The National Deaf Children's Society works to break down barriers for deaf children and young people. This includes barriers to independence for which the transition deaf young people make from education to employment is crucial.

What is your name?
what is your name:
Martin McLean

What is your job title / job role? (if applicable)
what is your job title or job role:
Education & Training Policy Advisor

What is your email address?
Email:
martin.mclean@ndcs.org.uk

Can we use your email address to update you with progress on the topic of this consultation?
Yes, please keep me up to date on progress

Are you answering on behalf of?
an organisation (in an official capacity)

If you are answering on behalf of an organisation, what is the name of the organisation:

Where are you/your organisation based?
Other

If you answered other please tell us where you or your organisation are based:
Across the UK

Questions for employers

5. Supporting young people

5.1 If you are an employer who has considered providing a supported internship placement but have not done so, please let us know what the barriers were. If you are interested in offering a supported internship, please provide your contact details so we can help to match you to a local school or college.

If you are an employer who has considered providing a supported internship placement but have not done so, please let us know what the barriers were. If you are interested in offering a supported internship, please provide your contact details so we can help to match you to a local school or college.

8. Embedding good practices and supportive cultures

8.1 What are the key barriers preventing employers of all sizes and sectors recruiting and retaining the talent of disabled people and people with health conditions?

What are the key barriers preventing employers of all sizes and sectors recruiting and retaining the talent of disabled people and people with health conditions?

8.2 What expectation should there be on employers to recruit or retain disabled people and people with health conditions?
What expectation should there be on employers to recruit or retain disabled people and people with health conditions?:

8.3 Which measures would best support employers to recruit and retain the talent of disabled people and people with health conditions?:

Which measures would best support employers to recruit and retain the talent of disabled people and people with health conditions?:

8.3(a) What information would be reasonable for employers to be aware of to address the health needs of their employees?:

8.3(b) What are the barriers to employers using the support currently available?:

8.3(c) What role could a 'one stop shop' play to overcome the barriers?:

8.3(d) How can government support the development of effective networks between employers, employees and charities?:

8.3(e) What role could information campaigns play to highlight good practices and what they should cover?:

8.3(f) What role can government play in ensuring that disabled people and people with health conditions can progress in work, including securing senior roles?:

8.3(g) What impact did the previous financial, or other, incentives have and what type of incentives would influence employer behaviour, particularly to create new jobs for disabled people?:

8.3(h) Are there any other measures you think would increase the recruitment and retention of disabled people and people with health conditions?:

8.3(i) Do you think there should be a different approach for different sized organisations and different sectors?:

8.4 How can we best strengthen the business case for employer action?:

How can we best strengthen the business case for employer action?:

9. Moving into work

9.1 How can existing government support be reformed to better support the recruitment and retention of disabled people and people with health conditions?:

How can existing Government support be support be reformed to better support the recruitment and retention of disabled people and people with health conditions?:

10. Staying in or returning to work

10.1 What good practice is already in place to support inclusive recruitment, promote health and wellbeing, prevent ill health and support people to return to work after periods of sickness absence?:

What good practice is already in place to support inclusive recruitment, promote health and wellbeing, prevent ill health and support people to return to work after periods of sickness absence?:

10.2 Should Statutory Sick Pay be reformed to encourage a phased return to work? If so, how?:

Not Answered

Please explain your views:

10.3 What role should the insurance sector play in supporting the recruitment and retention of disabled people and people with health conditions?:

What role should the insurance sector play in supporting the recruitment and retention of disabled people and people with health conditions?:

10.4 What are the barriers and opportunities for employers of different sizes adopting insurance products for their staff?:

What are the barriers and opportunities for employers of different sizes adopting insurance products for their staff?:

11. Improving discussions about fitness to work and sickness certification

11.1 How can we bring about better work-focussed conversations between an individual, healthcare professional, employer and Jobcentre Plus work coach, which focus on what work an individual can do, particularly during the early stages of an illness/developing condition?:

how can we bring about better work-focussed conversations between an individual, healthcare professional, employer and Jobcentre Plus work coach, which focus on what work an individual can do, particularly during the early stages of an illness/developing condition?:

11.2 How can we ensure that all healthcare professionals recognise the value of work and consider work during consultations with working-age patients? How can we encourage doctors in hospitals to consider fitness for work and, where appropriate, issue a fit note?
how can we ensure that all healthcare professionals recognise the value of work and consider work during consultations with working-age patients? How can we encourage doctors in hospitals to consider fitness for work and, where appropriate, issue a fit note?

11.3 Are doctors best placed to provide work and health information, make a judgement on fitness for work and provide sickness certification?

If not, which other healthcare professionals do you think should play a role in this process to ensure that individuals who are sick understand the positive role that work can play in their recovery and that the right level of information is provided?

11.4 Turning to the fit note certificate itself, what information should be captured to best help the individual, work coaches and employers better support a return to work or job retention?

Turning to the fit note certificate itself, what information should be captured to best help the individual, work coaches and employers better support a return to work or job retention?

11.5(a) Is the current fit note the right vehicle to capture this information, or should we consider other ways to capture fitness for work and health information?

can you suggest other ways to capture this information:

If you answered no what do you suggest instead?

13. Transforming the landscape of work and health support

13.1 How can occupational health and related provision be organised so that it is accessible and tailored for all?

How can occupational health and related provision be organised so that it is accessible and tailored to all?

Please explain your views:

13.2 What has been your experience of the Fit for Work service, and how should this inform integrated provision for the future?

what has been your experience of the Fit for Work service, and how should this inform integrated provision for the future?

13.3 What kind of service design would deliver a position in which everyone who needs occupational health assessment and advice is referred as a matter of course?

what kind of service design would deliver a position in which everyone who needs occupational health assessment and advice is referred as matter of course?

15. Changing the culture around work and health

15.1 how can we bring about a shift in society’s wider attitudes to make progress and achieve long lasting change?

how can we bring about a shift in society’s wider attitudes to make progress and achieve long lasting change?

15.2 what is the role of government in bringing about positive change to our attitudes to disabled people and people with health conditions?

what is the role of government in bringing about positive change to our attitudes to disabled people and people with health conditions?

All the questions in the consultation

1. Achieving lasting change: investing in innovation

1.1 What innovative and evidence-based support are you already delivering to improve health and employment outcomes for people in your community which you think could be replicated at scale? What evidence sources did you draw on when making your investment decision?

Evidence based support:

1.2 What evidence gaps have you identified in your local area in relation to supporting disabled people or those with long term health conditions? Are there particular gaps that a Challenge Fund approach could most successfully respond to?

gaps in your local area in supporting disabled people or those with long term conditions:

1.3 How should we develop, structure and communicate the evidence base to influence commissioning decisions?

How should we develop, structure and communicate the evidence base to influence commissioning decisions?
2. Building work coach capability

2.1 How do we ensure that Jobcentres can support the provision of the right personal support at the right time for individuals?

How do we ensure that Jobcentres can support the provision of the right personal support at the right time for individuals?:

For Jobcentres to provide effective support for deaf people they need to be fully accessible. This means Jobcentre staff making reasonable adjustments such as holding a meeting in a quiet room, being flexible about how they communicate and booking communication support (e.g. sign language interpreters) when appropriate.

We have come across examples of deaf young people who have been asked to attend Jobcentres for interviews but no communication support has been provided. This has caused delays in them getting the support they require including the payment of Job-seekers allowance. Additionally, it can result in a very negative experience for deaf people which means they may not feel the Jobcentre is a supportive or welcome environment.

We believe that Jobcentre Plus needs to create guidance on their responsibilities around booking communication support. Additionally, Jobcentre staff should have easy access to guidance on supporting deaf clients effectively.

2.2 What specialist tools or support should we provide to work coaches to help them work with disabled people and people with health conditions?

What specialist, tools or support should we provide to work coaches to help them work with disabled people and people with health conditions?:

During a DWP Green Paper consultation event, a deaf charity that supports deaf people into employment raised the issue of job coaches not having the time or skills to best support disabled clients. It was felt that an appointment every two weeks with a job coach can be insufficient. Communication support is often not in place and job coaches are left communicating with clients through pen and paper. With many deaf people having low levels of literacy this is inappropriate.

A lack of awareness of the barriers that deaf people face and a lack of understanding of their communication needs will mean that a job coach is not likely to meet a deaf client's needs.

Disabled people have diverse needs and it is difficult to train job coaches to work with people with a wide range of conditions. We believe that deaf people should have access to job coaches with specialism in supporting deaf clients. We are aware that this currently exists in a few areas such as Islington in North London.

In some areas this may be difficult to ensure access to specialist support for geographical reasons. However, at the very least, a job coach should be able to access specialist advice on supporting deaf clients and book communication support for appointments if required.

3. Supporting people into work

3.1 What support should we offer to help those ‘in work’ stay in work and progress?

What support should we offer to help those ‘in work’ stay in work and progress?:

3.2 What does the evidence tell us about the right type of employment support for people with mental health conditions?

What does the evidence tell us about the right type of employment support for people with mental health conditions?:

4. Improving access to employment support

4.1 Should we offer targeted health and employment support to individuals in the Employment Support Allowance Support Group, and Universal Credit equivalent, where appropriate?

Please explain your views:

4.2 What type of support might be most effective and who should provide this?

What type of support might be most effective and who should provide this?:

4.3 How might the voluntary sector and local partners be able to help this group?

How might the voluntary sector and local partners be able to help this group?:

4.4 How can we best maintain contact with people in the Support Group to ensure no-one is written off?

How can we best maintain contact with people in the Support Group to ensure no-one is written off?:

5. Supporting young people

5.1 If you are an employer who has considered providing a supported internship placement but have not done so, please let us know what the barriers were. If you are interested in offering a supported internship, please provide your contact details so we can help to match you to a local school or college.

If you are an employer who has considered providing a supported internship placement but have not done so, please let us know what the barriers were. If you are interested in offering a supported internship, please provide your contact details so we can help to match you to a local school or college.
Supported internships were originally presented as being for those with severe learning difficulties and not seen as appropriate to deaf young people. The Department for Education could consider how supported internships are marketed to employers.

6. Reforming the assessment process

6.1 Should the assessment for the financial support an individual receives from the system be separate from the discussion a claimant has about employment or health support?

Should the assessment for the financial support an individual receives from the system be separate from the discussion a claimant has about employment or health support?:
Yes. Currently, many deaf young people are not entitled to Employment Support Allowance due to the high eligibility threshold for the benefit. The Work Capability Assessment does not take into account the difficulties they face in finding and sustaining work if the appropriate support is not in place. There is a danger that if deaf young people are not eligible for ESA or the Universal Credit equivalent that their support needs are overlooked particularly with the Work Programme being abolished.

We believe the Work Capability Assessment should not be used to identify whether an individual should be eligible for personalised employment support. We agree with the proposal that work coaches could instead make decisions about the employment support individuals may require.

6.2 How can we ensure that each claimant is matched to a personalised and tailored employment related support offer?

How can we ensure that each claimant is matched to a personalised and tailored employment related support offer?:
We believe that it is critical for assessors to have an understanding of deafness through their training. Generally, in social security provision, our clients have great difficulties when engaging with officials and agents who appear to understand little of their experience.

6.3 What other alternatives could we explore to improve the system for assessing financial support?

What other alternatives could we explore to improve the system for assessing financial support?:
The ESA sick notes and means-testing regime is not suitable for claimants in post-16 education who are claiming on the basis of receiving the PIP daily living component. There appears to be confusion from Jobcentre Plus exactly how such claims should be handled. Government guidance states that students on DLA or PIP can apply for ESA: www.gov.uk/employment-support-allowance/eligibility

7. Assessments for benefits for people with health conditions

7.1 How might we share evidence between assessments, including between Employment Support Allowance/Universal Credit and Personal Independence Payments to help DWP benefit decision makers and reduce burdens on claimants? What benefits and challenges would this bring?

How might we share evidence between assessments, including between Employment Support Allowance/Universal Credit and Personal Independence Payments to help DWP benefit decision makers and reduce burdens on claimants?:
We agree that evidence should be shared between assessments to to avoid claimants having to explain the same things repeatedly and ensure that there are no unrealistic conditional requirements being imposed.

What benefits and challenges would this bring?:
It would encourage a more holistic approach to decision-making in relation to financial support.

7.2 Building on our plans to exempt people with the most severe health conditions and disabilities from reassessment, how can we further improve the process for assessing financial support for this group?

Building on our plans to exempt people with the most severe health conditions and disabilities from reassessment, how can we further improve the process for assessing financial support for this group?:
The support of DWP Visiting could better publicised to support claimants through the process, particularly in the context of collapsing welfare rights services.

7.3 Is there scope to improve the way DWP uses the evidence from Service Medical Boards and other institutions, who may have assessed service personnel, which would enable awards of benefit to be made without the need for the claimant to send in the same information or attend a face-to-face assessment?

Is there scope to improve the way DWP uses the evidence from Service Medical Boards and other institutions, who may have assessed service personnel, which would enable awards of benefit to be made without the need for the claimant to send in the same information or attend a face-to-face assessment?:

8. Embedding good practices and supportive cultures

8.1 What are the key barriers preventing employers of all sizes and sectors recruiting and retaining the talent of disabled people and people with health conditions?

What are the key barriers preventing employers of all sizes and sectors recruiting and retaining the talent of disabled people and people with health conditions?:

Through an employment project funded by the Department for Education in 2015-16, we held focus groups with employers of varying sizes and sectors to ask them their views on employing deaf young people. The focus groups revealed a lack of knowledge about the needs of deaf people and preconceptions about their ability to communicate. Additionally, most participants were not aware of the support available to disabled employees through Access to Work. When employers understood how barriers to communication could be overcome they felt much more confident about employing a deaf young person.

Deaf young people have reported cases of discrimination in finding employment to us. In one recent example, a deaf college leaver reported that he found a job as a chef for a catering firm where he worked for several months. He was well supported by his manager who was aware of his communication needs. However, his manager was one day dismissed and his new manager was far less understanding of his needs. He was asked to attend a ‘review meeting’ and a British Sign Language interpreter was booked for this. The day before his review meeting, the interpreter was cancelled by his employer. He turned up at the review meeting with no communication support in place. His employer fired him on the spot, handing him a sheet of paper which stated he had to leave immediately with no proper explanation.

8.2 What expectation should there be on employers to recruit or retain disabled people and people with health conditions?

What expectation should there be on employers to recruit or retain disabled people and people with health conditions?:

As a minimum, we expect employers to fulfill their duties under the Equality Act 2010. However, research has found there is limited awareness of the Equality Act and disabled people’s rights under it particularly within the small business sector. See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/78434/Eval_of_Equality_Act_Report2.PDF

With the onus being on disabled individuals to take legal action we believe that the Equality Act is insufficient on its own to ensure employers recruit disabled people as there is a lack of clarity over what constitutes as a ‘reasonable adjustment’ under the Act.

Government procurement provides an opportunity to ensure that companies supplying services for the public sector are positive about recruiting disabled people and have taken steps to become more ‘disability-friendly’. However, we are unsure that establishing quotas or targets for the number of disabled people employed are a helpful step forward. Disabled people are a diverse group whose needs will vary greatly from person to person. A quota may lead to companies encouraging disclosure among staff with lower levels of need rather than taking steps to ensure their workplace is as accessible as possible to people with a wide range of conditions.

8.3 Which measures would best support employers to recruit and retain the talent of disabled people and people with health conditions?

Which measures would best support employers to recruit and retain the talent of disabled people and people with health conditions?:

For deaf people the Access to Work scheme is vital because the cost of communication support is generally above what employers would consider reasonable to pay for. However, it is underutilised with many employers unaware of the support that is available. Additionally, issues with the scheme mean the process of applying and making claims can be frustrating and time-consuming for deaf people and their employers.

We believe that customer service is an ongoing issue with Access to Work. Young people and those applying for the first time may find it daunting to have to quantify and justify the support they need. The forms can be challenging to complete and it was raised during a Green Paper consultation event that deaf people can feel that the Access to Work advisors are working against them rather than supporting them through the process.

8.3(a) What information would be reasonable for employers to be aware of to address the health needs of their employees?:

For deaf young people, an understanding of their communication needs and the reasonable adjustments that can be put into place is very important. On our website we have a personal profile template aimed at deaf young people to help them explain to their employers their needs and how they can be met. http://www.ndcs.org.uk/family_support/leaving_school/employment/breaking_down.html#contentblock1

Employers need to be better informed about Access to Work and how they can support employees with the process of applying and claiming. The Government needs to invest more in the promotion of the Access to Work scheme and ensure that those supporting young people with the transition from education to employment such as careers advisors are aware of it.

8.3(b) What are the barriers to employers using the support currently available?:

We believe that the Disability Confident employer scheme is inferior to the Two Ticks scheme which it replaced. With three different levels it has become convoluted and the requirements for employers have been watered down. Previously, under the Two Ticks scheme employers had to agree to five different actions. Under Level 1 of the Disability Confident scheme they only need to complete one action.

Employers usually pay for communication support and then claim back the costs from Access to Work. However, this process can be quite bureaucratic and requires a time commitment from an employer to process the claims. Sometimes claims can be underpaid or rejected without any communication from Access to Work to the employer who may only realise they are out of pocket from checking their accounts.

There is a cap of £41K for amount that can be paid for an individual’s support needs. This is sufficient to meet most deaf employee's communication support needs. However, for some roles full-time interpreting support may be required. With the cap, employers may be left to make up the difference which can run into tens of thousands of pounds.

8.3(c) What role could a ‘one stop shop’ play to overcome the barriers?:

It is crucial for employers to be able to easily access information on supporting deaf employees such as our Breaking the Sound Barrier resource: http://www.ndcs.org.uk/family_support/leaving_school/employment/breaking_down.html#contentblock3

We agree with having a central source of information to direct employers to. However, regard must be given to the wide spectrum of needs that exist among disabled people. Generic advice on employing disabled people can outline fundamental principles and key rights under the law. This should also be supported by specialist information on meeting the needs of people with specific disabilities such as deafness.
A 'one stop shop' must be properly maintained and not become overpopulated with duplicate, redundant or poor-quality resources.

8.3(d) How can government support the development of effective networks between employers, employees and charities?:

8.3(e) What role can information campaigns play to highlight good practices and what they should cover?:
We support the idea of information campaigns to highlight positive case studies of disabled people in employment. These should not only be targeted to employers but to disabled people themselves to encourage them to follow their aspirations and ensure they have an understanding of their rights in employment and the support available to them.

Deaf young people often receive very poor support from those providing careers advice to them who are unaware of their rights under the Equality Act or support available through Access to Work. Any information campaigns should also consider targeting careers advisors.

8.3(f) What role can government play in ensuring that disabled people and people with health conditions can progress in work, including securing senior roles?:

8.3(g) What impact did the previous financial, or other, incentives have and what type of incentives would influence employer behaviour, particularly to create new jobs for disabled people?:

8.3(h) Are there any other measures you think would increase the recruitment and retention of disabled people and people with health conditions ?:

8.3(i) Do you think there should be a different approach for different sized organisations and different sectors?:

8.4 How can we best strengthen the business case for employer action?

How can we best strengthen the business case for employer action?:

9. Moving into work

9.1 How can existing government support be reformed to better support the recruitment and retention of disabled people and people with health conditions?

How can existing Government support be support be reformed to better support the recruitment and retention of disabled people and people with health conditions?:
Access to Work:
1. If there were 'young people's champions' (i.e. advisors with specialism in supporting young people) in each team of Access to Work advisors, young people could be better supported when making the transition between education and work.
2. Interim packages of support should be agreed for those starting a new job and are waiting for a workplace assessment to take place. This would ensure that any support is in place for a deaf employee's first few weeks at work which is often when they most need communication support.
3. Funding for additional support for apprentices should be joined up with Skills Funding Agency funds as recommended by the Maynard Review last summer. Currently, it is left for apprentices to apply for their own support through Access to Work.

Disability Confident:
1. The employer scheme should be simplified and more actions should be expected of employers in order to receive the Disability Confident badge.
2. A stronger system of regulation is required in order for disabled people to have confidence in the scheme.

10. Staying in or returning to work

10.1 What good practice is already in place to support inclusive recruitment, promote health and wellbeing, prevent ill health and support people to return to work after periods of sickness absence?

What good practice is already in place to support inclusive recruitment, promote health and wellbeing, prevent ill health and support people to return to work after periods of sickness absence?:

10.2 Should Statutory Sick Pay be reformed to encourage a phased return to work? If so, how?

Not Answered

Please explain your views:

10.3 What role should the insurance sector play in supporting the recruitment and retention of disabled people and people with health conditions?

What role should the insurance sector play in supporting the recruitment and retention of disabled people and people with health conditions?:

10.4 What are the barriers and opportunities for employers of different sizes adopting insurance products for their staff?

What are the barriers and opportunities for employers of different sizes adopting insurance products for their staff?:

11. Improving discussions about fitness to work and sickness certification
11.1 How can we bring about better work-focussed conversations between an individual, healthcare professional, employer and Jobcentre Plus work coach, which focus on what work an individual can do, particularly during the early stages of an illness/developing condition?

11.2 How can we ensure that all healthcare professionals recognise the value of work and consider work during consultations with working-age patients? How can we encourage doctors in hospitals to consider fitness for work and, where appropriate, issue a fit note?

11.3 Are doctors best placed to provide work and health information, make a judgement on fitness for work and provide sickness certification?

11.4 Turning to the fit note certificate itself, what information should be captured to best help the individual, work coaches and employers better support a return to work or job retention?

11.5(a) Is the current fit note the right vehicle to capture this information, or should we consider other ways to capture fitness for work and health information?

12. Mental health and musculoskeletal services

12.1 How should access to services, assessment, treatment and employment support change for people with mental health or musculoskeletal conditions so that their health and employment needs are met in the best possible way?

12.2 How can we help individuals to easily find information about the mental health and musculoskeletal services they can access?

13. Transforming the landscape of work and health support

13.1 How can occupational health and related provision be organised so that it is accessible and tailored for all?

14. Creating the right environment to join up work and health

14.1 How can we best encourage innovation through local networks, including promoting models of joint working such as co-location, to improve health and work outcomes?

14.2 How can we encourage the recording of occupational status in all clinical settings and good use of these data?
How can we encourage the recording of occupational status in all clinical settings and good use of these data?:

14.3 What should we include in a basket of health and work indicators covering both labour market and health outcomes at local level?

What should we include in a basket of health and work indicators covering both labour market and health outcomes at local level?:

14.4 How can government and local partners best encourage improved sharing of health and employment data?

How can government and local partners best encourage improved sharing of health and employment data?:

14.5 What is the best way to bring together and share existing evidence in one place for commissioners and delivery partners?

What is the best way to bring together and share existing evidence in one place for commissioners and delivery partners?:

14.6 What is the best way to encourage clinicians, allied health professionals and commissioners of health and other services to promote work as a health outcome?

What is the best way to encourage commissioners of health and other services to promote work as a health outcome?:

15. Changing the culture around work and health

15.1 How can we bring about a shift in society’s wider attitudes to make progress and achieve long lasting change?

How can we bring about a shift in society’s wider attitudes to make progress and achieve long lasting change?:

Long-lasting attitudinal changes will not be achieved without looking at the role of the UK’s education systems. It is short-sighted simply to look at the role of employment support or health services and it is disappointing that the Green Paper makes little reference to the role of local authorities and education providers.

The education system in England can do much more to prepare deaf young people for making the transition from education and employment. Too many deaf young people are leaving education without the qualifications, softer skills and confidence to achieve their aspirations. We would like to see deaf young people receive specialist careers advice that addresses their fears about moving into employment and better links between education providers and those providing employment support.

15.2 What is the role of government in bringing about positive change to our attitudes to disabled people and people with health conditions?

What is the role of government in bringing about positive change to our attitudes to disabled people and people with health conditions?:

Again we refer to the role of education systems. A deaf young person stated during a Green Paper consultation that schools can do more to educate people about disability and that learning about disabled people was not part of the curriculum. Understanding the social model of disability could help young people to see disabled people in a more positive light.

Equalities impact assessment

16 Equalities impact

16.1 Could any of the proposals within the green paper potentially have an adverse effect on people with a protected characteristic?

Yes

Could any of the proposals within the green paper potentially have an adverse effect on people with a protected characteristic?:

Deaf/hearing impaired people

Could any of the proposals within the green paper potentially have an adverse effect on people with a protected characteristic?:

Para 95 on page 32 describes the Work and Health Programme which will replace the Work Programme. Currently, many deaf people accessed specialist employment support through the Work Programme which had a much larger budget than the proposed Work and Health programme. It is not clear whether deaf people who do not receive Employment Support Allowance will be eligible for support through the Work and Health programme. The much smaller budget for the Work and Health programme could leave deaf people without specialist employment support which could have a significantly negative impact.