



RehabGroup

Investing in People, Changing Perspectives

**Rehab Group Submission to European Commission
Public Consultation on
Quality Jobs Roadmap**

29 July 2025

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1. Introduction

As one of the largest providers of disability services in Ireland, Rehab Group welcomes the European Commission's initiative to develop a **Quality Jobs Roadmap**, as set out in the 2025 Commission Workplan.

We call on the European Commission to **ensure full inclusion of people with disabilities** in the Roadmap, particularly in light of the digital and green transitions, which risk further excluding this already marginalised population.

Inclusive employment is not only a rights-based imperative but also a key to unlocking untapped labour potential in Europe's tightening labour market.

2. Policy Context

The right of persons with disabilities to work on an equal basis is grounded in the:

- **UN Convention on the Rights of Persons with Disabilities (UNCPRD)** – Article 27
- **Sustainable Development Goal 8** – Decent Work for All
- **EU Pillar of Social Rights (ESPR) and Action Plan**
- **EU Disability Strategy 2021–2030**
- **EU Disability Employment Package (2022)**

Despite these frameworks, the **disability employment gap remains stark**. In Ireland, only **36.2% of people with disabilities are employed**, with a disability employment gap of **38.6%**—the widest in the EU.

3. Core Barriers to Quality Employment for People with Disabilities

1. Employer Attitudes and Practices

- Persistent stigma, lack of disability awareness, and misconceptions about accommodations.
- Need for targeted employer engagement and support.

2. Accessibility and Accommodation

- Gaps in digital and physical accessibility.
- Poor understanding and under-implementation of reasonable accommodation practices.
- Misinformation regarding cost and complexity of accommodations.

3. Skills and Education Gaps

- Lower education levels among people with disabilities due to inaccessible systems.
- Need for **inclusive national skills strategies** aligned with green/digital transitions.

4. Inflexible Work Conditions

- Lack of remote or flexible work options limits access.
- Statutory entitlements to flexible arrangements should be considered.

5. Disincentives to Work

- Fear of losing social supports (e.g., medical cards, transport subsidies).
- Need for integrated employment and benefits advice systems.

6. Low Pay and Limited Progression

- People with disabilities often confined to low-paid, precarious roles with little upward mobility.

7. Underutilised Public Procurement

- Ireland's public spending (€22bn/year) could leverage **Article 20 of the EU Procurement Directive** to promote inclusive employment, as highlighted in the OECD's 2023 report.

4. Recommendations for the Quality Jobs Roadmap

1. Mainstream Disability Inclusion

- Embed disability rights and accessibility into all pillars of the Roadmap, including job quality indicators, skills policies, and employment services.

2. Develop Inclusive Skills Strategies

- Ensure vocational education and lifelong learning are fully accessible.
- Provide targeted supports for learners with disabilities.

3. Support Employers

- Expand training for HR professionals on inclusive practices.
- Offer clear guidance and financial incentives for implementing accommodations.

4. Promote Fair and Flexible Work

- Introduce statutory rights to flexible working conditions.
- Prioritise safe, well-compensated, and progression-friendly roles.

5. Combat Disincentives

- Align social protection systems with labour market policies to reduce financial risk of employment for disabled people.

6. Leverage Public Procurement

- Encourage Member States to use reserved contracts and social clauses to boost employment of people with disabilities.

7. Enable Social Dialogue

- Ensure meaningful participation of **Disabled Persons' Organisations (DPOs)** in social dialogue and collective bargaining processes.

5. Conclusion

The Quality Jobs Roadmap offers a pivotal opportunity to close the employment gap for people with disabilities. We urge the European Commission to ensure that **disability inclusion is not an afterthought but a core design principle** of the initiative. A strong, inclusive approach will not only support social equity but also enhance innovation, productivity, and resilience across the European labour market.