

## **Submission on the Mid-term Review of the National Disability Inclusion Strategy, 2017-2021**

I wish to make a submission on behalf of the Rehab Group on the mid-term review of the National Disability Inclusion Strategy, 2017-2021.

The publication of the Strategy was a welcome step forward and we are delighted to see progress in many areas.

However, there are a number of areas that could be significantly improved. We wish to emphasise the following points in relation to the mid-term review of the strategy.

### **1. Funding of Section 39 Disability Organisations**

A key objective of the National Disability Inclusion Strategy is to ensure that people with disabilities are supported to reach their full potential.

In our view, the failure of the Strategy to adequately protect front-line services in areas such as social care, means that many thousands of people with disabilities continue to fall far short of achieving their full potential.

Fundamentally, Government is not providing sufficient funding for front-line services delivered by Section 39 organisations. As a Section 39 organisation, Rehab can testify first-hand how we are not being fully funded for the services we provide. This has major implications for the level of service we can provide and the number of people with disabilities we can reach.

Most frustrating for our front-line workers and centre managers is seeing the huge level of unmet need that exists across the country which we are not in a position to respond to. All other Section 39 organisations are in the same position.

Crucially, Section 39s have not yet received the full cost of pay restoration, which contributes to high staff turnover and which in turn adds to recruitment, training and agency staff costs. We are also being required to fund a massive growth in regulation and compliance, and meet the huge increase in insurance costs, without additional resources.

Negotiating with the HSE is really difficult, especially agreeing Service Agreements, because there is no mechanism to recognise deficits in funding provision, in itself a very serious issue.

Up to recently the shortfall has been bridged from the sector's own resources, but by now we simply don't have the resources to meet growing costs. All of us are facing huge challenges in keeping front-line services open. Many Section 39

organisations have already had to close services, reduce hours or introduce redundancies. We want to prevent this from escalating any further.

The mid-term review of the National Disability Inclusion Strategy should recognise the seriousness of this problem and how fundamental it is to having a meaningful strategy that is genuinely committed to ensuring that all people with disabilities reach their full potential.

We are asking that the Strategy be revised to include the following:

- A commitment to eliminating the deficits in Section 39 organisations.
- A commitment to adopting all of the recommendations of the Dr. Catherine Day (IRG) report on the role of voluntary organisations and their relationship with the state.
- A commitment to completing the pay restoration process for workers in Section 39 organisations.

## **2. Article 20 of EU Procurement Directive**

We believe the Strategy is missing a specific commitment in relation to the greater use of Article 20 of the EU Procurement Directive 2014. This article permits the use of public procurement to advance employment opportunities for people with disabilities.

Rehab's experience is that there has been only very sparse use of Article 20 in public procurement in Ireland since the transposition of the Directive. This contrasts sharply with our experience in Scotland, where we have social enterprises. We strongly believe that our experience in Scotland provides a model for how the State can genuinely engage in carving out space for people with disabilities through its public procurement policies, and we would strongly advocate the adoption of this model in Ireland.

We would ask that any revisions to the Strategy commit to adopting the Scottish model and ensuring that public bodies report annually on their use of Article 20.

## **3. Wage Subsidy Scheme**

Action 48 of the current strategy commits to continuing to support people with disabilities to access training and employment opportunities through programmes such as the Wage Subsidy Scheme.

The Wage Subsidy Scheme is a vital support for employers. It resolves two of the main concerns that employers have in relation to employing people with disabilities

by recognising that a person may experience decreased work intensity and that they may require additional support to carry out their role.

The problem is, however, that the level of subsidy available to employers under the scheme has not increased since the recession. When it was first established the Wage Subsidy Scheme's link to the National Minimum Wage was considered crucial to ensuring that people with disabilities were supported to get proper jobs in the open labour market. Before its introduction, employment opportunities for people with disabilities focused very much on sheltered workshop, community employment and other sheltered occupational services. Any loss or diminution of the linkage between the Wage Subsidy Scheme and the National Minimum Wage reduces this recognition by the State of the contribution that people with disabilities can make to the open labour market with appropriate support.

In the past few years, the level of the WSS has fallen out of alignment with the National Minimum Wage (NMW), due to it not being increased in line with the NMW. In 2008, the subsidy was 61% of NMW and this has fallen to 54% today. If this continues, the Scheme will become less and less attractive to companies considering employing people with disabilities. The dilution of the incentive and the decrease in support to employers means that the employment of people with disabilities becomes less attractive.

We would welcome an explicit commitment in any revised strategy to re-establishing a link between the Wage Subsidy Scheme and the National Minimum Wage.

#### **4. Rehabilitative Training Allowance**

The decision this year to end the Rehabilitative Training Allowance for new entrants was most regrettable. It was done without consultation with disability groups and runs contrary to the general thrust of commitments in the National Disability Inclusion Strategy. Indeed, we believe it flatly contradicts the commitment made in Action 46 of the current Strategy.

Staff in our National Learning Network repeatedly remind us of the value of this payment in encouraging people with disabilities to participate in programmes that significantly improve their chances of self-development and progression into employment. They point to the fact that the payment helped sustain participants in programmes and helped them meet basic participation costs such as travel.

We believe a revised National Disability Inclusion Strategy should reverse this decision and set out a clear commitment to sustaining the payment for the long-term.

#### **5. Transport Issues**

We would like to draw the Department's attention to a report produced by The Rehab Group, in tandem with Amárach Research, in March 2019 on the accessibility of public transport. 155 people with disabilities responded to the survey. The respondents to the survey included people with many different types of disability including those who use wheelchairs or have a mobility issue, those who have a visual impairment or a hearing difficulty and those with intellectual disabilities. As a follow up to the online survey, an in-depth interview approach was adopted. This involved a series of seven telephone interviews.

***The following are the key findings of this research***

90% did not have enough supports and opportunities to access public transport. Similarly, across the interviews there was a feeling that public transport was simply not suited to people with disabilities.

The level of public transport usage was low amongst those interviewed – due to the perceived 'hassle' factor.

For more rural locations, the interviews found that public transport was not an option most of the time due to not all buses being wheelchair accessible.

Over half of those surveyed claimed that they 'sometimes' had to cancel trips because of issues with transport. A further 16% 'always' or 'usually' had to cancel trips. Of those interviewed, many had cancelled trips, but access issues at the destinations were the key causes of this. Trips were cancelled because of past experiences or because of perceived issues they might face.

Significant proportions of those surveyed believed that access to transport had a negative effect on their independence, with almost half (47%) feeling it 'always' or 'usually' limited their independence.

Roughly 30% of those surveyed claimed that access to transport limited their ability to get education/ training either 'always' or 'usually' with a further 36% saying it sometimes limited them in this area.

The survey found that access to transport is seen to have a very significant negative impact on people's social life. Over half claimed it limited their social life 'always' (25%) or 'usually' (27%).

77% of those surveyed said they had experienced on-street obstacles which have disrupted their movement. This proved to be a major issue for many of the interviewees too, and greatly contributed to the lack of confidence many felt when taking trips or planning to take a trip.

72% of those surveyed felt accessible/ disability parking spaces was lacking in their county. This was raised as a significant issue during the in-depth interviews. Most tended to avoid city centres believing they would be unable to find suitable parking close to where they wanted to go.

The survey found that bus and car are the most widely used modes of transport. Interview respondents preferred to use the car as their primary mode of transport - the benefit being that they could easily plan their trip and park at their destination.

The research found a high degree of 'hidden costs' associated with disabilities and transport. Many relied solely on family members for their transport needs and to care for them overall - bringing financial costs but also impacting on their life in general.

The National Disability Inclusion Strategy 2017-2021, promises to 'improve accessibility and availability of public transport'. It is evident from our reports findings that the overwhelming majority of people surveyed have not found the public transport service suitable for their needs.

This has a significant impact on persons with disabilities in their work, education/training and social lives. The Comprehensive Employment Strategy for People with Disabilities 2015-2024, highlights the development of accessible transport as a key support in the securing of employment by people with disabilities, a concept that has been developed further in the Department's recent publication of phase two of the action plan. Reliable and accessible public transport is required for people with disabilities to plan their journeys for work and leisure.

Finally, the report reveals that people with disabilities rely on cars as it allows them independence and reduces the hassle they can experience taking public transport to and from their destination. These issues need to be addressed in the Strategy, as those with no access to a vehicle or family member with a vehicle, with limited money for taxis, are indeed less likely to take up work or education/training. Relying on a car or lifts from others incurs an extra cost which impacts them financially, but also limits their independence.

Thank you for taking the time to read and consider our submission and we wish you well in reviewing the Strategy.

Yours sincerely,

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