

Disability and Work Strategy - Public Consultation Questions

IMPORTANT

When responding to this questionnaire, please do not provide us with any personal information such as your name or anyone else's name.

About You

- 1 Are you responding as an individual, on behalf of an individual, or on behalf of an organisation?

REQUIRED

On behalf of an organisation

- 2a IF AN INDIVIDUAL OR ON BEHALF OF AN INDIVIDUAL

Are you or the individual...

TICK ALL THAT APPLY

A person who is disabled

A person who has a long-term health condition

A person with caring responsibilities for someone who is disabled or has a long-term health condition

None of the above

Prefer not to say

2b1 IF AN ORGANISATION

What is the name of your organisation?

REQUIRED

Royal College of Psychiatrists in Northern Ireland – which is the statutory body responsible for the supervision of the training & accreditation of Psychiatrists in the UK & for providing guidelines & advice regarding the treatment, care & prevention of mental & behavioural disorders. Among its principal aims are to improve the outcomes for those with mental illness & to improve the mental health of individuals, families & communities. The College has approximately 450 Members in Northern Ireland (including Doctors in training) who provide the backbone of the local Psychiatric service, offering acute & community treatment, as well as specialist care & consultation across a large range of settings. This response is submitted on behalf of the Devolved Council of the Royal College of Psychiatrists in NI.

2b2 What category best describes your organisation?

REQUIRED

TICK ONE BOX ONLY

Voluntary and Community Sector

Academia

Charity

Disability Organisation

Private Sector

Public Sector

Other (please state)

Professional Body

3 Strategy Scope

The Strategy is aimed at supporting people in Northern Ireland who are:

- Deaf or disabled, and/or
- have health conditions, and/or
- are neurodivergent.

...to prepare for work, obtain work, remain in work, and progress in work.

The Strategy's scope includes people from the above groups who are:

- of working age and not currently working, or
- already in work, or
- young people who are about to transition out of school, further education, or higher education.

3a To what extent do you agree with the scope of the Strategy?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not Answered

3b Please provide us with any comments you have on the scope of the Strategy.

This is confusing. The Strategy scope summarized above is different from that in the document at page 4. On pages 12 & 32 under the NI Executive Disability Strategy outcome 7 it refers to "Deaf and Disabled people..." However we cannot find this document to understand the context of deafness and disability it is referring to (the link needs to be added). Scope above refers to Deaf or Disabled. This needs to be clarified - maybe using the definition as quoted from the HM Government National Disability Strategy (2021).

The definition of long-term illness refers to the report "Living with Long term Conditions" a Policy Framework (2012) but there is very little reference to Mental Illness. Long term illness and disability are closely interrelated and this should be described in better detail in a document such as this - with more clearly specified disabilities related to Mental illness Disability, Learning Disability and Neurocognitive Disorders.

4 Guiding Principles

The Strategy is built upon six guiding principles which are:

- Ambitious and inclusive
- Person-centric
- Collaborative and joined-up
- Evidence driven
- Open, honest and transparent
- Flexible and responsive

4a To what extent do you agree with the guiding principles of the Strategy?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not Answered

4b Please provide us with any comments you have on the guiding principles of the Strategy.

We agree with these Guiding Principles. However, we have issues with how Evidence Driven has been applied to this Strategy.

Evidence Driven: This is interesting, but it groups all people with Disability together. We need more information on the types of disabilities people have, in order to ensure that there is no discrimination within this population of people. Also, how people with mental illness and learning disabilities are assisted in vocational rehabilitation will be different from each other and different from other groups of people with disabilities. There needs to be more disability specific research in this field and how good outcomes are obtained. There needs to be more granular information.

5 Overarching Outcome

The Strategy's overarching outcome is

- To increase the employment rate for disabled people to 50% by 31st March 2036.

We estimate that this would mean an additional 50,000 disabled people or people with health conditions in employment in Northern Ireland by March 2036.

5a To what extent do you agree with the overarching outcome of the Strategy?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not Answered

5b Please provide us with any comments you have on the overarching outcome of the Strategy.

We support this. It would be great to have a higher target, but this could be reviewed again in 5 years' time.

There should be more information on the different Disability groups . Disabled people should not be grouped together under the general statement of "Disabled". More granular information is essential to ensure proper monitoring of types of disabilities that people have who are benefiting from this Strategy and what does not work so well.

6 Sub-outcomes

The sub-outcomes for the Strategy are:

- To increase the disability employment rate for all age groups
- To increase the disability employment rate for males and females
- To increase the disability employment rate for people with different types of disability
- To reduce the disability pay gap
- To reduce levels of underemployment of disabled people
- To increase levels of self-employment for disabled people

6a To what extent do you agree with the sub-outcomes of the Strategy?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not Answered

6b Please provide us with any comments you have on the sub-outcomes of the Strategy.

We agree with this, but there needs to be more information describing the types of disabilities under each section.

7 Key Themes

The key themes of the Strategy are:

- Personalised Support
- Inclusive Skills, Careers and Educational Transitions
- Supporting and Enabling Employers
- Strategic and Structural Enablers

7a To what extent do you agree with the key themes of the Strategy?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not Answered

7b Please provide us with any comments you have on the key themes of the Strategy.

This should include moving from school into Apprenticeships/Further and Higher education as well as from there into work/careers.

There should be more specific background information on the types of disabilities which people have in each of these stages and how the four key Strategy Themes are tailored to meet their needs. More information and data specific to the types of disability are necessary.

There are many people who have more than one disability and this will require a major focus.

8 The Strategy's Actions

The proposed actions in the Strategy are summarized on pages xx to xx of the document under the themes of:

- Personalised Support
- Inclusive Skills, Careers, and Educational Transitions
- Supporting and Enabling Employers
- Strategic and Structural Enablers

8a Please provide any comments on these actions in the box below. In providing comments, please consider:

- Do the actions address the key areas of need for Disability and Work?
- Have you any particular comments related to any of the actions that you wish to provide?
- Are there any actions missing, and why do these need to be included?

PERSONALISED SUPPORT: There are changes being made to Benefits and people returning to work in England. The Green paper has recently been published on this. This should be consulted. When frontline staff are being trained to support people with a disability in their journey, they need to be trained in the specific types of disabilities that they will be helping people with. People with lived experience should be recruited into Health and Work adviser roles. We agree strongly on in-work support for clients and support for employers and staff in supervising roles.

INCLUSIVE SKILLS etc.: We support strongly the need to prepare young people with disabilities to transition through the education system and into employment or career/professional development. Specialised employment support needs to be developed around the nature of the disabilities - especially if the client has more than one disability. We endorse the involvement in Higher Education.

SUPPORTING EMPLOYERS: Issues 7 & 8 & 9 are very important for the success of vocational rehabilitation. Developing the skills within organisation staff to help people with disabilities should be a focus, so that the support becomes integrated rather than always provided externally. Awards for successful employers should be expanded.

STRATEGIC ENABLERS: We support the setting up of an Oversight Council. Shifting the focus to outcomes is welcome, but activity figures are also important - especially looking at the information and achievements of people with different types of specified disabilities.

9 The Disability and Work Council - Functions

A new Disability and Work Council will be established to support delivery of actions under the Strategy, and will report annually on progress against the Strategy's outcomes.

This Council will provide structures to bring partners together to co-ordinate, drive, support and monitor delivery. It will also provide a Forum for stakeholders to discuss disability and work issues, and better inform our approach; as well as enhancing engagement with stakeholders and disabled people.

- 9a To what extent do you agree with the creation of a new Disability and Work Council, and its proposed functions?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not Answered

- 9b Please provide us with any comments you have on the new Disability and Work Council, and its proposed functions.

We welcome this, but there needs to be adequate data available to the Council to support this work. Council members should include people with lived experience as well as professional and HSC organisations.

The proposed three oversight groups of the Council and the delivery partnerships page 89 are welcome.

10 Disability and Work Council – Partnership Working

The proposed Disability and Work Council will be jointly led by a senior civil servant from the Department for Communities and a disabled person.

It is proposed that across the structures of the Council, the following organizations will work in partnership to support the work of the Council:

- The Department for Communities
- The Department for the Economy
- The Department of Education
- The Department of Health
- Relevant public bodies (such as the Equality Commission)
- Local Councils
- Disabled people
- Organisations from the disability sector and wider voluntary and community sector
- Employers and their representative bodies
- Experts from academia and the research community

10a To what extent do you agree with the proposed representation across the Disability and Work Council structures?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not Answered

10b Please provide us with any comments you have on the new Disability and Work Council, and its proposed membership.

There would need to be more clear links described between the Delivery Partnership, which seems to consist mainly of Civil Service Departments with Higher and Further Education establishments, apprenticeship schemes and professional bodies.

More detail on how employers and employer bodies are to be included would be welcome.

Representatives from HSC and professional bodies should be included.

11 Any Other Comments on the Strategy

If you have any other comments on the Strategy, please enter them in the box below:

This is an important and very welcome Strategy. We have since been informed that the highlighted NI Executive Disability Strategy has not yet been published. This should have been stated in this Strategy. The Outcome 7 statement should have also been accompanied by some of the context for the Outcome. As stated above it makes it difficult reading to understand fully the focus of the scope of this document.

In chapter 3 there is a summary of a report commissioned by an independent company. While what is quoted is very useful, there should be a clearer breakdown on the types of disabilities and numbers of people in each group. This work needs to be done to enable the building up of what types of services and supports are needed, rather than referring to Disabled people as a group. One would not talk about services for “ill people” without describing the different types of illnesses and services needed.

For people with a Learning Disability, it is important that the outcome of this Consultation on Disability and Work aligns with the ambitions of the recently concluded Consultation on the Department of Health Learning Disability Service Model for NI (LDSM) “We Matter”.

There are multiple barriers to people with learning disabilities entering paid employment which needs to be addressed by the creation of cross-Departmental initiatives.

The LDSM states that “individuals will be supported to access a range of community-based services and supports to lead full meaningful lives, have access to a wide range of social work and leisure opportunities and to form and maintain friendships and relationships”. In addition, “an individual’s Care Plan will be reviewed with them on an annual basis to ensure access to a range of community-based services, activities and training and/or employment opportunities, as appropriate”.

We stress that this should be paid work - currently a very small percentage of people with learning disability are in paid work. Social enterprises provide valuable training opportunities and should be funded on a long-term, sustainable basis. Commercial and state-funded employers should be encouraged to review their attitudes and practices in respect of employing people with learning disabilities.

This section of the questionnaire relates to the Equality Impact Assessment (EQIA).

The EQIA is a tool that helps us identify, assess, and mitigate the potential adverse or positive impacts of this Strategy on the nine categories of people with protected characteristics under Section 75 of the Northern Ireland Act (1998), ensuring that the Department for Communities meets our statutory duties to promote equality of opportunity and good relations.

The nine Section 75 groups are:

- people with different religious beliefs
- people from different racial groups
- people of different ages
- people with different marital status
- people with different sexual orientations
- men and women generally
- people with or without a disability
- people with or without dependants
- people with different political opinions

EQIA data, needs and issues

12a Are there any data, needs or issues in relation to any groups within the Section 75 equality categories that have not been identified in Section 3 of the Equality Impact Assessment document?

Yes

No

12b If YES, what are they?

1000 characters

Potential Impacts

13a Do you think that *Disability and Work: A Strategy for Northern Ireland* will have any adverse impacts in relation to any of the groups within the Section 75 equality categories that have not been identified in Section 3 of the Equality Impact Assessment document?

Yes

No

13b If YES, what are they?

1000 characters

Potential mitigating actions

14 Please state what action you think could be taken to reduce or eliminate any adverse impacts that *Disability and Work: A Strategy for Northern Ireland* may have on any groups within the Section 75 equality categories.

2000 characters

Any other comments on the EQIA

- 15 If you have any other comments on this Equality Impact Assessment, please enter them in the box below:

2000 characters

- 16 If you would like to receive a pdf version of your consultation response to the consultation questionnaire, please enter your email address in the box below.

This option is voluntary.

Please ensure that you are inserting the correct email address as failure to do so may result in your responses being sent to someone else.

The email address you input below will not be saved or stored and is used only by the system to automatically send you a receipt.

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