



# RehabGroup

Investing in People, Changing Perspectives

## **Rehab Group Submission to European Commission Public Consultation on Enhancing the Strategy for the rights of persons with disabilities up to 2030**

**06 February 2026**

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## **SUMMARY OF RECOMMENDATIONS:**

### **Make sure persons with disabilities can work and go to school**

Ensuring that persons with disabilities can access education and employment on an equal basis is a right protected under international, EU, and national law. However, Ireland continues to lag behind, with the lowest disability employment rate in the EU at 32%, compared with an EU average of 51%, and the largest employment gap at 44%. While EU initiatives such as positive action measures, guidance on reasonable accommodation, and research into alternative employment models are welcome, significant challenges remain. Persistent negative employer attitudes, reported by service users, highlight the need for stronger action, including funded disability awareness training, expanded supported employment services, and fuller use of public procurement tools to promote inclusive workplaces.

### **Help people with disabilities live where they want**

Many people with disabilities are unable to live independently due to housing shortages, long waiting lists, and insufficient supports, leaving independent living out of reach for most. Rehab service users report that living independently in Ireland is extremely difficult, particularly for young adults. The EU strategy must prioritise accessible, affordable housing, strong community supports, supports for people with complex needs, adequate personal assistance, and a clear, enforceable right to independent living.

### **Make buildings, transport, and websites easier to use**

Accessibility is essential for independent living and social inclusion. Public transport remains a major barrier, particularly in rural areas and viable alternatives are not available due to inconsistent mobility supports across Member States.

In Ireland, there is a lack of support for options other than public transport. Those who cannot access public transport are left with no clear alternative creating an added financial burden and adding to the cost of disability for individuals. Personal transport is prohibitively expensive for the majority. Those unable to drive due to disability may own a vehicle but cannot insure it themselves, relying instead on family or others as the insured driver.

The EU should provide clear guidance to Member States on improving accessibility in private transport for people with disabilities. This guidance could address insurance regulations, vehicle taxation, and other legal or financial barriers, ensuring that adapted vehicles are both affordable and usable. By setting common standards and best practices, the EU can help create a consistent framework across Member States, enabling greater independence and mobility for people with disabilities.

Public transport accessibility remains a major barrier to full participation for people with disabilities. The EU Disability Strategy should provide guidance to Member States on creating inclusive public transport systems; reducing requirements for advance booking for accessibility features; ensuring coordinated planning between public and private operators; incorporating inclusive design in new initiatives; providing accessible information and infrastructure at stations and stops; and consulting people with lived experience at design stage. Accessibility must move beyond legal obligations to everyday practice.

### **Make voting accessible for persons with disabilities**

People with disabilities continue to face barriers to democratic participation. In Ireland, election information is often unclear, rushed, or difficult to understand, with limited access

to candidates, especially in rural areas. Accessible formats—such as easy-to-read materials, braille, and clear visual layouts—are frequently lacking, and polling stations are not always fully accessible, compromising independence. The EU Disability Strategy should ensure equal participation requiring Member States to provide fully accessible voting processes, training election staff in disability inclusion, and safeguarding voter privacy and autonomy.



## **Submission to European Commission**

### **Enhancing the Strategy for the rights of persons with disabilities up to 2030**

#### **Additional Research from Rehab Group Focus Groups**

**6 February 2026**

**Email: [publicaffairs@rehab.ie](mailto:publicaffairs@rehab.ie)**

## **1. Introduction**

Rehab Group is an independent voluntary organisation that has supported adults and children with disabilities in Ireland for more than 75 years. As a campaigning and advocacy body, we represent the voices of the 12,500 individuals who currently access our services, as well as their families.

Our mission is to empower those we support to live more independent lives and to participate fully and meaningfully in their communities. We achieve this through the delivery of high-quality, flexible, and sustainable services in care, learning and education, training, and employment.

We are a rights-based, inclusion-focused organisation, operating through three key divisions: RehabCare, National Learning Network, and Employability and Social Enterprise.

In preparing this submission, Rehab Group conducted more than 25 in-depth focus groups, engaging 160 service users from across the country. To complement these insights, we have included feedback from other relevant focus groups held over the past year in preparation of our Pre-Budget Submission and national consultations on employment and the electoral process.

## **2. Lived Experience Feedback**

What is evident from the lived experiences of people who use our services is that there is a severe disconnect between them and the European Union.

The main positive from the focus groups is that the majority of the service users feel that the situation for persons with disabilities has improved in Ireland in the last 5 years, Agree 29% and Somewhat Agree 37%, while for the European Union it was Agree 25% and Somewhat Agree 29%.

The disconnect between persons with disabilities and the EU manifests itself when asked if the initiatives of the European Union have helped to improve the situation of persons with disabilities in Ireland. Here the majority, 30%, said somewhat agree but closely followed by Don't Know 26% and Neither Agree nor Disagree 17%. This contrast is even more pronounced when respondents are asked whether European Union initiatives have improved the situation of persons with disabilities: 34% answered "Don't know" regarding the EU, rising to 39% when considering persons with disabilities worldwide.

### 3. Inclusive and Equal Democratic Participation

What is clear from our Focus Groups is that the Strategy on Enhancing the Rights of People with Disabilities must address: the right to inclusive and Equal Democratic Participation. That disconnect begins with inaccessibility at the polling booths and an inability to engage in the political process at the most basic of levels.

Even where voting rights are not restricted people with disabilities still experience numerous barriers when attempting to vote.

In Ireland Rehab service users have highlighted issues with limited signage for polling stations, voting papers being too long, a lack of Braille polling papers, and a lack of accessible tables for voting leading to people with mobility issues losing their independence and secrecy of their vote.

Disabled people are significantly underrepresented at national and local government level. In Ireland, 22% of the population identifies as having a disability. While no statistics are available for the number of public representatives in the Oireachtas (National Parliament) with a disability, a study on the 2024 local elections identified that just over 2% of the 949 councillors elected identified as disabled. This is reflected at EU level where fewer than 1% of the 720 MEPs in the European Parliament have identified as disabled<sup>1</sup>.

The EU strategy needs to bring in measures that establish an EU wide:

- Universal right to vote regardless of legal capacity
- Fully accessible polling stations and materials
- Disability Training for election staff in polling stations
- Strong safeguards for privacy in voting.
- Voter education programmes in communities

### 4. Independent Living

Living independently is a crucial goal of people with disabilities.

When asked which areas should be the most important ones to improve the situation of persons with disabilities in the European Union? The majority of Rehab service users chose Independent Living as number one.

However, 59% of Rehab service users felt in Ireland it is almost impossible for both financial and practical reasons. Young adults with disabilities are also more likely to live with their parents.

Access to assisted and independent living is declining as a result of the housing crisis. People with disabilities also spend longer on social housing waiting lists than non-disabled people.

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<sup>1</sup> [European Data Journalism Network](#)

With an ageing population of parents and carers, urgent action and clear direction within the EU Strategy, with funding to match, is required to address housing needs of people with disabilities in a meaningful way. Clear pathways for those with disabilities to future proof their lives must be developed around suitable housing solutions in the first instance.

Participants in our Focus Groups made the following recommendations:

**Building strong community-based services:** We need strong local support services so people with disabilities are not isolated and can fully take part in community life. These services should help people connect, participate, and belong in their communities. EU funding should support moving away from institutions without simply replacing them with new forms of segregation. Instead, it should focus on helping communities develop the skills, resources, and services needed to properly support people with disabilities in everyday life. Funding to support people with disabilities to take part in community life through subsidies or discounts for local leisure and cultural events would break down the significant barrier of affordability and the cost of disability in this regard.

**Including people with complex or high support needs:** Supporting people with severe or complex disabilities to live independently takes careful planning so they are not left out or excluded. People with intellectual disabilities experience huge difficulties accessing affordable and accessible housing. In Ireland in 2022, only 299 people with intellectual disabilities were allocated social housing through local authorities, less than in previous years. Training should help change attitudes and give professionals, carers, and decision-makers the practical skills they need to make inclusion work in real life.

**Raising awareness and support in the community:** Plans should be put in place to help the public better understand and welcome inclusive living in their communities, so these arrangements are supported rather than resisted. By tackling barriers in systems and attitudes, people with high support needs can be included in meaningful, community-based living situations where they belong.

**Personal Assistance:** People with disabilities experience significant issues with managing day-to-day living at home or living independently with the limited number of PA or home support hours they receive, with some effectively confined to their homes due to the lack of PA supports.

*"I need more P.A. hours. It would help me to do more things out in the community. Currently there is no cover if my P.A. is out sick or on holidays, this needs to change."*

*"A lot of us would get home help need more hours of home help to maintain living independently. The waiting lists for suitable housing are really long."*

An EU law establishing a right to personal assistance for people with disabilities would ensure that independent living would begin progressing rather than regressing across member nations. This would enable people with disabilities to live independently within their communities:

- EU-wide minimum standards for, and a legal right to, personal assistance
- Scalable, person-centred schemes
- Support for family and sibling caregivers
- Enforceable right to independent living

## **5. Transport and Mobility**

Public transport accessibility remains a major barrier to full participation for people with disabilities. The EU Disability Strategy should provide guidance to Member States on creating inclusive public transport systems; reducing requirements for advance booking for accessibility features; ensuring coordinated planning between public and private operators; incorporating inclusive design in new initiatives; providing accessible information and infrastructure at stations and stops; and consulting people with lived experience at design stage. Accessibility must move beyond legal obligations to everyday practice.

In Ireland, there is a lack of support for options other than public transport. Those who cannot access public transport are left with no clear alternative creating an added financial burden and adding to the cost of disability for individuals. Personal transport is prohibitively expensive for the majority. Those unable to drive due to disability may own a vehicle but cannot insure it themselves, relying instead on family or others as the insured driver.

The EU should provide clear guidance to Member States on improving accessibility in private transport for people with disabilities. This guidance could address insurance regulations, vehicle taxation, and other legal or financial barriers, ensuring that adapted vehicles are both affordable and usable. By setting common standards and best practices, the EU can help create a consistent framework across Member States, enabling greater independence and mobility for people with disabilities.

## 6. Employment

The right of persons with a disability to work on an equal basis with others is enshrined in international, EU and national policies, including the UN Convention on the Rights of Persons with Disabilities.

When asked which areas should be the most important ones to improve the situation of persons with disabilities in the European Union? Rehab service users listed Work or Employment second only to Independent Living.

Despite this, the European Disability Forum's Human Rights Report (2023) reported that the employment rate in Ireland for people with disabilities at 32% is the lowest in the EU and compares poorly with the EU average of 51%. At the same time, the disability employment gap is the highest. The EU average gap between the employment rate of persons with disabilities and others stands at 24%, while in Ireland, it stands at 44%.

Rehab welcomes some of the efforts made in the first half of the Strategy particularly:

- A catalogue of positive actions to encourage the hiring of persons with disabilities and combating stereotypes.
- Reasonable accommodation at work, guidelines and good practices.
- Study on alternative employment models for persons with disabilities.

However, more still needs to be done on a European level to ensure that certain countries, including Ireland, are not allowed to fall behind when it comes to the right of persons with a disability to access employment.

The people who use Rehab services have expressed frustration over their inability to gain employment. They have found that employers were biased against taking on someone with a disability due to misguided preconceptions around employing someone with a disability based on negative stereotypes. Many of the people who took part in our focus groups felt that they were ready for employment but that employers weren't ready for them. The need for disability awareness training for employers to help reduce stigma and encourage inclusive hiring practices was a recurring theme in many of our Focus Groups.

"I need a chance, they don't look at you if you have a disability. You've to hide your disability."

"I worked in a creche, they were aware of my disability, and they were not supportive of me in the workplace."

The "catalogue of positive actions to encourage the hiring of persons with disabilities and combating stereotypes" is welcomed by Rehab but we stress the need to push it further. The new strategy needs go beyond positive actions and see EU funding put towards employer disability awareness training in each state.

Rehab believes the strategy needs to look towards employment on a holistic basis from all angles taking into account other EU directives that could have a beneficial impact on disability employment. For example, a recent OECD Study in Ireland found that Ireland was not availing of existing EU instruments (such as Article 20 of the EU Procurement Directive) its €23 billion procurement budget to promote the employment of people with disabilities<sup>2</sup>.

Greater use of Article 20 of the EU directive on Public Procurement could have a significant impact on the employment of people with disabilities if each State was compelled to put it into action. This would have a significant impact on the profitability of organisations that employ large numbers of people with disabilities and would encourage others to do the same.

Several of our service users who feel they would benefit greatly from a form of supported employment. Several participants said they would benefit from a support person or job coach or mentor, especially during the preliminary stages of employment. Assistance in preparing for interviews was seen to be an important support. Such supports would instil a sense of reassurance and confidence. A mentor within the workplace would also be a huge benefit as it would reassure the new employee with a disability that there was somebody there they could ask questions of while still learning their new role:

“If there was a support person with you while you were doing your job to help you, because in the past I have not known what I was doing.”

There are a number of programmes that provide some on-the-job support but access to such programmes is patchy across the country. Guidance and funding from the EU to allow for greater provision of in-work supports for people with disabilities would significantly strengthen inclusive employment opportunities. We also recommend the development and expansion of structured, supported placements that will ultimately lead to real employment.

## **7. Assistive Technology**

Assistive technology (AT) helps people with disabilities take part in everyday life on the same basis as everyone else. It supports independence and gives people more choice and control over how they live their lives. Access to AT is not just helpful, but a basic human right and a key part of making the UN Convention on the Rights of Persons with Disabilities a reality.

- To best support people with higher support needs, a team-based approach that uses technology wisely is essential. A blend of digitalisation and person-to-person support is essential.
- Digital literacy must be developed through continuous training and upskilling of social service staff to ensure AT is delivered sufficiently. Capacity-building initiatives should be implemented to ensure that professionals remain informed about emerging technologies and best practices that impact service delivery.

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<sup>2</sup> [Sunday Business Post 26 July 2023](#)

- Funding initiatives need to be established in order to ensure that assistive technology becomes far more accessible to people with disabilities.

Artificial intelligence can also have a huge role to play within assistive technology and its benefits for disabled people however, the benefits of artificial intelligence need to be balanced and taken into account within the context of the disadvantages and the exclusionary aspects of both. Artificial intelligence provides great opportunities for people with disabilities to improve their productivity within a workplace environment however there is the possibility that artificial intelligence will take roles that would previously have been filled by people with disabilities.

The digitalisation of society also needs to be balanced and carried out with people with disabilities in mind. Benefits of the digitalisation of society, like online banking, can drastically improve the independence of people with physical disabilities who will be able to do many tasks now online or on the phone that they would not have been able to do previously without assistance. However, for people with cognitive disabilities the opposite may be true as things that would have been carried out on a one-to-one person-to-person basis, either in a branch or on a telephone, are now replaced by AI Bots online which lack flexibility and a personal touch making things more complicated or difficult.

The next stage of the EU strategy on the rights of persons with disabilities needs to recognise the new and changing technological society. New goals need to be established within the strategy that will support people with disabilities to take the greatest advantage of assistive technology and artificial intelligence while protecting them from the negative impacts that may arise.