

Disability Confident Leader Validation template

The following template can be used by your independent validators to challenge your self-assessment and confirm that you are delivering against all of the core actions as a Disability Confident Employer, are employing disabled people and taking action to record and report on disability, mental health and wellbeing in the workplace.

You should complete the evidence column which will be used by your validator to challenge your self-assessment.

The amount of evidence required will vary depending on the size and nature of the business. The guidance for each criteria is included in the <u>Disability Confident employer (level 2) self-assessment pack</u>, which you can download from GOV.UK.

Business/Organisation name	Nottinghamshire County Council
Disability Confident Reference number (DCS00xxxx)	DCS005692
Validator's name (organisation, group, forum or Disability Confident leader)	
Date of validation	

Criteria As a Disability Confident employer, my business is:	Evidence	Validator comments or further action required
 Actively attracting and recruiting disabled people to help fill your opportunities (including jobs, apprenticeships, internships, work experience, etc. 	The Council's commitment to enabling everyone to achieve their employment potential is outlined in the <u>Employment and Health Strategy</u> The Council is committed to employing and retaining employees who have a disability, as	



Theme 1 – Getting the right people i	Theme 1 – Getting the right people for your business - The employer must have agreed to all the following actions.	
	stated in the <u>Guidelines for Managers on</u> <u>Recruiting Disabled People</u> .	
	The Council's <u>Recruitment Statement</u> states that any applicant who has a disability should be shortlisted for interview where they meet all the essential shortlisting criteria or they meet the essential shortlisting criteria taking into account any reasonable adjustments which can be made.	
	The Council's job application form states the Council's commitment to developing positive practices to promote equality in employment, and a guarantee of an interview to disabled candidates who meet the essential shortlisting requirements.	
	The Council participates in the Leonard Cheshire Change 100 Internship Programme, which brings together employers and disabled graduates to offer paid work placements.	
	The Council attends a number of jobs fairs and careers outreach events throughout the year for various audiences, including attending the Armed Forces Covenant Job Shop	
	The Council has produced ' <u>Guidance on</u> advertising to attract under-represented groups'	



	which provides guidance on placing job adverts in the disability press and on disability websites	
2. Providing a fully inclusive and accessible recruitment process.	To ensure that people involved in the recruitment process at the Council are Disability Confident and know how to support disabled applicants the Council provides specific guidance for managers on Employing Disabled People, created in consultation with the Council's Disabled Employees Support Network.	
	Managers are also required to undertake 'Recruitment and Selection' e-learning, which includes information on equality and disability. All members of staff are required to complete "Treating People Fairly" e-learning.	
	Vacancies are advertised with a detailed job description and person specification which clearly set out what the job holder is required to achieve.	
	The online recruitment system has been tested by members of the Council's Disabled Employees Support Network and different formats are available. Applications are submitted online, but alternative methods of submitting application forms are available	



3.	Offering an interview to disabled people who meet the minimum criteria for the job.	The Council's <u>Recruitment Statement</u> states that any applicant who has a disability should be shortlisted for interview where they meet all the essential shortlisting criteria or they meet the essential shortlisting criteria taking into account any reasonable adjustments which can be made.	
		The Council's job application form states the Council's commitment to developing positive practices to promote equality in employment, and a guarantee of an interview to disabled candidates who meet the essential shortlisting requirements. The application form provides an opportunity for applicants to declare their disability alongside the information on the interview guarantee.	
		The Council identifies the core elements of a job and makes these known in the job advert, job description and person specification that is published with each job advert.	
4.	Being flexible when assessing people so disabled job applicants have the best opportunity to demonstrate that they can do the job.	Managers have been provided with guidance on making reasonable adjustments <u>Guidelines for</u> <u>Managers on Recruiting Disabled People</u> . and can also seek advice from the HR Service. Applicants are asked if any reasonable adjustments are needed to allow them to be	



Theme 1 – Getting the right people for your business - The employer must have agreed to all the following actions.		
	considered for the job and to attend an interview.	
	A range of assessment tools are available to managers and advice given on any potential bias which can be implied from the use of any one of these	
5. Must proactively offer and making reasonable adjustments as required.	The Council actively encourages all managers to identify and make full use of reasonable adjustments when the duty arises.	
	Guidance on reasonable adjustments and what this might include is available to all managers: <u>Guidelines for Managers on Recruiting Disabled</u> <u>People</u>	
	The Council also promotes flexible working and disability leave, which can support disabled people to enter the Council's workforce and remain in employment whilst managing their disability.	
	Where financial assistance is provided through the Access to Work scheme, the Council commits to cover a proportion of any associated costs of recruiting, inducting and retaining a disabled person when required.	



6.	Encouraging our suppliers and partner firms to be Disability Confident.	In accordance with Equality Act 2010, and Public Sector Equality Duty, the Council's procurement strategy sets out our priority to encourage our suppliers to support our commitment to equality, fairness and transparency; to be responsive to the needs of our communities; to meet the diverse needs of all users to ensure no one group is disadvantaged and to commit to developing a diverse and inclusive workforce. All providers with whom we contract for services are required to have sound equality policies and procedures in place which ban discrimination/bullying, provide diversity training for their staff which is inclusive of all the protected characteristics as defined by the Equality Act 2010 and revise their policies regularly.	
7.	Ensuring employees have appropriate disability equality awareness training.	 The Council ensures all employees have sufficient disability equality awareness through a range of learning and development opportunities that includes: Treating People Fairly – mandatory training for all staff underpinning how we provide our services and work together. Covers the Law and personal attributes and behaviours 	
		Autism Awareness	



Theme 1 – Getting the right people for your business - The employer must have agreed to all the following actions.		
	Communicating with Deaf Customers	
	Deafblind Awareness	
	 Equality Impact Assessments 	
	 Learning Disability Awareness 	
	 Accessible Information (covers legislation, The Councils responsibilities, how to create accessible information and supporting people with communication difficulties) 	
	Unconscious Bias	
	Active bystander	
	Bereavement	
	 Mental Health First Aider course 	
	Personal Resilience	
	 Parkinson's awareness 	
	 Dementia Friends – working towards making Nottinghamshire more Dementia Friendly covering how dementia effects a person and what you can do to make a difference 	
	 Attendance Management and Wellbeing – includes employee well-being policies, the role of Occupational Health Unit, disabilities, impairments and protected characteristics 	



In addition to the above courses, all employees have access to a catalogue of personal development learning topics that include sections on equality and diversity, resilience, values, well-being, self-awareness and emotional intelligence	
Further specialist learning and development opportunities covering a range of disabilities are available for staff within our adult and children social care teams	



Disability Confident Leader Validation template (Annex A)

Theme 1 – Getting the right people for your business

Activity	Evidence	Validator comments
1. Providing work experience.	We have a comprehensive work experience programme starting from Year 10 onwards that includes specific modules for Looked After Children and Care Leavers.	
	We also offer work experience placements to adults looking at a career change or returning to work.	
	There is also a wide range of opportunities for placements from local universities to specific teams within the Council that offer work experience relevant to the study. Most noticeably for social work, occupational therapists and post graduate Public Health courses	
	Applicants for all work experience programmes are asked about any reasonable adjustments or additional support needs they have.	
	Following the Covid 19 pandemic, we are developing a range virtual work experience	



Activity	Evidence	Validator comments
	package that will be accessible through a dedicated eLearning portal	
2. Providing work trials.	A small number of work trials in place of interviews have been offered to applicants with Autism and Asperger's for our apprenticeship programme	
 Providing paid employment (permanent or fixed term). 	6.38% of the Council's workforce have declared that they consider themselves to have a disability as of April 2020, an increase from 5.77% in 2019	
	Two interns have retained employment with the Council as a result of their participation on the Change 100 programme	
4. Proving apprenticeships.	The Council currently has 166 directly engaged apprentices and 55 engaged through our schools. We promote apprenticeship opportunities in a range of places to promote our offer to all parts of our existing and future workforce.	
	The Apprenticeship salary budget managed by the Workforce and Organisational Development	



Activity	Evidence	Validator comments
	team is ringfenced for apprentices from groups vulnerable to NEET status	
	A number of apprentices have disclosed a range of learning disabilities, predominantly dyslexia, and one apprentice was redeployed from the Councils supported employment programme when changes were made to the team	
5. Providing a traineeship.	The Council currently contract our Traineeships for 16 – 24year olds to Inspire Learning. Inspire is Community Benefit Society developed as part of an innovative strategy led by the Council to manage some of its libraries and cultural services across Nottinghamshire.	
 Providing paid internships or support internships (or both). 	The Council partners with Leonard Cheshire to deliver the Change 100 programme of internships for disabled students and graduates.	
	A representative of the Council supports the national recruitment to the scheme by participating in assessment centres.	
	The Council has participated in the Change 100 programme since 2017 and have offered a variety of opportunities for interns across	



Activity	Evidence	Validator comments
	departments each summer. The Council offers four placements a year and whilst 2020 placements were impacted by Covid 19, still successfully supported intern placements working remotely.	
	The managers, mentors and wider teams that are hosting an intern all receive disability and employment training sessions as well as ongoing support form Leonard Cheshire during the programme which is in addition to our own comprehensive learning programme.	
	Two interns have retained employment with the Council as a result of their participation on the Change 100 programme	
 Advertising vacancies and other opportunities through organisations and media aimed particularly at disabled people. 	All vacancies are advertised on the Council's website. Recruiting managers have the option to post the vacancy to a number of other online recruitment and social media sites including LinkedIn.	
	The Council has produced ' <u>Guidance on</u> <u>advertising to attract under-represented groups</u> ' which provides guidance on placing job adverts in the disability press and on disability websites	



Activity	Evidence	Validator comments
	such as Disability Now magazine, Able Magazine and Disabilityjobboard.com.	
	Apprenticeship opportunities are advertised on the National Apprenticeship Service website and circulated to local employability and Careers IAG services	



Activity	Evidence	Validator comments
 Engaging with Jobcentre Plus, Work and Health Programme providers (If you're in Scotland contact <u>Fair Start Scotland</u>) and local disabled people's user led organisations (DPULOs) to access support when required. 	All of our vacancies are available to the Jobcentre Plus for people attending the Work and Health programme to apply. The Council publishes a list of organisations across Nottinghamshire who represent people with protected characteristics. These organisations can be contacted for support, advice or consultation	
 Providing an environment that is inclusive and accessible for staff, clients and customer. 	All Council buildings are DDA compliant The Council is committed to ensuring that the duty to make reasonable adjustments for disabled employees is followed in a positive and proactive manner The Council has developed and implemented an Accessible Communication Policy that ensures the Accessible Information Standard is complied with. The scope of the Standards extends to individuals (and parents/carers where appropriate) who have information and/or communication support needs which are related to or caused by a disability, impairment or sensory loss.	



Activity	Evidence	Validator comments
	The Council uses a range of customer focussed digital platforms as a source of information, access services and to establish two-way engagement	
10. Offering other innovative and effective approaches to encourage disabled people to apply for opportunities and supporting them when they do.	I-work team – offers support to Nottinghamshire residents who have a learning disability or Asperger's to find a job, set up a work trial and continues support once a position has been secured.	
	Employment Training Hub – offers employment and training opportunities to Nottinghamshire residents who have a learning disability, autism or Asperger's. The programme aims to get people ready for paid employment through a range of activities in a work environment	
	Engage2Employ – supports Nottinghamshire young people aged 16 – 25 not in Education, training or employment who have a learning disability or Asperger's to find work placements that will lead to sustained employment	



Theme 2 – Keeping and developing your people

The employer must have agreed to all the following actions.

Criteria As a Disability Confident employer, my business is:	Evidence	Validator comments or further action required
1. Promoting a culture of being Disability Confident.	The Council strives to ensure it goes beyond the requirement of the Equalities Act and prides itself on being accredited as a Disability Confident Organisation. the Council is also a Stonewall Top 100 employer and has schemes to support LGBT and Black employees through the Proud Ally and Anti-Racism Ally programmes.	
	The Council has three well established staff groups:	
	Disabled Employees Support Network	
	Black Workers Network	
	 Lesbian, Gay, Bisexual and Trans Staff Network 	
	which provide support and professional development opportunities for employees and are important consultation forums for reviewing policies and services.	



The Council has created <u>Guidelines for</u> <u>Managers on Employing Disabled People</u> , created in consultation with Corporate Disabled Employees Support Network, which details the benefits of employing disabled people, and the Council's commitment to employing disabled people. "Treating People Fairly" is one of the Council's core values.	
The Council encourages employees to dis- close information on any disabilities they may have. Employees are encouraged to update their equality information held on the HR Sys- tem BMS, with regular reminders issued. 83% of employees have confirmed their disability status as of April 2020.	
The proportion of employees who classify themselves as having a disability has in- creased from 5.14% in April 2017 to 6.38% in April 2020.	
The Council, working with the Trade Unions, has reviewed how employees share infor- mation around their disability and any required adjustments with a view to streamlining this process, currently badged as a 'disability pass- port."	
The Council's <u>Harassment Complaints</u> <u>Procedure</u> details the Council's policy and processes for making a complaint, informally	



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	and formally, on any grounds including disability discrimination.	
	The Council regularly consults with employees about their perceptions of issues, barriers and concerns. The Corporate Equality Group meets regularly, and the Council's staff groups are represented by their respective chairs, including the Disabled Employees Support Network chair. Feedback from the Network is shared at the Corporate Equality Group meetings.	
	The Council has reviewed its key employment policies and ensured that they are fully compliant with all the requirements of the Equality Act 2010 and inclusive to all employees.	
	The Council's Disabled Employees Support Network organises an event in November to celebrate Disability History Month, in collaboration with public sector partners.	
2. Supporting employees to manage their disabilities or health conditions.	The Council supports its employees to manage their disabilities and health conditions.	
	The Council provides support for employees who become disabled or experience health problems via the Council's Occupational Health Service, which provides early intervention, promotes active case	



management to assist with rehabilitation and supports return to work following long term absence.	
Disability Leave is also available to support employees who have a disability, who need to take time off work for rehabilitation, assessment or treatment. This is not recorded as sickness and does not count for sickness absence trigger purposes.	
The Council also supports employees through offering flexible working patterns and home working and is currently working with Timewise to develop the Council's flexible working offer and become a Timewise accredited employer.	
Guidance has been produced on <u>supporting</u> <u>employees with terminal illness</u> , and the Council also signed up to the TUC Dying to Work Charter in 2016, to signal its commitment to supporting employees who are diagnosed with a terminal illness.	
The Council's <u>Guidelines for Managers on Re-</u> <u>cruiting Disabled People</u> provides guidance on making reasonable adjustments to support em- ployees. Where financial assistance is pro- vided through the Access to Work scheme to cover a proportion of any associated costs of retaining a disabled person in the workplace, the Council is committed to supporting costs	



associated with the Access to Work scheme as required	
The Council has an extensive range of support and information to all employees on managing their Health and Wellbeing with a dedicated page on the Intranet under Employee Wellbeing	
This page includes information on a range of topics and links to the support networks for employees that include:	
Mental Health First Aiders	
Workplace Chaplaincy Service	
Workplace Buddy Scheme	
Workplace Health Champions	
 Links to other support organisations external to the Council 	
The Council's counselling service	
There is also information on discounted gym membership, cycle to work scheme, flu jabs, eye vouchers and the health cash plan that is available to all employees.	
These pages are updated regularly and have specific sections on in response to Covid 19	
The Council also provides support for employees assessed as having dyslexia and	



	has produced associated management guidance.	
	The recognised Trade Unions are engaged in joint working with Council managers and HR colleagues to further develop employee health and wellbeing initiatives.	
	The Council is a platinum award winning wellbeing winner	
3. Ensuring there are no barriers to the development and progression of disabled staff.	The Council is committed to ensuring there are no barriers to the development and progression of staff with disabilities.	
	The highest representation of disabled employees at the Council is in mid-level professional (8.21%) and line management posts. 4.30% of the Council's top paid 5% of staff stated that they have a disability in 2020.	
	The Employee Performance and Development Review (EDPR) and Support and Supervision processes are arenas for all employees to discuss training and development on a regular basis.	
	Appropriate support is offered to employees when attending learning and development courses. The booking process asks employees to identify any additional needs they may have, which are reviewed by the HR, Workforce and Organisational Development Business Support	



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	Team and appropriate arrangements made. All venues used for direct delivery are accessible. An evaluation form is sent to every training course attendee which allows employees to feedback on any accessibility issues.	
	The E-learning system that the Council uses is compatible with most screen reader software.	
	There is a taxi service in lieu of authorised car user allowances for eligible employees, which is promoted on relevant job descriptions.	
	The council has developed an in-house coaching network which is promoted across the workforce as a mechanism to allow employees to work with a trained coach on areas of development outside of traditional line management arrangements	
4. Ensuring managers are aware of how they can support staff who are sick or absent from work.	Managers are providing with a range of support and guidance on supporting staff who are sick or absent from work.	
	Special consideration is given to employees that require leave that is directly associated with their disability	
	There is a clear process for managing absence detailed in the Attendance Management Procedure, published on the intranet. The employee induction checklist requires	



managers to discuss the absence/sickness procedures with staff in their first week.	
The Attendance Management Procedure requires managers to maintain contact with staff who are absent from work through regular telephone or written correspondence and a pre-arranged visit after four weeks' absence.	
Guidance on managing stress in the workplace is available for managers and risk assessments can also be undertaken at an individual level by the manager and employee.	
The Wellness Action Plan is available to all employees to identify how to identify stressors and what you can do to keep well at work	
The Stress Return to Work Questionnaire is also available for managers to complete with the employee when planning an employee's return to work following stress-related absence.	
Managers are also supported by:	
the Occupational Health Service	
The HR Service	
 Guidance and support on making reasonable adjustments for employees with a disability. 	



	 Guidance for managers on supporting employees diagnosed with a terminal illness 	
	The Redeployment Policy states the Council's commitment to retaining the services of employees who as a result of disability, illness or injury may be "at risk" of losing their existing job. This commitment extends to making an adjustment to their existing job to enable them to continue working wherever possible. The Policy sets out the Council's processes for the redeployment of employees.	
5. Valuing and listening to feedback from disabled staff.	There are a range of opportunities for all employees to provide feedback.	
	Employee Health Check surveys are regularly undertaken in Children's and Adult's Services.	
	Six Employee Workshops were held for staff across the County in 2018 with 550 employees attending. The two-hour workshops were hosted by the Chief Executive Anthony May to hear people's views about what it's like to work for the Council. Feedback was also sought via email for those staff who did not attend a session.	
	The Chief Executive also has a regular blog which encourages employees' feedback and	



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	throughout the Covid 19 pandemic there have been a number of Chief Exec's Q&A sessions with employees	
	The Workplace Buddy scheme was developed following a staff survey and focus groups to ascertain what activities employees would find most helpful in preventing them suffering from stress or becoming depressed and help them remain at/return to work.	
	The Change 100 interns provide feedback on their placements to allow the Council to improve the programme in future.	
	The Council has a self-managed Disabled Employees Support Network for Council employees who identify as having a disability. The chair of the Network attends the Corporate Equality Group, and feedback from the Network is shared at the Corporate Equality Group meetings.	
	The Employee Performance and Development Review (EDPR) and Support and Supervision processes are also arenas for all employees to speak about their needs and ambitions.	
6. Reviewing this Disability Confident employer self-assessment regularly.	This is the first detailed review since October 2018. Quarterly reviews on progress will be built into the programme to develop our approach	

disability files confident	
	Our application has received the support of elected members as part of Personnel Committee who have supported this submission and have requested regular updates



Theme 2 – Keeping and developing your people.

Activity	Evidence	Validator comments
 Providing mentoring, coaching, buddying and or other support networks for staff. 	NCC provides a wide range of support for staff including:	
	An accredited <u>Mental Health First Aiders</u> scheme offering a first port of call, listening ear and signposting service for employees	
	A <u>Workplace Chaplaincy service</u> – offering independent confidential support to employees.	
	A <u>Volunteer Workplace Buddy Scheme</u> – providing support for employees returning to work after a significant period of long term absence. The buddies help to support reintegration into the workplace and help sustain the employee's ongoing attendance at work.	
	Workplace Health Champions who are network of employees that provide information about healthy lifestyles to all employees	
	Managers can refer staff to a formal Counselling Service provided by an external provider, via the HRWOD team. and	



	Employees can self-refer to telephone Counselling scheme A <u>coaching network</u> which provides coaching for employees from a network of training and qualified coaches. Employees can self-refer or be referred by their manager. Workplace coaching can assist with personal growth and	
	building confidence and resilience. A <u>Disabled Employees Support Network</u> pro- vides support for Council employees who iden- tify as having a disability. The Network aims to support, help and offer guidance, challenge discrimination in the workplace on the grounds of disability, promote awareness of issues which affect people with disabilities and advise on making Council services and policies more inclusive of people with disabilities. All council employees who identify as having a disability are entitled to up to 3 hours per month away from their workplace to attend the meetings and/or get involved in network activities. The Network reports into the Corporate Equality Group.	
disability awareness training in our induction	The Council ensures all employees have sufficient disability equality awareness through a range of learning and development opportunities that includes:	



 Treating People Fairly – mandatory training for all staff underpinning how we provide our services and work together. Covers the Law and personal attributes and behaviours
Autism Awareness
Communicating with Deaf Customers
Deafblind Awareness
Equality Impact Assessments
Learning Disability Awareness
 Accessible Information (covers legislation, The Councils responsibilities, how to create accessible information and supporting people with communication difficulties)
Unconscious Bias
Active bystander
Bereavement
Mental Health First Aider course
Personal Resilience
Parkinson's awareness
Dementia Friends – working towards making Nottinghamshire more Dementia Friendly covering how dementia effects a



		person and what you can do to make a difference	
		• Attendance Management and Wellbeing – includes employee wellbeing policies, the role of Occupational Health Unit, disabilities, impairments and protected characteristics	
		In addition to the above courses, all employees have access to a catalogue of personal development learning topics that include sections on equality and diversity, resilience, values, wellbeing, self-awareness and emotional intelligence	
		Further specialist learning and development opportunities covering a range of disabilities are available for staff within our adult and children social care teams	
		The employee induction checklist requires managers to inform new starters about the self-managed staff groups (including the Disabled Employees Support Network) and the Council's Equality and Diversity policy.	
3.	Guiding staff to information and advice on mental health	The Council provides information and advice to employees on mental health conditions via:	
	conditions.	The <u>Career Development Portal</u> launched in October 18 which contains information and advice on a range of subjects including stress,	



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	resilience and wellbeing. Specific information and advice are also available for managers on mental health and wellbeing.	
	'Personal Resilience' and 'Emotional Intelligence' e-learning is available to all staff.	
	'Mental Wellbeing – Managers Guide', 'Developing Mental Toughness' and 'Emotional Intelligence' e-learning is available to managers.	
	A network of Workplace Health Champions (who have attending a Royal Institute of Public Health Level 2 in Understanding Health Improvement course) cascade information about healthy lifestyles to colleagues.	
	The wellbeing intranet pages were relaunched in January 2020 and provide advice and information on Covid 19, mental health wellbeing, support available at work, and contact details for relevant health and wellbeing organisations.	
	The Council recognises a number of Health and Wellbeing campaigns that all involve some events designed to raise aware and offer support to employees. Including but not limited to:	
	Time to Talk Day (February)	



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	Stress Awareness Month (April)	
	World Health Day (7 th April)	
	Deaf Awareness week (May)	
	Mental Health Awareness week (May	
	Men's Health Week (June)	
	 World Suicide Prevention Day (10th September) 	
	MacMillan Coffee Morning (September)	
	World Mental Health Day (10 th October)	
	World Aids Day (1 st December)	
	Recent initiative around Time to Talk day had virtual drop in sessions hosted by our Mental Health First Aiders and Chaplaincy service, with talks on promoting positive mental health and sitting yoga sessions	
 Providing occupational health services if required. 	NCC has an Occupational Health service for employees.	
 Identifying and sharing good practice. 	The Council is a member of a number of public sector networks seeking to maximise best practice and to utilise knowledge and experience of Public Health and integrated Care System colleagues to promote positive health and wellbeing messages	

disability Confident		
 Providing human resource managers with specific Disability Confident training 	HR staff receive ongoing awareness training and information on how to promote employment with the council to disabled people	



As a validator will also need to confirm actions below:

Reporting on disability, mental health and wellbeing

You are taking action to record and report on disability, mental health and wellbeing in the workplace, by referring to the Voluntary Reporting Framework.

Activity	Evidence	Validator comments
That as a business you are employing disabled people?	The latest workforce information for Nottinghamshire County Council is based on data at April 2020.	
	The Council encourages employees to dis- close information on any disabilities they may have. Employees are encouraged to update their equality information held on the HR Sys- tem BMS, with regular reminders issued. 83% of employees have confirmed their disability status as of April 2020.	
	The proportion of employees overall, including, those who classify themselves as having a disability has again increased to 6.38% in April 2020	



That you are using the Voluntary Reporting Framework and are collecting information	
Are reporting or intend to do so within the next 12 months in line with the Voluntary Reporting Framework.	