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# **Disability Benefits Consortium response to SSAC consultation: How should DWP involve disabled people in changing how it works?**

The Disability Benefits Consortium (DBC) is a coalition of over 100 different charities and other organisations working towards a fairer benefits system for disabled people and those with long-term health conditions. Using our combined knowledge, experience and direct contact with people with disabilities, those with long-term conditions and carers, we seek to ensure government policy reflects and meets the needs of disabled people.

## **Summary of recommendations**

* The DWP should consider reasons for low attendance at or participation in consultative events and exercises and improve the process.
* The DWP should publish findings in a way that is accessible to all, in a timely manner.
* The DWP should take a more proactive approach to contacting organisations they don’t know so well and build relationships with them, supporting them to be able to engage better.
* There must be better co-ordination between policy teams within the DWP to avoid overlap and confusion.
* The DWP must ensure more notice is given for workshops, forums and focus groups.
* The DWP should involve disabled people and organisations as early on in the process as possible.
* The DWP should try to give as much time to respond to consultations as is possible.
* The DWP should consider as many ways as is possible for disabled people to engage with them when consulting on policy.
* The DWP should explore ways for disabled people to be able to participate more easily and consistently.

## **Q1. Can you tell us about the process?**

1.1 The most common way many organisations, including the DBC, engage is via consultations. It’s important that submissions by the DBC represent the views of our members. We try to include case studies of various conditions, or quotes. Where appropriate and relevant, we share a draft with members to comment and feedback on before submitting a final response. We ask members to pass us information they think may be useful and incorporate this into the response, as well as using our own research.

1.2 Sometimes we are made aware ahead of the consultation being launched that it is impending, but that is very rare. Through our networks we can have an idea that something is coming, but the timelines given are often vague and regularly change. Mostly, we find out about consultations, once they’ve been published, through various channels, in some cases a number of days after their launch. Sometimes this could be word-of-mouth, which is less than ideal. The time frame in which to respond is relatively short, so the sooner we know about it the better. The amount of time is even more important as we like to be able to involve our members as much as possible. Not only would we encourage them to submit their own response, we would also ask that they share that response or the points they want us to include so we can incorporate them into our own. Where this is not possible, we use the information we already have to hand, including our own research and surveys, and policy positions that have previously been agreed with members.

1.3 Recently we have begun being invited to DWP workshops and stakeholder engagement events, along with many of our members. We have also been invited to smaller meetings with civil servants working on the upcoming Green Paper on disability benefits, and with the Minister. They have asked us to give an idea of what we feel should be included and how we can help provide relevant evidence. These meetings and workshops could be taken as a positive sign that the DWP are committed to improving their engagement with stakeholders. We believe that we are invited to attend as a result of our reputation, the strength and quality of our evidence and our ability to represent the view of a wide community.

1.4 Every six weeks the DBC hold an all members’ meeting. The DWP have attended a number of these, either through our inviting them, or on occasion they ask if they can come along. These meetings give members the opportunity to hear directly from the DWP. This is particularly important for some of the smaller organisations who perhaps don’t have a direct relationship with the DWP. It also means the DWP can engage and build relationships with member organisations individually.

1.5 More recently, the DWP has contacted the DBC and our members, asking us to share details of regional events they have been holding. Again, we welcome this level of engagement. If workshops are well attended, this will mean that there is an argument for them to be commonplace in relation to all issues that impact on disabled people, but unfortunately, the short notice given means take-up can be limited. Low attendance should not be taken as an indication that people aren’t interested in being involved. Other reasons should be taken into consideration and improvements made to make sure they are better attended.

**Recommendation:**

* The DWP should consider reasons for low attendance at or participation in consultative events and exercises and improve the process.

## **Q2. To what degree have there been benefits from engaging with DWP?**

2.1 As we have built and developed our relationships with the DWP there have been benefits for us both, and our conversations are regular and two-way. We are reassured that we are being heard, and that we are able to keep our members informed on what is happening. As these relationships improve, there is more opportunity to shape future work and that has become apparent with the upcoming Green Paper and the level of engagement they have undertaken with us.

2.2 We believe the various ways we (the DBC and members) engage with the DWP has led to tangible improvements for disabled people. These can often be complex, and slow to be delivered or realised. They also vary, there has been policy change, operational change, and as relationships improve, there is the opportunity to shape things in the early stages, including being able to comment on proposals. It is important to note however, that this is a relatively new approach the DWP have taken. Of course, it is also often the case that our recommendations are not accepted – good communication does not necessarily signal agreement.

2.3 The nature of our relationship with the DWP means conversations are regular and two-way, so it would be fair to say we get some level of feedback and feel comfortable asking for it when we don’t. However, that works for us, but not everyone. These conversations do not and should not, replace something more formal, such as a report. As an example, the DWP recently held three regional workshops across the country with disabled people and local organisations. They shared their findings in a larger stakeholder meeting, but it is unclear how they have shared them with the groups that took part. After some pressure, they have agreed to publish findings, but what that will look like is also still unclear. Unless a full DWP report is published, it could mean that disabled people and Disabled People’s Organisations may be reluctant to take part in future workshops.

**Recommendation:**

* The DWP should publish findings in a way that is accessible to all, in a timely manner.

## **Q3. Based on your experiences, would you wish to engage with the DWP in future?**

3.1 There are many ways for DBC, our member organisations and disabled people to influence and try to achieve the change we want to see. We believe that continuing to engage with the DWP is one of the ways to do this, and it is important to maintain a good relationship.

3.2 Balancing the relationship with the DWP against other actions we may take to lobby and influence for change can be difficult. We know that if we choose to take an action ‘against’ the Government or DWP this could damage our relationship with them. However, if we are seen to be too close to the DWP, this could damage our reputation and credibility with members and those we represent.

3.3 We have also experienced our engagement with DWP and Ministers being misrepresented and used as an indication of support for a particular policy, which was not the case and was actually something that the DBC and its members were lobbying to change. It was important in this case that the Minister apologised and made it clear that engaging does not mean support.

3.4 It could be said that perhaps the DWP value our engagement, and that of some individual organisations, higher than direct engagement with disabled people, although there is some movement here. Engaging with the DBC and with individual member organisations is important, as we have an overall perspective on a wide range of issues. However, it is vital that the DWP involve disabled people directly in any engagement process as well.

3.5 The more you engage with the DWP (whether at our or their request) the more you’re asked to engage. This is easier for larger organisations with more resources, and/or capacity. It also benefits those organisations based in London, who are more likely to be able to attend meetings at short notice. This means the views the DWP hear can be narrow. It can be frustrating for smaller organisations that there can appear to be a ‘clique’ and ‘it’s not what you know, it’s who you know’. The DWP should take a more proactive approach to contact organisations they don’t know as well and build relationships with them.

3.6 While we welcome the various ways the DWP involves stakeholders, there can be confusion with the number of engagement forums that are run by different policy areas. There can often be overlap in the policies they cover and it’s not always clear how they fit together. It can be like a jigsaw puzzle that needs to be solved. The number of meetings of the various forums can make it difficult for smaller organisations and those who are based outside of London to attend them all, even though they may see them as important. This in turn means it’s the ‘usual suspects’ that attend, and as mentioned above the relationships build and we begin the cycle of ‘who you know’. The DWP is missing out on the insights of a variety of organisations and communities.

3.7 We want to see better co-ordination within the DWP regarding the different, but linked policy areas. For example, it is highly likely that an organisation that wants to engage on Personal Independence Payment is also interested in Universal Credit. There have been occasions where the engagement forums on these policy areas have taken place on the same day at the same time, so most organisations have to choose which one to attend. There must be better co-ordination between policy teams within the DWP, for example holding two engagement forums on the same day, but one after the other. Organisations, in particular smaller ones and those outside of London, are more likely to be able to attend both.

3.8 Amongst disabled people in particular and some disability organisations, there can be a lack of trust and perhaps cynicism when it comes to the DWP attempting to engage with them. We have seen a noticeable improvement in the way the DWP has tried to work with stakeholders, but they need to go further, constantly reviewing and looking for ways to improve. This should include giving people more time to respond to consultations, making sure it is easy to respond and that the process is accessible to everyone. Ideally, engagement with disabled people and disability organisations should come before a Green Paper or consultation is published, to help shape and prepare for what is likely to be asked.

3.9 As we have already mentioned, the DWP have begun to organise focus groups for disabled people in their local areas, working with disability organisations for support. This should help with increasing participation, as these organisations understand the needs of their community. But we would like the DWP to explore other ways for disabled people to be involved, for example running remote digital focus groups, which will also mean there is more diversity.

3.10 To ensure continuing participation, those involved must see the importance and value of their involvement. If what they are telling the DWP isn’t actioned or can’t be seen in the policy and decisions made, then the cynicism continues and it becomes a box-ticking exercise.

**Recommendations:**

* The DWP should take a more proactive approach to contacting organisations they don’t know so well and build relationships with them, supporting them to be able to engage better.
* There must be better co-ordination between policy teams within the DWP to avoid overlap and confusion.
* The DWP must ensure more notice is given for workshops, forums and focus groups.
* The DWP should involve disabled people and organisations as early on in the process as possible.
* The DWP should try to give as much time to respond to consultations as is possible.
* The DWP should consider as many ways as is possible for disabled people to engage with them when consulting on policy.
* The DWP should explore ways for disabled people to be able to participate more easily and consistently.

## **Q4. Please tell us about other engagement you have had on disability issues with public sector or other organisations outside of DWP.**

4.1 The DBC have built up relationships with other organisations in the same way it has with the DWP. Engagement is similar, as over time our reputation and credibility has grown. Because of this, and the relationships we have with people within these organisations, we are regularly contacted directly to be informed of upcoming inquiries or consultations, sometimes asked to be involved beforehand, for example working with clerks of select committees to suggest and recommend issues for inquiries. We have worked with the SSAC, National Audit Office, researchers and think tanks, as well as individual charities and other organisations and MPs. These are all important channels for us to be able to influence change.

4.2 Unfortunately, on some occasions, as with the DWP, the deadlines given can mean too short a time to be able to respond fully in the way we would like. Rather than involving members and disabled people at the time, we have to rely more heavily on evidence, knowledge and expertise we already have to hand.

**Conclusion**

5.1 Getting evidence, information and experiences from across the disability community and sector, through a variety of sources and methods, is essential to developing a well-rounded and effective policy, but what is lacking is engagement with disabled people directly. The DWP must get better at this.

5.2 We welcome the improvements we have seen over the past year in the way the DWP engages with stakeholders, but the focus remains on engagement with charities and similar organisations. We feel they could do more to ensure disabled people are able to participate and their views and opinions heard directly. We have seen an increase in the number of online forums, and local/regional groups and it is important that these continue. There is still work to be done to make it easier for disabled people to participate.