

# Natspec response to Disability Action Plan 2023 to 2024 consultation

## Summary

Natspec welcomes the Disability Unit's aim to identify and take actions which will improve the lives of disabled people within the next year, alongside a longer-term strategy. While all the Unit's proposals have merit, they are rather piece-meal and do not address some of the most pressing issues for disabled people, including the impact of the cost-of-living crisis, social exclusion, and the disability employment gap.

We are calling on the Disability Unit to ensure that they consider the needs of and potential impact of government policies on disabled people at different ages and life stages, and with different needs. In particular, we are challenging them to put a focus on young disabled people and people with learning disabilities, groups often over-looked in disability policy making.

As an organisation concerned with the further education and training of young people with learning difficulties and/or disabilities we have focused our response on those questions which are most relevant to this group.

## Responses to individual questions submitted via an online survey

### **Question 3: To what extent do you agree with the proposed plan to increase disability inclusion in emergency planning and resilience work?**

Strongly agree

Natspec's experience of recent government guidance in response to emergency situations, including the Covid pandemic, was that it was often not inclusive of disabled students or meaningful to colleges working with them. Recent guidance for schools on responding to security situations being prepared by DfE, when reviewed at draft stage, was similarly uninclusive of disabled children (for example, providing no alternative guidance to Run, Hide, Tell for children using wheelchairs or to use of silent communication by teachers for children with sensory impairment.)

Covid guidance also revealed a lack of join-up between government departments, with advice from DHSC and CQC sometimes conflicting with that issued from DfE, which resulted in confusion in settings which are both FE colleges and registered care homes.

DfE guidance on RAAC in educational settings was also slow to reach the specialist FE sector, where the young people with the most complex SEND are educated, suggesting that government is not always thinking beyond mainstream settings and the needs of non-disabled children and young people in its first response to emergencies.

While we thoroughly support the proposal to work with disabled people's organisations (DPOs), we recommend that government also consults with other organisations supporting and advocating for disabled people to help understand the potential impact of policy or guidance on disabled people. We also recommend that government considers the impact of emergency planning and resilience work on disabled people of all ages, including children and young people.

**Question 5: To what extent do you agree that the Disability Enabled Badge scheme would give increased confidence to disabled customers when accessing businesses or services?**

Somewhat agree

We support the aim of making businesses and services more accessible to disabled people and agree that better informed personnel will help achieve this. However, government will need to ensure that the scheme is not tokenistic. The training offered must be of high quality. It should promote the social (rather than medical) model of disability and build understanding of disabled people as a diverse group of individuals with different needs and preferences which may vary at different ages and life stages. Disabled people should be involved in the design and delivery of the training. In determining which external providers are approved to provide the training, government should take care not to exclude high-quality local providers who already offer a valuable service in favour of large national providers.

**Question 6: To what extent do you agree with the proposal to explore hosting the Special Olympics Summer Games in Great Britain as a way of the government meeting its aim to raise awareness of learning disabilities, drive greater grassroots participation and celebrate the wider world of human talents and potential?**

**Strongly agree**

Hosting the Special Olympics would certainly help raise awareness of people with learning disabilities and open the eyes of the general public to their talents – provided the mainstream media gives the games sufficient coverage. Government should make it an explicit aim of hosting the Special Olympics that there is a long-lasting legacy of increased inclusion of people with learning disabilities by sports organisations and a wider range of accessible sporting facilities and opportunities – not just increased participation. Government should also be seeking to promote inclusion of people with learning disabilities in their communities at a broader level, using sport as an example that be replicated across other facets of society.

Hosting the Special Olympics would need to be just one in a range of government strategies intended to help people with learning disabilities to reach their full potential. For example, much more work is needed on increasing employment levels for people with learning disabilities; this is the group most adversely affected by the disability employment gap and for whom employment levels in recent years have actually been falling. According to the government's own latest figures, just 4.8% of adults with a learning disability and autism known to adult social care are in paid employment.

**Question 8: To what extent do you agree that access to assistive technology would be improved by better-informed advice from public sector staff?**

Strongly agree

The government can only support and advise disabled people to access assistive technology (AT) if it has up-to-date knowledge of the field itself. The field of AT is incredibly wide and varied and policy makers and public sector delivery staff must therefore continually update their knowledge by maintaining partnerships with sector delivery bodies and researchers. Training needs to extend beyond Microsoft's Accessibility Fundamentals programme, which has a focus on Microsoft's own software. Google and Apple systems are also utilised heavily in education and employment.

Built-in accessibility features in phones and computers will meet many needs but require integration with other hardware and software to be efficient and effective. Referral routes are therefore also important when disabled people may require more complex AT that involves specialist setup and support.

A senior assistive technology champion within government would be welcome but they must be supported by AT champions within government departments and teams so knowledge can be shared more widely. Natspec TechAbility's Champions scheme for education and care professionals has shown that peer-level advice and support have significant impact above and beyond training. This practice ties in with Rogers' Diffusion of Innovations theory research.

Development of a centralised resource to enable discovery of AT would support individuals to find the solutions for their particular needs. Some of the 31% of disabled people who do not have the AT products they need to participate in daily life are likely to be unaware of the AT that could be useful to them. Any centralised resource needs to enable discovery without prior knowledge; an artificial intelligence (AI) tool might usefully aid this. Disabled people with and without prior knowledge of AT should be involved in developing such a tool.

**Question 9: To what extent do you agree with each of the following proposed areas of focus for a cross-government task force with the aim of maximising disabled children's wellbeing and opportunities**

- **Transitions to adulthood**
- **Accessibility of public spaces and transport**
- **Bullying, personal safety and impact on wellbeing**
- **Earlier identification of need and support for families?**

Somewhat agree

Natspec would recommend that the taskforce is expanded to cover children *and* young people up to the age of 25. This would be consistent with the 0-25 special educational needs and disability (SEND) system and government's own SEND and alternative provision improvement plan. The taskforce should include a specific focus on the changing needs of children and young people at different ages and life stages. For example, for young people, work on bullying and personal safety needs to address vulnerabilities to exploitation including radicalisation, sexual, financial, such as mate crime and cuckooing, and gang involvement.

While we support accessibility of public spaces and transport as a focus, we would recommend a broadening this beyond primarily physical access to include wider community participation. Work should be done to consider how children and young people can feel more welcome in their own communities and enabled to develop into active, contributing citizens and not just service or facility users. This would also help combat loneliness - one of the key concerns identified by disabled people in a recent survey by Sense.

We would urge government to enable disabled people who are eligible for a travel/bus pass as part of the English National Concessionary Scheme to use this pass when travelling before 9.30am. This will enable them to use the discounted travel to get to college or to the workplace. Applying the same restrictions around the use of the pass to disabled people as to people of retirement age suggests an assumption that disabled people are not needing to travel for work. This is entirely untrue; transport costs are just one of the many barriers faced by disabled employees and job-seekers. Natspec's Student Parliament has previously raised this issue with Grant Shapps when he was minister for transport but sadly they did not receive a response.

**Question 11: To what extent do you agree with the Disability Unit's proposal to broaden their approach to evidence and evaluation so that it includes a focus on the experiences of disabled people and the way in which policies impact their lives?**

**Strongly agree**

Natspec advises that the Disability Unit does not undervalue qualitative data and that it seeks to gain feedback from a wide range of disabled people at different ages and stages of their lives, from different socio-economic groups, and with a variety of different primary needs. We would particularly ask that research includes young disabled people and those with learning disabilities and that research methods promote the inclusion of those who are not able to respond to surveys or take part in focus groups. In essence, we would warn the DU against presuming that disabled people speak with a single voice or all share the same concerns.

**Question 12: To what extent do you agree that the Disability Unit should focus some of its evidence and insight work on anticipating future challenges for disabled people, rather than focusing solely on further exploring known needs?**

**Strongly agree**

Natspec advises that the Disability Unit should talk to children and young people to help gain this insight. They should be asking them what their primary concerns are for the future and where they see inequalities opening up between themselves and their non-disabled peers.

**Question 13: What do you think of the plans and suggested areas of action described in this consultation as a whole? Are these the right things for the government to be focusing on over the next year?**

While all the proposals have merit and the potential to improve the lives of disabled people, they make for a slightly strange mix of actions. There is no sense that some are of greater importance and therefore higher priority than others. Nor is there a sense that they fit into a more holistic vision of a society that is fully inclusive of disabled people or into a strategy to achieve that vision. Natspec would particularly like to stress the importance of ensuring that disabled young people and people with learning disabilities are fully factored into the Disability Unit's work. Too often these two groups are overlooked in government strategies on disability.

The title of the consultation document refers to 'actions for 2023/24'. However, we are already in autumn 2023 and still at consultation stage. Consequently, most of the actions will need to be completed in 2024, a year in which activity will be curtailed by preparations for a general election. There is likely to be a very short window in which the DU will be able to act. We would therefore recommend that it prioritises those actions which will have most impact for disabled people *and* which can be delivered in this timeframe, and that it seeks cross-party agreement on other actions which will need to extend into the next parliament. Otherwise, we risk a set of false starts, raising the hopes of disabled people only to let them down.

**Q14. What alternative actions might the government consider that would make a positive difference to the lives of disabled people?**

The most surprising omissions from this plan are actions to

- help disabled people manage the impact of the cost-of-living crisis
- combat loneliness and social exclusion
- decrease the disability employment gap.

The first of these is the most acute issue for disabled people right now but is entirely overlooked. There are various opportunities within the suggested actions to address the second issue but there is a risk they may be lost unless the Disability Unit makes social inclusion a specific aim. Despite being one of the most persistent inequalities that disabled people face, there are no actions to tackle the disability employment gap.

Other respondents will be better placed to make specific recommendations on the first two of these. In relation to the third area, as an organisation concerned with the education and training of young people with learning difficulties and/or disabilities, Natspec would like to see greater join up between the DfE and DWP in helping disabled education leavers to secure paid employment. Young people with the capability to work, but no job secured, describe themselves as 'dropping off a cliff edge' when they leave college, with little or no access to support to help them maintain their employability skills or to find work. Eligibility for DWP schemes needs to start in the term before the young person leaves school or college and certainly should not require them to have experienced a period of unemployment before they can access it. DWP staff need training in supported employment practices and to have qualified job coaches on their teams. DfE research shows that just 25% of young people who move into paid work after completing a supported internship are still in work a year later. DWP should provide a dedicated funding stream for ongoing support to young disabled people who move straight into work from education, and to their employers, to help the young people sustain employment and progress their careers.

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