

# CIOB Response to the Disability Workforce Reporting Consultation

## Overview

CIOB responded to the [Disability Workforce Reporting](#) consultation through their web survey. Through this consultation, the Cabinet Office's Disability Unit is exploring how best to increase transparency and reporting practices that support the cultural changes required to build a more inclusive society.

## Part 1: Employee demographics

Whose views are you representing in this response?

### **For employee representative organisations or networks**

#### **1. What type of organisations or networks does your response represent?**

- Professional body representing construction professionals

#### **2. Whose views does your organisation or network represent?**

- Organisation view with public interest remit

#### **3. How many members does your organisation or network represent?**

- More than 1,000

#### **4. Where does your organisation or network operate?**

- International (UK and other countries)

#### **5. What sector is the organisation or network in?**

- Construction

#### **6. What is your role in the organisation?**

- Policy & Public Affairs professional

## Part 2: Employer perspectives

We welcome contributions from all employers and employer representative organisations and networks in this section. We are particularly interested in hearing from large employers (over 250 staff) and business representative groups.

There is a duty on public authorities to consider how their policies and decisions affect people who are protected under the Equality Act 2010. In responding to this

consultation, please highlight any equalities impacts across protected characteristics in your answers.

#### Section A: Understanding the current landscape

We want to understand how and what information is currently collected by employers on disability in the workforce, the impact to business, and the behaviours it causes.

#### **7. Does your organisation currently collect information on the proportion of disabled people in your workforce?**

- This is not relevant as I am answering as a representative organisation

#### Section B: Benefits and barriers to disability workforce reporting

This section seeks to better understand perceived benefits and risks involved in disability workforce reporting, both voluntary and mandatory.

Please explain and provide evidence for your answers where possible.

#### **8. Do you think that greater transparency on disability in the workforce leads to more inclusive practices?**

- I strongly agree that they should.

**Please explain and provide evidence where possible.**

Publishing company data or being more transparent on disability in the workforce is an opportunity for companies to celebrate success, renew focus, evaluate strategies on areas they can improve on and implement new strategies to address gaps in inclusion practices.

#### **9. Do you think that disability workforce reporting by large employers (250 or more employees) should be voluntary or mandatory?**

- Mandatory.

#### **10. What do you think the main benefits of a voluntary approach to disability workforce reporting are?**

Companies who are transparent and choose to report on their workforce can be a motivational tool, engendering pride among the workforce that progress is being made as well as the drive to achieve more. It is also a recruiting tool as people who are disabled, or from underrepresented groups, will be more attracted to companies who can demonstrate their commitment to diversity and inclusion, and their willingness to have that commitment held up to scrutiny.

**11. What do you think the main risks are?**

Not all companies will want to commit to producing this data which could be down to time constraints, current systems in place and unwillingness to be held up to scrutiny on new practices. With voluntary schemes we do not see large take-up from businesses if there is no incentive to do so.

**12. The research available indicates low uptake of the disability voluntary reporting framework. How could voluntary reporting be increased?**

We recognise that Government have previously produced a disability, mental health and wellbeing voluntary framework for large organisations to record and report information on. The Health and Wellbeing at work 2021 report by CIPD showed that awareness of the framework remains limited with just over a fifth (21%) of respondents stating that they were aware.

To increase awareness of the framework, Government should look to undertake a raising awareness campaign for all sectors who work in both the private and public sector.

To increase uptake of the voluntary framework, incentivisation for reporting on workforce data should be explored by Government. Currently, the framework incorporates mental health and wellbeing reporting in addition to disability. Therefore, there needs to be clear guidance for businesses of all sizes and different sectors to easily undertake voluntary workforce reporting.

**13. What do you think the main benefits of a mandatory approach to disability workforce reporting are?**

All businesses will be required to collect data on their workforce and so better aggregate data will be available for understanding how businesses are using inclusion policies for their workforce. Additionally, not all employers will voluntarily collect data on disability workforce and the gender pay gap reporting has proven more successful since it has been made mandatory than previously when it was voluntarily.

Mandatory reporting could go a long way to helping businesses provide a safer working environment which is critical for those working in the construction and wider built environment sector. Those working in construction undertake risky work on-site and with there being a 'macho' culture where people do not like to share weaknesses those who have hidden disabilities could feel embarrassed or concerned about reporting and having work adapted. By making it mandatory this will help to create a culture change within this sector to be more open and to be provided with the necessary adjustments to undertake work in a safe and controlled environment.

**14. What do you think the main risks are?**

Mandatory reporting is often seen as legal compliance for businesses and so it does not gain buy-in from companies to adopt practices that could improve inclusion of the workforce. Before reporting takes place, it would be useful for employers to actively demonstrate a commitment to improving disability inclusion at work – moving away from a sole focus on data collection and meeting legal obligations. As mentioned previously, incentivisation can help businesses want to implement policies and demonstrate change.

**15. What do you think the main benefits of publishing disability workforce information are?**

It is an opportunity to celebrate success, renew focus, evaluate strategies and make new ones to address gaps in inclusion policies. It holds businesses accountable and collecting data to build an accurate picture of their workforce can help with both recruitment and retention. Companies publish their workforce data can be a motivational tool, engendering pride among the workforce that progress is being made as well as the drive to achieve more.

There are other actions that employers can take to promote disability equality and inclusion. Although data is a part of understanding gaps in policies and areas to improve on, employers must feel empowered to undertake change in their business practices through taking practical steps like the use of inclusive language in training, reviewing HR practices, listening to disabled staff and having reasonable adjustments disability passports.

**16. What do you think the main risks are?**

It is important to learn from any issues mandatory reporting on the gender pay gap. However, we cannot see any risks for publishing disability workforce information.

Section C: Considerations if mandatory disability workforce reporting were to be implemented

This section explores issues requiring careful consideration if disability workforce reporting were to be made mandatory through legislation. The information you provide here will be considered in the broader context of answers to sections A and B, where you were asked to set out the benefits and risks of voluntary and mandatory reporting processes.

**17. 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?**

- Other.

**Please explain your answer.**

To understand the extent of the problem of disability discrimination it is necessary to have accurate data over the forthcoming years to monitor progress. Employers who are successful at promoting disability equality will be able to share their inclusive practices for the benefit of all.

**18. What, if any, statistic could be reported alongside or instead of the proportion of employees identifying as disabled? Please explain.**

When we talk about disability many assume physical disabilities but forget that neurodiverse conditions are classified as disabled. There must be clarification or separation between physical and neurological disabilities so that data collected on employees for disability is accurate.

**19. Do you agree or disagree that large employers (250 or more employees) should use a standardised approach to collect disability workforce data if reporting became mandatory?**

- Strongly agree.

**Please explain your answer.**

All data should be standardised as much as possible so that we can apply to the general population and compare between industries.

**20. 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.**

Government must set-out clear and consistent guidance and processes for reporting. Large employers have had to adapt to new processes such as the gender pay gap and so should already have tools in place to collect workforce data.

**21. 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?**

- Central Government.

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

Yes. If we look at the move towards mandatory reporting on the gender pay gap, we can see how successful that has been in most cases for creating business change. Companies should be required to post to a central Government website on an annual basis.

**23. If published, who do you think should publish this information?**

- Central Government.

Section D: Alternative approaches

Mandatory workforce reporting is one means to increase transparency on disability in the workforce, with the aim to improve information and achieve more inclusive practices. We are interested to hear your views on other initiatives that might have the same outcomes.

**24. What alternative approaches would you suggest to increase transparency, inclusion and employment of disabled people in the workplace? If you have any evidence to support this suggestion, please provide it.**

The Chartered Institute of Building (CIOB) have produced a Diversity and Inclusion in Construction charter for competitive advantage and enhanced employee belonging. Outlining 5 steps businesses can undertake to becoming a more diverse and inclusive employer. The steps include showing leadership, making a plan, shape a culture, being transparent and being accountable. CIOB believe that having resources like the charter can be an asset for industries like the construction industry where they can commit to the charter and start on their journey to gather data to understand their workforce, identify gaps in their policies and become more accountable and transparent on their progress.

To make it business priority to implement policies across all the under-represented groups central Government should consider introducing measures in their public procurement that requires employers to sign-up to sector-led Charters.