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c/o Jean St Rose

FAO Green Paper Consultation team

Work & Health Unit

Department for Work and Pensions

Caxton House

6-12 Tothill Street

London SW1H 9NA

 17 February 2017

Dear Sir/Madam,

**Barclays’ consultation response: Improving Lives – the Work, Health and Disability Green Paper**

Please find attached Barclays’ response to the Department for Work and Pensions and the Department of Health’s consultation on the Green Paper looking at how to halve the disability employment gap.

We welcome the opportunity to respond to this consultation, and are pleased to see both Departments taking action on the important issue of increasing employment opportunities for those with disabilities.

We trust that you find Barclays’ contribution of assistance. If you would like to discuss any element of our submission further, please contact paulette.cohen@barclays.com.

Yours faithfully

Paulette

Paulette Cohen

Director, Diversity and Inclusion

Barclays

**Department for Work and Pensions and Department of Health**

Barclays response to: Improving Lives

- The Work, Health and Disability Green Paper

**Introduction**

Improving Lives – the Work, Health and Disability Green Paper was published on 31 October 2016 by the Department of Work and Pensions and the Department of Health, and reflects the Government’s approach to work, health and disability.

Barclays has contributed to discussions to date as a participant in the Expert Advisory Group. A case study of Barclays’ ‘This is Me’ campaign is included as a best practice example of creating a culture that encourages disclosure. We welcome the Government’s commitment to halving the disability employment gap.

The core premise behind the Paper is that it is not a disability or health condition that should dictate the path a person can take in life – or the workplace – but their talents and aspiration to succeed.

This is directly in line with Barclays aspiration to become the most accessible and inclusive FTSE 100 company. It also reflects our approach to increase employment opportunities for all, develop ways to recruit and retain the talents of all colleagues, with or without a disability or health condition, and build a culture of inclusion.

**Core themes**

We have considered the questions in the Green Paper that are most relevant to Barclays and have drawn out the following key points as the core elements of our response:

* ***Strengthen existing recruitment and retention processes and make them more inclusive***
	+ Proposed actions: Review the eligibility criteria for pre-employment and traineeship programmes, including internships and apprenticeships, by removing age and prior qualification criteria (e.g. Barclays Able to Enable internships for people with disabilities covers all ages); ensure programmes lead to meaningful work opportunities
* ***Improve knowledge/awareness of the employment potential of people with disabilities and health conditions***
	+ Proposed actions: Initiate a nationwide campaign to change attitudes towards people with disabilities in the workplace; adopt ‘This is Me’ as a national campaign for employers to challenge stigma around mental health in support of the PM’s review of mental wellbeing in the workplace; help education institutions build the confidence of disabled young people so they consider a wider range of employment opportunities
* ***Create the culture for an inclusive workforce that retains people with and/or acquiring a health condition by building healthier workplaces***
	+ Proposed actions: Consider the impact of short term diagnoses that could lead to long-term sickness absence by reflecting a broader range of health conditions, and not just disability in accordance with the Equality Act; embed wellbeing programmes in the workplace
* ***Promote the value of employee networks to support colleagues with disabilities and promote wellbeing***
	+ Proposed actions: Create ‘virtual’ colleague networks across smaller employers who can’t establish their own (possibly industry-specific); recognise the value of networks in supporting wellbeing to retain people of all abilities in employment
* ***Share best practice, in particular by supporting SME’s***
	+ Proposed action: Proactively connect large employers with examples of best practice to smaller organisations, e.g. their SME clients (e.g. Barclays corporate accessibility portal), provide industry-specific mentoring; engage supply chains and consider suppliers’ commitment to inclusive workplaces
* ***Strengthen existing Government initiatives to better serve employers as well as employees***
	+ Review Access to Work to streamline processes; ensure quality checks are incorporated into the Disability Confident Scheme

**Detailed response linked to Green Paper questions:**

**Question 5. Supporting people into work**

***What have you as an employer done to provide supported internships and what were the barriers?***

**Strengthening recruitment processes:**

Barclays is fully supportive of scaling up supported internships for people with disabilities and has its own programme to drive this forward: Able to Enable. We recognise that such programmes are beneficial for people of all ages.

We would, however, recommend that DWP pre-employment programmes and DFE traineeship programmes should be re-aligned to develop a single, all-age pre-apprenticeship programme. At Barclays, we partner with Remploy to identify suitable people for our internships, and Capita to identify candidates with disabilities for our apprenticeship programme. <http://joinus.barclays.com/emea/apprenticeships/>

We recommend businesses increase their percentage of people with disabilities taking up suitable apprenticeships and that the right steps are put in place to support them in that recruitment process. At Barclays, our ambition is to achieve a minimum of 10% of people with disabilities taking part in our Early Careers programmes. We also believe employers should be able to invest a percentage of their levy funding on pre-apprenticeships programmes and take ownership of programme design.

Businesses should recognise that some environments and roles do not lend themselves to employing people with certain types of physical disability where environments may restrict mobility and accessibility is currently limited e.g. some bank branches. Barclays has learnt that there is more to do to improve situations of physical accessibility to open up more employment opportunities. Business also needs to do more to simplify recruitment processes, and challenge myths and stigma around recruiting people with disabilities ( see our recommendation around a campaign).

**Improving knowledge/ awareness:**

Barclays experience of proactively recruiting people with disabilities suggests there is lack of knowledge in schools and colleges about the business opportunities available and that employers are now looking more to judge applicants on potential and merit rather than disability. Heightened awareness in education institutions is needed to build the confidence of young people with disabilities to apply for these opportunities.

**Question 8. Embedding supportive practices and cultures**

***What are the key barriers preventing employers recruiting and retaining the talent of disabled people and people with health conditions?***

**Strengthening recruitment processes:**

The Green Paper clearly focuses on work for those with disabilities, but it should better acknowledge that most people will acquire a disability, or a long or short term health condition, whilst they are in employment and therefore should reflect a broader definition of health conditions beyond the Equality Act. There is a need to reinforce the importance of providing support for people whilst they are in work and responding to both long-term health conditions and disabilities as well as short-term conditions with a broad approach to implementing a business-wide wellbeing strategy. We recommend taking an inclusive approach to workplace adjustments and a centralised budget so that adjustments are open to all and there is a consistent response. Ensuring that there is an approach to offering flexible working also opens up opportunities for people with disabilities and health conditions. At Barclays, our Dynamic Working campaign is designed to ensure every potential and existing employee has the same opportunities at work: <https://jobs.barclays.co.uk/working-here/dynamic-working/>

**Creating an inclusive workforce:**

It’s important to encourage people to disclose their disability or health condition both when applying for work and whilst in work. However, we do not feel disclosure should be mandated, but rather business adopts a more inclusive culture that encourages voluntary disclosure. To do this, there needs to be a more positive attitude towards recruiting people with disabilities as we know people fear they will not be considered for employment if they do.

**Improving knowledge/ awareness:**

We fully support an awareness campaign to challenge misconceptions about employing people with disabilities. It should leverage case studies of people with a wide range of abilities to help build the confidence of others who are seeking employment.

In Barclays, our campaign ‘This is Me’ has played this role and supported people by breaking down barriers and challenging stigma around mental health at work. It has helped build the confidence of those who have told their story and encouraged disclosure – Barclays saw an increase in self-identification from 3% to 7% over two years. Personal films from those with a disability or health condition, sharing their story are a pillar of the campaign. These resources are widely available through channels like YouTube and are therefore open-source for the Government to use as examples of best practice.

It has helped to embed a culture of wellbeing and has supported the retention of colleagues with disabilities as they feel they can be honest and open. In parallel to an awareness campaign, it’s important to ensure other support is in place. Barclays has partnered ‘This is Me’ with line manager training – a ‘Becoming Disability Confident’ online module, and also a robust process for workplace adjustments including the development of a Workplace Adjustment Passport, which enables colleagues with disabilities or health conditions, and the adjustments they need, and take this with them as they move through the organisation. We have also mainstreamed workplace adjustments, moving away from reasonable adjustments as a legal obligation only for colleagues with disabilities. This is both a more inclusive approach and makes good business sense. It enables all colleagues to perform at their best, and provides support to those returning to work from periods of absence with the adjustments they need whether they are covered by the Act or not.

We recommend that Government-led campaigns need to mainstream the issue of disability, e.g. the ‘Get In Go Far’ ad campaign for apprenticeships should feature a candidate with a disability and exemplify the positive impact employers can have in recruiting a diverse workforce. Showing ‘real’ stories reinforces authenticity and a genuine commitment to a diverse workforce.

‘This is Me’ is an example of how a campaign can scale up cultural change to build an inclusive workforce. In partnership with the Lord Mayor’s Appeal, ‘This is Me in the City’ has registered 76 organisations, with 22 directly deploying campaign activities, representing over 400k employees. It plans to double its reach and impact in 2017. Given the resources and charity partnerships are already in place, we recommend that ‘This is Me’ be adopted as a national campaign to tackle the stigma of mental health in the workplace across the UK. Rather than developing an alternative campaign, ‘This is Me’ would fully support the PM’s drive to shift the dial around mental health in the workplace. <https://www.home.barclays/news/2016/11/this-is-me.html>

Government need to consider that any external campaign should be matched with access to appropriate jobs. People with disabilities seeking work as a result of heightened awareness need to be able to source those roles.

**Promoting employee networks:**

Employee networks are increasing but more needs to be done to harness these groups to provide additional support for those with disabilities in work. Increased engagement with organisations like Purple Space would facilitate this.

Networks support the wellbeing of colleagues in the workplace, for example guiding people through the process of workplace adjustments and leading awareness campaigns. In Barclays, our network, Reach, has played a key role in mentoring candidates through the recruitment process and during their induction in the business once appointed. The Reach network initiated the ‘This is Me’ campaign to challenge the stigma of mental health in the workplace. From an original nine network members sharing their own experiences, nearly 200 colleagues have now done the same. Networks can help to influence practice and challenge culture and stigma within organisations and help to change minds and attitudes towards employees with disabilities and health conditions. Networks also provide valuable insight into the issues people with disabilities encounter at work and can help develop solutions. Research from Purple Space (Feb 2017) shows that 9/10 people surveyed feel that both employers and employees gain significant value from disability networks and 96% of those surveyed in the private sector believe that networks are key in retaining employees with disabilities in the workplace.

However, for smaller organisations, we recommend the government facilitate the development of industry-specific virtual networks to ensure that all organisations, including SME’s benefit from this asset. They should also capitalise on these structures to improve connectivity across networks and share best practice.

**Sharing best practice, in particular for SMEs:**

Sharing information and best practice is important and more could be done to bring together alliances of disability bodies and NGO’s to stop duplication of effort and to make it easier for people to find information. Action to link those organisations that are taking positive steps to recruit and support people with disabilities into work should be taken, recognising that there may be more relevant experience on a sector-by-sector basis and that sometimes organisations need more guidance than self-serving through a database. Organisations like BDF can play an important role here and Government could put in place steps to facilitate connectivity.

There is more business can do to connect large organisations with SME’s. Larger businesses can play an important role in supporting SME’s by connecting with clients, partners and supply chain as demonstrated through Barclays corporate portal [www.barclayscorporate.com/accessibility](http://www.barclayscorporate.com/accessibility). For example, in Barclays’ case it shares best practice with clients and finds ways to support them, and suppliers, with appropriate services, as well as mentor them around best practice processes. This could be seen as a powerful value-add to SME clients.

Metrics are important in trying to drive the business case. They help to build confidence within a business and influence the right processes and practice. However, more data is needed and there needs to be some consistent metrics that demonstrate the link between performance and productivity. The Government could play a key role in coordinating agreement around consistent key metrics and analysing the data that will support the business case for employing people with disabilities and health conditions.

**Question 9. Moving into work**

***How can existing government support be reformed to better support the recruitment and retention of disabled people and people with health conditions?***

**Strengthening Government initiatives:**

It is recognised that whilst Access to Work has the right objectives, there is more to do to meet the needs of both employers and those with disabilities and health conditions. Barclays experience is that processes can be cumbersome and bureaucratic, for both employers and employees. For example, grants coming in cannot be attributed to individual cases, and it is prohibitive for multiple use. There is also duplication of assessments by different bodies before any grant can be awarded which is both time-consuming and a drain on resources.

Based on this, we believe there is more it could do to meet its policy objectives and recommend it should be reviewed. Streamlining the process would increase efficiency and uptake, and a deeper understanding of the requirements of both key stakeholders is recommended. We would agree with the Business Disability Forum’s (BDF) recommendation that the scheme should be made more ‘customer-centric’.

There is also an opportunity to improve Access to Work’s process by moving from being paper-based to digital. This would enhance the claims process and could also consider ways of standardising accessibility markers to lead the way in shaping a common approach. We recommend this be considered as part of the review to make funding more accessible to applicants. Businesses like Barclays would be able to provide advice and testing with customers and clients.

We acknowledge that the Green Paper references a strengthening of the Disability Confident Scheme and in particular the formation of the Disability Confident Leaders Group. We support the scheme being a first step for employers to consider recruiting more people with disabilities and building ‘quantity’ of participants.

However, we also feel it would benefit from great rigour in assessing ‘quality’ of actions, to ensure meaningful interventions are put in place at levels 1 and 2. Consideration should be given to expand a degree of independent benchmarking to these levels, even by Disability Confident Leaders who could assess the steps put in place to recruit and support people with disabilities or health conditions.

**Question 10. Staying in or returning to work**

***What good practice is in place to support inclusive recruitment, promote health and wellbeing, prevent ill health and support people to return to work after periods of sickness?***

**Strengthening processes:**

Processes need to be in place to enable managers to have the confidence to have a conversation about disability or health conditions in order to support people staying in, or returning to work. They should also be equipped to identify conditions that may lead to absence. We do not advocate mandating contact during absence which can actually exacerbate illness, especially if linked to mental ill health. However, it’s important to place emphasis on supporting line managers to have such conversations and advise on when these might be most appropriate rather than mandating it.

We believe there is an important role for Government in providing advice to business on best practice and take an industry/sector-specific approach, as a one-size-fits-all response would not be appropriate.

**Question 15. Changing the culture around work and health**

***How can we bring about a shift in society’s wider attitudes to make progress and achieve lasting change?***

**Improving knowledge/ awareness:**

We agree it is important to build a culture where employers accept it is their responsibility to look after their employees and to reduce the number of people acquiring conditions, or needing absence from work. This requires a sustained campaign that also incorporates the importance of long-term care and wellbeing as well as providing access to key information.

We recommend using existing frameworks, for example, the principles identified as part of the *Time to Change* campaign, and the Government needs to reinforce a long-term commitment to meeting such goals. ‘This is Me in the City’ is using these principles as a benchmark to monitor progress.

There is a role to play for NGOs to coordinate their efforts, rather than duplicate effort. The Government can play a role pulling them together, recognising collaborative efforts and not promoting independent action.

The media has an important role to play through its reportage of disability and mental health conditions – negative coverage perpetuates myths, and discourages employers, which acts as a barrier to employment of people with disabilities. Government can play an important role in getting the media on side to present a more positive representation of people with disabilities and their potential as a talented workforce.

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| **Summary of recommendations**  |
| **Strengthening recruitment processes** | * Remove age and prior qualifications criteria for traineeships/ internships and apprenticeships to develop a single all-age programme
* Enable employers to use a % of their apprenticeship levy funding on pre-apprenticeships programmes and give them ownership
* Provide all businesses with best practice to adapt recruitment processes to attract disabled applicants
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| **Improving knowledge/awareness** | * Initiate a nationwide campaign to change attitudes to disabled people at work
* Develop ‘This is Me’ to become a UK-wide campaign to challenge stigma around mental health the workplace
* Mainstream the issue of disability in government campaigns
* Work with the media to change reportage of disability at work
* Raise awareness of positive work opportunities for young disabled people through education institutions
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| **Creating an inclusive workplace to retain colleagues** | * Broaden the definition of health conditions beyond the Equality Act to include short-term and long-term conditions
* Encourage implementation of robust wellbeing programmes to create a healthy workplace and retain employees
* Support line managers in having conversations during absence of leave (and before) rather than mandating contact
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| **Sharing best practice in particular with SMEs** | * Facilitate the connections between large employers and SME’s to share learning and information and to act as mentors
* Harness relationships and resources through bodies like BDF to support small businesses
* Engage supply chains to build an inclusive workforce e.g. monitoring via codes of conduct
* Identify and coordinate core metrics that support the business case
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| **Promoting employee networks** | * Create virtual colleague networks across smaller employers and also enhance connections across networks to share best practice
* Harness the experience of bodies like Purple Space
* Work with existing colleague networks to influence culture and provide support when employing people with disabilities
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| **Strengthening government initiatives** | * Review Access to Work to make it work better for both employers and people with disabilities
* Move Access to Work from paper based to digital and create a common framework for accessibility markers
* Strengthen Disability Confident and ensure it includes quality checks not just a focus on quantity at levels 1 and 2
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