

# EDUCATION, EMPLOYMENT AND HOUSING

A CSJ submission to the Government's  
National Strategy for Disabled People

July 2021



Education, employment and housing:  
A CSJ submission to the Government's National Strategy for Disabled People  
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# About the Centre for Social Justice

Established in 2004, the Centre for Social Justice (CSJ) is an independent think tank that studies the root causes of Britain's social problems and addresses them by recommending practical, workable policy interventions. The CSJ's vision is to give people in the UK who are experiencing the worst disadvantage and injustice every possible opportunity to reach their full potential.

Since its inception, the CSJ has changed the landscape of our political discourse by putting social justice at the heart of British politics. This has led to a transformation in Government thinking and policy. The majority of the CSJ's work is organised around five 'pathways to poverty', first identified in our ground-breaking 2007 report, *Breakthrough Britain*. These are: family breakdown; educational failure; economic dependency and worklessness; addiction to drugs and alcohol; and severe personal debt.

In March 2013, the CSJ report *It Happens Here* shone a light on the horrific reality of human trafficking and modern slavery in the UK. As a direct result of this report, the Government passed the Modern Slavery Act 2015, one of the first pieces of legislation in the world to address slavery and trafficking in the 21st century.

The CSJ delivers empirical, practical, fully funded policy solutions to address the scale of the social justice problems facing the UK. Our research is informed by expert working groups comprising prominent academics, practitioners and policymakers. Furthermore, the CSJ Alliance is a unique group of charities, social enterprises and other grass-roots organisations that have a proven track record of reversing social breakdown across the UK.

The 13 years since the CSJ was founded has brought with it much success. But the social justice challenges facing Britain remain serious. Our response, therefore, must be equally serious. In 2019 and beyond, we will continue to advance the cause of social justice in this nation.



# Key messages and recommendations

## The background

This year (2021) will mark 26 years since the Disability Discrimination Act and 11 years since the Equality Act were passed into law. Despite this legislative change, progress towards greater equality between disabled and non-disabled people has been erratic and, in some areas, non-existent.

The Conservative party pledged in its 2019 manifesto to publish a National Strategy for Disabled People. The launch of this Strategy expected in June should mark an important milestone as the country recovers from the economic and social pain caused by the pandemic, which has disproportionately affected disabled people's income, health and employment prospects.

To influence the development and implementation of the Strategy, the CSJ Disability Commission ('the Commission') published *Now is the Time* in March 2021, offering a radical suite of recommendations to improve the life chances of disabled people.

The report highlighted how disabled people face multiple and interrelated disadvantages which lock disabled people in isolation, ill health, and poverty. As a result, a holistic approach to tackling the barriers to independent living is critical.

The Commission addressed issues across five areas of policy: education, employment, housing, transport, and access to goods and services. In this briefing paper, the CSJ has focused on areas of policy in which it has a historic policy presence: education, employment, and housing. The outcomes for disabled people across these three areas, and how they relate to the issue of unemployment specifically, are summarised below.

## Education

In the working age (21–64) disabled population, almost one in six have no qualifications at all, which is more than 2.5 times the rate of their non-disabled peers.<sup>1</sup>

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<sup>1</sup> ONS, 2019, Disability and education, UK: 2019. Measuring the data

## Employment

The disability employment gap remains stubbornly high, with only 52 per cent of disabled people being in work compared to 81 per cent of non-disabled people. This gap has shrunk by just five percentage points in seven years.<sup>2</sup> On the basis of current trends (all else remaining equal) the CSJ estimates that it will take 40 years to close the gap.<sup>3</sup>

## Housing

Almost one in four working age households with an identified need for accessible housing report that their need is unmet. Working age adults with an unmet need for accessible housing are four times more likely to be unemployed or not seeking work due to sickness/disability than disabled people without accessible housing needs or whose needs are met.<sup>4</sup>

A truly transformative National Strategy for Disabled People must address all of the areas of society in which disabled people face injustice and disadvantage. But the approach is as equally important as selecting the policy areas. In order to tackle any social injustice, the CSJ believes the Government should look to intervene early and address root causes. This approach is equally necessary to tackle the barriers preventing disabled people from participating in the economy and society. Within the context of disability policy, there are three overarching aims of this briefing paper. These are to:

1. Build in accessibility from the start;
2. Improve the quality and supply of services to support disabled people to live independently and to find employment; and,
3. Increase awareness of available support among all parties.

This briefing paper draws attention to ten of the Commission's main recommendations which, if implemented, will substantially improve the life chances of disabled people in the UK today.

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2 ONS, Dataset A08: labour market status of disabled people

3 CSJ analysis of ONS data (Ibid)

4 LSE, Papworth Trust & Habinteg, 2016, No place like an accessible home

# chapter one

# Education

Our education system can provide the armour against a torrent of immediate and longer-term challenges in our economy and society by developing the skills that prepare individuals for the future of work, enhancing employability and entrepreneurial spirit by incubating the leaders of tomorrow; and shaping our world views and attitudes towards others.

The Department for Education (DfE) does not measure 'disability' in schools. Rather, they use 'special educational needs and disabilities' (SEND), which refer to learning difficulties or disabilities. While these two categories are not the same, there is an overlap.

According to the latest data, pupils with special educational needs and disabilities (SEND) face disadvantage at each stage of education. In the academic year 2018/19, these pupils were three times less likely to meet the expected level across the 'early learning goals',<sup>5</sup> achieved the equivalent of more than half a grade lower in each of their GCSE subjects than their peers with a similar prior attainment,<sup>6</sup> and were 4.5 times more likely to be permanently excluded.<sup>7</sup>

To address some of these disparities the Coalition Government set out changes for pupils with SEND in 2013. Among other changes, the reforms introduced two levels of support for pupils with SEND:

## SEN Support

The school provides adjustments to support pupils learning, amounting to the first £6,000 of support. This can take many forms, including extra teaching assistance and/or assistive technology.

## EHC Plans

The local authority writes and approves these plans to provide more extensive additional support to the pupil across education, health and social care.

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5 DfE, 2021, academic Year 2018/19: Early years foundation stage profile results

6 CSJ analysis of DfE data: DfE, 2020, Statistics: GCSEs key stage 4 performance 2019 (revised)

7 CSJ analysis of DfE data: DfE, 2020, National Statistics: permanent and fixed period exclusions in England: 2018 to 2019

These reforms included important changes to how schools and other agencies work together to improve the educational outcomes of pupils with SEND. However, further improvements are needed to both types of support. Two practical changes are outlined below.

## SEN Support – embedding SEND within teacher training

SEN Support can be a preventative measure which counteracts the need for more extensive support later in the child's education, and prevents pupils from falling behind in their education which can be difficult to remedy.

If SEN Support is not used effectively or preventatively, the demand for more expensive EHC Plans is likely to rise. The Association of Educational Psychologists, in evidence to the Education Select Committee's inquiry into the SEND reforms, highlighted a link between the lack of support for pupils at the SEN Support stage with the increase in applications for EHC Plans.<sup>8</sup>

By contrast, improving the access to, and quality of SEN Support within schools may reduce: the pull towards EHC Plan assessment; the stress borne by families fighting for support; tribunal costs if families fail to get an EHC Plan; and the exclusion of pupils with SEND.

It is important that all staff have the tools to provide the best quality SEN Support. Indeed, all teachers are potentially teachers of pupils with SEND. According to an analysis by the Education Policy Institute, 39 per cent of children at some point between Reception (age five) and Year 11 (age sixteen) have an identified special educational need and/or disability.<sup>9</sup> And almost 91.6 per cent of pupils with SEN Support attended mainstream schools in 2019.<sup>10</sup>

Despite the need to prepare educators to teach pupils with SEND, many newly qualified teachers feel unprepared to do so. According to a Department for Education (DfE) commissioned survey of Newly Qualified Teachers (NQTs), nearly half of respondents (47 per cent) felt unprepared for teaching pupils with SEND, and 60 per cent felt unprepared to assess their progress.<sup>11</sup> Significantly fewer teachers at primary compared to secondary school felt prepared to teach and assess the progress of pupils with SEND.

There are also significant gaps in the knowledge of SEND provision in the existing teacher workforce. According to a DfE survey of teachers in mid-2019, more than a fifth (22 per cent) of teachers did not believe they are able to meet the needs of pupils with SEND, and more than one in ten (11 per cent) disagreed that when support is put in place for these pupils, it is based on evidence of what works best to meet their needs and achieve good outcomes.<sup>12</sup>

In addition, recent reforms to teacher training will not provide enough of a focus on SEND provision. In 2019, the Government updated the Framework of Core Content for Initial Teacher Training, which helps training providers to structure the content of their course. In November 2020, the Commission held a focus group of SEND inclusion

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8 Written evidence to the Education Select Committee's inquiry into the SEND reforms from the Association of Educational Psychologists (SCN0495)

9 EPI, 2017, Social mobility & vulnerable learners policy analysis: how many children have SEND?

10 DfE, 2019, Support for pupils with special educational needs and disabilities in England, pg 5

11 DfE, 2018, Newly qualified teachers: annual survey 2017

12 DfE, 2019, School Snapshot Survey Summer 2019, Table 328/1 (M7\_2) & Table 331/1 (M7\_5)

specialists from a range of school types. One of the topics covered was teacher training. The response of participants was that initial teacher training was inadequate and does not meet the needs of a diverse pupil body. One participant, who was a SEND Inclusion lead at a secondary school, claimed that “at most, the NQTs have half a day training at university in terms of supporting [pupils with SEND].”

The Government has also recently introduced the Early Career Framework (ECF) in 2019. This Framework provides the evidential base for a new training entitlement offered to all teachers in their first two years in employment and will include: high quality development materials, a dedicated mentor, and funding for five per cent time away from the classroom for teachers in their second year.<sup>13</sup>

However, this framework provides little reassurance that teacher training will improve sufficiently in relation to SEND. Indeed, the ECF mirrors the provision for SEND in the ITT Framework exactly, despite evidence above to show that problems remain in relation to the training outcomes for pupils with SEND. Given this, the CSJ believes the SEND element of the ECF could be strengthened in three ways.

1. The framework should encourage cross-pollination between mainstream and special/alternative provision (AP) schools by offering specialist placements. Emergent evidence from Ireland supports this approach. In the evaluation of changes to training, school placements in special schools, ‘resource classes’ or learning support roles was the second most important element of their training experience for their development as inclusive teachers.<sup>14</sup>
2. Training related to assistive technology should be more widely available, and the framework should encourage this. Assistive technology can open up the curriculum for pupils with SEND by enabling them to complete tasks they previously could not complete or did slowly, and in so doing, improve attainment. However, according to research by the Alliance for Inclusive Education (ALLFIE), few educational professionals believe that the content, structure and delivery of the curriculum is accessible for all disabled pupils.<sup>15</sup>
3. There should be accreditation for the training related to SEND. While not all teachers will specialise in SEND provision, or have the opportunity to be placed in an Alternative Provision (AP) or Special School, for those that are, a qualification which recognises the specialist knowledge and skills they have required is essential to encourage take-up. Similar benefits in support of attaching qualifications have been mentioned in the evaluation of the Careers Leaders Programme.<sup>16</sup>

<sup>13</sup> DfE, 2020, Policy Paper: Early Career Framework reforms: overview

<sup>14</sup> DfE, 2020, Policy Paper: Early Career Framework reforms: overview. NCSE, 2019, Initial Teacher Education for Inclusion, Research Report No. 27, pg xiii

<sup>15</sup> ALLFIE, 2020, Accessibility Plans as effective tools for inclusion in schools: are they working? Pg 88

<sup>16</sup> Institute for Employment Studies, 2020, Evaluation of the Careers Leader Training

### **Recommendation 1**

The Government should strengthen the SEND training element within the Early Career Framework for teachers and provide additional funding for this. In particular, the Government should offer:

- training based in Special Schools and AP;
- training on the role and use of technology and SEND; and,
- accreditation for training routes which specialise in SEND provision.

## **EHC Plans – strengthening transitions to employment within EHC Plans**

EHC Plans provide support for the young person until the age of 25, at which point the plan ceases to exist. Plans can also be terminated before this age by the local authority when the local authority is no longer responsible for the child or young person, or if the authority determines that it is no longer necessary for the plan to be maintained.<sup>17</sup> In the latter instance, the plan is no longer necessary if the young person no longer requires the special educational provision, or if the educational training outcomes specified in the plan have been achieved, which includes if the person moves into employment. Usually, but not always, plans are terminated in agreement with the pupil and their family.

The termination of plans before the age of 25 is concerning for three reasons. First, it is not correct to believe that education ends when employment begins, which means educational support may be still required. Education (through training) can be a key element of an employed role, for instance, in apprenticeships. Second, although the education part of the plan will be less relevant for the disabled person who is in employment, the social and health elements will still be pertinent.

Third, if an individual leaves employment before the age of 25, they must re-apply to their local authority to get another EHC Plan and the support it provides. As the case study below showed, returning to a plan can take months and is not guaranteed, during which time the individual concerned cannot access other essential opportunities to support them back into work (such as supported internships, which are exclusively targeted at young people with EHC Plans). This in turn places enormous stress on families. The loss of support when an EHC Plan ends may also deter parents from embracing programmes for work without the guarantee that the outcome will be sustained.

### Case study: Tom's story

'Tom' is a 23-year-old with autism and learning difficulties. Tom previously had an EHCP, but when he was 21 and starting to claim Universal Credit, they had a meeting with the EHCP team and agreed to end the plan. Mum said that from her point of view, Tom was claiming benefit and would get a job, so he would not need the EHCP anymore. We contacted the EHC Plan team in his area, explained the background and what we could put in place for him with a current EHC Plan. The EHC Plan colleague said that there would be a 5-month waiting list before it could be considered and, by then, Tom would then be too old to start a Supported Internship. There was no flexibility or special circumstances.

Source: BASE, in evidence to the CSJ Disability Commission

It is essential that disabled people have this support. Research by the Department for Work and Pensions (DWP) and the Department for Health and Social Care (DoHSC) shows that disabled people are twice as likely as non-disabled people to move out of work regardless of changes to disability status.<sup>18</sup> Individuals who are out of work for more than four weeks are likely to become long-term unemployed.<sup>19</sup>

To resolve these issues, the 'education' element of the EHC Plan should be replaced by an 'employment' placeholder when the pupil enters work. This small change would have three consequences: protect the automatic right to return to an EHC Plan, maintained until the age of 25; allow flexibility for the 'education' element to be re-instated if the person leaves employment; and emphasise the continuity of the health and social care aspects of the Plan.

### Recommendation 2

Pupils with an EHC Plan who move into employment before the age of 25 should be able to return smoothly and quickly to a new Plan if their employment ceases. This could be done by swapping the 'education' element of the EHC Plan with an 'employment' placeholder.

<sup>18</sup> DWP, DHSC, 2020, The employment of disabled people: data to 2019. NB: movement out of work is measured as the proportion of all working age people who were disabled and in employment who were no longer in employment when interviewed again twelve months later.

<sup>19</sup> NHS, 2020, Online version of the NHS Long Term Plan, Appendix: Health and Employment

## chapter two

# Employment

Disabled people suffer significant disadvantages in the labour market. For disabled people who want to work it is essential the barriers they face both within organisations and in the labour market more broadly are identified, addressed and dismantled. The Commission's report focused on both providing the support disabled people need for their job search activity, and encouraging employers to ensure their workplaces are inclusive and accessible. The five areas below are the most important supply-side and demand-side reforms which will transform the opportunities for and quality of employment.

### Supported internships

In *Now is the Time*, the Commission addressed issues relating to apprenticeships, supported employment services, and supported internships. In this briefing paper, the CSJ focuses on the quality and supply of supported internships in the UK.

According to the latest data, the disability employment gap stands at 29 percentage points. However, behind this headline gap are significant variations between different groups of disabled people. For instance, only 17.6 per cent of individuals with severe or specific learning difficulties are in employment. And within this group, just 5.6 per cent of individuals with learning disabilities who are known to adult social care services<sup>20</sup> are in employment. These figures suggest that some disabled people face greater barriers to achieving employment than other disabled groups.

Supported internships are government-funded placements, intended to improve the employment outcomes for young adults on Education, Health and Care (EHC) Plans with learning disabilities, who have the lowest employment rates of any disability sub-group. Most supported internships are created through a partnership between the local authority, an education provider, the employer, and a coordinating organisation. The Department for Education (DfE) expects supported internship providers to adhere to guidance (published in 2017) which sets out the key elements of supported internships. According to this guidance, while providers are free to design their programmes to 'fit their local circumstances and to meet the needs of their learners' there are four key principles that 'should be followed':<sup>21</sup>

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20 NHS, 2020, Measures from the Adult Social Care Outcomes Framework, England 2019–20, Tab 1E

21 DfE, 2014 (revised June 2017), Supported internships guidance, pg 12–13

1. A significant majority of the intern's time must be spent at the employer's premises;
2. Interns must have learning alongside work placements (including English and maths);
3. Jobs 'must work' for the young person and the employers, with the goal of paid employment at the end; and,
4. The ongoing support of the job coach to the young person and employer.

There are several problems relating to the funding, design, and delivery of supported internships. In the sections below, the CSJ focuses on two issues relating to the quality and supply of supported internships.

### Quality

Despite the expectation that providers adhere to the four principles outlined above, a DfE-commissioned research report into approaches to supported internships found that funding was given to providers that did not adhere to these principles including instances where some young people were not based primarily with the employer each week, job coaches were untrained, and supported internships took longer than two years to complete.<sup>22</sup> In addition to these concerns, according to a survey of schools and colleges only 47 per cent of supported internships included mentoring for the young people, and nearly a third of schools and colleges did not have a post-placement review.<sup>23</sup>

A central part of supported internships should be to support disabled people who want to find employment into sustained work. To the CSJ's knowledge there are no national longitudinal studies that have sought to determine long-term outcomes of supported internships, beyond the data collected by individual organisations such as DFN Project SEARCH.<sup>24</sup>

However, in the most recent DfE evaluation which included a sample of providers, although 'most providers' estimated that at least 50 per cent of young people on their programme achieved paid employment, with some reporting figures in excess of 75 per cent, others (proportion not stated) estimated employment rates below 50 per cent. A small number reported employment outcomes between zero and 25 per cent.<sup>25</sup> The evaluation did not show whether employment was full-time or sustained despite these being important markers of the success of the programme.

Part of the variation in the effectiveness of different supported internship schemes could be explained by the requirement from some supported internship providers that interns meet a minimum standard before they are admitted to the programme, while others take an open approach to recruitment. However, another explanation is likely to be that, as shown above, some providers do not adhere to the DfE's four key supported internship principles. Given the variation in models used for supported internships, a lack of understanding of 'best practice', and the variable outcomes achieved between providers, it is essential that a more detailed framework and set of standards is provided for supported internships.

22 DfE, 2020, Approaches to Supported Internship Delivery: research report, pg 5

23 DfE, 2017, Work experience and related activities in schools and colleges research report, pg 57 (base = 93)

24 DFN Project SEARCH Data – class of 2018-19 (unpublished). DFN Project SEARCH had 515 enrolments across 56 sites in 2018-19

25 DfE, 2020, Approaches to Supported Internship delivery: research report

## Supply

According to official DfE figures in 2016 there were just 65 supported internships in England. By 2020, this had risen to 2,231. However, these figures are inaccurate. DfE-commissioned investigations into the approaches to supported internship delivery highlighted that DfE-collected data often underestimated the number of young people on supported internships when compared to the figures reported by training providers, although the reason for this disparity was not examined.<sup>26</sup>

Even so, there is evidence to show that many educational institutions and employers do not offer, or are unaware of, supported internships, which suggests there is potential to increase supply. A 2017 DfE survey of schools and colleges found that only one eighth (13 per cent) of institutions offered supported internships, covering just over a quarter (28 per cent) of the population of post-16 learners.<sup>27</sup> At the time, 32 per cent of institutions expected to raise their technical and vocational qualifications by increasing the number of supported internships offered to young people.

There is, however, significant scope to expand supported internship provision in schools and colleges. Of the 9,350 pupils with EHC Plans who completed Key Stage 4 in 2018/19<sup>28</sup> most entered further education (63 per cent) or sixth form college/school sixth form (20 per cent).

To understand employers' awareness and use of supported internships, the Commission asked YouGov to survey 501 senior HR decision makers within private sector organisations in November 2020. According to the survey findings, only eight per cent of employers offered supported internships, and a further 33 per cent knew about them but did not have them.<sup>29</sup>

In its 2016 Post-16 Skills Plan the Department for Business, Energy, and Industrial Strategy (BEIS) stated that all young people with EHC plans should undertake a supported internship, unless there is a good reason not to do so.<sup>30</sup> The DfE needs to endorse this aim and provide a roadmap laying out how it will be achieved, engaging both employers and schools/colleges.

### Recommendation 3

The Government should draw on evidence-based research to create a national framework and set of standards for supported internships that builds on the four key principles stipulated by the DfE, and a focus on outcomes for young disabled pupils, including the journey made by participants. These standards should include the use of up-to-date tools and templates, and best practice resources and training, for example.

26 Ibid

27 DfE, 2017, Post-16 Institutions Omnibus: Wave 5 findings December 2017, pg 23 (base = 501)

28 DfE, 2020, Academic Year 2018/19: Key Stage 4 Destination Measures

29 YouGov, 2020, CSJ Disability Commission polling. NB: all figures, unless otherwise states, are from YouGov Plc. Total sample size was 501 Senior HR Decision Makers. Fieldwork was undertaken between 19–25 November 2020. The survey was carried out online. Base = 501

30 BIS & DfE, 2016, Post-16 Skills Plan

## Recommendation 4

The DfE should formally commit to ensuring all young people with EHC Plans are offered a fully funded supported internship.

## Disseminating best practice to employers

Best practice in relation to the employment of disabled people can range from providing alternative interview formats to ensuring disability is a corporate strategic priority. At the heart of best practice, however, is the provision of workplace adjustments for employees. The most common adjustments very often require a minimal budget.<sup>31</sup> (For more expensive adjustments, the Access to Work Scheme can be used – see 4.3.)

However, information pertinent to disability policy and practice does not often reach employers. CIPD research in 2019 claimed that it ‘is surprising that we find little discussion of evidence of ‘what works’ in diversity’ and ‘what strategies and practices seem to be the best bet for increasing workplace diversity and inclusion.’<sup>32</sup> More narrowly, in evidence to the CSJ Disability Commission, the CIPD highlighted that employers are faced with a multitude of often confusing information on how to make adjustments across many different sources:

The collective view from our practitioners is that it can be confusing to navigate the many sources of disability and health related information, advice and guidance (IAG) already available – and this applies to all employers.

While a variety of guides exist, many businesses want simple, evidence-based guidance from one source. A Disability Rights UK survey in 2017 reported that 37 per cent of UK businesses believed a single gateway for information and advice would help businesses employ disabled people.<sup>33</sup> CIPD research also shows that when asked for the three government-led changes that would make the greatest difference to improving how their organisation manages people with a disability and/or long-term health condition, 58 per cent of private sector organisations selected a ‘one-stop shop’ providing information and practical tools.<sup>34</sup>

Commentators have also highlighted the fragmented nature of advice, which can impede employers from accessing tailored, timely, and practical advice beyond generic information.<sup>35</sup> Similar bodies already exist in the What Works Centre network that the Government created in 2013. The example of the Education Endowment Foundation (EEF) is provided below.

31 Business Disability Forum, 2020, The Great Big Workplace Adjustments Survey 2019–2020: exploring the experience and outcomes of workplace adjustments in 2019–20

32 CIPD, 2019, Diversity management that works: an evidence-based review

33 Disability Rights UK & REED, 2017, Disability and Employment, pg 9

34 CIPD, 2018, Health and wellbeing at work survey

35 Liz Sayce, in evidence to the CSJ Disability Commission (reference: LSE, 2018, Switching Focus)

### Case study: Education Endowment Foundation (EEF)

The EEF is a charity created in 2011 by the Sutton Trust in partnership with Impetus Trust. The DfE provided a founding endowment of £125 million, and between 2011 and 2018 the EEF raised £138 million from various public and private sources. Its main aims are:

1. To synthesise evidence on what works in teaching and learning and sharing this through practical and actionable resources such as its toolkit or guidance reports.
2. To generate evidence on what works and to improve teaching and learning by funding robust independent evaluations of high-potential programmes.
3. To scale up evidence to make sure that teachers and other practitioners can act on evidence, with visualisations for strengths of different interventions using 'cost,' 'evidence strength' and 'impact.'

The EEF has worked to achieve buy-in from thousands of teaching professionals. In 2018 alone, the Teaching and Learning Toolkit produced by the EEF was used by nearly two thirds of all senior leaders in secondary schools to inform their decision-making. It is also funding innovative new projects in areas of practice where little is known.

Source: EEF

A 'What Works Centre' for disability employment best practice would be well placed to synthesise knowledge and research on the policies and practices that would, in a multitude of different ways, support disabled people, provide specific guidance and interventions tailored to the needs of specific groups. It could also fund research to develop understanding of some of the thornier problems bedeviling policy makers: for instance, understanding how to create more positive workplace cultures, or how employees might be encouraged to disclose their disability. It could also be responsible for producing practical guidance to implement research findings, and link with business networks and Disabled People's Organisations (DPOs) to disseminate good practice to employers.

### Recommendation 5

A 'what works' centre should be established that ensures the recommendations stemming from existing and new high quality research can be made easily accessible to employers, and funds new research where there are gaps in knowledge.

## Improving the Access to Work scheme

While most adjustments require a minimal budget, not all are inexpensive. And previous employer surveys have highlighted how employers perceive the cost of adjustments to be a barrier to recruiting disabled people.<sup>36</sup> The Government introduced Access to Work in 1994 to support employers with this cost. Eligible adjustments include: communication support at interview, special aids and equipment, adaptations to premises, and support

36 CSJ, 2017, Rethinking Disability at Work: recommendations, polling data and key statistics

workers. Although most employers can access funding through this scheme, the proportion of costs the employer will be expected to pay will vary depending on how many people they employ, the type of adjustment, and purpose.<sup>37</sup>

By providing adaptations and adjustments, the scheme aims to reduce the inequalities in employment outcomes for disabled people. DWP qualitative research into Access to Work in 2018 found that because of the support provided, applicants felt ‘empowered’ and that the most successful applicants could work to the best of their ability and more confidently. The DWP concluded that Access to Work ‘levelled the playing field’ with their peers.<sup>38</sup> Research by the Centre for Economic and Social Inclusion in 2015 showed that the benefits of Access to Work to society outweigh its costs by a factor of more than three to one.<sup>39</sup>

Despite the opportunities presented by Access to Work there are several problems with the functioning of the scheme which prevent access to adequate support. The CSJ outline two of its main concerns below.

### Overall satisfaction rates for Access to Work are high but problems with its delivery remain

The Commission’s YouGov polling asked private sector employers about their perceptions of Access to Work. The results revealed a mixed picture (see Figure 1). Of the employers who knew about or used the scheme, only a third (32 per cent) agreed or strongly agreed that it has a good reputation, while more than one in ten disagreed or strongly disagreed. There was a distinct difference between satisfaction with the product itself (the outcome), and the route to getting the product (the process). Almost a third believed it took too long to reclaim the money from the scheme, and that it is too bureaucratic. Yet nearly four in ten employers stated it allowed for appropriate and fit-for-purpose adaptations (six per cent disagreed).

Evidence to the Commission on the process of providing adjustments highlighted several problems from the beginning to the end of the process. Delays, where they do occur, have a devastating effect on a person’s success in employment. The National Association of Disabled Staff Networks (NADSN) in evidence to the Commission, commented:

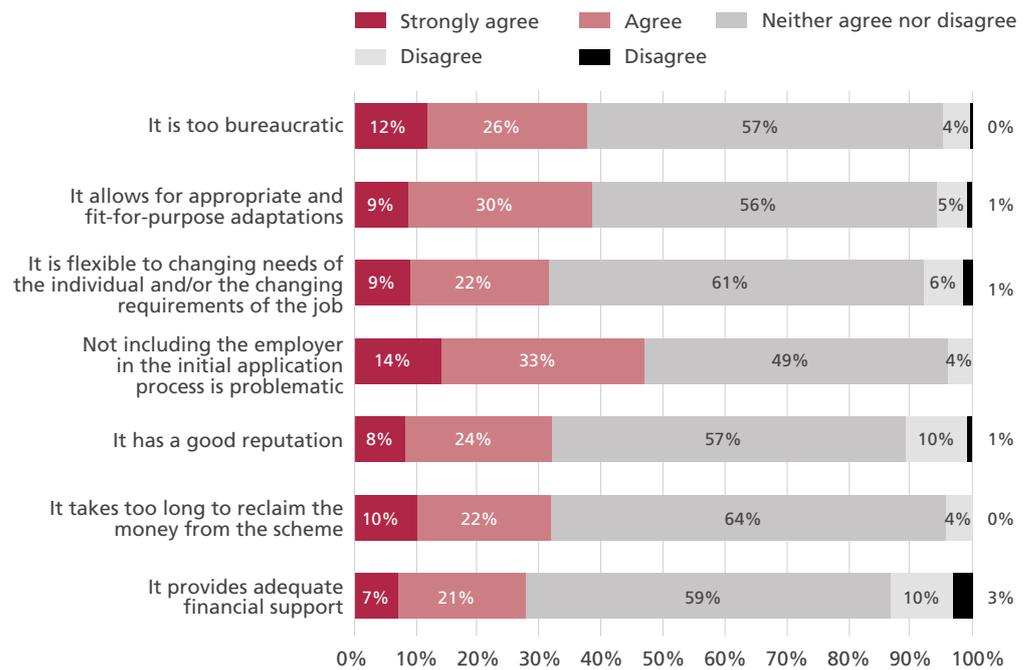
Delays can have a negative impact on Disabled staff who at best then have to wait for equipment and training [to use it]. At worst, extensive delays can jeopardise employment.

<sup>37</sup> House of Commons Library, 2020, Research Briefing – Access to Work scheme for disabled people

<sup>38</sup> DWP, 2018, Access to Work: Qualitative research with applicants, employers and delivery staff

<sup>39</sup> Melville, D. Stevens, C. and Vaid, L. (2015) Access to Work Cost Benefit Analysis, a report for RNIB, Centre for Economic and Social Inclusion

Figure 1: Perceptions of Access to Work, all private sector employers who know or use Access to Work, UK, 2020



Source: CSJ Disability Commission/YouGov<sup>40</sup>

It is difficult to identify a single key reason for the delays that occur. The APPG for Multiple Sclerosis described the application process for employees as ‘onerous’, and highlighted decision delays by the Access to Work service following application and assessment.<sup>41</sup> The continued reliance on paper-based systems has been exposed during the coronavirus pandemic as a lengthy (and sometimes unachievable) ask. In evidence to the Commission, Abbi Brown, Knowledge Sharing Officer at the National Deaf Children’s Society, stated:

colleagues who use British Sign Language (BSL) interpreters have been told by Access to Work (AtW) during lockdown that they still need to provide paper copies of invoices signed by hand by their managers [... which] would mean the manager printing off the invoice, signing it by hand and then sending back to the deaf employee to be countersigned and then sent back to AtW by which time the deadline for the invoice to be sent may have passed, and the cost of the interpreter will have to be paid by the company.

A further potential source of delays is that employers only become involved at the procurement stage, after the employee has made the initial application. This can result in missed deadlines, especially if employers are engaging with Access to Work for the first time, given the need for them to develop an understanding of the scheme and their responsibilities within it. According to DWP research, not involving employers until the procurement stage has contributed to employers’ ‘limited understanding of [Access to Work] and the overall process’<sup>42</sup> and in some cases led to aids and adaptations being

40 YouGov, 2020, CSJ Disability Commission polling. NB: all figures, unless otherwise states, are from YouGov Plc. Total sample size was 501 Senior HR Decision Makers. Fieldwork was undertaken between 19–25 November 2020. The survey was carried out online. Base = 501

41 APPG for MS, 2016, Employment that works: supporting people with MS in the workplace

42 DWP, 2018, Access to Work: Qualitative research with applicants, employers and delivery staff

delayed. Almost half (47 per cent) of all private sector employers in response to the Commission's YouGov polling agreed or strongly agreed that not including the employer in the initial application process is problematic.

Another concern relates to delays in employers receiving reimbursement after having paid up-front for the cost of adjustments. This may result in adaptations not being provided at all. The Commission's polling showed that a third (32 per cent) of private sector employers (and 50 per cent of large employers with 250+ employees) that use or are aware of Access to Work agreed with the statement that 'it takes too long to reclaim the money from the scheme,' while only 4 per cent disagreed (Figure one).

### Integrating support at higher education with support in the workplace

Data on applications from 2018/19 show there were 32,000 people above the age of 16 who successfully applied to Access to Work.<sup>43</sup> Even so, the number of people accessing the scheme can be considered low given 78,310 undergraduate students in higher education were in receipt of Disabled Students Allowance in England in the same year.<sup>44</sup> Many, if not all, students, will require similar support in employment. In these instances, the individual will have to apply again for similar support through the Access to Work scheme. However, there are concerns that a significant gap exists between the support available under the Disabled Students' Allowance (DSA) and from universities, and what is available through Access to Work. This is worrying because almost three in ten (28 per cent) of DSA recipients disagreed that the support they receive meets all their needs. According to the University of Warwick, in evidence to the Commission:

The difference between the support available under DSA and from universities compared to what is available from Access to Work can be stark. Support, such as mentoring for people on the autism spectrum... is often difficult and expensive for employers to access for their employees and rarely funded.

The lack of join-up between DSA and Access to Work can lead to adaptations not being provided in place of existing support funded in the final year of study through the DSA. According to the Business Disability Forum, there have been several examples where assistive technology funded through the DSA was not matched by Access to Work funding. In these instances, some disabled people have struggled to transition into work,<sup>45</sup> while others have had to go on to 'adjustments leave' (waiting for their role to be adjusted) or have taken sick leave in their first year of employment.

43 House of Commons Library, 2020, Research Briefing – Access to Work scheme for disabled people

44 HESA, 2020, Participation of students in higher education who are in receipt of Disabled Students' Allowance (DSA) 2015/16 to 2019/20

45 BDF, 2020, Assistive technology in employment – written submission to the APPG on Assistive Technology, Paragraph 6.4

## Recommendation 6

The administration surrounding Access to Work applications needs to be reviewed and amended to ensure the bureaucratic burden for applicants is minimised. Given the stated cost barriers experienced by employers to employ disabled people, the length of time it takes to receive re-imbusement for up-front payments for adjustments should be reduced, and employers included at an earlier stage.

## Recommendation 7

The Disabled Students' Allowance which provides support in higher education should be passported to Access to Work once the student has graduated. This provides continuity between higher education and work and reduces the need for separate assessments for each.

Once the above issues have been addressed, more needs to be done at employer-employee touch points to raise awareness of the available support. Many disabled employees, even more than quarter of a century after the introduction of the scheme, are unaware of the scheme. According to a survey by Unison in 2020 of 4,455 disabled people in public sector roles, more than two in five (41 per cent) were unaware of it, and 23 per cent did not think the scheme could help with working from home.<sup>46</sup>

To better understand employer awareness of the scheme, the Commission polled 501 senior private sector employers with HR responsibilities.<sup>47</sup> The analysis showed that 61 per cent of respondents were aware of Access to Work, but only 14 per cent of organisations use it. While overall awareness of the scheme was similar across all employer sizes, smaller employers (10 to 49 employees), who are the most likely to benefit from Access to Work, were the least likely to use it. Only 9 per cent used it, compared to 28 per cent of larger employers (250+ employees). These findings mirror those from the CSJ's poll in 2017.<sup>48</sup>

A strategy to increase awareness of the scheme might involve information campaigns in schools and universities, and requiring employers to provide information on the scheme to all job applicants. It might also involve including an up-to-date list of expert providers on the Access to Work webpage to allow disabled people to investigate and understand options before they make an application.

<sup>46</sup> Unison, 2020, Covid-19 and disabled workers: time for a home working revolution

<sup>47</sup> YouGov, 2020, CSJ Disability Commission polling. NB: all figures, unless otherwise states, are from YouGov Plc. Total sample size was 501 Senior HR Decision Makers. Fieldwork was undertaken between 19–25 November 2020. The survey was carried out online

<sup>48</sup> YouGov, 2017, CSJ polling. NB: all figures, unless otherwise states, are from YouGov Plc. Total sample size was 502 Senior HR Decision Makers. Fieldwork was undertaken between 27 January–7 February 2017. The survey was carried out online

## Introducing mandatory workforce reporting

The UK government acknowledges the transformation benefits of disability employment reporting, and has outlined these benefits in its framework for *Voluntary reporting on disability, mental health and wellbeing*,<sup>49</sup> introduced in November 2018. Some of the reported benefits of transparent reporting include improving employee engagement and retention, and a better understanding of the experiences of disabled people.<sup>50</sup> In a survey of large organisations with more than 250 employees, 31 per cent agreed that there was a business case for disability, mental health and wellbeing reporting, and 50 per cent agreed the moral case was clear.<sup>51</sup> Several private sector organisations, such as five UK broadcasters (BBC, ITV, Channel 4, Channel 5, and Sky) have implemented workforce reporting.

Several businesses have reported the benefit of increasing the transparent representation of disabled people.<sup>52, 53</sup> And in countries where mandatory disability employment reporting has been implemented, evidence suggests this has improved employer understanding of diversity and inclusion policies in relation to disabled people, and testing out new policies and practices. According to a survey of US federal contractors who are required to report their disability prevalence, 52.9 per cent stated that their disability policies and practices changed somewhat or to a great extent as a result of the introduction of disability employment reporting. These employers are also using their data to assess their success in recruiting (51 per cent), retention (27 per cent) and progression (23 per cent) of disabled people in the workforce since the introduction of mandatory workforce reporting.

Few employers perceive barriers to reporting. In February 2019, the CIPD conducted a survey of 731 senior HR and business leaders for organisations with more than 250 employees. Only a quarter of these employers agreed that their organisation lacks the systems/infrastructure to be able to collect high quality data, suggesting that over three quarters of organisations already have all or at least some of the infrastructure in place to facilitate mandatory reporting. Only 15 per cent reported the cost of collecting the data as prohibitive.<sup>54</sup>

Despite the relative lack of barriers to implementing disability reporting, and the benefits of doing so, surprisingly few employers are using the government's framework for *Voluntary Reporting on Disability, Mental Health and Wellbeing*. According to Commission polling, 11 per cent of private sector employers used the framework, while 59 per cent had never heard of it.

49 DWP & DoHSC, 2018, Guidance: voluntary reporting on disability, mental health and wellbeing [Accessed via: <https://www.gov.uk/government/publications/voluntary-reporting-on-disability-mental-health-and-wellbeing>]

50 DWP & DoHSC, 2018, Guidance: voluntary reporting on disability, mental health and wellbeing

51 CIPD-commissioned survey – YouGov, 2019

52 Channel 4, 2016, Channel Four television corporation report and financial statement 2016, pg 110

53 See also Microsoft's endorsement of disability reporting: Microsoft, 2020, Global Diversity and Inclusion Report 2020, pg 15

54 CIPD/YouGov Survey 2019 – data shared with the CSJ Disability Commission by the CIPD (unpublished)

## Recommendation 8

The Government should require employers with 250+ employees to report the proportion of their workforce that is disabled. Employers should be required to report their workforce disability prevalence to the Government. The Government should publish these figures.

The Commission also made recommendations as to how disability workforce reporting should be implemented. In short, the Commission argued that employers should be required to use a standardised question when asking their employees about their disability status, and the data should be collected annually in a standardised collection process. This is because people respond differently depending on the method of collection (for instance, an anonymous form versus an HR survey) and the question asked. Providing a standardised data collection method and question would minimise variation in the outcomes reported by each organisation, and allow them to benchmark their progress against competitors and the national average.

## Reforming Disability Confident

Accreditation of employers via the Disability Confident scheme has the potential to signal to disabled jobseekers the employers who are more likely to hire them and treat them well. Almost two thirds of disabled applicants state that finding a disability-friendly employer is very relevant to their search for employment.<sup>55</sup> And accreditation has the potential to support employers to achieve meaningful change by increasing their attractiveness to disabled applicants, which in turn may prove important in addressing their skills gaps.

The first government accreditation scheme aimed at signalling best disability practice among employers was the Positive About Disabled People Two Ticks Award, introduced in 1990. This was awarded to employers who agreed to act on five commitments regarding the employment, retention, training and career development of disabled employees. However, of these five commitments, Two Ticks employers were found to be no more likely to uphold four of the commitments.<sup>56</sup> In 2016, the Two Ticks scheme was replaced by Disability Confident. It has three levels of accreditation, outlined in Table 1.

<sup>55</sup> Evenbreak, 2020, Barriers to employment: what disabled candidates say

<sup>56</sup> Hoque, K., Bacon, N. and Parr, D. (2014) 'Employer disability practice in Britain: assessing the impact of the Positive About Disabled People 'Two Ticks' symbol'. *Work, Employment & Society*, 28(3): 430–451

Table 1: The levels of Disability Confident

Level	Number of employers (%) as at 3/12/2020	Key requirements	External auditing?
Level 1	15,389 (79.7)	Employers agree to five commitments and to carry out at least one of nine activities.	No
Level 2	3,578 (18.5)	Employers agree to all core actions set out in two lists (one for the recruitment and one for the retention of disabled people) and at least one activity from each of the two 'activity' lists.	No (self-assessment form)
Level 3	336 (1.7)	Employers must: achieve all core actions for level 2 accreditation (and have this externally validated); engage with the Voluntary Reporting Framework (though doing so does not require them to record or report information on the proportion of the workforce that is disabled); and employ at least one disabled person.	Yes

Source: DWP<sup>57, 58</sup>

Even though there were evident shortcomings of the previous Two Ticks Award, 2,311 employers were transferred to the Disability Confident scheme at level 2 without these employers being audited to ensure they met the requirements expected of them by the scheme.

To add to these problems, Disability Confident suffers from similar drawbacks as its predecessor. Emergent research on the scheme suggests that, as with Two Ticks, its impact has been limited. While a recognised achievement of the scheme has been that it has raised awareness of disability in the workplace, it can do more.

Research by the DWP on Disability Confident found that accredited employers were 'positive about employing' disabled people but, surprisingly for a scheme dedicated to being confident about disability, a significant minority of Disability Confident employers (12 per cent) did not disagree that disabled staff would make the organisation less productive.<sup>59</sup> This finding is comparable to those in surveys of all organisations, regardless of Disability Confident accreditation. For example, a Disability Rights UK survey in 2017 of all UK employers found that only 82 per cent of respondents said disabled people were as productive as non-disabled staff.

In addition, while one of the main aims of Disability Confident is for employers to recruit more disabled people, fewer than half (48 per cent) of all employers in the DWP's research reported they had employed at least one person with a disability 'as a result of joining the scheme.'<sup>60</sup>

<sup>57</sup> DWP, 2020, Disability Confident: employers that have signed up

<sup>58</sup> DWP, 2019, Guidance: Disability Confident for levels 1, 2 and 3 (updated 28 November 2019)

<sup>59</sup> DWP, 2018, Disability Confident Scheme: summary of findings from a survey of participating employers, pg 3

<sup>60</sup> Ibid

Other evaluations have also highlighted the limited effectiveness of Disability Confident. The NHS's Workforce Disability Equality Standard report for 2019 showed that only a marginally higher proportion of disabled staff in Disability Confident Trusts than in non-Disability Confident Trusts felt that adequate adjustments had been provided (72.8 per cent versus 67.1 per cent). There were no other significant benefits for disabled staff as a result of working in a Disability Confident Trust.<sup>61</sup>

In a recent poll of disabled adults commissioned by the BBC and conducted by YouGov in October 2020, of those who said they had heard of it, just over a third (37 per cent) stated they believed it has been effective at promoting employment for disabled people. A relatively similar size stated that it has not been effective (36 per cent), and within this, 15 per cent stated it has been very ineffective. Evidence to the CSJ Disability Commission from the University of Greenwich pointed to qualitative research suggesting the scheme 'was seldom a driver for change.'<sup>62</sup>

Given this, the Commission believes Disability Confident should be substantially reformed. Employers at levels 2 and 3 should be required to meet minimum thresholds for the proportion of their workforce that is disabled. The exact thresholds should be determined in consultation with DPOs, employers' organisations and other relevant stakeholders. This will ensure Disability Confident becomes focused on accredited firms' disability employment outcomes rather than simply on the practices and processes they have adopted.

### **Recommendation 9**

Disability Confident needs to be reformed so that levels 2 and 3 require new and current members of the scheme to meet minimum thresholds regarding the proportion of their workforce that is disabled. The exact thresholds should be determined in consultation with DPOs, employers' organisations and other relevant stakeholders.

61 NHS, 2019, NHS Workforce Disability Equality Standard (WDES) Annual Report 2019, pg 45

62 Professor Susan Corby and Dr Laura William, University of Greenwich, in evidence to the CSJ Disability Commission

## chapter three

# Accessible Homes

We are facing an ageing population who are living longer and working later into their adult lives. To add to this, almost 80 per cent of people become disabled during their working lives, which makes it important that all houses have an adequate level of accessibility and are adaptable. Yet we are facing a crisis in which the supply of accessible housing is outweighed by increasing demand, all of which negatively affects disabled people's employment opportunities, wellbeing, and health.<sup>63</sup>

In a survey of wheelchair users conducted by Adobe Impact in 2019, 80 per cent of respondents were currently living in a home that does not fully meet their needs, and 91 per cent experienced barriers to accessing the private rented sector; the main reason was the lack of available accessible properties (62 per cent).<sup>64</sup> A new approach is needed to build in accessibility at the design stage of the development.

### A new approach to building accessible homes

The Government's 2013–14 Housing Standards Review found accessibility standards for dwellings were a patchwork of local approaches to rules, guidance, codes, and regulations which were complex, counter-productive and sometimes contradictory.<sup>65</sup> As a result of this review the Government introduced new national accessibility standards in 2015, under *Approved Document M of The Building Regulations 2010*, which set the minimum accessibility standards for all new buildings in England. Volume 1 relates to dwellings (outlined in Table 2).

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63 Department for Communities and Local Government, March 2015, Housing Standards Review, pg 47

64 Adobe Impact, 2018, Accessibility is the Key

65 Department for Communities and Local Government, August 2013, Housing Standards Review

Table 2: The Building Regulations 2010 Access to and use of building: Approved Document Part M, Volume 1: Dwellings M4 (Categories 1–3)

<b>Mandatory</b>	M4(1) Category 1: Visitable dwellings	Guidance provided on level access, level thresholds, door and corridor widths, entrance level WCs and accessible heights for controls.
<b>Optional</b>	M4(2) Category 2: Accessible and adaptable dwellings	Broadly equivalent to the Lifetime Homes Standard, offering enhanced accessibility in circulation spaces and sanitary provision (bathrooms), and features to make homes more easily adaptable over time.
	M4(3) Category 3: Wheelchair user dwellings	Either: <i>Wheelchair adaptable</i> including design features to make a home easy to convert. <i>Wheelchair accessible</i> including features required by wheelchair users.

Source: MHCLG<sup>66</sup>

Each local authority is responsible for producing a local plan which sets out the building priorities for the local area, including in relation to accessibility. However, while the optional accessibility standards were introduced in 2015, it was not until the National Planning Policy Framework published in February 2019 that it became obligatory for local authorities to make use of these standards in the local plan where a need is identified.<sup>67</sup> In November 2020, the Government announced a consultation on raising the minimum accessibility standards.

The CSJ believes there are three reasons why the Government should raise the minimum accessibility standards from M4(1) to M4(2). First, the cost-saving of designing in accessibility from the start is huge, especially where this can reduce the need for adaptations later. On average, adapting a typical home costs up to five times more than making one adaptable at the design stage.<sup>68</sup> Indeed, CSJ analysis shows that the average total cost of building an accessible and adaptable house to M4(2) standards versus the minimal standards is equivalent to the average cost of retrofitting a ramp and widening a door.<sup>69</sup>

Put another way, one local authority estimated the cost of the 40 per cent M4(2) proportion on a 100-unit scheme was estimated to be less than 0.2 per cent of build costs,<sup>70</sup> while another stated that ‘most of the differences between the standard building regulations and the M4(2) standard can be achieved through careful design and layout rather than requiring additional costs.’<sup>71</sup> And each house that meets the M4(2) standard has an average 60-year saving to society of between seven and eight times the average cost of embedding higher accessibility at the design stage.<sup>72</sup>

66 MHCLG, 2020, Raising accessibility standards for new homes: a consultation paper, pg 8–9

67 Planning Portal, About the Planning System

68 EHRC, May 2018, Housing and disabled people: Britain’s hidden crisis, pg 25

69 EHRC and Habinteg, October 2018, Housing and disabled people: a toolkit for local authorities in England

70 Waveney District Council, December 2028, Topic paper: lifetime design M4(2) Standard Justification

71 Eden District Council, 2015, Eden local plan: Housing standards review and policy H55 background paper pg 9

72 Huntingdonshire District Council, 2017, Huntingdonshire Accessible and Specialist Housing Evidence paper, pg 20–21

Second, the baseline accessibility standard M4(1) does not provide a good level of accessibility for most disabled people. Under this minimal standard to which property developers must adhere, the front door must be accessible with a flush entrance and level access. However, there is no requirement for any of the other external doors in the house to meet this standard.<sup>73</sup> This may pose a potential fire risk to disabled inhabitants and would also require immediate adaptations to the property for it to be suitable for a wheelchair user.

Despite 80 per cent of disabled people acquire their disability during their working lives, the minimum standards have few requirements to prepare houses to be adapted later in life. For instance, there is no requirement that the ground floor bathroom has walls that are strong enough to support grab rails or other adaptations. This can mean that housing is often not suitable to be adapted to the needs and requirements of disabled people. At worst, individuals may have to sell their home to move into a more accessible property.

Third, few local plans include any targets for housing to meet higher accessibility standards which are more likely to meet the needs of disabled people. A Habinteg survey of local authorities in 2020 showed that just 25 per cent of new homes due to be built in England are set to the optional access standards (M4(2) or M4(3) standards).<sup>74</sup> Critically, more than half of English local plans have no mention of the optional accessibility standards.

There are several reasons why local authorities have failed to set targets in their local plans. Many local plans were put in place before the introduction of Part M in 2015, and before the introduction of the National Planning Policy Framework in 2019, which mandated the use of optional accessibility standards (if need is identified) in the local plan. There is also a general paucity of information on need in the local area, which local authorities need to use to justify the proportion of houses to be built to higher accessibility standards.

Despite optional accessibility targets having the same legal weight as any other element of the Building Regulations, in instances where local plans include these standards some developers do not adhere to them. The Equality and Human Rights Commission stated in their research report in 2018 that: 'developers can argue that accessible housing is more expensive and, therefore, less profitable, and negotiate that houses are built to the lowest allowable standards.'<sup>75</sup>

The CSJ Disability Commission created a survey to ask local authorities in England about the awareness of developers' non-compliance with accessibility targets. In total, eight per cent of local authorities (base = 236) were aware of developers in their local area that do not adhere to the accessibility targets specified in the local plan (or negotiated on site). The main reasons cited were cost and viability (50 per cent), optional accessibility targets not being a requirement (28 per cent), and site-specific constraints (17 per cent) including extensions to buildings not falling within the scope of the regulations. Two local authorities estimated that the proportion of developers who do not comply is more than 75 per cent.

73 Local Authority Building Control, 2016, Building regulations approved document Part M in a nutshell

74 Habinteg, January 2021, Briefing: forecast for accessible homes, pg 5

75 EHRC, 2018, Housing and Disabled People: Britain's Hidden Crisis, pg 5

The figures above are based on the local authority's awareness of non-compliance. While local authorities can check compliance with targets in their local plan, according to the Equality and Human Rights Commission, only 56 per cent of local authorities in Great Britain had an officer charged with monitoring compliance against the target.<sup>76</sup> The true figure for non-compliance is therefore likely to be much higher than the Commission's survey reveals.

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### **Recommendation 10**

The Government should raise the minimum accessibility standards from M4(1) to M4(2). This means that all new houses in large developments must be built accessible and/or adaptable as standard. This higher baseline will also help to remove the concern about non-compliance with the current optional targets.



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