

Response ID ANON-N17J-K4VY-E

Submitted to Disability workforce reporting consultation
Submitted on 2022-03-25 14:22:50

About you or your organisation (Page 1)

1 Whose views are you representing in this consultation? Please select one option below.

an employer or employer representative organisation or network

About your company or organisation (Page 2 of 3)

1a What type of organisation do you represent? Please select one option below.

Employer

If other, please specify here:

1b What is the name of your organisation?

type your organisation's name here:

Royal Pharmaceutical Society

1c Would you like to receive updates on this consultation? If so, please provide an email address

type your email or address here:

amandeep.doll@rpharms.com

About your company or organisation (Page 3 of 3)

2 How many employees or members does your organisation have?

250 - 999

3 Where does your organisation operate?

Great Britain (England, Wales and Scotland)

If other, type where your organisation operates here:

4 What sector is your organisation based in? Please select one option below.

Other

If other, type the sector your organisation is in here:

Membership organisation

5 What industry is your organisation based in? Please select all that apply.

Health and social care

If other, type the industry your organisation is in here:

6 Does your organisation currently collect diversity workforce data on a voluntary basis for the following? Please select all that apply.

I'm not sure

If other, type the other diversity workforce data you collect:

7 What is your role in the organisation?

Diversity and Inclusion professional

If other, please type your role here:

Section A - Understanding the current landscape of disability reporting (Page 1)

1 Does your organisation currently collect information on the proportion of disabled people in your workforce? Please select one option below.

Yes

Section A - Understanding the current landscape of disability reporting (Page 2 of 3)

2a Please outline the information your organisation collects on disability in the workforce. Please select all that apply.

Proportion of disabled people in the workforce, Proportion of staff requesting reasonable adjustments, Pay of disabled people comparative to non-disabled staff

2b How is this information on disability in the workforce collected? Please select all that apply.

Using existing HR systems and processes

If other, type how this information is collected here:

2c How long has your organisation collected this information on disability in the workforce for? Please select one option below.

Between 1 to 5 years

If other, type your answer here:

3a Do you know if your organisation uses the disability voluntary reporting framework? Please select one option below.

I don't know if my organisation uses it

3b If your organisation does use the framework, how useful is it? Please select one option below.

I don't know

Type the reason for your selection here:

4 Is there a cost to your organisation for collecting this data? Please select one option below.

None or negligible

5 How does your organisation use workforce information on disability in your organisation? Please select all that apply.

Other

If other, type how your organisation uses workforce information on disability here:

The information is used to anonymously aggregate statistics on the diversity of the workforce, it is also used to produce a disability pay gap which we released for the first time in October 2021 <https://www.rpharms.com/recognition/inclusion-and-diversity/pay-gap-2021>

6a Does your organisation publish disability workforce data externally?

Yes

Section A - Understanding the current landscape of disability reporting (Page 3 of 3)

6b Where does your organisation publish the data it collects about disability in the workforce.? Please select all that apply.

On your website

If other, type any other places you publish this information here:

Section B - Benefits and barriers to disability workforce reporting (Page 1 of 4)

7a Do you think that greater transparency on disability in the workforce leads to more inclusive practices?

Yes

7b Please explain your answer above and provide evidence or examples where possible in the box below.

Type the reason for your selection here:

Through our disability awareness we have spoken to many pharmacy professionals who have had a number of years of experience throughout different healthcare sectors representing a diversity of disabilities ranging from visible, non-visible and living with a long term condition. One of the common

themes through these discussions is that there is still a need for adequate support provision from employers and team leaders for individuals and in order for that to happen disability data needs to be collected to give a better picture of the workforce and therefore, what support the workforce requires. Disability workforce reporting would allow not only a picture of the current workforce but also develop a wider picture over a number of years. If the data collection also captured adjustments that have been made for individuals to do their role this experience would be able to support individuals in similar roles as at times line managers and organisations may not know how to approach the situation resulting in an inconsistency of experiences for individuals working in similar sectors.

It will also provide data on recruitment and retention of staff, highlighting whether or not people with a disability are being recruited and feel like they can apply for roles. It can also show if people are likely to stay in their roles, and if not, steps can be taken to find out why they are or not staying. It enables us to have baseline data across the systems and also sharing examples of practices where employers and organisations are doing well.

Section B - Benefits and barriers to disability workforce reporting (Page 2 of 4)

8 Do you think that disability workforce reporting by large employers (250+ employees) should be voluntary or mandatory? Please select one option below.

Mandatory

If other, please type your answer here:

It should be mandatory as this would support proactive collection of data. It would increase transparency and improve the workplace experience of individuals. However, there is a recognition of potential unintended consequences such as individuals feeling pressured into disclosing their disability status, so if mandatory disability workforce reporting were to become the norm there needs to be some education for individuals around sharing of that information. It should be mandatory for employers to ask their employees for their disability data which means that employers are accountable for disability workforce reporting. If it is voluntary, then employers may consider the data 'too hard' to complete and will therefore not collect it. A concern with mandatory disability workforce reporting is that it may be collected but then nothing is done with the data. This will have a negative impact on individuals who have taken the time to complete the report, expecting an improvement in their working environment and culture, and then feel like nothing changes.

9a What do you think the main benefits of a voluntary approach to disability workforce reporting are? Please type your answer in the box below.

Type the benefits of voluntary reporting here:

With voluntary disability workforce reporting employers who are collecting this data will be in a better position to use this data and be open with this information. They are choosing to be proactive if the data is voluntary rather than reactive if it was mandatory.

9b What do you think the main risks of voluntary reporting are? Please type your answer in the box below.

Type the risks of voluntary reporting here:

With the voluntary approach there is a risk here that the employers and organisations for whom inclusion and diversity is important and priority will take this forward and take the initiative to collect disability workforce reporting. For those employers who would not voluntarily undertake disability workforce reporting, they will not have disability data on their workforce and will not be able to support their employees and provide the support they may need. It will also make it harder for employees to ask for help as they could potentially experience line managers who do not understand their needs and therefore they will not be able to access the help or adjustments that they need.

10 The research available indicates low uptake of the disability voluntary reporting framework. How could voluntary reporting by employers be increased? Please type your answer in the box below.

Type here how voluntary reporting could be increased:

There could be more information about how to use the reporting framework and what organisations could do with the data and also why they should be using it. Currently the information is only presented in a PDF format but there could be webinars or videos and information in different formats to make it more accessible for people to use. There could also be more promotion of the reporting framework, such as working with Disability Confidence scheme to promote it.

The reporting also relies on people acknowledging and accepting they have a disability to report. Some people don't like to identify as having a disability or maybe be afraid of declaring their disability status due to fear of discrimination or they may be unaware they have a disability. Within this framework there needs to be support for people to declare their disability in a safe way. With the reporting framework employers should provide support or signpost to support if people are sharing their status and they feel vulnerable in doing so. Information should be provided about what will happen with the information that is shared and how it will be used and what benefits it will have both for the individual and for employers.

Employers should be asked if they use the voluntary reporting framework, and their use should be registered to aid in collecting data around its usage.

The reporting framework scope could potentially be seen as too broad with it capturing data on disability and mental health and wellbeing. They could perhaps be undertaken separately to ensure clarity of the data being collected.

Section B - Benefits and barriers to disability workforce reporting (Page 3 of 4)

11a What do you think the main benefits of a mandatory approach to disability workforce reporting are? Please type your answer in the box below.

Type the benefits of mandatory reporting here:

By having a mandatory approach, it would encourage all organisations to have a strategy to collect disability data for their employees particularly organisations that do not currently proactively engage with inclusion and diversity.

Having a mandatory approach would increase the possibility of having a complete data set on disability workforce data, making it clear what recruitment and retention rates are for people with a disability and highlighting any gaps. If additional protected characteristic data is collected it would really be able to highlight if individuals from particular groups and backgrounds face more barriers to recruitment and retention and then specific actions can be taken to address this e.g. individuals from Black, Asian and Minority Ethnic backgrounds may face additional barriers in addition to their disability.

11b What do you think the main risks of mandatory reporting are? Please type your answer in the box below.

Type the risks of mandatory reporting here:

Making it mandatory may make individuals feel under pressure to share their disability status

The organisation may collect the data and then do nothing with it so it becomes a tick box exercise

Collecting data doesn't necessarily make it a safe supportive environment. A safe supportive environment needs to be created to ensure people feel comfortable in disclosing their disability status.

Section B - Benefits and barriers to disability workforce reporting (Page 4 of 4)

12a What do you think the main benefits of publishing disability workforce information are? Please type your answer in the box below.

Type the benefits of publishing here:

Publishing disability workforce information enable accountability for organisations and employers in highlighting they're collecting disability data. It may highlight to employees which organisations are more disability inclusive if organisations have a higher recruitment and retention of staff with a disability.

Publishing data would also be an enabler to ensure organisations are creating a safe and inclusive environment for individuals to thrive and signing up to initiatives to support people with a disability in the workplace to thrive and develop to support retention.

It is also an enabler to support disability pay gap reporting as organisations would already be collecting some data.

12b What do you think the main risks of publishing are? Please type your answer in the box below.

Type the risks of publishing here:

Disability workforce reporting may only present one dimension of the work organisations are doing. The disability data would need to be broken down into different protected characteristic groups as this would also demonstrate how inclusive organisations are.

Section C - Considerations if mandatory disability workforce reporting were to be implemented (Page 1 of 3)

13a Disability workforce reporting is intended to increase transparency and the recruitment, retention and progression of disabled people. Do you agree or disagree that the proportion of employees identifying as disabled is a useful statistic to report on? Please select one option below.

Agree

If other, type your answer here:

13b Please explain your answer in the box below.

please explain the reason for your answer to the previous question here:

A culture of reporting needs to be created which needs to be started with individuals who are comfortable to share their disability status. Having this baseline data will provide some information to employers about their workforce and what support they may need to provide. Having a lack of employees with a disability or a high attrition rate of individuals with a disability would also highlight a problem they may not have been aware off. Individuals may also become disabled throughout their working career and this needs to be captured.

Embedding disability workforce reporting is an indication to individuals that their workplace is supportive and wants to take steps in becoming more inclusive and want to provide an environment where they are welcome. It also demonstrates the employer is keen to be transparent as long as this data is shared with the employees.

13c What, if any, statistic should be reported alongside or instead of the proportion of employees identifying as disabled? Please explain your answer in the box below.

Type what statistic should be reported here:

The reporting should be broken down into different groups such as ethnicity as we know intersectional individuals will experience additional barriers and discrimination which is important to highlight. It is also important to report any additional protected characteristics as discrimination against these may be holding them back rather than the disability.

Additional statistics that should be included are:

- Individuals requiring reasonable adjustments and whether these were met
- What additional support or signposting did individuals receive

These would also be helpful to report as organisations need to demonstrate they are supporting their employees to work successfully and thrive in their roles. It would not be enough to report just the disability status of employees as this would not provide any information on the working conditions and culture within the organisation and whether the person's disability was taken into account in terms of the working environment.

14a Do you agree or disagree that large employers (250+ employees) should use a standardised approach to collect disability workforce data if reporting became mandatory? Please select one option below.

Agree

14b Please explain your answer in the box below.

Please explain the reason for your previous answer here:

Having a standardised approach would enable a direct comparison of the data from different organisations. It will also support individuals in ensuring the definition of a disability is consistent if they move to different organisations. Having a standardised approach will make it easier for employers to implement the disability workforce framework. At the moment the framework outlines different questions that could be asked but if a set of agreed questions were set out the organisation could select this and it would become more of an enabler.

Section C - Considerations if mandatory disability workforce reporting were to be implemented (Page 2 of 3)

15 There are many ways that people are asked to self-identify as disabled. If large employers (250+ employees) were to use a standardised approach to data collection, which wording do you think should be used to ask employees if they identify as disabled? Please select all that apply.

Other

If other, type which other wording should be used here:

The GMC has a good definition: A disability is an impairment that has a substantial long term adverse effect on a persons ability to carry out normal day to day activities. It also outlines what a disability means in a practical way.

16 What could support large employers to implement disability workforce reporting in consistent and effective ways? For example, would tools or guidance help consistency across organisations and sectors, and if so what could this look like? Please type your answer in the box below.

Type what support employers might need here:

Different mediums of guidance such as webinars and other digital solutions, as well as documents, will ensure implementation of disability workforce reporting is successful.

17 If large employers were required to collect disability workforce information and report it to another organisation, which organisation do you think they should report to? Please select all that apply below.

Other

If other, type who large employers should report to here:

It should be reported to organisations such as the Chartered Institute of Personnel and Development (CIPD) or the Business Disability Forum (BDF). In particular, the BDF will be able to advise on what improvements should be made. Depending on the organisation it may need to be reported to more than one organisation such as NHS data should be reported to NHS Employers and regulators of different professions so specific actions can be undertaken to improve recruitment and retention of professionals.

Section C - Considerations if mandatory disability workforce reporting were to be implemented (Page 3 of 3)

18a Should large employers publish organisation-level disability workforce statistics? For example, the proportion of their workforce identifying as disabled.

Yes

18b If published, who do you think should publish this information? Please select all that apply.

Other

If other, type who should publish this information here:

This data will support transparency and accountability for larger organisations, providing an incentive for organisations to create inclusive working environments into which people with a disability are recruited and successfully progress. The positive impact of this has been seen with gender pay gap reporting. Publishing disability workforce data would be the enabler in making disability pay gap reporting mandatory.

Section D - Alternative approaches (Page 1 of 1)

19 What alternative approaches would you suggest to increase transparency, inclusion and employment of disabled people in the workplace?

Type what alternative approaches you would suggest here:

- Having Disability staff networks which have senior or executive sponsor will also ensure people with a disability have a way to raise concerns which are addressed by the senior team.
- Reverse mentoring of senior staff by people with a disability will support perceptions and biases of people with a disability
- Fairer recruitment processes