



Rehab Group Pre-Budget Submission 2023



Our Vision

Rehab – Who We Are and What We Do

The Rehab Group is an independent voluntary organisation providing services and support for 10,000 adults and children with disabilities for more than 70 years. We are a campaigning organisation that advocates for the people who use our services and their families.

Our purpose is to empower those we support to lead more independent lives and play an active and meaningful role in their communities by providing high-quality, flexible, and sustainable care services, learning, training and education, and employment skills and opportunities.

We are a right-based and inclusion focussed organisation comprised of RehabCare, National Learning Network and Employability and Social Enterprise.

Funded by the HSE, RehabCare provides innovative and responsive care based on the current and changing needs of the people who use our services. We provide high-quality Care services in every community healthcare organisation in Ireland, aligned to international best practices.

National Learning Network (NLN) provides high-quality, innovative, individualised education and training. Our services are guided by international best practice in disability inclusion. NLN is funded through the Education and Training Boards (ETBs) and the HSE.

Our Employability and Social Enterprise Division is one of the largest employment providers for people with disabilities. It operates a unique integrated model of employment, where employees with disabilities work alongside employees without disabilities across a number of sectors.

We champion and promote the employment of people with disabilities through trialling an innovative Transitional Workforce Model (TWM) of employment. We advocate for the rights of people with disabilities to access meaningful employment.



Introduction

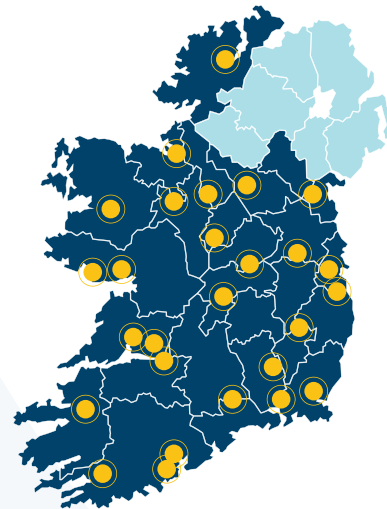
“Rehab Group believes that people with disabilities should live self-determined, independent lives. Therefore, budget 2023 must create a platform to deliver a more equal and just society and develop pathways into full community participation for people with disabilities. This pre-budget submission will allow the service users of the Rehab Group to highlight and address some of their critical concerns before budget 2023.”

The people who use Rehab Group services are our most important stakeholders. One of the primary aims of our five-year Strategic Plan, ‘Delivering our Future,’ is to amplify the voice of the people who use our services. Our overall objective is to ensure their voices are heard internally and externally. In preparation for this submission, Rehab Group carried out 26 in-depth focus groups with more than 220 service users across the country in June of this year. In these focus groups, we discussed life for people with disabilities in a country beset by housing and cost of living crises. We listened as they passionately outlined the difficulties they face in the current climate and the solutions they implored the Government to put in place.

What is abundantly clear from our research is that disabled people are more isolated and excluded in society than ever before. Disabled people are marginalised by financial, physical, and societal constraints that the Government needs to act upon now.

While we are currently amid a cost of living crisis, disabled people have been living through a cost of disability crisis for years. Employment of people with disabilities in Ireland is still at a rate that is amongst the lowest in Europe, while disabled people, especially those in rural areas, struggle to access viable and truly accessible transport. Ireland has a 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.

In this submission, we will take the points put forward by our service users based on their real-lived experiences of disability. In addition, we will highlight the critical pillars on which the next Budget should build the support to make a difference in the lives of people with disabilities.



In Budget 2023, we are calling on the Government to take the following headline measures:

- Increase social welfare rates.
- Introduce Cost of Disability payment..
- Increase investment in rural transport addressing frequency, reliability, accessibility and affordability of rural transport in Ireland today.
- Introduce alternative financial support for people who require more individualised travel support when looking to access transport.
- Address hidden healthcare costs by incorporating all medical needs into the Medical Card scheme, e.g. blood tests and medical certs. In addition, dental care needs to be provided for and expanded under the medical card scheme.
- Invest and develop a clear strategy for supporting people with disabilities to gain and retain employment.

Barry McGinn CEO

Cost of Disability Report

The Rehab Group welcomed the publication of the Cost of Disability report in December of 2021. However, we also welcomed the publication of the previous cost of disability reports in the nineties and the noughties. Unfortunately, there was limited impact from both reports as they were overlooked and ignored by the governments of the time, thus ignoring the extra financial burdens faced daily by those with disabilities. It is essential for the Government not to make the same mistakes of the past. This time they must ensure that actions are taken to ensure people with disabilities are no longer treated like second-class citizens.

The results of our research corroborate the findings of the Cost of Disability report, with participants highlighting difficulties in surviving financially with day-to-day expenses, especially those considering living independently. Specific barriers lead people with disabilities into an almost unending cycle of relying on welfare payments that do not meet their needs.

The Indecon research has indicated that the cost of disability increases depending on the severity of the disability. Their estimations indicate that the cost of a severe disability ranges from €9,600 to €12,300 extra per year and between €8,700 and €10,000 extra per year for those with limited disabilities. These are hugely significant financial burdens faced daily by people with disabilities. The challenge for this year's Budget is how to address such extreme financial disparities.

The cost of living was a dominant issue throughout our focus groups and will influence our recommendations throughout this submission. Although a common thread throughout the groups was how difficult it was to survive on social welfare payments, many outlined that living independently or without their family's support would be impossible.

While much of the general public struggles with the cost of living crisis, many of our service users face additional costs associated with their disability. Despite publishing a third Cost of Disability report, the Government has yet to respond to any of its recommendations. This failure has exacerbated the difficulties faced by people with disabilities during this time.

The following are some of the observations of our service users:

"It's very difficult to pay bills, inflation is so high. When the Government gave a payment for those out of work as a result of Covid, it started off at €350, this set a bar and we only get €200, and this was before inflation."

"We need more money to live. The Disability Allowance needs to be increased by at least 30 euros to be able to live on it."

"It becomes a decision about whether I eat or I travel. I can either buy food or fuel but not always both."

"If the government could put together a supplementary payment (top-up on Disability Allowance), that would help."

"People with disabilities have more expenses – medical costs, prescription charges etc."

Costs and Barriers

Recognising the various barriers and additional costs faced by people with disabilities within the context of the Cost of Disability report is vital. The report outlines that individual key components gather to form the cost of disability and that these include: fuel and light, transport, therapeutic equipment, medical expenses, domestic services, equipment aids and appliances, mobility and communications, daily living costs

and the costs of care and assistance among others. Our focus groups also identified many components, particularly fuel and light, transport, and medical expenses.

When the Cost of Disability Report estimated the additional costs of disability, it also took into account those costs which an individual may incur but which they are unable to afford to meet. Amongst those who indicated there were extra costs related to adequate housing due to their disability that they could not afford, the average annual amount that they could not afford was €7,380. When asked about the costs related to transport they could not afford to pay, that figure was estimated to be more than €3,000 a year. The Government must develop a roadmap to address the extra costs faced by people with disabilities, informed by the Cost of Disability Report as a matter of urgency because we know that people with disabilities are more than twice as likely to experience poverty and deprivation than those without disabilities.

Supportive Solutions

The report's analysis found that, across all types of disability, those who report being strongly limited by a disability have higher total additional costs of disability. As a result, while the extra financial burdens make a differentiation between the severities of disabilities, the current payment system does not. There is no differentiation between payment and no differentiation between payment increases to recognise this difference. It is essential to acknowledge that these cost differentials by disability are on a spectrum rather than just two or three standard cost brackets. However, supplementary payments on top of a realistic Cost of Disability Payment on a graduated scale of severity of disability may be a solution.

Inclusion in employment is another critical component of addressing the cost of disability. Encourage or incentivise employers to take part in Disability Awareness Training. Ensure that this training helps ease employers' anxieties about employing someone with a disability whilst educating them on the available reasonable accommodation funding.

Our asks

- **Publish the Cost of Disability action plan. Disabled people experience lasting poverty at over five times the national average. (19.2% vs 4%).**
- **Increase basic rates of Social Welfare payments by at least €30 per week in recognition of the cost of living and the increasing rate of inflation.**

- **Install supplementary payments on top of the basic Cost of Disability Payment which differentiates between the severities of disability and recognises the extra costs borne at each stage.**

Transport

Many people with disabilities are isolated due to the lack of accessible transport; this isolation can happen whether a person lives in a rural or urban setting while living alone or with family. Transport is key to people with disabilities realising their independence.

Inaccessible transport is a specific contributor to the isolation and exclusion of the people who use our services. Transport is often unreliable and infrequent, particularly in rural areas, and neither it nor its infrastructure is accessible.

This effect prevents the people who use our services from achieving their desired personal progression socially, educationally, or professionally. In addition, it causes significant anxiety as people miss out on attending their education and stifles their opportunity to enter employment. When it comes to holding down a job, socialising or going on holidays, just getting there can often be the greatest challenge to overcome.

"I have a travel pass, but what's the use? I can't use it to go anywhere."

Local Link services have been expanded. However, they don't meet the needs of many people who use Rehab Group services. Many of these services need to be expanded further, while others need retrofitting or work to make the service accessible.

The following are some of the observations of some of our service users:

"I rely on public transport to get into the centre, there is only one bus into Galway in the morning at 7am, and one to go home at 6pm. It makes my day really long and I get very tired. It means I will only come in once a week. I feel like I'm going to miss out on activities and workshops because of this."

"The reliability [of public transport] is another issue, sometimes it might come late, at times, it doesn't turn up at all. The stress of this, imagine you were going to a job interview, they would just say sorry, the job is gone."

I'm very isolated. I live in rural Ireland, and the transport service is really bad. It would be great to have a better Local Link service that extended all the areas that need it or a voluntary group that would collect you and bring you home. Without such a thing, I have no social life."

"I can pay anything up to €24 one way for a taxi, on my income, how can I afford to keep paying that?"

One individual explained how he had a travel pass, but due to the poor infrastructure for public transport, a twenty-minute journey took over an hour and a half.

"Some people come to the centre late in the mornings as that is the only time public transport will come in and some leave early in the evening again for the same reason. NLN are understanding. "Imagine that in a work situation, who will employ that person?"

Article 9 of UNCRPD: Accessibility: To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure that persons with disabilities have access, on an equal basis with others, to the physical environment, to transportation, to information and communication.

What we ask

- Significant investment in local Link services to expand on the service it already provides and ensure those services are viable and accessible to disabled people.
- Introduce alternative financial support for people who require more individualised travel support when looking to access transport.
- Roll out the Travel Assistance Scheme nationwide to respond to the needs of people with disabilities in their locality, thus enabling them to build confidence when using public transport.

Housing

Article 19 of the UNCRPD reaffirms the right of people with disabilities to live independently and be included in the community with the support needed.

Issues impacting people with disabilities include; the lack of available, accessible houses with supported living packages, difficulties navigating the social housing application process due to its inaccessible nature, and issues regarding decision-making when they enter into tenancy agreements. In addition, people with disabilities face many extra barriers, which can affect educational opportunities and contribute to unemployment and a lack of income. One of the core values promoted by Rehab is supporting people to live independent lives of their choosing. Consequently, people should have the right to a home of their own. Yet people with disabilities always face obstacles to finding suitable housing accommodation.

What we ask

- Ring-fence funding for accessible homes and provide support services for people with disabilities who have been allocated housing through the local authority or Approved Housing Body (AHB's), or those who may need support to rent privately.
- Develop a clear pathway to apply for support to live in your own home.
- Invest in building accessible social housing units, and require that any new build housing for use by local authorities will be universally designed and accessible to all.
- Increase funding to accelerate the move of the 28411 remaining residents from institutions to homes in the community with appropriate support within the next five years.
- Increases in, and modernisation of, supports for those living independently to cover the cost of living and support for modern necessities like broadband.
- Disregard the household income means testing criteria and increase the maximum grant to reflect current building costs.

Training and Education for People with Disabilities

National Learning Network (NLN) is the training, education and employment access arm of Rehab Group. National Learning Network provides personalised inclusive education programmes and supports to about 6,500 people across Rehabilitative Training, Specialist Training in the Further Education and Training (FET) sector and Inclusive Education Supports in several Higher Education organisations. We have 53 centres around the country, funded by the Education and Training Boards (ETB) and the HSE.

We support students with disabilities and those experiencing significant health challenges to access, stay engaged and progress in their lives and in their chosen fields of learning. We work to remove barriers and to provide accommodations to ensure equity of opportunity for all students to participate in education and work. One of our key strategic goals as an organisation is ensuring increased equity of access for students with disabilities and those needing specialist supports to access pathways to Further Education and training and Higher Education that meet their particular needs. There are a number of issues that need to be addressed in order to be able to provide students with a first class student experience.

Following are some of the issues we would like to see prioritised in Budget 2023:

Funding Model

For Budget 2023, we urgently need a commitment from Government to improve funding to Specialist Training Providers and review how the funding model works. We welcome the Review of the FET Funding model published in July 2022 with its recommendations that facilitate investment in critical capabilities that enable transformation of delivery, whilst also recognising the fixed nature of costs such as leasing and weighting required to meet variations in resourcing intensity. Whilst there is no specific reference to Specialist Training Provision, the Review does offer an opportunity to examine the similar challenges faced in providing these services.

The funding mechanism for these courses is based on a historical per capita fee for service basis: Funding is only received when students attend. There is no funding guaranteed to cover ongoing core costs such as staffing, leasing of facilities and transport for instance.

In practice, using this per-capita-fee-for-service funding mechanism means that the provider is only paid when a student attends their programme/course. This funding system does not fully allow for the student profile we cater for,

where there is arguably a far greater likelihood of a break in participation. If a student has to discontinue attending for any reason, e.g., due to disability complications, family circumstances, participation costs, or an offer of employment, then the service provider receives funding until the student returns or a new student starts. This causes fluctuations in demand which negatively impacts the funding to the provider.

This funding mechanism fails to recognise that providers have high fixed costs in terms of staffing, infrastructure and transport, which remain constant regardless of numbers attending or in-year fluctuations in demand.

This funding system makes it exceptionally difficult to adequately plan services and ensure sustainable provision to people who most need it.

In addition, the per capita fee for services system provided through the ETBs has not been increased since 2011. Further, no funding for pay restoration has ever been provided by Solas/ETBs.

The cost per place for ETB funded services has not increased since 2011. No funding has been provided for pay restoration relating to these services either.

Transition for Students exiting Second Level

We acknowledge and welcome that Government is looking closely at how best to improve the transition from second-level education to further and higher education for young people with additional support needs. This is an area that NLN has a particular specialism in, and we believe it is vital that Budget 2023 supports this initiative by dealing with some of the current challenges in the following ways.

- Investing in career guidance supports for students in special classes.

- Establishing a formal referral process that encompasses all options for students exiting second level, including information on vocational & specialist vocational training – so that students are not simply left with a social care option.
- Dealing with the funding model issues outlined above so that a wider range of options can be offered to and sustained for students.

Capital Funding

There is currently no capital fund available to Specialist Training Providers such as National Learning Network through Solas/ETBs. (The HSE does provide some capital investment for school leaver services).

This leaves providers reliant on fundraising to invest in their infrastructure. This means that students who attend NLN, some of the most disadvantaged people in our Further and Higher Education system, are further negatively impacted.

Our asks

- Additional funding to be set aside for both vocational and rehabilitative training. Funding mechanism for both to be reviewed to include core costs on a multi-annual basis.
- Capital funding to be provided for greater investment in the Specialist Training Provider sector.
- Introduce a formal system of referral for students exiting second level so that they can better access appropriate further education services .
- Commence Pay Restoration for Solas/ETB funded services in line with other organisations providing services on behalf of the State.



Employment Opportunities for Persons with Disabilities

Article 27 of the UN Convention on the Rights of Persons with Disabilities affirms the right of persons with disabilities to work, on an equal basis with others.

The European Commission Country Report for Ireland 2019 revealed that Ireland has one of the lowest employment rates for people with disabilities in the EU (26.2 % compared to 48.1 % in the EU in 2017). Ireland also has one of the highest gaps between people with and without disabilities (45.1 percentage points) in employment. The key government response to this crisis is a multi-pronged Comprehensive Employment strategy that set out to minimise people becoming jobless in the first case and to increase employment levels to at least 33%.

While the Strategy has had some limited success at increasing employment levels, the gap between levels of employment and unemployment for those with and without disabilities continues to widen.

People with disabilities experience multiple barriers to accessing and sustaining employment, including access and infrastructural barriers, poverty traps, negative stereotypical perceptions, and limited progressive education opportunities. The current Reasonable Accommodation Funds (RAF) grants are not described comprehensively enough, there needs to be awareness raising and support for the grants by all stakeholders.

Every day Rehab Group, in partnership with over 650 employers, is working hard to provide employment opportunities for people with disabilities. Between 2017 and 2022, more than 2,400 people with disabilities and those with additional needs have found jobs through our training provider National Learning Network. Since 2019 Rehab Group has been instrumental in developing the Individual Placement and Support service for those with severe and enduring mental health challenges in partnership with the HSE. A total of 616 people who participated in the IPS programme are now in employment.

Rehab Group's five-year strategy "Delivering our Future" will see it play a significant leadership role in supporting people with disabilities to develop and progress in their careers. An innovative new model of supported employment for people with disabilities the Transitional Workforce Model (TWM) will partner with the business community to provide opportunities for people with disabilities that have been underdeveloped.

TWF will provide a placement and support service for people with disabilities that offers a supported transition from unemployment to employment.

This innovation comes at an opportune time when they are acute staff shortage across various sectors in the economy. Simultaneously, post Covid19 home working and hybrid arrangements have opened up new opportunities for people with disabilities. TWM has the potential to be a game changer in the lives of people with disabilities supported by both the business community and the various state bodies involved.

Access to the wider employment market was also one of the main points of concern for the people surveyed who use our services. The main issues people encountered when trying to access employment included anxiety around how work may affect their Social Welfare payments and accessing transport to attend interviews and jobs. In addition, they also encountered a stigma or hesitancy amongst employers in employing someone with a disability and difficulties in gaining work experience due to the pandemic. In addition, some employers cited staff shortages as a reason not to take someone on work experience. New supports urgently need to be put in place to encourage employers to take on people with disabilities for work experience, something our service users have found difficult to access since the pandemic.

The following are some of the observations of our service users:

"It's hard to get back into the workforce."

"When I lived at home years ago I got a job and my D/A was cut after six months. So I was let go and it took roughly six/seven months to get my D/A back and my parents supported me. It was so hard to survive, so I would be afraid to go into work again plus I live independently now."

"People on disability allowance have a little money and limited opportunities to earn more."

“Employers have no interest in employing people with disabilities at the moment. They are shut down before they are even interviewed.”

One of the main pillars of the Rehab Group is our Employability and Social Enterprise division. Our mission is to provide sustainable employment for people with disabilities in commercial business units.

Rehab Enterprises is one of Ireland’s largest employers for people with disabilities. We employ over 150 people in Ireland, over 90 of whom are people with disabilities. We specialise in secure WEEE IT and paper recycling, JIT manufacturing and logistics.

Based on this experience, there is a key measure that the Government should look at as part of Budget 2023 that we believe could make a significant contribution to addressing Ireland’s very low rate of employment for people with disabilities.

Public Procurement

Article 20 of the EU Public Procurement Directive allows public procurers to reserve contracts to encourage the employment of people with disabilities and disadvantages. Article 20 was meant to herald a new dawn for employment opportunities for people with disabilities. However, Article 20 is simply not being used in Ireland. A survey of local authorities conducted by Rehab in 2021 found no evidence of use of the Directive since 2017.

From our operations in Scotland, we can see a very successful model of public procurement that has been an enormous success for people with disabilities. Under this model, the Scottish Government worked with the social enterprise sector to carve out areas of operation that could be served by enterprises that employed large numbers of people with disabilities. We would urge the Government to adopt a similar model in Ireland.

Unlike in Ireland, activity under Article 20 is legally required to be reported by public procurers in Scotland so that it can be tracked and targets set. Also, unlike in Ireland, there is an explicit policy that every public body should have at least one contract with “a supported business” (a business where the workforce is made up of at least 30% people with disabilities/disadvantages) and private sector companies are encouraged to buy goods and services from them too.

There is no reason why the model in Scotland, with a similar population and economic profile to Ireland, cannot be adopted here. It would make a huge difference to the sustainability of disability-focussed social enterprises in Ireland and could provide thousands of additional job opportunities to people with disabilities.

Recommendations:

- **Change Public Procurement policies so that Ireland adopts the Scottish model of Public Procurement to increase employment opportunities for people with disabilities.**
- **Changes to the Wage Subsidy Scheme to include:**
 - Lower the threshold to the minimum hours per week (eight hours) to allow for more people with significant disabilities to become employed.
 - Shorten the initial contract of employment to avail of WSS to a minimum of 3 months with any follow up contracts of employment requiring six months’ duration.
 - A more nuanced and tiered level of subsidy depending on proven productivity of the employee with a disability and their support requirements.
 - WSS should apply to all employees regardless of employment duration to provide an ongoing incentive for the employer to retain the person who acquires a disability.
 - Maintaining WSS in line with any increase to the minimum wage to reflect inflationary pressures and transfer to living wage.
 - IPS service to be rolled out across all local mental health services and available to transform the lives all those people could benefit from it.
- **Encourage and incentivise employers to take Disability Awareness and Diversity Training to reduce anxiety or hesitancy about employing a person with a disability or mental health challenge.**

Hidden Healthcare Costs

One of the expenses our participants found most challenging to manage were unexpected expenses, most of which were healthcare-related. Many considered that once they received a medical card, all medical care costs should be included and were often taken by surprise by hidden charges like blood tests, medication charges, or dental charges.

The following are some of the observations of our service users:

“I was charged €30 for blood tests from my GP that would feed me for three days.”

“Services cost an arm and a leg. I needed a counsellor before coming into NLN it was so expensive my parents had to pay this for me.”

“I only get the medication I really need, some months.”

“Unexpected costs, such as extra doctors or dentist bills, are a huge challenge. “To have to pay to get my teeth cleaned, what if I hadn’t saved up the money?”

One student reported being on the public waiting list for several years, waiting on speech and language therapy, which he needed, to be able to look for a job. However, these services were impossible to access once he became an adult. “If you cannot pay for it, you cannot access it.”

What we ask

- **Expand the services provided for dental care under the Medical Card scheme to prevent sudden unexpected, and expensive healthcare costs.**
- **Incentivise dentists to join the medical card scheme to help increase people’s options for dental care.**
- **Produce an information campaign clarifying entitlements to retain medical cards for three years when taking up employment.**
- **Give a clear indication to GPs to end the process of charging for essential letters and blood tests for medical card holders.**

Reform of the Sector

The various challenges facing Section 39 were acknowledged in the Report of the Independent Review Group. This review group was established to examine the role of voluntary organisations in publicly funded health and personal social services, known as the Catherine Day Report, published in February 2019. Although there has been some dialogue on these issues, many of the recommendations of this important report have not yet been adopted. That report set out a number of key recommendations on funding and relationships that we believe should be fully implemented. Some key recommendations cover areas such as the financial sustainability of the sector, multi-annual budgets, paying the full cost of service delivery, better governance, a forum, and a dispute resolution mechanism. We acknowledge and welcome progress on some of these issues, notably the ongoing Health Dialogue Forum and the commitment made to the HSE Corporate plan to move to multi-annual budgeting. If the Catherine Day report is implemented in full, it will allow disability service providers to plan ahead and give much greater certainty to all who depend on Section 39 services.

Pay Parity for Section 39 workers

Section 39 organisations, who deliver essential intellectual disability services, are now in crisis regarding the retention of existing staff and recruitment of new staff members, coupled with the growing crisis in relation to inflation. The recruitment crisis is significantly exacerbated for Section 39-funded members, who cannot compete with pay levels provided in Section 38 or HSE-funded disability services. This is affecting the delivery of existing services and planning for meeting emerging and unmet needs. We are therefore calling for equivalent pay for staff members in Section 39 disability provider organisations. For organisations to be able to recruit and retain high quality staff, they must show existing staff members and prospective candidates that they are valued equally; paid equally for the same work, whether they work for a Section 38, Section 39 organisation or the HSE. Equality in pay is essential to enable Section 39 services to provide supports to the citizens who use these services, on an equal basis with those services provided by HSE and Section 38 services. The governance, regulatory and financial requirements on providers in Section 38 and Section 39, and the needs of the people that they support through services are equal.

Financial support is required to support agencies in dealing with the growing and serious funding requirements associated with the current extraordinary levels of inflation.

Our asks

- Provide full pay parity for workers in Section 39 organisations - including the cost of pensions, all part-time staff and Employers' PRSI.
- Implement in full all the recommendations of the Catherine Day Report.
- Provide sufficient resources in Budget 2023 to deal with waiting lists and the extensive level of unmet needs identified in the Disability Capacity Review.
- Provide an adequate capital budget for Day services and children's disability services.

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