

**Submission to the
Department of Social Protection**

**Consultation on Successor to
Social Inclusion Roadmap (2020 – 2025)**

30 June 2025

Introduction

Rehab Group welcomes the opportunity to make a submission to the consultation on a successor plan for the Roadmap for Social Inclusion 2025. Rehab Group is an independent voluntary organisation that has been providing services to adults and children with disabilities for more than 70 years. We are a campaigning organisation that advocates for the 12,500 people who currently use our services and their families. The people who use Rehab Group services are our most important stakeholders. Our overall objective is to ensure their voices are heard both internally and externally.

People with a disability are marginalised by financial, physical, and societal constraints that reinforce our unequal society. This is evidenced by the fact that targets and commitments in the Roadmap for people with a disability, which were much less ambitious than for the general population, were not achieved. Ireland still has a long way to go to meet the needs and rights of disabled people as outlined in the United Nations Convention on the Rights of Persons with a Disability.

The overarching ambition of the Roadmap to reduce consistent poverty to 2% or less and to make Ireland one of the most socially inclusive countries in the EU was impressive and welcome. Significantly, the Roadmap adopted a holistic approach to solving poverty involving all government departments and rightly identified people with a disability as a priority group.

The focus of our submission is on measures that impact on this group.

It is disappointing that at the end of this plan, most of the targets in relation to people with a disability were not met and indeed this is one of the areas of significant under-performance. In 2024 with just one year left in the Roadmap, the number of people living in consistent poverty in Ireland was still at 5%¹, while the number of people with a disability living in consistent poverty was 19%, almost four times as high.

We are cognisant that the Covid pandemic arrived in the first year of this plan and understandably the focus was on putting in place measures to ensure that people were protected from the worst impacts of a global pandemic. While acknowledging that the Department of Social Protection has developed initiatives specifically targeting people with a disability during the lifetime of the plan, it is clear that the current level of social protection provision, and other disability policy supports, are not delivering poverty reduction targets. The annual scorecards indicated that people with a disability were falling further behind. Ireland now ranks 20th in the EU for disability poverty (32.7%), with an “at risk of poverty or social exclusion by level of disability (activity limitation)” rate 4% above the EU average (28.8%). This makes the claims in the Fourth Scorecard on Roadmap implementation that poverty reduction and employment targets have been achieved all the more perplexing.

The NDA Wellbeing Survey² reported that 65% of disabled people reported experiencing social exclusion/barriers to community participation, compared to 35% of non-disabled peers. The ambition of a whole-of-government approach to tackling poverty and social exclusion, particularly among people with a disability, did not materialise into concrete actions across issues of social protection, employment, housing, education, transport and health to enable people with a disability live independently and lead the life of their choosing.

Radical action is needed for the next plan if it is to make a real impact on the lives of disabled people in Ireland.

¹ [CSO SILC Data 2024](#)

² [Well and Social Inclusion Survey, 2022, National Disability Authority](#)

1. In your experience, what has worked well in reducing the number of people in Ireland experiencing poverty and social exclusion?

In the first instance we acknowledge the enormous challenges presented by the global Covid pandemic which broke out in the first year of this plan. We appreciate that the series of interventions taken mitigated the worst aspects of the pandemic.

The cost-of-living measure in recent budgets did help address the impacts of the pandemic and of rising inflation in the wake of geopolitical crises across the world. However, one-off measures in themselves will not resolve the serious issues facing those at risk of poverty and those living in consistent poverty.

We also acknowledge that a number of important inclusion and employment activation measures have been introduced or reviewed in recent years, such as the Early Engagement Programme, the Wage Subsidy Scheme, the new Work and Access Programme, and the Employability Programme.

Another welcome initiative for school leavers with disabilities was the facility to apply for a five-year deferral before going into daycare. This enables them to explore potential educational and employment opportunities which was not previously open to them. The challenge for government will be to ensure that there are sufficient educational places available to them to maximise their potential during this time.

But however laudable the above initiatives might be, they will not in themselves be sufficient to address the underlying structural drivers of disability poverty and exclusion.

2. In your experience, what has not worked so well, or is challenging in reducing the number of people in Ireland experiencing poverty and social exclusion?

i. Failure to address the Cost of Disability and Provide Adequate Core Social Welfare Rates

People with disabilities in Ireland are substantially more at risk of poverty and deprivation than those without disabilities. One of the biggest failures of the Roadmap was the failure to once and for all address the Cost of Disability, despite the publication of the Government commissioned Indecon Cost of Disability Report in 2021³. This failure significantly impacted the poverty and living conditions of people with a disability in Ireland. Disappointingly, the statistics at the conclusion of this roadmap show that the situation has deteriorated for people with a disability.

A key commitment in the Roadmap was to reduce the At Risk of Poverty or Social Exclusion (AROPE) rate among disabled people from 36.9% in 2018 to 28.7% by 2025 and 22.7% by 2030. This commitment aligns with the UN Convention on the Rights of Persons with Disabilities (UNCRPD⁴), particularly Articles 28 and 31, which advocate for social protection and anti-poverty measures.

Ireland ranks 20th in the EU for disability poverty (32.7%), with an “at risk of poverty or social exclusion by level of disability (activity limitation)” rate 4% above the EU average (28.8%). Consistent poverty rates for people unable to work due to disability reached 19%, compared to 3.6% national average and up from 16.5% in 2023. And almost half of this group lives in deprivation, lacking basic essentials. 27.3% of people unable to work due to long-standing health problems (disability) live at risk of poverty, compared to 5.8% of employed people, and 8.8% of those who are retired.

People with disabilities and households with disabilities are also more at risk of energy poverty. Rehab’s service users have raised serious concerns about rising electricity, gas and fuel expenses in each of our Pre-Budget Focus Groups over the past five years.

Current social welfare rates do not adequately compensate for disability-related costs nor do the base rates reflect the cost of living. In the period between 2020 to 2024, the cost of a Minimum Essential Standard of Living (MESL) increased by 16.8%. The absence of automatic indexation of core welfare rates to MESL has led to arbitrary and insufficient increases in annual Budgets, leaving welfare rates persistently lagging behind the MESL.

The Roadmap committed to producing a “strawman” on the reform of disability payments. However, the proposals in the ensuing Green Paper⁵ were met with strong opposition from the disability community largely because they failed to recognise or address the additional cost of disability. Instead, they conflated the cost of disability with a wholly separate issue - the capacity to work. The Green Paper was withdrawn by Government in 2024 and there has been no indication as to how the issue will be resolved. Yet the Roadmap claims that this objective has been achieved and marks it green!

The 2021 Government Commissioned Indecon estimated that the annual extra costs of having a disability ranged from € 8,700 - €12,300 per annum. Adjusted for subsequent inflation, the Cost of Disability is now in the range of €10,490 - €14,830. In addition, the ESRI and IHREC 2025 report “*Adjusting Estimates of Poverty for the Cost of Disability*” estimated costs can consume 52–59% of disposable income, and up to 93% in severe cases. Additional costs include transport, health, housing, energy, home adaptations, and assistive technology.

³ [Indecon Cost of Disability Report](#)

⁴ [United Nations Convention on the Rights of Persons with a Disability](#)

⁵ [Consultation on Reform of Disability Payments](#)

A Cost of Disability payment would provide long-term, sustained support for people with a disability and their households to address the additional costs associated with disability. The current Programme for Government – *Securing Ireland's Future*⁶ commits to a “introduce a permanent Cost of Disability payment” (p. 100). It is imperative that a substantial payment is introduced in Budget 2026 which would be index linked to inflation in future years.

The Cost of Disability Payment should not be targeted only at those in receipt of social welfare payments. People with disabilities in employment still must contend with the cost of disability and this should be factored into the introduction of this payment.

Recommendations for the Next Roadmap

- Introduce a permanent, non-means-tested Cost of Disability payment.
- Increase core welfare rates in line with the Minimum Essential Standard of Living (MESL).
- Commit to annual benchmarking of social welfare payments with MESL to ensure income adequacy and inflation alignment.
- Make the fuel allowance available to all people in receipt of disability related social welfare payments
- Maintain fuel allowance through summer months, particularly for those with high energy usage due to disability and
- A specific poverty reduction strategy for disabled people should be developed, given their disproportionately high poverty rates.

ii. Low rate of people with a disability in employment

The Roadmap set a target to “increase the employment rate in (for those aged 20-64) line with the Comprehensive Employment Strategy from 33.6% (in 2016 Census) to 38% by 2024.” (Fourth Scorecard).

Ireland’s employment rate for disabled people at 32.6% is the lowest in the EU, compared to EU average of 51%. The employment gap between disabled and non-disabled people is 44% in Ireland, as opposed to the EU average of 24%.

Research conducted by the NDA found that 23% of disabled youth (ages 16–24) who are not in Education, Employment, or Training (NEET) compared to 10% of non-disabled peers. This highlights the need for early intervention, career guidance, and education/training support.

The Comprehensive Employment Strategy, 2015–2024 (CES⁷) was intended to be the vehicle through which Government would tackle the unacceptable low levels of employment of people with a disability. The Strategy ultimately failed to deliver due to a combination of factors including poor departmental leadership, a lack of coordination and accountability and no implementation of final CES Action Plan (2022–2024).

The National Disability Authority’s 10-year review of the CES⁸ found that there has been no change in the Disability Employment Gap during the lifetime of the CES and that the number of people with a disability claiming social protection had increased over that time. Key failures identified included the low uptake of schemes to incentivise employers such as the Wage Subsidy Scheme (WSS) and Reasonable Accommodation Fund; and barriers to taking up employment that had been identified in the Make Work Pay report (such as provision for Personal Assistants for those in work), had not been addressed.

⁶ [Programme for Government 2025, Securing Ireland's Future](#)

⁷ [Comprehensive Employment Strategy for People with Disabilities](#)

⁸ [Final Review of Progress under the Comprehensive Employment Strategy for People with Disabilities \(2015-2024\)](#)

As the largest non-governmental employer of disabled people through Rehab Enterprises and the largest provider of Specialist Training Provision (STP) for disabled people through NLN, Rehab has considerable expertise and experience in employment activation programmes for people with a disability and in placing people in employment/work experience placements.

Participants in our Focus Groups, when speaking of their own lived experience, pointed to numerous serious systemic, attitudinal, and practical challenges that need to be addressed to make sure people with a disability get a fair opportunity for employment. They identified several barriers to finding and retaining employment including:

a) Fear of Losing Benefits

- The major concern among disabled people is losing Disability Allowance and vital secondary benefits (e.g., medical card, travel pass) when taking up work.
- Current rules do not account for fluctuating ability to work.
- Keeping a medical card for only three years is **insufficient** for those with chronic conditions.
- The fear of reapplying or permanently losing supports actively prevents people seeking to move into employment.

b) Employer Attitudes and Disability Stigma

- Employer bias, stereotyping, and reluctance to hire disabled people.
- Negative workplace experiences, including lack of understanding or accommodation.
- Employers with personal connections to disability are more likely to hire.
- Strong call for disability awareness training for employers to promote inclusive hiring.

“People with disability should have more inclusion in employment... the governing bodies should be proactive...”

c) Lack of flexibility

- Limited opportunities for part-time options.
- No recognition that work capacity varies across disabilities.

Wage Subsidy Scheme (WSS)

Rehab is one of the largest non-governmental employers of people with a disability availing of the Wage Subsidy Scheme. Despite changes to the scheme following the public consultation, problems persist which need to be resolved if it is to be a successful tool in increasing the number of disabled people in employment. The subsidy has not kept pace with increases in the National Minimum Wage. While at one point the base rate of the subsidy represented 70% of National Minimum Wage (NMW), it is now just 46.6% of the NMW.

This makes it particularly difficult for social enterprises such as Rehab Enterprises which operates in **low-margin sectors** to manage. Since 2019 the number of employers participating in the WSS has declined by 471 or 24% and the number of employees has declined by 463 or 16%.

Conclusion

Removing barriers to employment is key to addressing the higher rates of income poverty among disabled people. This requires a whole of government approach through investment in services such as childcare, adult care, education and training, along with changes in employer policies, such as flexible work arrangements and formalised recruitment practices. The Successor Roadmap and accompanying policies around the employment of people with a disability will need to address these issues in a more structured way.

Recommendations:

1. Protect Disability Allowance and Benefits for people moving into employment.
2. Remove time limits on secondary benefits like the medical card.
3. Expand supports that recognise part-time employment as a sustainable model.
4. Provide On-the-Job Supports such as job coaches and workplace supports to improve success and retention.
5. Educate Employers by providing disability awareness training to address bias and promote inclusive hiring.
6. Create structured pathways from placements to paid employment through programmes such as the Rehab Work Ready Programme.
7. Provide incentives to employers for real jobs, not token work experience.
8. Continue to promote the employment of people with a disability through local, national and social media advertising campaigns.

iii. Barriers to Independent Living and Participation in Society

For disabled people, a range of areas need to be considered, and a large number of barriers exist to full community inclusion and participation. These include issues like the lack of fully accessible housing, public transport, public buildings, community and public services. The ongoing chronic lack of independent living supports and Personal Assistance services available to disabled people will need to be addressed to deliver real social inclusion.

a) Housing

People with disabilities in Ireland continue to face severe housing exclusion, despite Government commitments under the Roadmap for Social Inclusion 2020–2025, the National Housing Strategy for Disabled People (2022–2027)⁹, and the UN Convention on the Rights of Persons with Disabilities (UNCPRD).

Commitments in the Roadmap on Social Inclusion 2020 - 2025 promised to:

- Deliver 50,000 social homes (12,000 annually).
- Implement the National Disability Inclusion Strategy (NDIS) and Comprehensive Employment Strategy (CES).
- Ensure accessible, appropriate housing options that allow people with a disability to live in the community with choice.

Housing is the gateway to education, employment, and community participation, and is a fundamental right. Yet living independently remains elusive for many of the people who use Rehab's services. A recent Focus Group of over 500 participants revealed that 60% of them felt that independent living would be impossible to attain due to financial and other constraints.

Not only does a lack of suitable housing result in the loss of independence and dignity but it presents substantial barriers to education, employment, and community participation, leading to increased poverty, isolation, and dependence on family or institutional settings.

Progress on implementation of The National Housing Strategy for Disabled People 2022 – 2027 has been staggered. The Strategy was published in January 2022, yet three years on there is still no clarity on the funding available for implementation.

⁹ [National Housing Strategy for Disabled People](#)

Social Housing lists are long, procedure for applying for private rented accommodation via HAP or rent allowance difficult to navigate for people with a disability, while most rental properties are unsuitable for people with a disability and cannot be easily adapted.

Housing adaptation grants, which were reviewed in 2024, remain inadequate to make housing accessible, given the spiralling inflation in building costs in recent years.

People with intellectual disabilities experience huge difficulties accessing affordable and accessible housing. In 2022, only 299 people with intellectual disabilities were allocated social housing through local authorities, less than in previous years.

The Capital Assistance Scheme (CAS) which provides the funding to purchase homes for people with a disability is not operating effectively:

- The recent introduction of a prohibition on the purchase of second-hand homes for CAS houses, while well-intentioned, will only result in thwarting progress in housing provision for some of the most vulnerable people who are in urgent need of housing.
- The price ceiling on three- and four-bedroom homes is unrealistic. The procedures for applying for approval are cumbersome and often suitable properties are lost due to delays in approval. At present it is very difficult for an Approved Housing Body (AHB) using CAS to acquire sites in the open market where the AHB may be competing with cash or mortgage-approved purchasers.
- As the prohibition on purchasing second hand houses comes into force, the four-stage process required for build projects is wholly unsuitable for single-property build projects due to the lengthy timeline in the process from application to approval and then to the build. This makes it unusable for a small AHB looking to develop single properties to meet disability needs. A two-stage process would be more appropriate for this type of housing provision and this should be facilitated.
- The lack of funding for maintenance and a sinking fund for capital expenditure presents significant challenges to AHB's providing housing for people with a disability.

Recommendations

- Provide dedicated funding for the 2022–2027 Housing Strategy for Disabled People.
- Empower local authorities with the resources and authority to deliver social housing.
- Reform the CAS system to enable housing bodies providing supported housing for people with a disability deliver in a timely and cost-effective way.
- Accelerate accessible housing delivery: legislate targets for accessible and universally designed social housing, ensuring at least 10% of all new social homes are fully accessible.

b) Transport

Access to transport is a lifeline for people with a disability. 53% of participants in Rehab focus groups stated that they were not satisfied with transport services. For them, it underpins their independence and access to education and employment. They cannot gain employment if they cannot travel to interviews, they cannot sustain employment if they cannot travel to their workplace. It also underpins their access to healthcare, mental health support and social activities and their participation in society. Yet for many disabled people in Ireland, transport remains a major barrier to living the life they choose.

The critical role of transport as a key element of inclusion is referenced in several chapters of the Roadmap, including Chapter Six on Disability. However, the indicators do not adequately address accessibility issues which should be addressed in the new Roadmap.

Under Article 20 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD), Ireland is obligated to ensure that people with a disability have access to transportation on an equal basis with others - a critical component of independent living and social inclusion.

While acknowledging that there have been significant improvements in public transport in recent years, participants in our focus groups still raised serious concerns about the accessibility of the public transport network. Many participants report that bus stops are “miles away” and not walkable as footpaths are either unsafe or non-existent. Poor infrastructure of bus stops and footpaths to the stops themselves can sometimes mean that accessible services are not accessible after all.

Participants with mobility challenges cited several obstacles such as train carriages with gaps too wide to board safely. Others complained of still having to give advanced notice required to book ramps on trains which severely limited spontaneity while others needed help from someone else to help book tickets online which reduced independence.

There is also a lack of support for options other than public transport. The Mobility Allowance and the Motorised Transport Grant were closed to new applicants in 2013, and no new scheme has been created to replace them. In the 2022 Annual Report of the Ombudsman strongly criticised the lack of progress and called for replacement schemes to be introduced. In the meantime, those who can't access public transport are left with no clear alternative creating an additional financial burden and adding to the cost of disability for individuals.

The review of the Disabled Drivers and Passengers Scheme, promised in the 2020 Programme for Government *Our Shared Future*, was never completed. It remains an objective of the current Program for Government *Securing Ireland's Future* but with no timeline for completion.

Recommendations:

1. **Include specific commitments** on making transport more accessible in the successor Roadmap.
2. **Improve Rural Transport:** Expand Local Link and introduce more frequent rural routes and bus stops closer to residences.
3. **Increase Transport Accessibility:** Make trains and buses more physically accessible; simplify booking for individuals with disabilities and remove requirement for advance notice.
4. **Enhance Infrastructure and Safety:** Ensure bus stops and train stations are fully accessible; and improve pedestrian facilities by building safer footpaths and providing more zebra crossings.

c) Personal Assistants

Article 19 of the UNCRPD affirms the right of people with a disability to live independently and be included in the community. A key enabler of this right is **Personal Assistance Services (PAS)**, which allows people with a disability to live, work, study, and participate in society with autonomy and dignity. PA support is absolutely essential to enable people who need that support get to work and participate in the labour market on an equal basis with others.

At present there is no statutory right to a PA service in Ireland which is creating significant anomalies in how the service is delivered across the country and leaving many disabled people **trapped at home**, reliant on family, or unable to pursue employment or education.

Participants in Rehab's Focus Groups expressed concern about inadequate PA hours and the lack of cover when assistants are sick or on leave.

While the **Action Plan for Disability Services (2024–2026)**¹⁰ calls for major increases in PA and home support hours, **Budget 2025 fell drastically short**, allocating only a fraction of the required hours.

We are cognisant that homecare and PA workers are among the **lowest paid** in the health sector and their income also needs to be protected.

Recommendations:

- Legislate a statutory right to PAS
- Provide funding to reach targets set out in Action Plan for Disability Services 2024-2026
- Ensure PA /Home Support workers continue to benefit from WRC agreements and that any change to the funding mechanism will not exclude them from future increases.

d) Access to Healthcare, Mental Health & Hidden Health Costs

Article 25 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) guarantees people with a disability the right to the highest attainable standard of health, without discrimination. However, many disabled people in Ireland face significant challenges accessing appropriate, affordable, and timely healthcare.

Little progress on the commitment to deliver “an Inclusion Health policy to address the healthcare needs of socially excluded groups who experience greater levels of health inequalities” (Commitment 55 of Roadmap), although a consultation has now commenced. This is an action that should be brought into the next Roadmap.

The issue of hidden healthcare costs is a recurring theme in Rehab Focus Groups and creates enormous stress. 80% of focus group participants hold a medical card yet find that many essential services such as dental care, chiropody, blood tests. Injections, medical certs and prescription charges are not covered. They also report that delays in GP appointments often result in emergency hospital visits.

Accessing mental health services is particularly problematic. People with disabilities face the same and greater stresses and strains of everyday living but struggle more to access mental health services. Our service users highlighted that access to mental health support is severely lacking. Often people are only able to access treatment if they go to hospital in crisis or if they go privately at huge expense.

Progress on Sláintecare implementation is slow although there are clear commitments rolling it out in the 2025 Programme for Government Securing Ireland’s Future.

Recommendations

- Expand Medical Card Coverage to ensure that all treatments are covered
- Enforce Existing Medical Card Entitlements
- Invest in Mental Health Services and fully implement *Sharing the Vision*, especially for youth and neurodivergent people.
- Deliver on the commitments in the Programme for Government on the rollout of Sláintecare.
- Ensure that the Inclusion Health Policy is prioritised in the next Roadmap.

¹⁰ [Action Plan for Disability Services 2024-2026](#)

e) Digital Divide

The Digital transformation has increased inequality due to inaccessible service design, poor broadband in some areas and a lack of tailored digital literacy supports. Many disabled people risk being left behind in Ireland's shift to online services and remote work.

We welcome the addition in 2023 of the commitment in the Roadmap to for a "Digital Inclusion Roadmap which sets out Government's approach to addressing barriers to digital inclusion, such as access, affordability and ability, which aims to empower and support everyone to use digital services, in particular digital public services, in a meaningful way." (Commitment 80)

While the Digital Inclusion Roadmap was published in 2023 with the aim of making Ireland one of the most digitally inclusive states in EU, there is significant work to be done to bridge the digital divide.

Digital transformation has increased inequality due to inaccessible service design, poor broadband in some areas and a lack of tailored digital literacy supports. Consequently, many disabled people risk being left behind in Ireland's shift to online services and remote work. The EU Accessibility Act which came into force in Ireland on 28 June, will help improve accessibility of many services but it will take some time for the law to bed down. Assistive Technology (AT) provides the tools, systems, and devices to support people with a disability in learning, communication, mobility, self-care, and participation in daily life. AT is essential for ensuring independent living, access to education, employment, and full inclusion in society. It promotes equality and inclusion, enabling people with a disability to engage in community life on an equal footing. The **WHO/UNICEF Global Report on Assistive Technology (2022)**¹¹ highlights AT as **pivotal to achieving the rights** of persons with disabilities.

Ireland still lacks a coherent national policy on AT provision and funding. Access to AT is fragmented, often determined by postcode, age, or service provider. Many Digital services and platforms remain largely inaccessible, excluding people from healthcare, education, and employment.

The assistive technology sector is changing rapidly due to technological advances and evolving needs. Investment in developing the AT ecosystem is required to ensure that assistive products are appropriate, affordable, safe, effective, acceptable and accessible to those who need the most. While the Digital and Assistive Technology (DAT) Fund introduced in 2022 represented a good start, much more investment is needed.

The Work and Access Programme which enables the purchase of AT which can then stay with the individual is a very welcome development. We are also calling for a consistent policy approach across the various programmes that currently support access to AT to ensure that equipment provided for pupils and students in education can stay with the individual rather than the institution. Currently, the Department of Education's policy on AT products/Augmentative and Alternative (AAC) Devices is that they remain with the school/college and not the individual.

Recommendations:

1. Develop a National Assistive Technology Strategy, co-designed with disabled people and linked to Ireland's digital agenda.
2. Enforce the EU Accessibility Act to ensure digital accessibility standards across all public-facing platforms and services.

¹¹ [WHO/UNICEF Global Report on Assistive Technology \(2022\)](#)

3. Invest in inclusive digital literacy training, with a focus on people with complex needs and limited digital experience.
4. Fund affordable access to assistive devices, including voice control, screen readers, and smart home supports.
5. Ensure a consistent policy approach to AT across education and employment situations.

What is the most appropriate timeframe for the new social inclusion strategy?

5 years with a mid-term review after 3

What priority Groups should be targeted

Unemployed people	Children	Older people	Travellers/Roma
People with Disabilities	Lone-parent families	Migrants	Other

People with a Disability must remain a top priority of the new Roadmap. As outlined above, people with disabilities face higher rates of consistent poverty (19%) and deprivation, even after accounting for supports. The cost of disability is not adequately met through current welfare provisions.

However, we would have concerns that this question seeks to pit one group against others, all vying for priority. We fully support the submission of the SVP which states that “the next strategy must prioritise groups who experience the deepest, most persistent, and often intersectional forms of deprivation.”

Any other Comments

We would be concerned that several commitments in the Roadmap are marked green as “achieved” while what is meant is that a policy was published or a target was set. Examples of this include:

- Commitment 42: Setting poverty reduction and employment targets
- Commitment 43: Develop and consult on a strawman proposal for disability payments
- Commitment 80: Publish a digital inclusion roadmap

The Roadmap frequently commits to publish a report or strategy, but has no underlying actions attached to that commitment to show how targets will be delivered. The next Roadmap must not just commit to publishing a policy or setting a target but must set out clearly how the issues will be addressed, with meaningful actions and KPIs included from the outset.

We note that the **National Disability Inclusion Strategy expired in 2022, midway through this Roadmap** and the successor Strategy has not yet been published (although publication is imminent). The priorities in the next Roadmap will need to complement and reflect the targets and priorities in the forthcoming **National Human Rights Strategy for Disabled People**, which will outline Ireland’s approach to UNCRPD implementation.

The new Roadmap will need to have robust structures in place that will be able to co-ordinate with all Government Departments. This will require strong political commitment at ministerial level.