

Belfast City Council's Draft Consultation Response to the Department for Communities' Disability and Work Strategy for Northern Ireland

Strategy Scope

The Strategy is aimed at supporting people in Northern Ireland to prepare for work, obtain work, remain in work, and progress in work. It aims to support people who are:

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

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

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

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

Strongly agree ☒ **Agree** Neither agree nor disagree Disagree Strongly disagree

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

The council welcomes the scope of the Strategy and the groupings that require assistance. We recognise there are many disability organisations already supporting disabled people to prepare, obtain and stay in work. The council's approach is to only intervene where there are gaps in provision and provide support by working along with delivery partners across the city. Examples of our work include the following:

- Delivering a Customer Service Employment Academy for people who are deaf (in association with AdaptNI) in January 2026. The academy is a short, intensive week-long training programme to help ten participants obtain skills, confidence, and support needed for work.
- Scoping out and developing a bespoke Employment Academy for blind people in association with a specialist disability charity. This predicated on job demand being confirmed with a major employer and is in early stages of development.
- Delivering a Classroom Assistants' Employment Academy for ten people who are deaf or people with hearing loss and are fluent in their primary language – either British Sign Language (BSL) or Irish Sign Language (ISL). Training is expected to be completed by June 2026. It is the first time an Academy in this format has been done in the education sector. The people who work using BSL/ISL as their first language. Participants will complete a Level 3 Certificate in Supporting Teaching and Learning in Schools (QCF 5329-31) over 12 months approximately. This support will improve participants employability and job prospects, provides an introduction to the education sector and as well as insights into various job roles. Participants will receive one-to-one mentoring.

Guiding Principles

The Strategy is built upon six guiding principles which are:

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

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

Strongly agree ☒ **Agree** Neither agree nor disagree Disagree Strongly disagree

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

While we broadly welcome the six guiding principles, a narrative on budget availability against each element of delivery would be beneficial to plan ahead for service delivery and workforce planning, if the employment rate for disabled people is to be increased by 50% by 31st March 2036. We welcome a flexible and responsive approach, particularly where delivery gaps emerge and additional support is required to increase the employment rate for disabled people. This will be important at a local delivery level. For example, Belfast may have different needs as a predominately urban area. Research undertaken by the Ulster University Economic Policy Centre for Belfast City Council in January 2024 (Economic inactivity draft: Who, what, where, why? A briefing paper on economic inactivity & inclusive labour markets in Belfast and Northern Ireland) reported:

- For males across Northern Ireland, the top reason for economic inactivity is long-term sick or disability. One in ten Belfast males report long-term sickness or disability, in turn accounting for half of the economically inactive male population. The concentration of long-term sickness among males in the Belfast area is concerning, specifically given that more recent economic inactivity increases at the national level have been associated with ill health;
- There are areas within Belfast such as Oldpark (18%) and Court (17%) that have male long-term sickness or disability rates that are closer to one-fifth of the male population compared to an average of 8% for Northern Ireland;
- In Belfast, the most predominant reason for economic inactivity among the 50-64 age cohort is long-term sickness or disability, reported by half (50%), compared to two in five (41%) across Northern Ireland. Current Labour Force Survey data shows this increasing to 58%;
- When working towards more inclusive labour markets, it will be important for employers to have a better understanding of the challenges associated with long-term health conditions and the need for flexibility within the workplace;
- Any progression towards a more inclusive labour market will need to tackle flexibility and additional supports that are often cited as being necessary to successfully (re) enter and remain in employment.
- Data from NISRA's Labour Market Status reports (2023), taken from the Labour Force Survey, report the disability employment gap (for people aged 16-64) in Belfast, as 39.6pp. This gap has stayed at approximately 40% for the last few years and is significantly above the rest of the UK (Maximising potential: A review of labour market outcomes for people with disabilities in Northern Ireland, UUEPC, 2022) and requires interventions to redress over the long term.

Overarching Outcome

The Strategy's overarching outcome is: To increase the employment rate for disabled people to 50% by 31 March 2036. We estimate that this would mean an additional 50,000 disabled people or people with health conditions in employment in Northern Ireland by March 2036.

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

Strongly agree ☒ **Agree** Neither agree nor disagree Disagree Strongly disagree

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

We welcome the ambition to increase the employment rate for disabled people to 50% by 31 March 2036. Within the refreshed Belfast Agenda (2024), community planning partners set a stretch goal to increase the employment rate for people living with a disability from 37% to 42% by 2028 (note the baseline uses figures from 2022). This equates to approximately an additional 3,000 disabled people living in the city in employment.

By 2024, the disability employment gap (for people aged 16-64) in Belfast was 48.8pp. (there is a 82.2% employment rate for people without a disability compared with 33.4% for people with a disability). There had been a significant reduction in the gap from 49.2pp in 2016, before increasing again more recently, however the gap has stayed at approximately 40% for the last few years. This is significantly above the rest of the UK and requires interventions to redress over the long term.

The Labour Force Survey Local Government District (LGD) tables for 2024 identify imbalance across the region. The employment rate for disabled people ranges from a high of 59.7% in Ards and North Down to a low of 33.4% in Belfast. This suggests a sub-regional approach should be considered, prioritising interventions in Belfast.

People with a disability are significantly disadvantaged compared to the rest of the population in terms of economic inactivity. It was estimated that over half of the people in Belfast in 2022, who were economically inactive, had a disability. In 2023, the economic inactivity rate for people with a disability is estimated to be 57.1% compared to 19.2% for those who are economically inactive but do not have a disability.

It is important to understand that the economically inactive cohort does not include people "actively seeking work". Previous research by UUEPC using data from ONS and NISRA reported that 16% of all people in Northern Ireland who are economically inactive due to long-term sickness or disability who definitely or probably work again. The 2023 Census reported that there were 26,781 adults aged 16-64 living in Belfast who were economically inactive due to long-term sickness or disability. Extrapolating this data for Belfast, suggests that there may be an estimated 4,300 people who are currently workless but may choose to become a jobseeker in the future. This is an important group to consider if this target is to be achieved.

We would welcome further details on the modelling criteria and rationale used to arrive at this figure and request if regular breakdowns at local government level can be published routinely to aid with resource planning for the city.

Early conversations with all stakeholders regarding data capture including the potential for statutory monitoring and reporting would be beneficial.

Sub-outcomes

The sub-outcomes for the Strategy are:

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

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

☒ **Strongly agree** Agree Neither agree nor disagree Disagree Strongly disagree

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

The Council strongly agrees with sub outcomes as they align with research carried out with disability specialist groups via the Belfast Labour Market Partnership and in our day-to-day practice in rolling out employment academies.

However, we would request that statisticians undertake secondary analysis of the available data to report baselines of the above indicators at a local government level. Furthermore, updates should be routinely published to aid with resource planning for the city. We are aware that issues exist due to small sample sizes and disaggregation at a more granular level often risks disclosure. Nevertheless, we would propose that this could be overcome by combining multiple years' of data in order to provide councils with vital information for them to plan and track performance.

The Belfast Labour Market Partnership produced People Based research in March 2024 to determine gaps and interventions needed to support disabled people in the city into work. The council engaged with 16 organisations, mainly from Disability Specialist groups but including the Department for Communities. Research findings broadly concurred with the proposed strategy and its proposed actions. Those attending the engagement sessions (mainly disability representative organisations) told us that:

- Employers lacked knowledge and understanding about disability and needed support in this area;
- Disabled people feared benefit loss where employment is taken up and associated risks (including cases where household income is affected). The need to protect benefits for disabled employees was frequently referenced;
- Many disabled people require significant pre-entry support to obtain and sustain employment;
- Mental health challenges were exacerbated because of the pandemic;
- Many individuals need significant pre-entry employment support before engaging with a service, let alone employment. The significant disconnect between the proportion of non-disabled people with no qualifications but who are still in employment, compared to the

equivalent for disabled people is stark and is considered a key barrier. Support to achieve entry level qualifications was identified as a potential area of focus;

- Practical issues such as securing reliable transport to work was raised consistently by contributors. Many people with physical disabilities may need support in arriving and leaving work or interviews for jobs, through means such as a friend or family member, public transport, or taxi services. This can be quite difficult to repeatedly obtain;
- There is a need to raise awareness of the availability of employment services – both for employers and disabled people;
- There are not enough highlighted examples of success and good practice to stimulate and motivate disabled people to follow a rewarding career path;
- There is a need for more accessible communication, outreach and partnership with schools, health and social care teams;
- A need to raise the aspirations of disabled people and importantly, their family members and to promote the prospect of work as a valid and achievable outcome;
- There is a lack of promotion of good workplace practice, highlighting positive examples locally, regionally, and internationally and sharing those across the sector could stimulate greater engagement from disabled people and employers;
- Their top three recommendations were: an awareness raising initiative for employers to include employment laws and to boost their confidence in supporting disabled employees into work, helping disability specialist groups better realise their Social Value offer and the development of a Disability Employment Initiative. DfC will be aware of the council's work in each of these areas.

This suggests that further qualitative research may be necessary in order to develop understanding if the sub-outcomes are to be delivered.

Key Themes

The key themes of the Strategy are:

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

7a. To what extent do you agree with the key themes of the Strategy (summarized on pages 19 to 27)?

☒ **Strongly agree** Agree Neither agree nor disagree Disagree Strongly disagree

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

The Council strongly agrees with the key themes as they align with research undertaken by the Belfast Labour Market Partnership (in conjunction with specialist disability groups) and in our day-to-day practice in rolling out employment academies. In March 2024, the Belfast Labour Market Partnership produced People Based research to determine gaps and interventions needed to support disabled people in the city into work. The council engaged with 16 organisations, mainly from Disability Specialist groups and including the Department for Communities. The research findings broadly concurred with the strategy and its proposed actions. Those who attended engagement sessions (mainly disability representative organisations) told us that:

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The Strategy's Actions

The proposed actions in the Strategy are summarized on pages 19 to 27 of the document under the themes of:

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

8. Please provide any comments on these actions in the box below.

Evidence from the 2024 Labour Force Survey Local Government District (LGD) tables identify imbalance across the region. The employment rate for disabled people ranges from a high of 59.7% in Ards and North Down to a low of 33.4% in Belfast. This suggests a sub-regional approach should be considered, tailoring and prioritising actions within Belfast.

Nevertheless, the council broadly welcomes all of the actions included in the draft. In particular,

- The council welcomes the action to develop a new Employer Engagement Strategy their exploration (with the Department for the Economy) of developing a scheme for employers, that grows their awareness of disability employment and supports and enables implementation of best practice in disability employment. The Department will be aware of the council's work around Inclusive Growth and the Belfast Business Promise (See <https://www.belfastcity.gov.uk/businesspromise> and <https://www.belfastcity.gov.uk/Documents/Our-commitment-to-Inclusive-Growth-2020-2022#2.%20Our%20inclusive%20growth%20statement> for further information).
- Belfast City Council's commitment to Inclusive Growth includes reference to disability employment practice for residents, our inclusive recruitment and opportunity, mainstreaming of equality, diversity and inclusion, engaging and building capacity within our neighbourhoods via the council's Community Outreach Programme, extensive employability support to educational establishments, disability organisations, criminal justice organisations and other community-based organisations; and prioritising employability and skills.
- The Belfast Business Promise includes a pledge to recruit inclusively, whilst larger organisations of more than 250 staff are tasked with routinely monitoring the diversity of their workforce and acting if there are issues. This includes monitoring their workforce's age, disability status, race, gender, and sexual orientation. In December 2025, Belfast City Council, the Equality Commission and the Northern Ireland Union for Supported Employment (NIUSE) delivered a conference focusing on practical ways to support disabled people at work and support employers. Employers, disability organisations and equality specialists attended to learn about workplace adjustments, disability support organisations, and practical examples of what works.
- The Belfast Health & Work Steering Group's work was established by Belfast City Council through the Labour Market Partnership to develop a strategic response to the pressing and persistent issue of economic inactivity in Northern Ireland. Considering transition from the European Social Fund (ESF) to the UK Shared Prosperity Fund (SPF) a process marked by uncertainty, fragmentation, and disruption, the Steering Group sought to inform the design of successor funding models and advocate for more integrated, co-designed, and place-based delivery systems. In the Bridging Health and Work Report produced on behalf of Belfast Health and Work Steering Group (August 2025), a twin-track approach was adopted to address the immediate challenge of designing a successor to UKSPF post-2026 and propose a long-term system reform to integrate health, employment, and community services in a person-centred model. The report concurs that siloed systems, narrow eligibility criteria, and short-term commissioning cycles have undermined impact across Northern Ireland. The report called for structural reform that: brings together health, skills, employment, and community services; fosters employer engagement and inclusive recruitment; and leverages community trust and local delivery infrastructure.
- The report emphasises greater engagement with employers, recommending that employers should be supported with training, guidance, and incentives to adopt inclusive practices such as flexible working, reasonable adjustments, and mental health-friendly policies. The report recommends that all services must embed trauma-informed, person-centred practice—particularly for those affected by conflict-related trauma, addiction, or adverse childhood experiences—ensuring interventions are strengths-based and client-led.

The Disability and Work Council - Functions

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

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

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

Strongly agree ☒ **Agree** Neither agree nor disagree Disagree Strongly disagree

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

The Council welcomes the development of the Disability and Work Council to provide oversight of the strategy and in particular the inclusion of local councils and reference to Labour Market Partnerships.

Disability and Work Council – Partnership Working

The proposed Disability and Work Council will be jointly led by a senior civil servant from the Department for Communities and a disabled person. It is proposed that across the structures of the Council, the following organisations will work in partnership to support the work of the Council:

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

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

Strongly agree ☒ **Agree** Neither agree nor disagree Disagree Strongly disagree

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

The council welcomes the development of the Disability and Work Council to provide oversight of the strategy (Figure 22: The Disability and Work Council P.89). We welcome the inclusion of local councils. We note there are three separate groups (Delivery Group, Operational Issues Forum and an Engagement Forum) feeding into oversight. We note there are nine groupings

including five Government Departments, Enterprise Agencies, Labour Market Partnerships and Employers and Employer Bodies and Disability Sector. We recommend that structures are streamlined to aid management and ensure actions are delivered and momentum is built and maintained.

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

To maximise employer engagement, we recommend that a target is set to reach employers in various sectors to increase support to help disabled people into work. The strategy would benefit from having reference links to the various employment programmes to aid understanding of the overall offer, both to employers and people with disabilities. Examples include JobStart Specialist Pathways, Additional Support Fund, Regional Day Opportunities Model, Workable NI, Access to Work NI, and the Condition Management Programme. We recommend that other supports are integrated to the offer, including the Work Experience Programme and Make the Call.

We note this consultation is taking place while there are severe funding cuts to disability specialist organisations supported through the UK Shared Prosperity Fund. Cuts will have a major impact on delivery of the Strategy; on disabled people, organisations and staff that deliver much needed employment services.

The council would conclude by reiterating that evidence from the 2024 Labour Force Survey Local Government District (LGD) tables highlights imbalance across the region and identifies that the greatest need is within Belfast. The employment rate for disabled people ranges from a high of 59.7% in Ards and North Down to a low of 33.4% in Belfast. We therefore recommend that the Department consider implementing a sub-regional balance approach, tailoring and prioritising actions where the greatest inequalities exist.

Please note that this response is still subject to council ratification. It will be presented to members of the City Growth & Regeneration on Wednesday 14 January before being presented to full council on 02 February. Officers will contact disabilityemploymentstrategy@communities-ni.gov.uk at this time should there be any changes.