



# Close the Gap submission to the UK Parliament's Women and Equalities Committee inquiry into equality at work: flexible working and disability

June 2026

## Executive Summary

Close the Gap's submission outlines the structural, intersecting labour market inequalities faced by disabled women in Scotland, and how this impacts their access to flexible working. We draw largely from our 2025 *Excluded by Design* research, in which more than 900 disabled women participated, which provides a rich understanding of disabled women's labour market participation and access to key supports such as flexible working. It applies an intersectional lens to set out how gender, disability and, in some cases race, compound to limit access to flexible work, prevent career progression in higher-quality jobs, and retention.

Key labour market indicators highlight the scale of the issue:

- The **disability employment gap** in Scotland stands at **29 percentage points** (51% employment rate for disabled people vs. 83% for non-disabled people).
- Disabled women face a **23.2% pay gap** compared to non-disabled men and a **9.0% gap** compared to disabled men.
- Being '**long-term sick or disabled**' has now overtaken caring responsibilities as the primary reason for economic inactivity among women in Scotland.
- **Occupational segregation** is exacerbated, with over 40% of disabled women's employment concentrated in lower-paid, undervalued sectors of health, social care, and education.

For disabled women, high-quality flexible working is not a perk; it is a critical gateway to the labour market. Because women continue to shoulder a disproportionate share of caring responsibilities, flexibility is essential to help them enter, remain in, and progress within the workforce. For disabled women, this need is compounded -

remote work, adaptable schedules, and part-time hours are vital structural adjustments required to manage long-term health conditions, control sensory environments, and mitigate the physical toll of commuting. When flexible working is absent or withheld, disabled women are pushed out of the labour market, accelerating the rising rate of economic inactivity due to long-term sickness in Scotland.

Recent legal changes to improve access to flexible working are welcome. However, access to flexible working for disabled women is likely to remain hindered because of entrenched cultural presumptions against flexible working, including home working, and deep-rooted prejudice and a lack of understanding of disability. The increasingly hostile, damaging political and social context, in which disabled women's rights and entitlements are under threat, further presents a deeply concerning backdrop to an already unequal labour market.

## **1. Flexible working and part-time work**

Our survey findings suggest that access to flexibility for disabled women is heavily segregated by income and role:

- **76.3% of those who are professionals and managers** agree that flexible working is available to them.
- **Only 40% of those working in caring, service, and elementary occupations** have access to flexible arrangements.

Because disabled women are acutely overrepresented in lower-paid sectors like health, social care, and education (accounting for over 40% of their total employment), they are disproportionately locked into rigid shift patterns. This forces many to work well below their skill level just to find manageable hours, trapping them in in-work poverty.

## **2. The impact of inflexible work on career progression**

The lack of flexible working at senior levels creates a '**double glass ceiling**', restricting disabled women from moving into management.

- **55.2% of disabled women** report that inflexible training formats such as rigid in-person venues without remote options prevent them from upskilling.

- Fear of losing existing flexible arrangements prevents women from seeking promotions, as they are terrified of having to ‘fight’ a new line manager to get their adjustments reinstated.

### 3. Stigma, bureaucracy, and the ‘default no’ culture

While the majority of survey respondents reported having some flexibility, maintaining it is laden with cultural barriers.

- **The ‘hierarchy of impairment’:** Employers are far less likely to grant immediate flexible adjustments for neurodivergence or mental health conditions (only 28.6% of women reported immediate implementation) compared to visible physical conditions.
- **Workplace backlash:** Women report being heavily stigmatised by managers, who often view working from home as a luxury that will make colleagues ‘jealous’, or who roll back flexible schedules the moment an employee appears ‘well’.
- **Performance misinterpretation:** When employers fail to provide flexible working or delay it, the resulting drop in an employee's work pace is frequently penalised as a performance issue rather than an organisational failure. This drives high rates of stress, sickness absence, and workforce attrition.

### 4. Failures in providing reasonable adjustments

While 61.9% of disabled women reported that their line manager understands their legal obligations under the Equality Act 2010, this rarely translates to action: **only 36.4% of adjustments were implemented immediately, and 18.6% were never put in place.** The current legal framework places an undue, exhausting administrative and emotional burden on disabled women to self-advocate, disclose their conditions, and navigate complex organisational bureaucracy.

### 5. Access to Work delays

The DWP’s **Access to Work scheme, which should be funding complex accommodations to facilitate flexible and remote working,** faces catastrophic backlogs, growing from 21,700 pending applications in 2022 to **66,000 in March 2026.** Wait times stretch up to **37 weeks** (against a 25-day target), causing severe hardship for disabled people. Close the Gap strongly criticises administrative opacity, poor communication, and the tendency of some large employers to inappropriately offload their baseline legal duties onto the Government scheme. Significant changes are

necessary to improve the system, underpinned by increased investment.

## 6. Selected recommendations for flexible working reform

Below are selected recommendations from our full submission.

### For the UK Government:

- **Require employers to implement rapid adjustments:** Legally mandate employers to notify employees of a decision on reasonable adjustments (including flexible/remote working requests) within **two weeks** of application.
- **Access to Work reform:** Clear the 37-week backlog, increase investment in the scheme, and provide clear guidance to large organisations so they stop delaying basic flexible accommodations while waiting on government funding.
- **Strengthen accountability:** Introduce mandatory disability pay gap action plans to force employers to address how a lack of flexible work drives occupational segregation.

### For Employers:

- **Flexible working by default:** Shift the organisational culture so that flexible, remote, and hybrid working options are automatically presumed approved across all levels, and explicitly list these options in all job advertisements.
- **Separate flexibility from performance:** Train line managers to understand that flexible schedules optimise productivity, eliminating the culture where disabled women feel forced to overcompensate (81% of respondents) to prove they are capable.
- **Leadership and management training:** Train HR and line managers on the intersection of gender and disability, eliminate biases against home working, and implement **reasonable adjustments passports** to ensure continuity during management changes.
- **Inclusive progression and anti-racism:** Deliver flexible, self-paced training opportunities and explicitly embed anti-racist practices to ensure racially minoritised disabled women, who face magnified workplace harms, are protected and supported.

## 1. Introduction

- 1.1 Close the Gap is Scotland’s policy advocacy organisation working on women’s labour market participation. For 25 years, we have been working with policymakers, employers and employees to influence and enable action that addresses the causes of women’s labour market inequality. Our vision is for a Scotland where all women have a good working life.
- 1.2 Close the Gap welcomes the opportunity to submit evidence to the Committee on flexible working and disability. The availability of high-quality flexible working remains a key challenge in the UK labour market. A lack of access to flexible working sustains women’s concentration in low-paid and undervalued work, exacerbates in-work poverty, limits progression, and is a significant driver of the gender pay gap. Women’s disproportionate responsibility for unpaid care means that access to flexible working is critical to enabling women to enter, remain in, and progress within the labour market.
- 1.3 Access to flexible working and other reasonable adjustments is therefore particularly important for disabled women who face additional barriers to accessing good-quality jobs and sustaining employment. This submission is primarily based on 2025 research conducted by Close the Gap on disabled women’s employment in Scotland. The full report *Excluded by Design* is available on our website.<sup>1</sup> This is the first research of its kind to provide Scotland-specific evidence of disabled women’s experiences, in which more than 900 disabled women and women with long-term health conditions participated.<sup>2</sup> It fills a critical gap in our understanding of how intersecting forms of discrimination constrain disabled women’s opportunities and outcomes in the labour market. We urge the Committee to centre intersectional analysis and ensure that the specific barriers disabled women face are visible in the inquiry.

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<sup>1</sup> Close the Gap (2025) *Excluded by Design: Research on disabled women’s experiences of employment in Scotland*, available at: <https://www.closesthegap.org.uk/content/resources/Excluded-by-Design---research-report.pdf>

<sup>2</sup> The research involved a literature review, two exploratory focus groups (n=18), an online survey (n=894), interviews (n=12), and a focus group of four racially minoritised disabled women (n=4).

## A note on terminology

1.4 Close the Gap uses the term ‘disabled women’ rather than ‘women with disabilities’ as we recognise that it is the failure of society to remove barriers to participation that makes someone disabled. This reflects the social model of disability, which is used by disabled people’s organisations, and was developed by disabled people. We acknowledge that not everyone who has a long-term health condition or impairment will identify as disabled. In this submission, we use the term ‘disabled women’ to refer to those who identify as disabled, as well as those who do not but have long-term health conditions or are neurodivergent, recognising that all of these women experience structural barriers that shape their experiences and drive the inequalities they face.

## **2. The context: disabled women’s labour market inequality**

2.1 Disabled women face a range of structural barriers to accessing and progressing in good-quality jobs. This includes discrimination in recruitment, inaccessible workplaces, inflexible jobs, lack of employer awareness of disability and reasonable adjustments, and inadequate support services, particularly severe delays in Access to Work. This is compounded by unequal caring responsibilities and low pay due to occupational segregation. This contributes to their exclusion from the labour market, and increased risk of poverty and violence against women (VAW).

2.2 There is a rising number of disabled people living and working in Scotland, with women more likely to be disabled than men<sup>3</sup>, and disabled women more reliant on social care support<sup>4</sup>. Data from 2025 shows that the employment rate for disabled people in Scotland was 51% compared to 83% for non-disabled people, representing a disability employment gap of 29 percentage points.<sup>5</sup> There are also significant pay gaps for disabled women in the UK, whose average hourly pay is less than non-disabled men (23.2% gap), non-disabled women (9.6% gap)

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<sup>3</sup> Scottish Government (2024) *Inequalities and challenges experienced by disabled people in Scotland: evidence review*, available at: <https://www.gov.scot/publications/evidence-review-inequalities-challenges-experienced-disabled-people-scotland/>

<sup>4</sup> Women’s Budget Group (2024) *Where do we go from here? An intersectional analysis of women’s living standards since 2010*, available at: <https://www.wbg.org.uk/publication/where-do-we-go-from-here-an-intersectional-analysis-of-womens-living-standards-since-2010/>

<sup>5</sup> Scottish Government (2025) *Scotland’s Labour Market Insights: April*

and disabled men (9.0% gap).<sup>6</sup> A key driver of this is acute and chronic occupational segregation, with more than 40% of disabled women employees in the UK working in health, social care, or education, in jobs which are often low paid and undervalued and offer limited career progression.<sup>7</sup> The economic inactivity rate for women aged 16 to 64 in Scotland in April 2024 to March 2025 was 26.4% compared with 20.3% for men.<sup>8</sup>

2.3 Just over a third (34.6%) reported this was because of being ‘long-term sick or disabled’, the highest proportion since the time series began in 2004-2005. The main reason for women being economically inactive has historically been looking after family/home - in other words, caring responsibilities - which reflects entrenched gendered patterns of unpaid care. However, in recent years, being long-term sick or disabled is now the most attributed reason for women being ‘economically inactive’. More research is needed to understand the reasons for this. Women’s Budget Group highlight women’s higher rate of sickness absence compared to men, reported as almost double that of men aged 35 to 49.<sup>9</sup> Furthermore, strong correlations exist between unpaid caring and poor health, and between economic inactivity due to poor health and previous low pay, with women overrepresented in both groups.

2.4 Racially minoritised disabled women face distinct and intensified challenges in the workplace with survey respondents reporting higher levels of discrimination during recruitment and being more likely to experience mental and physical harm at work.<sup>10</sup> These findings echo broader evidence that racism and disability discrimination intersect to create unique challenges in employment, progression, and workplace safety. Although the number of racially minoritised survey respondents was small, the focus group with racially minoritised disabled women provided deeper insight. Participants described a lack of trust

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<sup>6</sup> Office for National Statistics (2024) *Disability pay gaps in the UK: 2014 to 2023*, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilitypaygapsintheuk/2014to2023>

<sup>7</sup> Close the Gap (2025) *Excluded by Design: Research on disabled women’s employment in Scotland*, available at: <https://www.closesthegap.org.uk/content/resources/Excluded-by-Design---research-report.pdf>

<sup>8</sup> Scottish Government (2025) *Labour Market Insights – July 2025*, available at: <https://www.gov.scot/publications/scotlands-labour-market-insights-july-2025/>

<sup>9</sup> Women’s Budget Group (2024) *Women and the Labour Market – Briefing 1: Introduction and headline measures*, available at: <https://www.wbg.org.uk/publication/women-and-the-labour-market/>

<sup>10</sup> Close the Gap (2025) *Excluded by Design: Research on disabled women’s employment in Scotland*, available at: <https://www.closesthegap.org.uk/content/resources/Excluded-by-Design---research-report.pdf>

in employers, particularly around disclosure and support, and shared experiences of being judged, undervalued, and excluded. Some reported that their access needs were dismissed or deprioritised.

- 2.5 Close the Gap welcomed recent changes to strengthen flexible working provisions, and we strongly support planned changes to make it easier for employees to access flexibility. We note however, that these positive shifts are happening against the backdrop of a deeply concerning political and social context which is creating harm and risks to the rights of disabled people. This includes cuts to the health element of Universal Credit, and proposed cuts to Personal Independent Payment (PIP) which have been paused while the Timms review of the assessment process is ongoing. At the same time, the rise of the far right is driving hate and division, which threatens the safety and rights of disabled people, especially those who are racially minoritised, and is a threat to equality and human rights of all minoritised groups.<sup>11</sup> Globally, we have seen a backlash against equality, diversity and inclusion with increasing evidence that this is having a chilling effect on equality action by employers, while others are using this as an opportunity to drop their equality commitments.<sup>12</sup>

### **3. Responses to Consultation Questions**

Are there differences in disabled people's experiences of flexible working across different types of disability or impairment and among disabled people with a range of other protected characteristics, for example their age, sex, and race and ethnicity?

*Disabled women and part-time work*

- 3.1 Flexible and part-time work are particularly important for disabled women whose working patterns are influenced by intersecting gendered and disability-related structural inequalities. Persistent gender norms mean that women shoulder the burden of unpaid care for children and adults, and therefore often need to find flexible or part-time work to manage this. Disabled women often

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<sup>11</sup> Quinn, Ben (2026) Badenoch to vow to scrap the public sector equality duty in effort to fend off Reform, *The Guardian*, 8 June 2026, available at: <https://www.theguardian.com/politics/2026/jun/08/kemi-badenoch-vow-scrap-public-sector-equality-duty-reform-threat>

<sup>12</sup> Butler, Sarah (2025) UK firms ditching diversity and inclusion 'face higher risk of lawsuits', *The Guardian*, 10 August 2025, available at: <https://www.theguardian.com/law/2025/apr/07/uk-firms-diversity-and-inclusion-lawsuits-us-trump>

seek part-time work, as this allows them to better manage their condition and have their access needs met. In 2024-25 in Scotland, 37% of women worked part time compared with 14% of men.<sup>13</sup> Equivalent published data for disabled people in Scotland is not available but analysis published by Scottish Government for the period January-December 2022 found that one in three disabled people (32%) worked part time compared with one in four non-disabled people (24%).<sup>14</sup> UK research from 2019 on the intersectional discrimination experienced in employment found that 47% of disabled women held part-time contracts compared with 14% of disabled men.<sup>15</sup> Although there is a lack of disaggregated data on the prevalence of part-time work among disabled men and women, it can reasonably be assumed that disabled women are overrepresented among part time workers.

- 3.2 The link between disabled women and part-time work is important because part-time work is predominantly found in low-paid and often insecure jobs and sectors such as admin, caring, retail, and cleaning. This means that many disabled women are working below their skill level because they are unable to access the flexibility they need. Their overrepresentation in low-paid jobs drives the higher levels of in-work poverty they face, limiting their progression opportunities, constraining their career, and ultimately adversely affecting their pension.

*Disabled women's access to flexible working*

- 3.3 Flexible working is a critical adjustment that supports many disabled women to enter employment, do their job well, and stay in employment. 2026 research<sup>16</sup> by Flexibility Works in Scotland found that more than one in six survey respondents who are disabled or have a long-term health condition say their physical health is their main reason for flexible working. One in four said their mental health was the main reason for wanting to work flexibly. 40% of respondents said that their physical or mental health would suffer if they lost

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<sup>13</sup> Scottish Government (2025) *Scotland's Labour Market Insights July 2025*

<sup>14</sup> Scottish Government (2023) *Labour Market Statistics for Scotland by Disability: January to December 2022*

<sup>15</sup> Kim, E. J., Skinner, T., & Parish, S. L. (2019). A study on intersectional discrimination in employment against disabled women in the UK. *Disability & Society*, 35(5), 715–737, <https://doi.org/10.1080/09687599.2019.1702506>

<sup>16</sup> Flexibility Works (2026) *Flex for Life 2026*, available at: <https://www.flexibilityworks.org/flexible-working-research/flex-for-life-report-2026/>

their flexible working, and 19% said they would have no choice but to stop working.

- 3.4 Disabled women are a group that are traditionally viewed as being cared for, but disabled women's caring roles are an important aspect of their labour market experiences that is often hidden and overlooked. Disabled women routinely have an unpaid caring role while also having to manage their own long-term health conditions or impairments. 2025 research<sup>17</sup> from Flexibility Works found that caring responsibilities were the main reason for respondents working or wanting to work flexibly, accounting for one in three. There is no disaggregated data available for this survey, however it is reasonable to assume a significant proportion of these respondents were disabled women.
- 3.5 Close the Gap's research found that remote work and adaptable schedules were seen as essential for managing health conditions, supporting mental wellbeing, and balancing caregiving responsibilities. Participants valued the autonomy to structure their workday, such as starting earlier or later, and the ability to work from home, which allowed them to control their environment and reduce the stress of commuting. For some, this flexibility also supported their access needs, including the ability to work with personal assistants or manage sensory sensitivities in a more predictable setting.
- 3.6 Responses around flexible working availability were fairly positive, for example, 69% of the 420 who answered this question strongly agreed or agreed that they currently had access to a variety of flexible working options. This is likely to reflect the overrepresentation of public sector workers, specifically those who are office based, and those on middle incomes among survey respondents. However, despite this, participants reported barriers to accessing or maintaining flexible work. Some reported that remote work, although advertised, was restricted by probationary periods or inconsistently applied policies. Others expressed anxiety about the potential withdrawal of these arrangements, especially when managers failed to understand their ongoing importance. Open-plan offices and hot-desking were also cited as particularly challenging for those with anxiety or sensory sensitivities. Some respondents

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<sup>17</sup> Flexibility Works (2025) *Flex for Life 2025*

had experienced stigmatisation, a lack of understanding and being compared to other employees, such as the following quotes from survey respondents:

“When discussing the adjustment of working one afternoon a week from home, one of my managers said it’s not reasonable as my coworkers would be jealous of me.” *(survey respondent, long-term health condition, mental health condition, mobility-related impairment)*

“I required adjustments which were initially granted but were removed as soon as I appeared to be ‘well’. There is a lack of compassion and understanding that a disability doesn’t just go away and if a person appears well, it is because the adjustments are working for the individual. I was stigmatised and looked down upon due to being disabled, treated different from others. I was also compared to others with manager stating that I was ‘not the only one who has ailments you know’.” *(survey respondent, long-term health condition, mental health condition)*

- 3.7 In terms of differences in types of disability or impairment, the findings of Close the Gap’s research supports the existence of a ‘hierarchy of impairment’, which is identified in both the literature and in the early-stage exploratory focus groups. This is the belief that certain impairments are more disabling or more genuine than others. Mental health needs and neurodivergence were less likely to be accommodated by employers. Neurodivergent survey respondents had the lowest levels of agreement that their adjustments were put in place immediately (28.6% compared to the average across all groups of 36.4%) with the interview and survey open text responses highlighting the narrow and limited understanding many employers and organisations may have regarding the diverse nature of conditions and impairments:

One interview participant shared their experience:

“[Employers] don’t get it with mental health, they don’t get spectrum disorders, neurodivergence, it doesn’t fit their model... any other thing like chronic illness blows their mind.” *(interview participant, physical impairment, long-term health condition, mental health, degree-level education)*

One survey participant shared their experience:

“I disclose my diabetes because I am confident that I will be accommodated but I don’t disclose my mental health and neurodivergence.” (*survey participant, long-term health condition, mental health conditions, neurodivergent*)

- 3.8 This points to how disability discrimination shapes recognition: conditions/impairments such as mobility-related impairments or health conditions are often more visible or more readily understood, and therefore more likely to be accommodated by employers. This can make some people feel guilt that they are taking resources away from people that need it more or that their condition is being doubted.

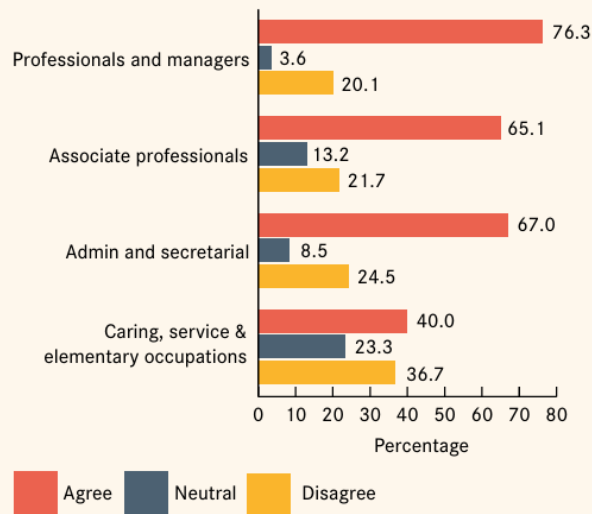
What are the experiences of flexible working of disabled people across different sectors of the labour market?

- 3.9 The availability of flexible working, a key component of enabling disabled people to access and remain in work, appears to vary for the disabled women who participated in our research, showing differences by occupational group. For example, as can be seen from the chart below, 76.3% of professionals and managers who responded agreed that flexible working was available to them, compared with only 40% of caring, service and elementary staff.<sup>18</sup>

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<sup>18</sup> Close the Gap (2025) *Excluded by Design: Research on disabled women’s experiences of employment in Scotland*, available at: <https://www.closesthegap.org.uk/content/resources/Excluded-by-Design---research-report.pdf>

Figure 10: Agreement that flexible working is available to me by occupational group (n=411)



**Image description:** bar chart titled 'Agreement that flexible working is available to me by occupational group'. Categories shown are: professionals and managers, associate professionals, admin and secretarial, and caring, service and elementary occupations. Those in caring, service and elementary occupations are significantly less likely to agree that flexible working arrangements are available to them.

3.10 Furthermore, respondents with mental health or mobility-related impairments, and those with three or more impairments, were more likely to be employed in caring, service or elementary roles than in other occupational groups, thereby exacerbating the inequalities they face. Disabled women working in these types of occupations often do not have access to regular remote working and/or are required to do physically demanding work. This was highlighted in the following quotes from survey respondents:

“...my supervisor...manager...knew my condition...kept giving me all hard jobs...i.e. clearing and emptying big fridge freezers loaded with food...cleaning floors...supposed to be a cleaning rota...I just kept getting hard jobs.” (survey respondent, mobility-related impairment)

“I was working as an early years practitioner... they made no adjustments and if I refused to, say, change a nappy on the floor I was made to feel bad.” (survey respondent, hearing-related)

*impairment, long-term health condition, mental health condition, mobility-related impairment, neurodivergent)*

- 3.11 The lack of flexible working is a major cause of the occupational segregation that defines the UK labour market. Those in higher-paid roles (especially non-disabled men) are more likely to be able to work flexibly while those in lower-paid, service sector roles (often disabled women) do not routinely have access to flexibility and instead work within rigid shift patterns. As women and disabled people are overrepresented in lower-paid jobs, this compounds the inequalities they experience.
- 3.12 Occupational segregation is amplified for disabled women, and the preponderance of inflexible work is a key reason for this. Data published by the Office for National Statistics<sup>19</sup> shows that disabled women in the UK are concentrated in health and social work, accounting for a quarter (25.1%) of all disabled women's employment compared with 21.7% of non-disabled women. Just 7.3% of disabled men work in health and social work. The second most common industry is another which is female-dominated, education, in which 15.3% of disabled women work, compared to just 6.4% of disabled men. This means that health and social work and education account for more than 40% of disabled women's employment. At the same time, disabled women are underrepresented in higher-paid, male-dominated industries compared with non-disabled women, who as a group are also underrepresented. For example, in professional, scientific and technical activities, they comprise just 6.5% compared with 8.9% for non-disabled women, in financial services they make up 3.4% compared with 4.2%, and in information and communication they comprise just 2.6% compared with 3.3% for non-disabled women.
- 3.13 Furthermore, disabled women experience a 'double glass ceiling'; they are underrepresented in management roles compared with disabled men (7.3% compared with 10.1% respectively) showing that disabled men still have more access to leadership opportunities.<sup>20</sup> The lack of flexible working at senior level

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<sup>19</sup> Office for National Statistics (2025) *The employment of disabled people 2024*, supplementary tables, available at: <https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2024/the-employment-of-disabled-people-2024>

<sup>20</sup> Ibid.

is highly likely to be a barrier for disabled women progressing into higher-paid, senior jobs.

What evidence is there about the impacts of flexible working on disabled people's progression in work?

- 3.14 Our research found that the factors affecting progression present a complex picture which will be specific to the organisational context, position and funding available, and also how disability and race intersect with other oppressions. Only 17% of survey respondents felt that their employer provided clear opportunities for them to progress at work, with 58% strongly agreeing or agreeing with the statement 'I feel my non-disabled colleagues have more access to promotion opportunities than I do' (n=238).
- 3.15 Unsurprisingly, the results suggest that not having access needs met in a timely manner is likely to reduce employee efficiency which then has implications for employee performance and progression. For example, of the 324 respondents who experienced delays in having their access needs met, the most cited impact of this was doing their job at a much slower pace (52%) or not able to do all parts of their job (28%).
- 3.16 Open text comments highlighted that progression challenges related to conditions/impairments were linked to the need for reasonable adjustments, concern about retaining adjustments, and a lack of time to dedicate to progression. For example:

*"I am too scared to progress as I find recruitment so triggering for my mental health." (survey respondent, long-term health condition, mental health conditions, neurodivergent)*

*"I don't feel there would be any adjustments for my mental health for the processes required to progress." (survey respondent, mental health condition)*

*"Progression feels difficult due to biases against working from home. I'm very cautious about potentially moving to a new role/area where I have to fight for my adjustments again." (survey respondent, long-term health condition, mental health condition, mobility-related impairment)*

“There are opportunities for me to progress at my work, but I would have to be on site in the office more frequently which adversely affects dealing with my [health condition].” (*survey respondent, long-term health condition*)

“There are opportunities to progress but not with the reasonable adjustments I need to do the job.” (*survey respondent, mobility-related impairment*)

“As a disabled person, I also need a lot of time to rest, attend medical appointments, and participate in essential therapies and I don’t get any time for that - so when am I supposed to work on my career progression or development?” (*survey respondent, long-term health condition, mental health condition, neurodivergent*)

- 3.17 Relatedly, respondents mentioned that their participation in training opportunities was shaped by their condition or impairment. For example, 55.2% said their condition/impairment prevented them from attending training and development opportunities as much as they liked. They mentioned that the venues where training took place were not always accessible and accommodations such as providing handouts were not always available. Some mentioned that the increased availability of online training in recent years has helped to address some of the challenges of attending in-person training. These findings underscore that employer practice on training and development often falls short in terms of flexibility and accessibility.

How clear and well understood is the law around employers' Equality Act duties to provide flexible working options and associated aids and equipment as "reasonable adjustments"?

- 3.18 Despite policy commitments and legal provisions, employer practice often falls short, with weak enforcement and inconsistent implementation of reasonable adjustments. The duty to make reasonable adjustments under the Equality Act 2010 is anticipatory and ongoing, requiring employers to proactively consider access needs rather than waiting for individuals to request support. However, there is a persistent gap between legal obligations and workplace reality. Employer understanding of legal responsibilities remains inconsistent,

particularly regarding less visible conditions such as mental health and neurodivergence.

3.19 The reasonable adjustments framework places the burden on disabled women to disclose their impairments, articulate their needs, and advocate for support. This reactive, individualised approach fails to address structural barriers and does not recognise the additional labour disabled women undertake in navigating workplace systems, educating employers, and managing the emotional and practical costs of self-advocacy. A Business Disability Forum survey<sup>21</sup> found that more than three-quarters of disabled employees (78%) said they, rather than their employer, had to initiate the process of getting adjustments. Furthermore, 58% of disabled employees said getting the adjustments they needed was due to how assertive and confident they are to ask for that support.

3.20 A common theme throughout Close the Gap's research was that line managers were often aware of their responsibilities regarding reasonable adjustments, but that this did not always translate to a meaningful and timely change when making these adjustments. For example, while 61.9% of survey respondents indicated that they strongly agreed or agreed with the statement 'My line manager was fully aware of their legal responsibilities in providing reasonable adjustments', only 36.4% of the respondents had their reasonable adjustments put in place immediately, with 18.6% indicating that adjustments had never been put in place. The process of procuring adjustments was long due to systemic delays or the need to provide evidence to prove their conditions/impairments to their manager. The cost of adjustments was seen as an expensive venture by managers, suggesting a lack of knowledge regarding grants available.

*"My line manager continually complains about how much my reasonable adjustments cost, and moans at having to complete paperwork for having it implemented." (survey respondent, mental health condition, mobility-related condition, neurodivergent)*

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<sup>21</sup> Business Disability Form (2023) *The Great Big Workplace Adjustments Survey 2023- what did people tell us?*

3.21 Participants highlighted a range of challenges when moving to a new employer or getting a new line manager, including fear of being seen as the ‘demanding employee’; power differentials, with more senior or established employees better positioned to advocate for their adjustments; employer concerns about the cost of adjustments and lengthy wait times; and the onus being on the employee due to a lack of employer understanding and support.

3.22 The following three quotes from survey respondents expressed that the fear of being seen as too demanding could be a barrier to obtaining reasonable adjustments:

“I think everyone is always a bit unsure of how system works. It’s easy to feel like a nuisance.” (*survey respondent, long-term health condition, mobility impairment, neurodivergent*)

“Asking for adjustments is truly difficult. You feel like a bother to them.” (*survey respondent, long-term health condition, mental health condition, mobility-related impairment*)

“I told my previous and now present line manager, and they were both excellent and basically advocated for me... however I would be slightly more wary giving details of my access needs to a new boss. I don’t want to seem like a difficult person straight away, and get a reputation, however bad that sounds.” (*survey respondent, long-term health condition, mental health condition, mobility-related impairment, neurodivergent*)

3.23 Survey respondents described having to fight to obtain adjustments and feeling the onus was on them to know their rights and be experts in the adjustments they needed:

“I had to (strongly/forcibly) advocate for myself and only when I privately funded formal assessment/diagnosis and shared this with employers did more supportive conversations occur. However, this was following an extremely distressing attendance/capability HR processes... I feel my future career progression has been adversely impacted as I require reasonable

adjustments.” (survey respondent, long-term health condition, neurodivergent)

3.24 Not all participants had the confidence to advocate for themselves in this way, particularly in workplaces where they did not feel well supported by line managers, such as this interview participant:

“I don’t feel confident at all asking for reasonable adjustments. When speaking informally, I often feel that business needs have taken priority over my own ability. I don’t feel like I understand my own long-term needs enough to formally request reasonable adjustments.” (survey respondent, mental health condition, mobility-related impairment, neurodivergent)

3.25 Supportive line management was a critical factor. Respondents in ‘high support’<sup>22</sup> workplaces were more confident and encountered less doubt or questioning of their access needs. Good line management was associated with increased disability awareness and understanding, and managers who had their employees’ best interests at heart, who, as one participant described, “would back you up.” Compassionate and flexible line management was also key, with participants sharing instances where their managers were actively responsive and proactive regarding their wellbeing, encouraging them to leave work to rest or seek medical attention. Yet, as shown in the survey findings, supportive line managers and colleagues were found in only a third of respondents’ workplaces, with differences by condition/impairment type (as mentioned previously) evident in the analysis. This suggests that employers may be better at supporting employees with certain impairments. Those with health conditions appeared more likely than those without to rate their workplace as high support, whereas neurodivergent respondents were more likely to rate it as medium or low support. Those in workplaces with medium or low support were more likely to have negative experiences.

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<sup>22</sup> A measure was created using the survey responses to indicate how supportive a workplace the respondent felt they had. See appendix for further details in Close the Gap (2025) *Excluded by Design: Research on disabled women’s employment in Scotland*, available at: <https://www.closesthegap.org.uk/content/resources/Excluded-by-Design---research-report.pdf>

3.26 Another common theme identified in Close the Gap’s research is that disabled women frequently face unfair questioning of their skills and capabilities, which can lead to unjust formal and informal performance management. For example, 52% of respondents had had their performance questioned at work because of attitudes to their condition/impairment, and 16% were involved in a formal performance management process, with 36% involved in an informal review. Further, 81% had felt the need to overcompensate or work harder at their job to prove they were as capable/productive as colleagues, which was also a theme from the interviews and focus groups. This in part speaks to employer failures to provide reasonable adjustments such as flexible working in a timely manner, or at all in some cases. Where disabled women’s access needs including flexibility are not met in the workplace, it makes it more difficult for them to do their job well or at all. This is often incorrectly interpreted by line managers as a performance issue which in turn creates increased stress for disabled women, and contributes to sickness absence and attrition rates.

To what extent can disabled people access the aids and equipment they need to work flexibly via the Government's Access to Work scheme? What changes could be made to make the scheme more effective in this regard?

3.27 Access to Work provides disabled employees with vital support that allows them to access employment or continue in a job. However, there are well-documented, significant delays in accessing support. When part or all support is refused, it makes it more difficult for disabled people to enter or stay in employment. A recent report<sup>23</sup> from the UK Public Accounts Committee laid bare the severity of the delays and the impact on disabled people. The Department for Work and Pension’s (DWP) target is to process applications in 25 working days; it is nowhere near to achieving this, currently telling applicants that it may take up to 37 weeks, nearly ten times longer than this target. The Committee found that delays were the most frequently reported issue in the inquiry, with direct and damaging consequences for disabled peoples’ employment, income, and health and wellbeing.

3.28 The backlog of applications for Access to Work support has built up over a number of years, with the number of cases awaiting a decision growing from

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<sup>23</sup> Public Accounts Committee (2026) *The Access to Work scheme, Sixth Report of Session 2026–27*, available at: <https://publications.parliament.uk/pa/cm5902/cmselect/cmpubacc/92/report.html>

21,700 in March 2022 to around 66,000 in March 2026. The Committee notes that DWP's expectation that it will take at least 18 months to clear the applications backlog means hardship for individuals and businesses will continue for some time.

- 3.29 The report also sets out that a large volume of evidence was received that highlighted the multiple failings of the administration of Access to Work. This includes poor communication from the DWP, with unanswered emails, unreturned calls, unclear letters, inconsistent advice and customers being passed between different staff without clear ownership. Another issue highlighted is the scheme's inaccessible process, that often requires the kind of administrative capacity that some disabled people are applying for support to access. Furthermore, Access to Work is built around assumptions that people are in a stable, full-time job, meaning that for many others in other kinds of employment, such as freelance, it does not work well.
- 3.30 A key point raised by the Committee is that the scheme provides support over and above the reasonable adjustments that employers are legally required to make. Access to Work should fund those adjustments that are necessary but that are not reasonable for an employer to provide, and that what is reasonable will vary depending on the employer. It notes concerns from DWP that some employers, particularly large ones, do not do enough to meet their legal obligations under the Equality Act 2010, and that the scheme may be filling the gaps. Employers cannot rely on Access to Work alone to meet their responsibilities to disabled staff and job applicants. This is particularly important given that around one in three Access to Work applications are now being rejected so employers should not delay adjustments while waiting for scheme decisions.<sup>24</sup>
- 3.31 We echo calls from disabled people's organisations<sup>25</sup> and the Access to Work Collective for increased investment in Access to Work to enable the significant change to the system that is needed. We strongly oppose any cuts to the

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<sup>24</sup> Facilitate Magazine (2026) *Access to Work is rejecting one in three applications – employers take note*, available at: <https://www.facilitatemagazine.com/2026/02/11/access-work-rejecting-one-three-applications-employers-must-not-wait>

<sup>25</sup> See for example, Inclusion Scotland (2025) *Consultation Response: Pathways to Work: Reforming Benefits and Support to Get Britain Working*

scheme.

#### **4. Recommendations:**

- 4.1 Disabled women experience deep inequalities in the labour market which means they are more likely to be unemployed and 'economically inactive'. When they are employed, they are more likely to be lower paid jobs, with fewer progression opportunities, and struggle to get the flexibility they need. The barriers are structural and require a range of action from Government and employers to address this systemic injustice. Below we set out our recommendations for change for disabled women:

##### UK Government

###### 1. On Access to Work:

- Reverse all planned cuts to the Access to Work programme, and take immediate action to address the backlog and fast track urgent cases.
- Develop a simplified process which avoids short-term approval periods, and which is compatible with project-based and short-term work.
- Provide specialist support with applications for those who need it.
- There should be a single contact for the employer and employee to create a more cohesive, joined-up process.
- Deliver training for case handlers on disability equality and the social model of disability, and wider investment in workforce capability to improve consistency and reduce turnover.
- Invest in digital, data and IT infrastructure including automation and improvements to self-service.
- Raise awareness with employers of Access to Work and the support available.
- Provide clearer guidance for employers on what is 'reasonable' for different sizes of organisations.

2. Strengthen employer accountability on reasonable adjustments by requiring employers to notify employees of a decision on reasonable adjustment within two weeks of an application. Adjustments could include providing flexible

working, giving written rather than verbal instructions, and installing assistive software.

3. Introduce mandatory disability pay gap action plans for employers, with a requirement to report on progress, to drive employer action beyond reporting data.
4. Work with Office for National Statistics and other producers of official statistics to increase the range and depth of intersectional data available at national and regional levels.
5. Deliver an awareness-raising campaign to build employer understanding of disability and legal obligations to provide reasonable adjustments.

### Employers:

1. Build capacity in senior leaders, HR, and line managers on the intersection of disability and gender, key considerations for different conditions and impairments, and on the specific barriers disabled women face in accessing, and progressing in, work.
2. Provide flexible working at all levels to support disabled women to do their job well and to manage their health and any caring roles they have, and ensure that availability of flexible working is included in job adverts.
3. Have a 'default yes' approach to flexible working requests to accommodate disabled women's needs, including providing remote and hybrid working as a reasonable adjustment.
4. Provide accessible, flexible training and development including remote, part-time, or self-paced learning to allow disabled women to upskill and progress.
5. Work with disabled people's organisations and specialists on disability equality to provide training for line managers on providing reasonable adjustments.
6. Introduce a reasonable adjustments passport to ensure that disabled women have consistent access to the support they need in the organisation.
7. Embed anti-racism practice across all disability and gender equality measures to ensure the overlapping impact of racism, sexism, and disability discrimination is recognised and racially minoritised disabled women are not left behind.