



ACS Submission - Improving Lives: The Work, Health and Disability Green Paper

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Improving Lives green paper. ACS represents over 33,500 local shops across the country including groups such as the Co-op, One Stop and McColls Retail and thousands of independent retailers. Further information about ACS is available as an Annex to this submission.

ACS continues to raise awareness with retailers about how they can make their stores accessible for both customers and workers. ACS participated in the Prime Minister's Champion Group for Retail, which has developed a guide for retailers on becoming dementia friendly, available [here](#). ACS has also produced best practice guidance for retailers to accommodate the needs of disabled customers. The guidance provides practical advice about how retailers can adapt their store environments and communicate with different customers to meet their needs. The guidance can be viewed [here](#).

This submission responds specifically to Chapter 4 of the Improving Lives Green Paper, regarding the role of employers in supporting disabled people and people with long term health conditions in workplaces. ACS does not hold data on the number of people working in the sector with disabilities or health conditions. However, ACS does complete an annual Colleague Survey of people working in stores which provides useful insights into employment in the convenience sector.

The Colleague Survey shows that convenience stores provide hyperlocal employment that flexes around employee's other life commitments. Over two-thirds (68%) of workers in the sector have existing commitments which affect the working hours they can undertake, including children, caring for older family members and full time studying¹. 70%² of staff work fewer than 30 hours per week, 51% of staff walk to work and the average journey time to work is only 13 minutes³. The flexible, local nature of employment in the sector is valued by staff; shown by 51% reporting that in five years' time they see themselves working with the same employer⁴.

ACS is making the following recommendations in relation to the questions in the Improving Lives Green Paper:

- Retailers would benefit from more information about how to address the health needs of their employees.
- The 'Small Employer Offer' should be expanded and promoted to businesses so more can take advantage of funding to get people with health conditions and disabilities back to work.
- ACS agrees that guidance should be published for businesses on employing disabled people with clarity about what reasonable adjustments can be made.

¹ ACS Colleague Survey 2016

² ACS Local Shop Report 2016

³ ACS Colleague Survey 2016

⁴ ACS Colleague Survey 2016

- ACS supports the reform of statutory sick pay to deliver more effective returns to work by encouraging conversations between employers and employees.
- Statutory sick pay is a significant financial burden for retailers. We would support action to incentivize employees to return to work quicker on reduced hours.

Embedding good practices and supportive cultures

What are the key barriers preventing employers of all sizes and sectors recruiting and retaining the talent of disabled people and people with health conditions?

What expectation should there be on employers to recruit or retain disabled people and people with health conditions?

Which measures would best support employers to recruit and retain the talent of disabled people and people with health conditions?

ACS' Local Shop Report shows that 37% of stores are wheelchair accessible, 9% have wider aisles to improve accessibility, and 7% provide hearing aid loops⁵. Refurbishing stores to account for the needs of employees and customers with disabilities is challenging for retailers, due to the financial commitment needed and size of stores.

Some stores in newly-built sites will be built to cater for the needs of staff with disabilities, but stores based in older buildings can be constrained by space and face greater difficulties in making these adjustments. For example, 50% of independent convenience stores are less than 1000 square foot⁶ making it difficult to widen aisles and introduce other measures for them to be suitable for wheelchair access.

74% of the convenience sector is comprised of independent retailers⁷. Most of these retailers do not have a HR department and provide employment support functions themselves. This means small retailers are not always clear what the requirement to make 'reasonable adjustments' under the Equality Act means for their business. ACS' guide on welcoming disabled customers is specifically designed to inform these retailers about adjustments they can make. We welcome suggestions in the green paper that employers might have more access to information to understand the health needs of their employees and access to new guidance to support them employ disabled people or people with health conditions.

Moving into work

How can existing government support be reformed to better support the recruitment and retention of disabled people and people with health conditions?

ACS supports the Small Employer Scheme and would like to see this expanded and communicated to businesses better. Businesses would value advice from people based in job centres and access to the £500 payment for 3 months of continuous employment. ACS would be happy to work with DWP to communicate this offer to more businesses in the convenience sector. We support DWP's ambition to provide guidance for employers on supporting disabled workers. The Government's approach must recognise the impact of business size on what support can be delivered.

⁵ ACS Local Shop Report 2016

⁶ ACS Local Shop Report 2016

⁷ ACS Local Shop Report 2016

Staying in or Returning to Work

Should Statutory Sick Pay be reformed to encourage a phased return to work? If so, how?

Retailers are very concerned about the removal of government funding for statutory sick pay and therefore the prospect of taking on more employment cost burdens. With the introduction of the National Living Wage retailers have seen their employment costs increase sizeably over the last year with the prospect of above inflation increase in wage rates to 2020.

Statutory sick pay is a significant cost burden for retailers, who must fund this at £88.45 per week plus another wage to cover the staff absence. Based on a sample of over 1,5000 stores retailers on average indicated 9% of convenience store staff had received statutory sick pay in the last year, demonstrating the financial impact this can have on convenience store retailers⁸.

We acknowledge that phased returns to work could promote staff returning to work sooner on lower hours. However, retailers fully topping up the reduced hours to statutory sick pay levels without some restrictions is not favoured due to the increase cost burdens this would place on retailers who are already under pressure from increased employment costs. We would therefore be interested to discuss how a Government supported scheme could deliver phased returns to work.

Feedback from members has suggested that a system of topping up would have to be capped at a certain level, for example a maximum of twelve weeks and only apply where the worker has been employed for over two years. Retailers have also indicated that for the initial return to work to be for a minimum of ten working hours or 25% of full time equivalent hours to enable workers to reach their normal hours before the twelve-week maximum topping up period is reached.

We welcome proposals for there to be ongoing conversations between employers and employees during sick leave periods. We are pleased that the consultation acknowledges that the current 'fit note' system can be a barrier to conversation between employers and employees. GPs should not be allowed to backdate fit notes which state that the worker was not fit for work when that worker was not personally assessed.

Retailers are also concerned about backdated payments and fit notes. Backdated fit notes should be limited to one week to encourage the fit note system to be based on legitimate and up to date assessments. Statutory sick pay claimants should also have to visit an occupational health professional at regular intervals to assess their health and encourage returns to work at a faster rate.

For further information on this submission, please contact Steve Dowling, ACS Public Affairs Assistant, via steve.dowling@acs.org.uk / 01252 515001.

⁸ ACS National Living Wage Survey 2016

Annex A

ABOUT ACS

The Association of Convenience Stores lobbies on behalf of over 50,000 convenience stores across mainland UK on public policy issues that affect their businesses. ACS' membership is comprised of a diverse group of retailers, from small independent family businesses running a single store to large multiple convenience retailers running thousands of stores.

Convenience stores trade in a wide variety of locations, meeting the needs of customers from all backgrounds. These locations range from city centres and high streets, suburban areas such as estates and secondary parades, rural villages and isolated areas, as well as on petrol forecourts and at travel points such as airports and train stations.



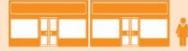
WHO WE REPRESENT

INDEPENDENT RETAILERS



ACS represents 22,870 independent retailers, polling them quarterly to hear their views and experiences which are used to feed in to Government policy discussions. These stores are not affiliated to any group, and are often family businesses with low staff and property costs. Independent forecourt operators are included in this category.

SYMBOL GROUPS AND FRANCHISES



ACS represents 15,060 retailers affiliated with symbol groups. Symbol groups like SPAR, Nisa, Costcutter, Lonsis, Premier and others provide independent retailers with stock agreements, wholesale deliveries, logistical support and marketing benefits. Symbol group forecourt operators and franchise providers like One Stop are also included in this category.

MULTIPLE AND CO-OPERATIVE BUSINESSES



ACS represents 12,165 stores that are owned by multiple and co-operative retailers. These businesses include the Co-Operative, regional co-operative societies, McColls, Conviviality Retail and others. Unlike symbol group stores, these stores are owned and run centrally by the business. Forecourt multiples and commission operated stores are included in this category.

THE CONVENIENCE SECTOR



In 2016, the total value of sales in the convenience sector was £37.5bn. The average spend in a typical convenience store transaction is £6.13.



There are 50,095 convenience stores in mainland UK. 74% of stores are operated by independent retailers, either unaffiliated or as part of a symbol group.



The convenience sector provides flexible employment for around 390,000 people. 21% of independent/symbol stores employ family members only.



24% of shop owners work more than 70 hours per week, while 22% take no holiday throughout the year. 74% of business owners are first time investors in the sector.



Convenience stores and Post Offices poll as the two services that have the most positive impact on their local area according to consumers and local councillors. 84% of independent/symbol retailers have engaged in some form of community activity over the last year.



Between August 2015 and May 2016, the convenience sector invested over £600m in stores. The most popular form of investment in stores is refrigeration.

OUR RESEARCH

ACS polls the views and experiences of the convenience sector regularly to provide up-to-date, robust information on the pressures being faced by retailers of all sizes and ownership types. Our research includes the following regular surveys:

ACS VOICE OF LOCAL SHOPS SURVEY

Regular quarterly survey of over 1200 retailers, split evenly between independent retailers, symbol group retailers and forecourt retailers. The survey consists of tracker questions and a number of questions that differ each time to help inform ACS' policy work.

ACS INVESTMENT TRACKER

Regular quarterly survey of over 1200 independent and symbol retailers which is combined with responses from multiple businesses representing 3,970 stores.

ACS LOCAL SHOP REPORT

Annual survey of over 2200 independent, symbol and forecourt retailers combined with responses from multiple businesses representing 5,785 stores. The Local Shop Report also draws on data from him! research and consulting, IGD, Nielsen and William Reed Business Media.

BESPOKE POLLING ON POLICY ISSUES

ACS conducts bespoke polling of its members on a range of policy issues, from crime and responsible retailing to low pay and taxation. This polling is conducted with retailers from all areas of the convenience sector.

For more information and data sources, visit www.acs.org.uk