

# How should DWP involve disabled people in changing how it works?

Written evidence from Business Disability Forum, April 2020

## 1. About Business Disability Forum

1.1 Business Disability Forum is a not-for-profit membership organisation which exists to transform the life chances of disabled people. As a membership organisation working with over 300 businesses, we are uniquely equipped to do this by bringing business leaders, disabled people, and Government together to understand what needs to change to improve the life opportunities and experiences of disabled people in employment, economic growth, and society more widely.

1.2 We provide practical, evidence-based, strategic solutions for businesses to recruit, retain, and provide inclusive products and services to disabled people. Our policy, research, and advice related functions are channels through which Business Disability Forum has access to the latest business insight on challenges, changing business structures and landscapes, and the types of practices that employers and service providers are currently developing and are most effective for removing barriers for people with disabilities and long-term conditions.

1.3 During 2018-2020, Business Disability Forum responded to 3 Government consultations, 6 parliamentary inquiries, and 7 independent inquiries.

1.4 Although Business Disability Forum does not work directly in the area of social security and welfare payments, we have taken the opportunity to respond to this consultation about Department for Work and Pensions (DWP)'s engagement with stakeholders on a wider range of topics and policy areas.

## 2. The process

2.1 There are three main ways DWP **engages with us**:

- a) we are part of already-established stakeholder groups (such as the Disability Confident Stakeholder Advisory Group and we have also joined and contributed to the Disability Confident Business Leaders' Group);

- b) we take part in consultations (our policy lead regularly checks the Government's consultation listings and we are also regularly approached to contribute to invitation-only consultations, including by the DWP); and
- c) some individual departments that are or were based within DWP keep in touch and welcome feedback and insights outside of consultation periods (such as the Work and Health Unit, the Disability Confident team, and the Access to Work team).

2.2 We are a core member of a stakeholder group related to **Disability Confident** and which is aiming to work with DWP, the Disability Confident Business Leaders' Group and the Disability Charities Consortium to create an online information and resource portal for organisations signed up to the Disability Confident scheme. This is an ongoing group, and there is no method for collecting feedback in depth from individual organisations on a specific issue within this group (to the same depth and quality of written evidence and one to one engagement).

2.3 We see engaging with DWP and other Government departments as a hugely helpful **positive**, for us as an advice and support information as well as businesses and DWP itself. Business Disability Forum was founded in 1991 to be a link between business, disabled people, and Government. We regularly work with our over three hundred member businesses on employment and consumer and services projects and issues, as well as collecting insight from their disabled employees. We can therefore gather both breadth and depth insights on a wide range of disability-related topics for Government to aid policy development relatively easily. In addition, our member businesses are keen to engage with Government, particularly on initiatives based within Government that are used by employers, such as Access to Work and Disability Confident. Members have told us that it is very helpful to have good communication between Business Disability Forum, businesses, and Government so that they can be kept up to date when changes to such initiatives happen. If we have better contact and engagement with DWP, we can promote policies and initiatives with businesses and support businesses to implement them effectively in their organisations as well as feeding back to DWP on what works for business in terms of practical implementation of policy – and what doesn't.

2.4 The process of taking part in a consultation is generally **accessible** to our policy team currently in post. However, consultation documents hosted on the gov.uk site are not always accessible to others. Business Disability Forum have on occasions had to translate a consultation document from the gov.uk into an accessible format for a member. Our members have also commented to us on the wider 'accessibility' of government consultations; that they are often "very long", and their topics are wide ranging. The latter is not necessarily an issue in itself, but it means it often needs more than one role or area of the business to be involved to give feedback for that organisation. This led several of our members to comment that if we (Business Disability Forum) had not "digested" the consultation and respond on their behalf, they would not have engaged with the consultation at all.

2.5 Policy areas within DWP have requested to speak to Business Disability Forum's CEO and Head of Policy on some specific issues and we are always very keen to engage in this way. In some cases, this has led us to build collaborative working relationships on an issue with those departments, which has worked well.

2.6 While we understand engagement with us does not always mean that our perspective will directly filter into policy change, there has not always been **feedback** from departments when we have presented information or evidence and this would be helpful in informing our future responses and engagement.

### 3. The benefits of engaging

3.1 Engagement with Government is central to our mission and existence; we seek to represent the voice of business and disabled people. Through Business Disability Forum, Government departments have access to the voices and experiences of many business areas within over three hundred businesses. The benefits to our members of us engaging with DWP are that they get their perspective represented to the departments who can make a difference to the efficiency of the policies and legislations that they have to operate within.

3.2 Feedback on improvements and changes DWP has made, or has chosen not to make, as a result of engaging with stakeholders is something we feel could be improved. Unless we have personal engagement with an individual within DWP (and/or other Government departments) it can be unclear what has happened (a) as a result of the information evidence we specifically gave, and (b) what a policy area decided on an issue we have been working on or that our members are concerned about. Our members often ask if DWP got back to us after we have engaged with them and it would be helpful for us to be able to show the impact that their feedback and evidence has had – even if that is to tell us that it has been considered but not taken forward and the reasons why.

### 4. Engaging with DWP in the future

4.1 The **positives of engaging** with DWP have been immense for us and for our members. As above, engagement with some policy areas has led to some strong working relationships and interesting, effective debates between us and the department. It has also sometimes led us to go away and think about a topic in a different way and 'test' it with our members. Gathering feedback from our members also enables us to offer an evidence base to DWP for their work.

4.2 As above, we do not see 'negatives' of engaging with DWP per se. There are, however, **challenges**. The timing of Government consultations across departments often do not 'sync' with one another (we are hoping a cross government approach to disability will change this). This means that there have been sometimes three or four consultations going on, sometimes on similar topics but from different departments, at the same time. This puts immense pressure on smaller organisations, where policy teams are very small (and where, as above, policy may not be the only remit of the postholder).

4.3 In addition, the method in which departments engage differ. For example, some call for written evidence and others rely on stakeholder engagement groups. This has led to occasions where two consultation groups for different policy areas happen on the same day. Where organisations do not have more than one person to attend such groups, the organisation has to choose. There was an occasion where a group we were not able to attend (and had notified them in advance of this) commented within the meeting – in front of other stakeholders - that we “had not engaged”, even though we had provided written information. Engagement must therefore include a range of methods to get the best from those it wishes to engage with alongside an understanding, as above, that for many organisations the policy function is very small and capacity very stretched.

4.4 Regular **stakeholder group meetings** are generally a few hours long, begin late in the morning, and require travel either side of the meeting start and finish times. For small organisations where there might be one policy post with other responsibilities, it is not feasible to spend almost a whole day out of the office. We find engagement reliant exclusively on this method more difficult to take part in.

4.5 Business Disability Forum will however **continue to engage** with DWP and other departments whenever we can.

## 5. How the process could be improved

5.1 Generally, although a lot of work for a small organisation such as Business Disability Forum, the process of contributing a **written submission** and being invited to a department to speak afterwards if something in our submission is of particularly interest for further exploration works very well.

5.2 Regarding written evidence, receiving a **receipt** that our evidence has been received would be ideal. Sometimes we have submitted evidence and never heard anything again; it is unclear if the department ever received what we sent.

5.3 It would also be ideal to hear back after the consultation (written or other) **what was decided and why**. This is for our own information, and so that organisations (and the public) stay informed, but it is also almost always asked for by our members; businesses are keen to know that Government is listening to their experiences.

## 6. Engagement with other public sector organisations

6.1 We often submit evidence to Select Committee and independent inquiries. The **process for submitting evidence to a select committee** is generally as follows:

- a) We see a call for evidence, or we are invited to take part in a ‘targeted’ call with a defined Terms of Reference.
- b) There is then a submission period. For targeted calls, we sometimes have around a fortnight to submit; for ‘open’ calls, often a couple of months.
- c) We submit our evidence in a Word document via an online portal, and we are then emailed a receipt advising of next steps.

- d) All submissions are published online for anyone to access. As soon as our submission is published on the Committee's website, we are sent an email with a link to the publications related to the inquiry.
- e) If we are called to be a witness or give evidence in person at a hearing, we will be contacted.
- f) After the inquiry ends and the report is written, we are contacted to thank us for our contribution and to advise as the report is now online (and the link is provided).

6.2 This process works well, and we feel as though we are being kept informed at each key stage the inquiry. Publishing other individuals' and organisations' submissions is also very helpful for us to see as well as for others' research purposes. It also enables greater transparency of the data gathering process.

6.3 We would like to see DWP's written engagement reflect this process. It is a process that is well communicated, everything is kept for reference on the consultation site for us to refer to as we work on our submission, and decisions of the outcomes are made available.

## 7. Future engagement with DWP

7.1. The **topics** we would like to see DWP engage with us on more are **Access to Work** and **Disability Confident**. We have had good operational engagement with these areas in the past.

7.2 However, when staff turnover naturally occurs, we are not often given a new contact. Engagement with Disability Confident and Access to Work has worked well when we have a named contact in these teams, because we often get many questions from our members who are using both of these in their businesses, and they feel 'out of touch' with changes that happen in these areas. If we are kept updated on changes before they happen, we can prepare employers and advise them accordingly and help promote DWP's work to our members and also then provide a feedback loop to DWP on how new policies and procedures are working in practice.

7.3 Our members say there is not enough communication between Access to Work and Disability Confident with them directly. For example, many – particularly working in larger organisations where they employ a high number of Access to Work claimants - have commented that they would like their HR teams to have a named contact within these areas.

7.4 We would also like to see DWP **conduct its own review of how both Access to Work and Disability Confident are working** for a wide range of businesses and across different sectors. Although there was an inquiry in 2017-18 on the Access to Work support cap, led by the Work and Pensions Committee, we feel it is important for DWP to lead its own review and engage with employers and employees directly (which we can help facilitate).

7.5 Our members consist of three hundred businesses, and their employees account for around twenty per cent of the UK's working population. We could therefore **add value** to

DWP in several ways. Our policy and advice teams specialise in disability, health and work related case management and can facilitate depth and insight work, inform policies with what our advice and research team are hearing (such as what businesses are currently finding a challenge), and ‘test’ policy ideas with either a wide range of businesses or a specific sector.

#### 7.6 There are many ways for **DWP to most effectively engage with us:**

- a) Continue via one to one work and meetings within various policy areas.
- b) Contribute via submissions to consultations and to present the strategic findings to DWP in person.
- c) We would also welcome an ongoing informal (and if preferred and as appropriate, confidential) dialogue with a named key contact to help DWP policy and process. This is something we have done with one policy area and that has worked well. In the past when we have engaged in initial conversations with DWP on a topic that we have a lot of knowledge on (for example, data monitoring) and then the conversations stop, the next we hear is that a fully formed policy on this area has been produced. This is frustrating as we know that with some earlier input we could have helped create a better product and outcomes.

7.7 In terms of our **minimum expectations of who DWP should consult, and how that should take place, to provide reassurance that decisions taken by the department are well informed**, we would recommend that different the organisations and individuals DWP and other departments engage with should be decided **based on the topic** under consideration. We do not think consulting a structured, pre-existing stakeholder group(s) always constitutes effective engagement on a topic. For example, different organisations might may be more insightful on welfare reform and others on occupational health. This would mean researching who (individuals or organisations) are currently working on a specific topic, but it would likely lead to a more informative and insightful engagement exercise.

7.8 In addition, a written summary of evidence and issues considered which is (a) publicly available on gov.uk and (b) sent directly to those involved in contributing to that topic would help many understand their role in DWP’s conclusions and decisions.

## 8 Contact for further information

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