**The National Disability Strategy - Where are the new promises and monies?**

**Philip Connolly for the Disability Resilience Network**

August 2021

Analysis of part 1

Historic barriers – author’s response

Deaf people allowed to serve on juries previously announced 9th march 2021

Help for disabled people to vote – arguably not an issue as local authorities such as Bradford have permitted their social workers to assist.

More disabled magistrates – previously announced 18/03/21

Enable Fund to support disabled candidates – previously announced 13th December 2018

Cabinet office to create a new website – when?

**Government Campaigns – author’s response**

Cabinet Office sponsored disability awareness campaign – new?

DHSC campaign for a better understanding of autism – previously announced on 8/03/21

**Access to Justice**

MoJ Intermediaries review – previously announced 8th January 2021

MoJ Code for witnesses and victims – previously announced 1st April 2021

MoJ neurodiversity training kit – already exists e.g. Jude Morrow, GMB, Adjust Services etc though arguably not in the context of the judiciary

Home Office strategy due in autumn 2021 – previously announced

CPS stakeholder panel – new though advocate panels currently exist

Review of abuse of adult disabled people in their own homes – new

**Housing**

* boost the supply of housing for disabled people by raising accessibility standards for new homes, increasing the supply of affordable homes, including supported housing, and accelerating the adaptation of existing homes by improving the efficiency of local authority delivery of the Disabled Facilities Grant, worth £573 million in 2021 to 2022

Previously consulted upon between 8/9/20 and 1st of December 2020

Disability Facilities Grant - previously announced in the allocation statement of 10th March 2020

Teresa May when Prime Minister previously announced on June 25th 2019 measures to favour Part M Volume 1 category 2 accessible housing

* extend disabled tenants’ rights on accessibility – new but unspecified
* ensure the safety of disabled people in buildings, for when there are emergencies – new building safety bill may make general provisions that also specify disabled people’s needs

MCHLG will confirm plans by December 2021 – previously announced

MCHLG have committed that 10% of the 180,000 unit affordable home programme will be supported housing.

The current requirement for strategic bids in the 2021-2026 programme is already to build a minimum of 10% supported housing as part of the funding criteria attached to these programmes.

DHSC, working with MHCLG, will invest £71 million in the CASSH Fund in the financial year 2021 to 2022.

This is welcome news but does not replace the need for housing to be both adaptable and accessible; it was previously announced on the 2nd August 2018.

MHCLG will make the new Shared Ownership model, including the reduced (10%) minimum initial stake, available to disabled people buying a home under the HOLD scheme.

Residents living in the new rented homes funded by the Affordable Homes Programme 2021-26 will also have the Right to Shared Ownership.

Are these last two statements new policy or the restatement of existing rights?

The Cabinet Office will progress work to require landlords to make reasonable adjustments to the common parts of leasehold and common hold homes. A consultation is planned for 2021.

**Transport**

We will take further steps to:

* tackle persistent accessibility issues across the transport network, including rail, buses, taxis and roads
* enable disabled people to travel with confidence by addressing staff training, information and the attitudes and behaviours of others

These statements are not new policy – previously announced in the Inclusive Transport Strategy of 2018

DfT will conduct a network-wide accessibility audit of station facilities at all 2565 mainline railway stations in Great Britain to inform future investment decisions.

This commitment dates back to 2003 “Making the connections: Final Report of the Transport and social Exclusion: SEU

DfT will consult on an update to the Design Standards for Accessible Stations, this year (2021). – New but no date for completion given

DfT will work with Network Rail to develop proposals for the accelerated upgrade of rail station platforms with tactile paving. – new but no completion date given

DfT innovation projects for communication – no dates or stated funds

DfT will invest a further £1.5 million during 2021. This funding will be available to bus operators across Great Britain. – Previously announced on 21/09/20

DfT will take forward legislation during the current Parliament to strengthen the law on the carriage of disabled people in taxis and PHVs across Great Britain. New?

DfT will provide up to £1 million to improve the accessibility of lifeline seaports on the Isle of Wight and the Isles of Scilly for disabled people, with ports invited to apply for funding for improvements in the financial year 2021 to 2022. New?

DfT has consulted on options to help local authorities address the problem of pavement parking

**Jobs**

We are ambitious to go further. We will:

* set out proposals to improve support for disabled people to start or stay in work
* create an Access to Work Adjustments Passport to support disabled people with their transition into employment, including disabled students leaving education
* encourage employers to recruit, retain and progress their disabled employees and to create inclusive workplaces by reviewing Disability Confident, promoting the Voluntary Reporting Framework and consulting on taking this further, and disseminating best practice to employers
* scale up supported employment services
* strengthen rights in the workplace, encouraging flexible working and introducing carers leave, and improving access to advice on employment rights for disabled people and employers
* explore with disabled people what extra help would be most useful for those wishing to start a business
* champion opportunities for disabled people in the Civil Service and ensure the support to thrive at work
* create more opportunities for disabled people to serve in the armed forces and the agencies

Several of these proposals had already been announced and in some cases such as the passporting of support date back to the Government’s acceptance of the recommendations in the 2012 Sayce Review. The question remains do these proposals add up to the 200,000 shortfall on the employment target. These proposals do not include targets, completion dates or allocated funds.

Disability Confident

DWP will work with the Disability Confident Professional Advisers Group (PAG) and the Business Leaders Group this year to review and strengthen levels 2 and 3 of the scheme, to support employers to increase disabled people’s employment opportunities. The update will be completed by the end of the year.

There have been numerous previous reviews of disability confident.

In 2021, DWP will develop and test an improved information and advice offer for employers. There have been repeated attempts at this but the question is what are the new incentives.

This content will also be reviewed and updated in 2021 to ensure that it meets the needs of employers.

The Department for Business, Energy and Industrial Strategy (BEIS), working with the Advisory, Conciliation and Arbitration Service (Acas), has developed a new online advice hub. From July 2021, this appears to be a new and welcome emphasis.

**Employment support**

To reduce the chance of people being out of work in the long term, DWP will explore offering earlier and more intensive back-to-work support in Jobcentres for people before their work capability assessment (WCA). – explore?

From August 2021, to meet an anticipated rise in need for support as a result of COVID-19, DWP will increase places on IPES by 25%. This will help ensure that more disabled people and people with health conditions will be able to rapidly access appropriate tailored support. How many people is an 25% increase? The IPES was procured in March 2019 with a £40 million budget that was expected to find around 10,000 places so a 25% increase may represent about £10 million and 2500 places.

In 2021, Cabinet Office will consult on workforce reporting on disability for large employers, exploring voluntary and mandated workplace transparency, and publish a set of next steps. Arguably this maybe the most significant half measure in the national strategy.

DWP will fund an IPS local supported employment trailblazer, working with 20 local authorities, expected to begin in autumn 2021. There has previous announcements of trials of IPS. The Work Foundation wrote an evaluation of IPS for a pilot that ended in December 2014.

**Author’s response**

The central weakness in the “Disability Confident Scheme” is that it doesn’t require an employer to employ a disabled person. In addition it is not linked to any new incentives for employers. Each revision makes evaluation and comparison more difficult and leads to the need to reappraise the whole scheme to ensure consistency.

The BEIS contribution to the strategy is to apply the brakes though it needs to be said that the door may not have been closed to a progressive agenda. It appears to be the case that all future BEIS contributions are contingent upon further reviews.

BEIS is reviewing the statutory right to request flexible working.

We are committed, subject to consultation, to make flexible working the default, unless employers have good reasons not to.

BEIS will launch a consultation by the end of 2021 on making flexible working the default in Great Britain, unless employers have good reasons not to.

These moves represent a further half measure and are welcome.

BEIS will set out next steps in progressing the government’s commitment to introduce unpaid carers’ leave across Great Britain by the end of 2021.

BEIS will publish proposals by the end of 2021 to ensure that every disabled person who wants to start a business has the opportunity to do so

**Civil Service disability employment targets**

We will go further to support disabled civil servants to thrive at work.

All UK government departments will:

* encourage and support workplace disability networks, to talk about disability issues, change perceptions and encourage inclusive behaviour
* achieve and maintain the highest level of Disability Confident accreditation, alongside other major public bodies
* ensure responsive and timely support to meet workplace adjustment needs – this will include training leaders and managers and ensuring clear and accessible guidance is in place by early 2022
* develop and embed flexible working so that it helps disabled people to thrive and progress in their careers, works for all civil servants, and meets the needs of the Civil Service

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By September 2021, the Ministry of Defence (MOD) will publish a plan to bring more disabled people into the civilian workforce to meet its target of 15.3% by 2030. Civilians are civil servants working alongside military personnel, both in the UK and overseas on postings or operational deployments.

MI6 will strive to ensure that by 2025, 9% of the organisation is drawn from those identifying as disabled, both overall and at each grade.

Author’s response

There have been numerous previous reviews of the numbers of disabled civil servants.

There is no explanation of how many MoD civil servants that the increase to 15.3% or the increase to 9% in the case of MI6 represents?

These are welcome sound commitments to taking the opportunity of a staff salary budget that the MoD controls but the point that is missing is that all defence contracting is public money and its tenders could include the same disability employment targets on the wider defence industry. This logic also applies to construction, engineering, the nuclear industry, transport and many other sectors where the Government is the prime commissioner.

There are also welcome commitments to more disabled people featuring as reservists but there is no mention of money, numbers or what exactly the benefits are for disabled reservists.

**Education**

We will go further in the following ways:

* improve support for children and young people in England with special educational needs and disabilities (SEND) in the financial year 2021 to 2022, including: completing a wide-ranging review to improve outcomes, an extra £730 million the high needs revenue funding for children and young people with more complex needs, and an extra £300 million to improve existing school provision and accessibility
* boost professional development for those supporting children and young people with SEND
* support improvements to the supported internships programme
* increase the number of disabled people entering into apprenticeships and ensure that those who start an apprenticeship go on to thrive

**Author’s response**

**The £730 million was previously announced on the 6th September 2019.**

**The £300 million appears to be the money committed by Theresa May when Prime Minister to tackle mental health amongst pupils. The allocation of the funds was evaluated by School Week on line and found to be both scaled back and delayed. (See** [mental health: Is government fulfilling its £300m promises? (schoolsweek.co.uk)](https://schoolsweek.co.uk/is-the-government-fulfilling-its-300m-mental-health-promises/)

There have been regular and repeated efforts to boost the numbers of disabled apprentices. Prior to the present time the former skills minister Ann Milton launched the five cities pilot on the 1st of February 2018. The present shortfall is very likely linked to the pandemic.

DfE will consult on improvements to the SEND system through the SEND review.

The SEND Review will focus on improving support and preparing disabled children and young people for fulfilled adulthood. We want to:

* identify needs early and address them as soon as possible
* clarify the roles and responsibilities for all parties involved in the SEND system, across education, health and care, and with a clear offer in mainstream education
* provide faster, more streamlined access to Education, Health and Care Plans for those who need them

This is welcome news but without dates, new staff or benchmarking there is no way of knowing whether it is happening.

DfE is providing funding of up to £3.82 million in the 2021 to 2022 financial year to offer staff in schools and colleges continuing professional development, specifically in supporting children and young people with SEND.

DfE is contributing £9.3 million in the 2021 to 2022 financial year to fund the training of more educational psychologists, increasing the number of trainee educational psychologists each year to over 200.

DfE is providing funding of £8.6 million in financial year 2021 to 2022 to strengthen the participation of parents and young people in the SEND system, through ensuring that they have a voice in designing policies and services, and have access to high quality information, advice and support.

These measures were previously announced by DfE as part of a larger package of measures on the 11th of February 2021.

DfE will improve supported internships in England, including updating guidance, developing a self-assessment quality framework, and helping local authorities to develop local supported employment forums by March 2022. This was previously announced in DfE guidance on supported internships issued in June 2017.

DfE will evaluate the impact of this £237 million investment in traineeships on young people with SEND by July 2022.The process of evaluation dates back to research briefs commissioned in May 2011. The reference to £237 million investment is not possible to confirm and may relate to the budget for training and research of an institute of the United Nations. The figure of £111 million was given for tripling traineeships by the Chancellor Rishi Sunak in July 2020.

DfE will improve supported internships in England, including updating guidance, developing a self-assessment quality framework, and helping local authorities to develop local supported employment forums by March 2022. This appears to have been previously published by DfE in update guidance on 21st June 2017.

There are a series of four statements on apprenticeships but these do not declare policy positions or policy development. Their action verbs are strengthen, consider, take into account etc. These statements are not linked to budgets or new commitments.

The department will also consult on what else we can do to strengthen pathways to employment in England. Why is there no mention here of volunteering; is it because volunteering lies within the remit of DCMS and not DfE?

Shopping

We will:

* make high streets more accessible
* accelerate the delivery of Changing Places toilets in England
* explore a new assistive technology challenge
* explore how to improve the accessibility of private sector websites
* appoint more business leaders to promote accessibility in their sectors

BEIS and the Cabinet Office will set up an Extra Costs Taskforce, bringing together disabled people, regulators and businesses, to better understand the extra costs faced by disabled people, including how this breaks down for different impairments - by summer 2022.

Though we can all be pleased to see the charity Scope recognised for their excellent work, the danger must be that their work over several years will be simply replicated. The regulatory bodies have many of the duties and in some cases such as banking, insurance and communication have already been assessing how their disabled customers have been experiencing provision.

DfT will update the Inclusive Mobility guidance and Use of Tactile Paving Surfaces guidance in 2021, and guidance on designing streets for people (Manual for Streets) in 2022. A scoping study for updating g “Inclusive mobility” was published on 26th July 2018.

MHCLG will make £30 million available from summer 2021 to accelerate delivery of Changing Places toilets in existing buildings in England. This was previously announced by MCHLG in a media release on the 4th march 2021.

DfT will extend its Changing Places programme by making a further £450,000 available for Changing Places toilets to support disabled people using the wider transport network, on top of the £2.2 million already invested at motorway service stations in England. Whilst naturally this is welcome news it does need to be understood that the typical modular unit and installation cost is about £62.000 without VAT so this welcome sum would pay for six toilets.

BEIS will challenge UKRI and other research stakeholders to use future innovation challenges to accelerate innovation in assistive technologies.

The Department for Digital, Culture, Media and Sport (DCMS) will build the evidence base about the nature and scale of the inaccessibility of private sector websites, and explore how the government can effectively intervene including possible legislative options, reporting back by spring 2022. The Government’s Central Digital and Data issued guidance on this on the 9th of May 2018.

Leisure, culture and tourism

We will:

* widen participation in arts, culture and sport
* make the UK the most accessible tourism destination in Europe
* improve access to paths
* make playgrounds more inclusive

Sport England will:

* invest £20m in the financial year 2021 to 2022 through its Tackling Inequalities Fund – this fund has successfully reached and impacted under-represented groups, and includes a specific focus on disabled people
* find new ways to address inequalities in physical activity levels between disabled and non-disabled people, in partnership with the Design Council by March 2022
* develop and pilot a new training programme to better enable social workers to promote physical activity to disabled people in 2022

This welcome announcement was previously made on the 10th of September 2020 by Sport England.

DCMS will:

* work with VisitBritain and VisitEngland and other stakeholders in the tourism sector to promote the importance of accessible tourism in the media and to businesses
* partner with the Inclusive Tourism Action Group and promote the National Accessible Scheme which rates tourist accommodation based on its suitability for guests with accessibility requirements
* hold a series of roundtables, hosted by the Minister for Sport and Tourism, with stakeholders across the tourism industry to better understand the barriers disabled people face as tourists

I don’t think this counts as policy welcome though it maybe.

The Department for Environment, Food and Rural Affairs (Defra) will:

* make the England Coast Path as easy to use as possible for disabled people – all stretches of the England Coast Path will be open or with establishment works underway by the end of 2021, unless there are ongoing planning or legal issues
* create a new north coast to coast National Trail from St Bees in Cumbria to Robin Hood’s Bay in Yorkshire by 2025
* improve access, signage and information on existing national paths and trails

These plans were previously announced, the path at St Bees opened in March 2021.

Arts Councils across the UK are working together with the British Film Institute to launch a free, UK-wide arts access card by March 2022.

This has been previously announced, there is already a model in existence used by 38,000 people.

Access to Benefits

DWP is also exploring options to reduce the frequency of repeat Work Capability Assessments (WCA) and Personal Independence Payment (PIP) assessments, to avoid assessments where a change of award is unlikely.

This policy dates back to an announcement by Damian Green when Secretary of State at DWP – 1st October 2016.

Access to health and social care

DHSC will work with disabled people and disability organisations at every stage of social care reform to ensure their voices are heard and needs reflected.

We are also modernising the Mental Health Act. We want to give people more control over their treatment and make sure they are treated with the dignity and respect they deserve.

Alongside these longer term reform efforts, DHSC will:

* strengthen the data and evidence base to support policies that will transform outcomes for disabled people, including improving our understanding of the needs of disabled people and those with multiple long-term conditions and disability
* ensure that health and social care staff understand learning disability and autism to reduce the health inequalities people with these conditions often face

None of this is new policy and indeed is already legally required in several instances e.g. consultation guidance.

Disability data and evidence

DHSC will establish a new disability data working group in 2021 to look at health and social care datasets and address priority areas where there are gaps in the data.

DHSC and NHSX published a draft data strategy for health and social care in 2021 to drive improvements in data on working age adults in receipt of care.

Autism

Subject to evaluation, DHSC will make training on autism and learning disability available for all 2.7 million health and adult social care staff.

This policy has previously been consulted upon with the consultation closing on 26th April. An easy read version was circulated in February 2019.

Digital accessibility

As part of a cross-government effort with the Central Digital and Data Office and the Crown Commercial Service, the Home Office will tackle this issue by:

* defining a cross-government accessibility profession – this will formalise the role of accessibility specialists and encourage more public sector organisations to properly resource to deliver accessible services
* building a pipeline of talent for the accessibility profession by using existing successful and emerging career development programmes to tackle the skills shortage – working across government to share learning
* improving how we buy digital products and services in government and across the public sector as a whole – for example, through more formal controls, support and training for commercial teams

We will also explore how we can drive improvements in public services through a Centre for Assistive and Accessible Technology. The Disability Unit will consider new ways to make assistive and accessible technology part of the everyday design of public services

This section may come to be its most important contribution to innovative and progressive policy making. I understand that £1 million has been allocated for this.

Overall comments

What is the narrative of this strategy and is there a narrative change?

There are 23 uses of the word consult, 12 of the word explore and 37 of the word review. Other words fared less well, decided 2 mentions, decision 4 mentions and implement four mentions. The social model is mentioned only twice, once in the context of language and once in the context of a commitment by the Welsh Government. There are seventeen mentions of rights but only two extensions of rights, one in respect of a right to flexible working and one in respect of a right to accessibility in housing. There is only one mention of enforcement in the context of the EHRC work. There is no mention of any new ideas or intellectual framework. There are five mentions of procurement, none of resilience and none of narrative change or modelling everyday disability. In summary the strategy offers an “ideas lite programme heavy” approach.

The emphasis on programmes to address gaps in achievement is welcome but risks our aspirations being subject to the commitment of other people and operational difficulties of the kind we have seen with the Government’s mental health mentoring scheme. The drawback of programmes is that it is a numbers game: how many will be referred, what will the average spend per client be? Who will be eligible and how will this be decided and worst of all who be contracted to deliver this and how much of the available money will they take to deliver. At every stage of that decision tree disabled people will lose out. The battles for provision will then be fought at arms length from the Cabinet Office. Over time few will be happy. In short we need to move away from traditionally designed programmes to mainstreaming provision. A transformative approach would both require this and fund it too. Consideration also needs to be given to how sustained progress is achieved especially through adopting behavioural change campaigns as opposed to public awareness campaigns. The strategy is largely a re-presentation of the past instead of a blueprint for connecting us to the future.

It is often unclear what the whole system approach is or the theory of change that links the issue identified to the solution offered and perhaps for this reason it doesn’t evaluate its own contribution to its own targets e.g. on employment.

Though this strategy is supposed to be cross cutting and involve all Government departments it omits the Treasury. This in itself may explain why I have only been able to identify 9 new promises from 122 made in the strategy. What is even worse there is no reference to the levelling up fund or the money that will replace what was formerly European Union funding. I have only been able to identify three significant new funds: 1) £10 million for 2500 new IPES places, 2) £450,000 for six new changing places toilets and 3) £1 million for the new centre on Assistive and accessible technology. This suggests that the Minister didn’t so much lose policy battles with the likes of BEIS but fail to have them with HMT. It is for these reasons I think he should resign. The sum of about £12 million does not go far in transforming the lives of the 200,000 the Minister says he targets to get into work and £10 million is allocated to the 2500 additional IPES placements. The Minister appears to have almost completely failed with regard to additional funding.

Lastly only we the disabled people can say whether the strategy is transformative and even then we may have to ask our disabled and non-disabled children. We need both transformative and generational change.