



# RehabGroup

Investing in People, Changing Perspectives

## Pre-Budget Submission 2024: Advancing Disability Rights – Progressing People's Potential







Budget 2024 must create a platform to deliver a more equal and just society and develop pathways to full community participation for people with disabilities.

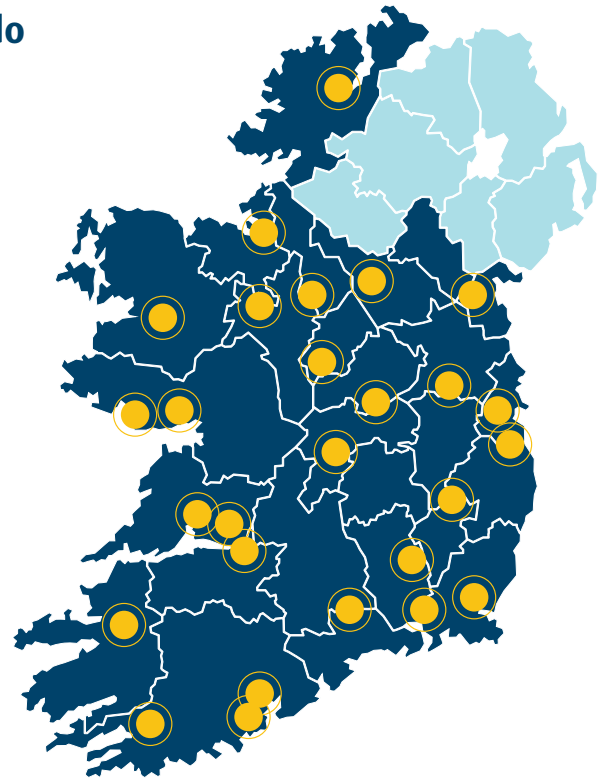
## 1. Our Vision

### Rehab Group: Who we are and what we do

The Rehab Group is an independent voluntary organisation that has been providing services and support for 10,000 adults and children with disabilities for more than 70 years. Our campaigning organisation 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 rights-based and inclusion focussed organisation comprising RehabCare, National Learning Network and Employability and Social Enterprise.



## 2. Foreword



**Rehab Group believes that people with disabilities should live self-determined, independent lives. Budget 2024 must create a platform to deliver a more equal and just society and develop pathways to full community participation for people with disabilities.**

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.

Disabled people are marginalised by financial, physical, and societal constraints that reinforce our unequal society. 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.

Independent living is out of the reach of so many people who aspire to find their own accommodation; employment of people with disabilities in Ireland is still at a rate that is amongst the lowest in Europe; disabled people, especially those in rural areas, struggle to access viable and truly accessible transport; hidden healthcare costs eat into whatever small disposable income they may have.

Many of the issues raised in Rehab's Pre-Budget Submission 2023 are still relevant in this submission for Budget 2024. The key asks that Rehab Group put forward last year and, indeed, in previous years, remain unaddressed or inadequately tackled. With just two budgets to go to fulfil the commitments in the Programme for Government, this must be the year that those issues are progressed in a meaningful way.

**Barry McGinn**  
CEO



### 3. Introduction

In preparation for this submission, Rehab Group carried out 49 in-depth focus groups with more than 460 service users across the country in June of this year. In order to supplement our service users' views, we also carried out a short survey with a small cohort of frontline staff, including Care Workers, Instructors, Psychologists, Rehabilitation Officers, Supervisors and Managers.

#### IN BUDGET 2024, WE ARE CALLING ON THE GOVERNMENT TO TAKE THE FOLLOWING HEADLINE MEASURES:

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- i. Introduce a Cost of Disability payment and increase basic rates of Social Welfare by at least €30 per week.
- ii. Provide funding for full pay restoration for Section 39 organisations and return to alignment with HSE pay scales.
- iii. Publish outstanding action/implementation plans such as the Cost of Disability Action Plan, Implementation Plan on Disability Capacity Review, UNCRPD Implementation Plan, and invest money to resource them.
- iv. Provide multiannual funding for disability organisations delivering vital services on behalf of the HSE and State.
- v. Increase investment in housing provision and financial supports to enable people with disabilities to live independent lives.
- vi. Ensure a first-class education experience for learners with a disability through the provision of capital investment, funding for core costs and students' extra-curricular activities.
- vii. Address Ireland's appalling record on the employment of people with disabilities by investing and developing a clear strategy to support people with disabilities to gain and retain employment.
- viii. Address hidden healthcare costs by ensuring all medical needs are covered by the medical card and ensuring speedy access to mental health services.
- ix. Invest in rural transport links and provide greater supports for individualised transport, including subsidies/allowances for people with disabilities to avail of driving lessons.
- x. Investment in the development of an Irish Assistive Technologies ecosystem that supports the active inclusion and participation of disabled people in all aspects of life.

## 4. The Cost of Disability amid a Cost-of-Living Crisis

While we are currently amid a cost-of-living crisis, disabled people have been living through a cost-of-disability crisis for years.

Rehab Group pre-budget submissions have always sought greater economic support for people with a disability, given the greater risk of poverty they face and the extra costs associated with having a disability.

These additional costs were outlined in the Cost of Disability Report carried out by Indecon and published by the Government in June 2021, yet there is still no sign of the Action Plan to implement the recommendations. The Cost of Disability Report by Indecon and Government published in December 2021 indicates that being disabled costs a person between €9,000 and €13,000 extra per year. With rising inflation, particularly since the outbreak of war in Ukraine in March 2022, these costs would have increased exponentially since then.

Our adult service users report being unable to survive independently without financial support from family, being dependent on food banks to meet food bills or being unable to cope with exceptionally high energy costs. Staff report that they are providing more assistance to link with community supports such as Saint Vincent De Paul to ensure that our service users can heat their homes and light their stoves.

*"Please realise that we can't survive independently on what we get in our D.A. It's embarrassing having to ask our family for help. I'm an adult, I want to be independent."*

*"I live alone and have to rely on 'Food Cloud' most weeks to supplement my weekly food shop as I can't always afford to buy enough to keep me going."*

*"I moved into my new home two weeks ago and I'm concerned about how I'm going to survive. At the minute, my brother is helping me out with my food bills. But that can't continue."*

*"If you are powering equipment like a wheelchair the cost of electricity is really important and extra help is needed."*

While the €500 disability once-off payment announced in Budget 2023 was welcome, it was far from an adequate response to the issues raised in the Indecon Report. An Implementation Plan on how the recommendations of the Cost of Disability Report can be actioned is long overdue.

### COST OF LIVING: OUR KEY ASKS

- ▶ An annual cost of disability funding stream to be introduced in Budget 2024 to address the inequality identified in the Cost of Disability report. We are calling on the Minister and Department of Social Protection to consult with the Disability Sector in determining the rates and frequency of that payment between now and Budget 2024.
- ▶ Publish an Implementation Plan on the Cost of Disability Report.
- ▶ An increase in basic rates of Social Welfare payments by at least €30 per week in recognition of the increasing cost of living and inflation.
- ▶ Extend the period of the fuel allowance for people with a disability.



## 5. Independent Living & Housing Supports

Article 19 of the UNCRPD underpins the right of people with disabilities to housing and access to support to enable them to live independently in the community.

The National Housing Strategy for Disabled People 2022 – 2027 trumpeted a new vision for housing for Disabled People. However, given the lack of progress on tackling the current housing crisis, it will likely take much longer than anticipated for that vision to be achieved.

The Strategy was published in January 2022, but the Action Plan for implementation was just published in June 2023. We have strong concerns that the funding for implementation will not match the ambition of the Strategy.

Services users report being forced to live at home with their parents and often struggle to get the services they value. They tell us that they need support to help them achieve their dream of living independently.

*"I struggle to pay rent, so I share my bedroom with another person."*

*"I can't afford to live independently; I have to live with my parents."*

Our staff members also expressed concern about students having their independent living either hampered or destroyed by a lack of suitable housing.

People with disabilities seeking private-rented accommodation also face enormous additional challenges. Most rental properties are unsuitable for people with disabilities and cannot be easily adapted. The process of applying to go on a local authority housing list or for the Housing Assistance Programme (HAP) is challenging for people with disabilities as they try to negotiate the myriad of bureaucracy without support. For many, the process can take much longer than the maximum three months rent allowance period.

Service users also reported significant issues with managing day-to-day living at home or living independently with the limited number of PA hours they received, with some effectively confined to their homes due to the lack of PA supports.

Assistive Technology(AT) can play a pivotal role in ensuring people with disabilities have access to independent living, education and employment and can live the life of their choosing. The Digital and Assistive Technology (DAT) Fund introduced last year represented a good start in establishing an AT ecosystem, but much more investment is needed.

We are seeking continued and increased investment in the development of an AT ecosystem across the country that supports the active inclusion and participation of disabled people in all aspects of life.

A cross-departmental approach to supporting people with disabilities move to independent living is pivotal to putting in place the supports required depending on individual needs - including personal assistance hours, residential support, transportation, housing adaptations, and tenancy sustainment supports.

### HOUSING & INDEPENDENT LIVING: OUR KEY ASKS

- ▶ Increase the amount and extend the duration of Rent Supplement to allow sufficient time to go on the housing list and access the HAP payment.
- ▶ Invest in building a sufficient percentage of universally designed++ social housing units.
- ▶ Provide support services for people with disabilities who have been allocated housing through the local authority or Approved Housing Body or those who may need support to rent privately.
- ▶ Disregard the household income means testing criteria and increase the maximum grant for the housing adaptation grant to reflect current building costs.
- ▶ Increase the number of Personal Assistance Hours.
- ▶ Investment in the development of an Assistive Technology ecosystem that supports active inclusion and participation of disabled people in all aspects of life.



## 6. Hidden Healthcare Costs and Mental Health

People with disabilities face the same and greater stresses and strains of everyday living but struggle more to access mental health services.

Unexpected expenses, most of which were health-related, placed a huge stress on our service users. They were often taken by surprise to learn that the medical card does not cover hidden charges like dental charges, blood tests and prescription charges. Moreover, medical procedures or appointments that are covered by the medical card have such unacceptable waiting lists that participants in urgent need of treatment have to seek assistance from family members to pay privately.

*"I can't afford to go to the dentist. If I don't go for check-ups or to get my teeth cleaned now because I can't afford it, my teeth will end up getting bad and I'll need fillings or to get my teeth taken out which will be even more money that I don't have!"*

*"We need better mental health services in my community (outside of my local GP) and supports for a better social life."*

The issue of mental health services was raised in almost all focus groups and by many staff survey participants. People with disabilities face the same and greater stresses and strains of everyday living but struggle more to access mental health services. Those looking for counselling services were faced with unacceptable waiting times or had to pay privately for counselling.

Both service users and staff emphasised the need to provide funding for a more holistic approach to healthcare, such as mental health workshops, subsidised gym/swim and social activities that promote wellness.

### HEALTHCARE & MENTAL HEALTH: OUR KEY ASKS

- ▶ 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.
- ▶ Ensure access to screening blood tests for people with disabilities is covered by the medical card.
- ▶ Reduce waiting times for people with disabilities to see qualified counsellors.
- ▶ Provide funding for local authorities to make leisure activities (pools, gyms etc.) available free of charge or at greatly discounted rates for people with disabilities (e.g., on disability allowance).





## 7. Transport

Transport is a key element of independent living. Inaccessible public transport is a specific contributor to the isolation and exclusion of the people who use our services.

Living independently can take many forms. It is not just the ability to choose who to live with or where to live. It is also the independence for a person to choose to travel where and when they want to. Transport is a key element of independent living.

Under the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD), the Irish Government has a responsibility to provide access to transportation on an equal basis with others to enable people with disabilities to live independently and participate fully in society.

Our service users emphasised that good and accessible public transport, the Local Link and the travel pass were services that they could not live without. The isolation of people with disabilities due to economic factors is exacerbated by the inability to access public transport or personal transport.

*“Access to transport for wheelchair users is a big problem. We have a normal bus and I am the one that suffers because I can’t use it.”*

*“There are no wheelchair accessible taxis in [Town] and I wish there was so I could be more independent.”*

*“A night-time bus-service for people that works and better rural transport and local link services are needed in this area”.*

Staff witness these struggles on a daily basis as service users depend on family members, often ageing parents, to transport them to and from services and highlight the need for more funding towards alternative transport means for adults with disabilities.

In 2013, the then Government announced that it would introduce an alternative to the Motorised Transport Grant and Mobility Allowance schemes. However, over ten years later, nothing has happened. This inaction recently led the Ombudsman to decry Government inaction on the matter.

A new cost arising in this year’s focus groups was the significant cost of trying to access driver’s licenses. People on social welfare are struggling to afford the significant costs associated with accessing driver theory tests, license applications, and driving lessons.

The significant cost that has been added to learning to drive with the compulsory twelve driving lessons has removed

the possibility for many people with a disability to own their own car. We estimate that costs such as learner permits, driver theory tests, eyesight reports, driver tests and licenses application can cost up to €860. These costs need to be met before the cost of purchasing, adapting, insuring, and maintaining a car is taken into account.

### TRANSPORT: OUR KEY ASKS

- ▶ Significant investment in local link services to expand on the service it already provides and to ensure those services are viable and accessible to disabled people.
- ▶ Put in place the long-promised and long-awaited Transport Support Scheme to replace the Motorised Transport Grant and the Mobility Allowance since they were discontinued in 2013 as recommended by the Ombudsman.
- ▶ Financial support for people who require more individualised travel support when looking to access transport
- ▶ Subsidies and/or allowances for driving lessons to people with disabilities and abolition/reduction in associated costs (Theory Test, license application etc.).

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## 8. Training and Education for People with Disabilities

As the Further Education and Training (FET) sector moves forward with a new and growing FET ecosystem and a vision for the College of The Future, it is essential that no one is left behind.

National Learning Network (NLN) is the training, education and employment access arm of Rehab Group. We provide personalised inclusive education programmes and supports to about 6,500 people across Rehabilitative Training(RT), Specialist Training (STP) 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.

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.

In recent years, FET has undergone significant structural reforms and is now the fastest-growing education sector in the country. As the sector moves forward with a new and growing FET ecosystem and a vision for the College of The Future, it is imperative that people with disabilities are included on an equal basis.

Yet there has been no substantive reform of the provision of training for people with disabilities since 2001. There is now a real danger that people with disabilities will be left behind in these ambitious proposals for FET. We were particularly disappointed that there was no specific reference to Specialist Training Provision in the FET Review of July 2021.

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 students with additional support needs. This is an area that NLN has a particular specialism in, and we believe it is vital that Budget 2024 supports this initiative with resources for career guidance and a formal system of referral for students exiting second-level.

STP providers are now in a challenging position with a funding model which has yet to move to meet inflationary or staffing cost increases over a twelve-year period with no clarity on the future position of STP within FET. Solas commenced a review of STP in 2020, but this still needs to be completed or published. The HSE has announced a review of RT, but again this has not been commenced and will take at least 12 to 18 months to complete, with possible further delays before the report is finally published.

Reviewing STP and RT concurrently would be the most effective means to identify the best ways to organise and fund future provision of post-second-level education and training for adults with disability and health challenges. This review should be far-reaching and should examine all aspects of education provision to and funding for people with disabilities in consultation with all stakeholders.

In the interim, there are issues that need to be urgently addressed in 2024.

### Operational Funding Model

For Budget 2024, we urgently need a commitment from Government to improve funding to Specialist and Rehabilitative Training Providers.

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. Such a funding mechanism needs 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.

In addition, the per capita fee for services system provided through the ETBs and HSE has not been increased since 2011 and no funding for pay restoration has ever been provided by Solas/ETBs. This funding system makes it exceptionally difficult to adequately plan services and ensure sustainable provision to people who most need it.

## Capital Funding

There is currently no capital fund available to Specialist Training Providers such as National Learning Network through Solas/ETBs. Indeed, no significant capital funding has been invested in the sector since the cessation of the ERDF funding in 2001. The HSE does provide some capital investment for school leaver services.

Our students deserve to have a quality learning experience, one that can bring them to further education or employment. They deserve to be treated on an equal footing with other students in ETB/Solas-funded FET courses. Funding should be provided to bring Education/ Services in line with other colleges. Students have the right to receive training in state-of-the-art buildings with provision for sensory rooms and assistive technology.

Funding should also be available for social events, clubs and societies, and overnight trips with support to make the real college experience for our students.



## EDUCATION & TRAINING: OUR KEY ASKS

We propose that the reviews of STP and RT should be carried out concurrently, in consultation with all stakeholders and within an agreed timeframe. This review would examine all aspects of education provision and funding.

We are not necessarily seeking an increase in the operational funding envelope. Many of the issues could be resolved by a thorough revision of the current per capita, utilisation-based funding mechanism to one which would recognise core operational costs.

In the interim, Budget 2024 must address the following key issues:

- ▶ Budget 2024 should ensure that, as a minimum, core funding is available to providers, which is not solely based on the utilisation/attendance of students. This would require a guarantee to providers of a minimum baseline funding level to cover core costs of provision.
- ▶ Capital funding to be provided for greater investment in the Specialist Training Provider sector to give our students the quality experience they deserve.
- ▶ Invest in career guidance supports for students in special classes.
- ▶ Introduce a formal system of referral for students exiting second-level so that they can better access appropriate further education services and students with a disability are not simply left with a social care option.
- ▶ Commence pay restoration for Solas/ETB-funded services in line with other organisations providing services on behalf of the State.
- ▶ Funding for students to participate in clubs/societies and social events to make the college experience real and aligned with the experience of those who do not have a disability.

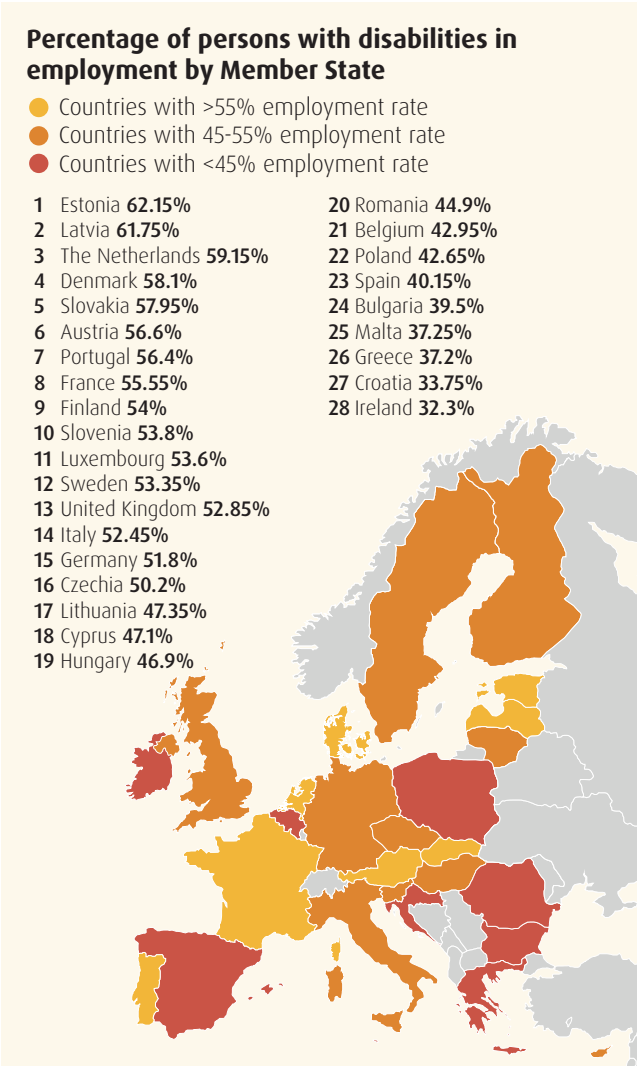
# 9. Employment Activation Measures

The employment rate in Ireland for people with disabilities at 32% is the lowest in the EU, and the disability employment gap is the highest.

The right of persons with disabilities 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, the European Union Pillar of Social Rights and the 2020 Programme for Government, Our Shared Future. However, while the need to build bridges to employment in the open labour market for persons with disabilities has been clearly identified, significant obstacles remain in developing pathways to their employment.

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%.

Barriers to hiring persons with disabilities are created not only by negative stereotypical beliefs and preconceptions but also by a lack of positive action, guidance and information on support for the adaptation of concrete recruitment processes and for social inclusion of persons with disabilities at the workplace. As a result people with disabilities in Ireland are almost three times more likely to experience poverty and isolation than those around them who do not have a disability. Employment activation measures in Budget 2024 must start to make a dent in Ireland’s poor record of employment of people with disabilities.



## Wage Subsidy Scheme (WSS)

The Wage Subsidy Scheme (WSS) aims to create more inclusive and diverse workplaces in Ireland by supporting employers to hire individuals with disabilities who may otherwise struggle to find employment.

We welcome the launch of a public consultation on the Wage Subsidy Scheme, and we particularly welcome the specific call to people with disabilities to respond to this consultation. Rehab has made a comprehensive submission to this consultation reflecting the views of our service users as well as from our own perspective as the largest employer of disabled people.

### OUR KEY ASKS ON THE WAGE SUBSIDY SCHEME 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 three months, with any follow-up contracts of employment requiring six months’ duration.



- ▶ A more nuanced and tiered level of subsidy depending on the 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.
- ▶ Individual Placement Service to be rolled out across all local mental health services and available to transform the lives of those who could benefit from it.
- ▶ Lowering the threshold for the number of people with disabilities employed to avail of funding for an Employment Assistance Officer and link it to the needs and profiles of employees with disabilities.
- ▶ Frame the WSS in terms of the positive impact of employing people with disabilities rather than in terms of compensation for loss of productivity.

## Transitional Workforce Solution

Rehab has recently made a comprehensive submission to the Department of Social Enterprise in relation to providing support for an employment activation programme currently being piloted by Rehab Enterprises – **The Transitional Workforce Solution (TWS)**.

A key goal of the TWS is to maximise retention rates for people with disabilities entering employment through post-placement supports and interventions. By supporting participants and host companies during the initial six months of employment, the difficult transition into long-term employment through integration supports such as disability awareness training leads to higher retention rates than would otherwise be achieved.

However, the TWS does not fall neatly into the strict criteria of current DSP disability employment incentive programmes such as the Wage Support Scheme or the Work Placement Experience Programme.

We are seeking a funding stream for the TWS model either through one of the existing DSP disability employment programmes or from a bespoke funding model. The level of funding should reflect the unique and deep supports offered to ensure the maximum opportunities and retention rates for programme participants.

## 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 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.

We would urge the Government to adopt a procurement model similar to the model adopted in Scotland. There, activity under Article 20 is legally required to be reported by public procurers in Scotland so that it can be tracked and targets set (and this practice has continued since Brexit). 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.

Such a model would make a huge difference to the sustainability of disability-focused social enterprises in Ireland and could provide thousands of additional job opportunities to people with disabilities.

## EMPLOYMENT: OUR KEY ASKS

- ▶ Amend the WSS as outlined above to make it more accessible and responsive to more people with disabilities and to promote the scheme to both SMEs and large employers.
- ▶ Change Public Procurement policies so that Ireland makes full use of Article 20 of the Procurement Directive to increase employment opportunities for people with disabilities.
- ▶ 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.
- ▶ Support for a funding stream for the Transitional Workforce Solution model in the Social Protection envelope for Budget 2024 either within the existing programmes or through a specific TWS Programme.
- ▶ Fund and maintain an individualised placement service across all local mental health services and available to transform the lives of those who could benefit from it.

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## 10. Funding and Reform of the Sector

The various challenges facing Section 39 organisations were acknowledged in the Report of the Independent Review Group, known as the Catherine Day Report, published in February 2019. This review group was established to examine the role of voluntary organisations in publicly funded health and personal social services.

Although there has been some dialogue on these issues, many of the recommendations of this important report have not yet been adopted. 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.

Despite our repeated calls in previous pre-budget submissions, it is deeply disappointing that the multi-annual funding has still not been put in place. This is all the more perplexing as numerous reports commissioned by Government and State Agencies point to the necessity of moving to a multi-annual budgetary process which would ultimately be more cost-effective, enable innovation and put individuals at the centre of the delivery of services.

A number of excellent reports have been produced in recent years on plotting the way forward for disability services. However, for most, we are still awaiting an action plan and/or budgets to match the ambition of those plans. We are calling on Government to publish the Implementation Plans for the Cost of Disability Action Plan, Implementation Plan on Disability Capacity Review, UNCRPD Implementation Plan, the Review of Reasonable Accommodation Fund, and the promised Roadmap for progressing Disability Services Programme.

### Access to Disability Services

The demand for disability services is at crisis level. Despite a commitment to roll out Multi-Disciplinary Teams (MDT) across the country, there are significant shortfalls in the availability of these teams to meet current needs, particularly as young people exit school and move into adult services. Consequently, RehabCare is now including the costs for the provision of MDT supports in all our service proposals, including those for school-leavers.

Additional funding must be provided to enable Section 39 organisations providing disability services to deliver MDT supports to include Physiotherapist, Occupational Therapist and Speech and Language Therapist services.

In the long-term we believe that the 2004 Health Act will need to be amended to ensure that essential services provided on behalf of the state by Section 39 organisations are funded on an equivalent basis to those provided directly by the HSE or Section 38 organisations.

### Pay Parity for Section 39 workers

Section 39 organisations delivering essential 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 issue of pay parity for Section 39 organisations is severely impacting all sections of the Rehab Group in terms of the delivery of existing services and planning to meet emerging and unmet needs.

Our survey of staff highlighted numerous ways this is impacting our services. They report that it can prove difficult for our service users to build sustainable relationships with incoming staff. Many of our service users rely heavily on routine and have difficulty adapting to new faces that can disappear before they have the chance to build rapport. The issue of pay parity affects the morale and motivation of staff.

Individuals and families relying on services from Section 39 organisations have the right to the same level of service as those in Section 38 and HSE-provided 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.

Increasingly staff in Section 39 organisations are incentivised to apply for vacancies in Section 38 organisations or the HSE where the salary is higher and other terms and conditions (e.g., pensions, hours of work etc.) are more attractive. Moreover, as the Government negotiates new pay deals for public servants under “*Building Momentum*”, there are serious concerns among Section 39 organisations that the pay discrepancy is only going to create an even wider pay gap between the sectors.

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.

## FUNDING AND REFORM: OUR KEY ASKS

- ▶ Provide a dedicated funding stream to support the recommendations of the Report of the Independent Review Group.
- ▶ Provide multi-annual funding for Disability organisations delivering vital services on behalf of the HSE and the State.
- ▶ Publish outstanding action/implementation plans such as the Cost of Disability Action Plan, Implementation Plan on Disability Capacity Review, UNCRPD Implementation Plan, the Review of Reasonable Accommodation Fund, and the promised Roadmap for progressing Disability Services Programme and provide funding to match their ambition.
- ▶ Provide funding for S39 organisations to include MDT supports within their services.
- ▶ Provide funding for full pay restoration for Section 39 organisations and return to alignment with HSE pay scales.



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# 11. Summary of Recommendations

## Cost-of Disability

- ▶ An increase in 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.
- ▶ Extend the period of the fuel allowance for people with a disability.
- ▶ An annual cost of disability funding stream to be introduced in Budget 2024 to address the inequality identified in the Cost of Disability report. We are calling on the Minister and Department of Social Protection to consult with the Disability Sector in determining the rates and frequency of that payment between now and Budget 2024.
- ▶ Publish an Implementation Plan on the Cost of Disability Report.

## Independent Living and Housing

### Key Recommendations:

- ▶ Increase the amount and extend the duration of Rent Supplement to allow sufficient time to go on the housing list and access the HAP payment.
- ▶ Invest in building a sufficient percentage of universally designed++ social housing units.
- ▶ Provide support services for people with disabilities who have been allocated housing through the local authority or Approved Housing Body or those who may need support to rent privately.
- ▶ Disregard the household income means testing criteria and increase the maximum grant for the housing adaptation grant to reflect current building costs.
- ▶ Increase the number of Personal Assistance Hours.
- ▶ Investment in the development of an Assistive Technology ecosystem that supports active inclusion and participation of disabled people in all aspects of life.

## Hidden Healthcare Costs & Mental Health

### Key Recommendations:

- ▶ 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.
- ▶ Ensure access to screening blood tests for people with disabilities is covered by the medical card.
- ▶ Reduce waiting times for people with disabilities to see qualified counsellors.
- ▶ Provide funding for local authorities to make leisure activities (pools, gyms etc) available free of charge or at greatly discounted rates for people with disabilities (e.g., on disability allowance).

## Education and Training

- ▶ Budget 2024 should ensure that, as a minimum, core funding is available to providers, which is not solely based on the utilisation/attendance of students. This would require a guarantee to providers of a minimum baseline funding level to cover core costs.
- ▶ Capital funding to be provided for greater investment in the Specialist Training Provider sector to give our students the quality experience they deserve.
- ▶ Invest in career guidance supports for students in special classes.
- ▶ Introduce a formal system of referral for students exiting second level so that they can better access appropriate further education services and students with a disability are not simply left with a social care option.
- ▶ Commence pay restoration for Solas/ETB funded services in line with other organisations providing services on behalf of the State.
- ▶ Funding for students to participate in clubs/societies and social events to make the college experience real and aligned with the experience of those who do not have a disability.



## Employment

- ▶ Reform of 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 three 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.
  - Individual Placement Service will be rolled out across all local mental health services and available to transform the lives of all those who could benefit from it.
  - Lowering the threshold for the number of people with disabilities employed to avail of funding for an Employment Assistance Officer and link it to the needs and profiles of employees with disabilities.
  - Frame the WSS in terms of the positive impact of employing people with disabilities rather than in terms of compensation for loss of productivity.
- ▶ Amend the WSS as outlined above to make it more accessible and responsive to more people with disabilities and to promote the scheme to both SMEs and large employers.
- ▶ Change Public Procurement policies so that Ireland makes full use of Article 20 of the Procurement Directive to increase employment opportunities for people with disabilities.
- ▶ 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.
- ▶ Support for a funding stream for the Transitional Workforce Solution model in the Social Protection envelope for Budget 2024 either within the existing programmes or through a specific TWS Programme.
- ▶ Fund and maintain an individualised placement service across all local mental health services and make it available to transform the lives of those who could benefit from it.

## Funding and Reform

- ▶ Provide a dedicated funding stream to support the recommendations of the Report of the Independent Review Group.
- ▶ Provide multi-annual funding for Disability organisations delivering vital services on behalf of the HSE and the State.
- ▶ Publish outstanding action/implementation plans such as the Cost of Disability Action Plan, Implementation Plan on Disability Capacity Review, UNCRPD Implementation Plan, the Review of Reasonable Accommodation Fund, and the promised Roadmap for progressing Disability Services Programme and provide funding to match their ambition.
- ▶ Provide funding for S39 organisations to include MDT supports within their services.
- ▶ Provide funding for full pay restoration for Section 39 organisations and return to alignment with HSE pay scales.

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