

We've outlined our advice and recommendations below:

- \* Although senior leaders have an overall "people development objective", it's not clear how every leader is going to be equipped to understand what this means in terms of inclusive leadership that includes people with disabilities and long-term conditions.

- \* The document references your commitment to making reasonable adjustments for disabled employees and customers. You need to ensure that Ofcom's reasonable adjustments process is robust and that HR and line managers are trained and confident in its usage.

- \* We recommend carrying out a full equality analysis of your performance and appraisal policy and procedure with qualitative input from disabled staff. This will help you to find out how disabled employees experience the performance/appraisal procedure compared with non-disabled employees. This feeds into an inclusive leadership aim.

- \* Ensure that building accessibility also includes looking at the working environment from the perspective of people with a diverse range of non-visible conditions such as autism in addition to visible and physical conditions. This aspect needs to be included whenever tendering or choosing access auditors.

- \* We advise that one of your commitments refers to ensuring your technology is accessible and the IT infrastructure is barrier free. To assist you in doing this, Ofcom could commit to working alongside BDF's Accessibility Maturity Model<<https://members.businessdisabilityforum.org.uk/resource-category/resource/accessible-technology-charter-accessibility-maturity-model/?logoutSuccess=1>>.

- \* Ofcom last did the Disability Standard in 2014-15. Given your commitment to ensure disability is a bigger part of their inclusion strategy moving forward, we recommend that you consider doing the Standard again. This will help you to assess and improve upon your disability performance across your whole organisation.

- \* It is great that Ofcom is rolling out a role-modelling scheme to support women at Ofcom to maximise their potential. We recommend that this is extended to disabled colleagues also. You may wish to look towards House of Commons' Role Models campaign<<https://www.parliament.uk/about/working/workplace-equality-networks/parliamentary-role-models/>>, which reaches to all nine and extended protected characteristics.

- \* In section 3.17, the document uses the language of "special needs". This is quite out-dated language that we don't advise using anymore and the term "Special" is not in keeping with your values on 'diversity' or 'inclusion'. We advise removing this term and using learning disability instead.

- \* Unconscious bias training is important, however we see a lot of packages which don't adequately address what 'unconscious bias' means when in regards to disability. This needs to be considered in whichever provider is chosen. If Ofcom uses Civil Service Learning, we understand there is a limited amount that can be done to alter the programme and many Civil Service departments are providing additional training to what CSL provide.

- \* If Ofcom wishes to become a Disability Confident Leader (Level 3 status) the BDF Advice Service can validate your Level 2 self-assessment free of charge. Here is a link to more information on this service.<<http://www.businessdisabilityforum.org.uk/media-centre/news/free-disability-confident-accreditations-for-business-disability-forum-members-and-partners/>>