the status of the Strategy and its actions, many of which have been put on hold, it is less clear whether these actions have or will move the dial on ‘making the world of work more inclusive and accessible’ for disabled people as the Strategy suggests. It is difficult to meaningfully assess whether delivering these short-term actions will achieve goals across its key areas such as removing the barriers to accessible and inclusive employment without clear targets or measures accompanying the actions outlined.

5.3 Meanwhile in several places, the Strategy deferred to forthcoming consultations when it came to more substantive policy reform, such as for health and disability benefits and mandatory disability workforce reporting. As we await the outcomes from these exercises, it remains to be seen what direction disability policy in these areas will be taken in the medium term of the Strategy.

5.4 Concerningly, the recent written statement from the Minister for Disabled People also indicates that several important commitments put forward in the Strategy are currently paused.[[2]](#footnote-2) This includes the establishment of an Extra Costs Taskforce by Summer 2022, which aimed to bring together disabled people, regulators, and businesses to consider the extra costs many disabled people face for goods and services, an issue of increasing importance given the current cost of living crisis and its impact on disabled people.[[3]](#footnote-3)[[4]](#footnote-4) With funding for much of the Strategy only covering the 2021 financial year, this risks achievable short-term goals not continuing to be met and the initial momentum established from the Strategy’s launch to dissipate.

**6. How effectively is the Government communicating with disabled people and involving them in the implementation and further development of the strategy?**

6.1 During the development of the Strategy the DCC was clear with the DU on what it felt an accessible and inclusive consultation should look like, providing several suggestions on accessible and inclusive communications to help maximise engagement. These included launching an accessible media campaign to raise awareness of the forthcoming Strategy and the consultation informing it, carrying out co-production and listening exercises in each region of the country, and offering a range of alternative formats of information and enabling people to participate by submitting responses in different formats such as British Sign Language and Easy Read.

6.2 Since the Strategy’s launch, more could be done to meet the principles of meaningful engagement with disabled people, to update them on progress of the strategy, and foster stronger engagement with this work. In particular, the Committee has previously endorsed and called for the implementation of RNID’s 'shopping list' for accessible communications.[[5]](#footnote-5) The DCC has noted, however that this is still not being used in day-to-day government communications.

**7. What progress has been made on the DU’s review into the way the Government engages with disabled people?**

7.1 Following the Strategy’s launch, the DCC has engaged with the DU as part of its Disability Stakeholder Review, which was due to be completed by late 2021. This was then extended into Spring 2022. Quarterly meetings between DCC Chief Executives and the Minister for Disabled People have continued but are currently focused primarily on immediate interventions to support disabled people during the cost-of-living crisis rather than on the implementation of aspects of the Strategy such as the stakeholder review. This focus and some of the support delivered for disabled people by government has been welcome, but alongside the pausing of some actions pending the appeal has meant the DCC has not fed in more detail to the stakeholder review.

**8. How well are the goals in the strategy being funded and measured for success?**

8.1 Overall, the Strategy was announced as being supported by £1.6 billion in funding for the 2021 financial year. However, only approximately £4 million was newly announced funding and some of the total headline figures still needed to be bid for as part of the Comprehensive Spending Review process following the Strategy’s launch.[[6]](#footnote-6) This has meant that more substantive long-term policy commitments are missing from the Strategy, given that such multi-year funding was not there to support their delivery.

8.2 The former Minister for Disabled People, Justin Tomlinson, highlighted to the Work and Pensions Committee the efforts made by the DU in the lead up to the last Spending Review to support disability-focused bids. Departments were reminded of the importance of making such bids and collective effort was made to share evidence gathered from health and disability stakeholders to increase the likelihood of these bids being successful.[[7]](#footnote-7)

8.3 The DU could go further than this, and work to ensure that disability does not slip off the agenda in any department, by working with the Treasury to secure a funding settlement to ensure each government department has what it needs to deliver its strategic aims in the Comprehensive Spending Review or Budget process. This would allow for the aims and goals of the Strategy to become fleshed out as fully costed, multi-year plans to address the scale of the challenges faced by disabled people.

8.4 Moving towards that longer-term well-funded vision will be the development of staggered measures of progress. Though the Strategy committed to publishing a set of indicators and a dashboard to track its impact, and the DCC has engaged on its initial work to develop metrics, this work has had to be paused following the Judicial Review. We believe these should have been in place from the beginning in the form of yearly Key Performance Indicators and these could and should still be produced. Without these being in place, the accountability mechanisms underpinning the successful delivery of the Strategy are not there, and potential future learnings are limited. Meaningful targets for year-on-year progress are needed so that policy interventions can be evaluated effectively and changed if necessary.

8.5 Effective monitoring ties back to the issue of funding and resourcing underpinning the Strategy’s implementation. An enhanced Strategy with a longer-term vision and build in year-on-year targets could be monitored and bolstered, both in scope and resources, with an enhanced role for the Minister for Disabled People. Though it is nominally the case that the Minister sits across government, covering policy in all aspects of disabled people’s lives, and the move of the Disability Unit to the Cabinet Office has been very positive in supporting and promoting this, they need to have greater enforcement powers with other departments in order for this to be meaningful and allow for monitoring of progress.

8.6 It would be important that disabled people and their experiences are centred as part of this monitoring and should also be engaged with throughout the Strategy’s lifespan. This could involve using the initial survey as a benchmark, to assess whether disabled people across the UK feel their quality of life has improved over the Strategy’s duration.

**9. Are there any specific groups that will be supported well, or supported badly, by the strategy?**

9.1 Rather than being supported badly by the Strategy, the DCC has noted that one of the main groups not sufficiently addressed was children and young people and their families. Apart from the delivery of the SEND Review, there were insufficient commitments to improve the daily lives and life chances of disabled young people.

9.2 Rather than any condition specific or demographic group being supported badly by the strategy, collectively disabled people will not be as effectively supported as they could be. Ultimately, the Strategy is less a joined-up approach to improving the lives of disabled people fostering positive cross-departmental working, than a list of actions for each department to deliver. While Ministerial Champions are very welcomed and have helped the Strategy’s actions to have clear ownership, frequent changes in ministerial personnel, as has been the case recently, can also limit this positive step and impact on effective delivery.

9.3 Though the Strategy committed to improving disability data in health and social care, this could be extended to all key areas of policy action, along with greater transparency and openness in sharing research and statistics on the lives of disabled people.[[8]](#footnote-8)[[9]](#footnote-9) In this way as the implementation progresses, whether specific groups are not being sufficiently supported by the Strategy will become readily monitorable.

**10. How should the needs of disabled people be reflected in the post-pandemic recovery and other flagship Government policies such as Levelling-up?**

10.1 Disabled people have been disproportionately impacted at all stages of the pandemic, making up 6 in 10 of all Covid deaths, having vital care and support packages paused, and experiencing significant impacts on current employment and future opportunities.[[10]](#footnote-10)[[11]](#footnote-11) Though the Government has moved to the new phase of managing the pandemic with its ‘Living with COVID-19’ strategy, it is important to recognise the reality that for many disabled people across the country we are currently still far from being ‘post-pandemic.’ To tackle the unequal impact of the pandemic many are still facing, there is a need for disabled people to be centred in policy initiatives like levelling up rather than still remaining an afterthought.

10.2 The Levelling Up White Paper recognised that both *‘while geography has a significant bearing on pay, so do other interpersonal factors such as disability’* and *‘local authorities with the largest disability employment gaps tend to be concentrated within more deprived areas of the UK.’[[12]](#footnote-12)* But this acknowledgement did not follow through to stating any clear goals to tackle disability pay or employment gaps specifically, which remain persistently stable, as part of the paper’s 2030 vision.[[13]](#footnote-13) The funding committed to improve disability employment is a positive step but falls short of the scale of support needed to tackle deep rooted barriers to employment and progression in work.

10.3 A National Disability Strategy which lays out a clear long-term vision for policy in areas like employment will also require a review of other key existing strategies affecting economic activity, to ensure disability inclusion is centred in their own aims and targets. This would include the Levelling Up agenda, as well as the Industrial Strategy and the Good Work Plan. As Government has recently reported that it has reached its 2017 target of one million more disabled people in employment by 2027, the DCC would encourage the government to look next and meaningfully reducing the disability employment gap and review current strategies to ensure they are mutually reinforcing in supporting disabled people to enter, succeed, and progress in employment.

1. <https://rnid.org.uk/wp-content/uploads/2021/02/DisabilityCharitiesConsortiumManifestoForTheNationalDisabilityStrategyJan2021.pdf> [↑](#footnote-ref-1)
2. Disability Update. Statement made on 13 June 2022. Statement UIN HCWS93: <https://questions-statements.parliament.uk/written-statements/detail/2022-06-13/hcws93> [↑](#footnote-ref-2)
3. Leonard Cheshire (2022), Rising costs are a catastrophe for disabled people: <https://www.leonardcheshire.org/about-us/our-news/press-releases/rising-costs-are-catastrophe-disabled-people> [↑](#footnote-ref-3)
4. <https://www.sense.org.uk/get-involved/campaign/cost-of-living/> [↑](#footnote-ref-4)
5. <https://publications.parliament.uk/pa/cm5801/cmselect/cmwomeq/1050/105008.htm#_idTextAnchor045> [↑](#footnote-ref-5)
6. Work and Pensions Committee Oral evidence: The work of the Minister for Disabled People, Health and Work, HC 671: <https://committees.parliament.uk/oralevidence/2726/pdf/> [↑](#footnote-ref-6)
7. Ibid. [↑](#footnote-ref-7)
8. Work and Pensions Committee (2022), Disabled people’s experiences of the benefits system: Committee publishes Government-commissioned research. [↑](#footnote-ref-8)
9. Office for Statistical Regulation (2022), Mary Gregory to Steve Ellerd-Elliot: Universal Credit Work Capability Assessment statistics. [↑](#footnote-ref-9)
10. <https://www.health.org.uk/news-and-comment/news/6-out-of-10-people-who-have-died-from-covid-19-are-disabled> [↑](#footnote-ref-10)
11. Leonard Cheshire (2021), Still locked out: Breaking down the barriers to disability inclusive employment. [↑](#footnote-ref-11)
12. Department for Levelling Up, Housing and Communities (2022), Levelling Up the United Kingdom. [↑](#footnote-ref-12)
13. House of Commons Library (2022), Disabled people in employment. [↑](#footnote-ref-13)