



**An Roinn Leanaí, Comhionannais,
Míchumais, Lánpháirtíochta agus Óige**
Department of Children, Equality,
Disability, Integration and Youth



Údarás Náisiúnta Míchumais
National Disability Authority

National Disability Strategy call for written submissions

Please answer the questions below and submit to nda-events@nda.ie by **Friday 02 February 2024** We ask that you please adhere to the word counts provided. An A4 page with single spaced text font 12 is between 400 and 500 words.

You can also post your submission to:

NDS Consultation,

National Disability Authority,

25 Clyde Road,

Dublin 4.

About you

Please respond to one of the options below.

I am responding as:

- A representative of a Disabled Persons Organisation
If yes, please specify your name and the name of the organisation:
- A representative of another disability organisation
If yes, please specify your name and the name of the organisation:

Emer Costello
Head of Advocacy and Campaigns
Rehab Group

- An individual with a disability
If yes, please provide your name (your name will not be included in the consultation summary):
- An individual who is a carer
If yes, please provide your name (your name will not be included in the consultation summary):
- Other
Please specify:

Questions

The vision of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), which Ireland has ratified, is that disabled people can exercise their human rights like everyone else in society and have an equal opportunity to live their lives with dignity, respect

Q1: What changes do you see as important to ensure that disabled people in Ireland are fully included in society in line with the vision of the UNCRPD? (Maximum 500 words)

Independent Living

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. The funding for implementation of that strategy must match its ambition.
- The people who use our services report significant issues with managing day-to-day living independently with the limited number of PA hours they receive, with some effectively confined to their homes.
- A whole of Government/cross-departmental approach is pivotal to putting in place the supports required depending on individual need - including personal assistance hours, residential support, transportation, housing adaptations, and tenancy sustainment supports.

Cost of Disability

- 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.
- The Government's Cost of Disability Report published in December 2021 indicates that being disabled costs a person between €9,000 and €13,000 extra per year. Rising inflation has led to significant increases in the cost of living since 2021.
- Immediate recognition and redress of the cost of disability is imperative if the rights of disabled individuals are to be upheld.

Future Proofed Disability Services

- Quality disability services require proper workforce planning. The National Disability Strategy should signal a change from reactive/corrective planning for people with disabilities to a more proactive evidence-based approach. Resources, supports and funding need to be in place to meet both unmet and future needs and to ensure timely and equal access to support across a person's lifespan.
- 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 need. The new strategy must ensure funding for disability services providers to deliver MDT supports.
- There is an urgent need to deal with the funding crisis in disability services which stems from the absence of a policy or strategy defining the role of the sector in delivering disability services for which the state is responsible. The Strategy needs to set out a roadmap on engagement with Disability Services Providers and to ensure that funding is in place so that the most vulnerable citizens of our society are protected and given the care they need and deserve.
- The rollout of multiannual funding for disability organisations delivering vital services needs to be put in place as a matter of urgency.

Education and training

Article 24 of UNCRPD highlights the need for disability inclusive educational options for all.

- There has been no substantive reform of provision of training for persons with disability since 2001. Since then, population needs have changed, young adults with disability are now presenting with higher levels of communication and interaction needs, cognition and learning difficulties, social, emotional and mental health difficulties and sensory and physical needs, often on a concurrent basis.
- Disability is not homogenous, many with the same diagnosis present with very different support needs.
- Current post second level provision for students with disability is insufficient to meet all needs, is fragmented, geographically disparate and hard to access.
- Mainstream FET or indeed STP or RT providers are not currently resourced to adequately meet this emerging need.
- The role of STP and RT within an evolving FET and HE ecosystem needs to be clearly outlined and properly resourced.

Employment Activation

Article 27 of UNCRPD recognises the rights of PWD to work on an equal basis with others. Yet significant obstacles remain in developing pathways to employment. Ireland has the lowest employment rate of people with disabilities and the highest disability employment gap across the EU and OECD countries.

- An integrated employment strategy across a number of government departments combined with significant investment in employment activation measures is required.
- The Wage Subsidy Scheme is urgently in need of reform and restructuring to allow greater flexibility and to help it sustain more employment opportunities.
- Government and Local Authorities should seek to use public procurement to pursue social goals as highlighted in the OECD Report of July 2023.
- The strategy must examine ways to remove barriers to hiring persons with disabilities which not only stem from negative stereotypical beliefs and preconceptions, but arise because of a lack of positive action, guidance and support for the adoption of concrete recruitment processes and the social inclusion of PWD at the workplace.

Assistive Technologies

- 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 NDS should develop a programme of 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.

Q2. What needs to happen for these changes to be achieved? (Maximum 500 words)

- Proper oversight is pivotal to the implementation of an efficient strategy. At present the co-ordination of the National Disability Strategy is managed through DCEDIY. The Department of the Taoiseach should have overall responsibility for UNCRPD oversight and implementation. This is the best way to ensure all Government departments are held accountable for delivery.
- The Department of Public Expenditure, NDP Delivery and Reform must be fully engaged in the Strategy planning process from the outset to ensure adequate funding across the lifetime of the strategy.
- An overarching theme of this submission has been the need for a whole of Government approach to Disability. The silo mentality prevalent in many government departments must be eliminated and replaced by strong coordination and integration of policies and services. Action is needed to mobilise cross sectoral actors and establish mechanisms to produce rights-based public policy and truly embed the rights of people with disabilities in Irish society. **All** Government policies and strategies should be disability proofed against the UNCRPD.
- Government ministers should be required to report annually on their department's progress in delivering UNCRPD to the relevant Oireachtas Committees and both Houses of Oireachtas.
- A lack of understanding of the UNCRPD Convention across public bodies and sectors prevails. Staff in Government Departments, Local Authorities and State Agencies should be surveyed on the level of awareness of UNCRPD (similar to the survey undertaken on SDG awareness carried out for the SDG Implementation Plan¹). UNCRPD training should be rolled out across all government departments.
- The Optional Protocol to the CRPD which would allow individuals, groups of individuals, or third parties to submit a complaint to the CRPD committee about human rights violations should be ratified without further delay. Ratification of the Optional Protocol would support a more effective implementation of the UNCRPD.
- The Wage Subsidy Scheme needs radical overhaul including restoration of the link with the National Minimum Wage and replacing the "loss of productivity" clause with a more positive rationale².
- Increase in income disregards in line with budgetary measures to ensure that increases in NMW or other benefits will not impact on secondary benefits.
- The role of Specialist Training Provision/Rehabilitative Training within the evolving FET ecosystem needs to be fully acknowledged and resourced to equip PWD with skills to progress through to further education/employment.
- This strategy should ensure full accessibility to the physical environment, transportation, services, information and communications, including ICTs, and other facilities and services open to or provided to the public, in both urban and rural areas.
- The principles of co-production and co-design must be embedded in the new strategy. It should combine attempts to draw on wider policy with the insights from people with lived experience of disability. A truly co-produced disability strategy needs to be overarching in improving outcomes for and with disabled people through design and delivery to evaluation phases.
- Similarly, disabled persons', organisations representing both service providers and advocacy organisations must be consulted and centrally involved in the Strategy from planning to delivery and evaluation.
- The Irish Human Rights Commission point out that under Article 31 of the CRPD, Ireland must collect appropriate statistical data relating to people with disabilities. Without this data, it is impossible to understand where progress is being made and where we are regressing. In the words of the IHREC "there is such a dearth of disaggregated data at the moment that it makes the exercise of disability-proofing public policy akin to building a house on a giant trampoline." The CSO must be resourced to collect relevant, disaggregated, and timely data which would inform future policy development.
- Section 39 organisations delivering essential disability services are in crisis regarding the retention of existing staff and recruitment of new staff members. 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. 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.

¹ [Ireland's Second National Implementation Plan for the Sustainable Development Goals](#) (page 32)

² [Rehab Submission to DSP on Reform of the Wage Subsidy Scheme](#)

Question 3: What would a successfully implemented strategy look like? For example, how do you think life should have improved for disabled people in Ireland at the end of the 5-year strategy?

A successfully implemented strategy would:

- have a transformative impact on people with disabilities and their families. Firstly, it would ensure that the rights of PWD to live independently in their communities and live the life of their choosing would not just be aspirational but a reality.
- see PWD in Ireland being able to live the lives of their choosing, being supported from an early age to achieve their goals, live independently and participating as a valued member of their community. This strategy should recognise that the need of each individual is different and provide the resources so that every person with a disability is able to create their own roadmap, while remaining safe in the knowledge that their supports will not be taken away.
- provide pathways to independent living and freedom of choice for PWD to live how and where they want (Live the life of their choosing). It would result in positive measurable outcomes for people with disabilities including housing, personal assistance hours, education and employment.
- mean disability services that are fit for purpose with planned resources through a proactive rather than reactive budget.
- deliver integrated care services, with multi-disciplinary teams and collaboration across all disability services.
- replace the medical approach to disability with a socially inclusive model which values a range of abilities and adds to our collective richness and diversity. It would mean that people with disabilities will no longer live in congregated settings but would instead be part of inclusive communities.
- deliver a formal transition of supports for PWD entering adulthood, putting them on a pathway to achieve their ambitions through collaborative approaches to education, training and employment.
- provide equality of opportunity in education and employment for PWD and close the employment disability gap between PWD and the general population.
- improve the health and well-being of people with disabilities by reducing the risk of poverty.
- deliver improvements in the accessibility of public infrastructure and public transport, especially rural transport.
- mean that the voice of PWD is amplified, listened to and understood by policy makers. It would signal the successful synchronisation between various National Plans – e.g. National Disability Strategy, Disability Housing Action Plan, Disability Action Plan, SDG Implementation Plan
- ensure that PWD had access to information in an accessible fashion to enable them assert and seek to vindicate their rights.
- progress urgent recruitment and retention measures for disability and mental health services as has been done with the Older Persons' Strategic Workforce Advisory Group (SWAG) report.
- address the urgent Section 39 pay parity issues which are threatening the sustainability of disability support services.

A successfully implemented strategy will only be possible if people with disabilities are consulted properly and involved in decision-making processes.

Question 4: If you have any other views that are relevant to the National Disability strategy, please tell us. (300 words)

- Six years on from Ireland’s ratification of the UN Convention on the Rights of People with Disabilities in 2018, we are concerned that significant progress has not been made in implementing the recommendations of first National Disability Inclusion Strategy. While we understand that the challenges and constraints caused by Covid-19 during the previous Strategy may have hampered progress in implementation, the failure to implement key recommendations cannot fully be attributed to Covid.
- There are clear linkages between the National Disability Strategy and the SDG National Implementation Plan. The impact of climate change on marginalised and disadvantaged groups, including people with disabilities, is outlined in the United Nations Human Rights Council report.³ The UN High Commissioner for Human Rights has spoken of the need to ensure mutual reinforcement of the Sustainable Development Goals (SDGs) and the CRPD.
- The Global Action Plan briefing paper on Climate Change and Disability⁴ found widespread consensus that climate debate and policies to date have not adequately considered the needs and views of people with disabilities. This is an area that should be addressed by the Strategy.
- The UN Agenda for 2030 pledges that “no one will be left behind.... and we will endeavour to reach the furthest behind first.” The new Strategy must embrace the principle of “the furthest-behind first”.
- The National Disability Strategy must ensure that meaningful and effective participation of persons with disabilities and DPOs in the development of this Strategy. Consultations on the Strategy must ensure that there is sufficient time for DPOs and Disability Service Providers to consult with their member, the people who use their services and their families. In that context it was disappointing that this phase of the consultation was carried out over the Christmas period with insufficient time for meaningful engagement. Going forward, longer timeframes need to be provided so that organisations like Rehab can carry out consultations with the people who use our services before making any submissions.
- The new Strategy needs to be ambitious and action oriented if the rights of disabled people in Ireland are to be vindicated.

³ United Nations Human Rights Council, ‘Analytical study on the promotion and protection of the rights of persons with disabilities in the context of climate change’, 22 April 2020, A/HRC/44/30, [A/HRC/44/30 \(un.org\)](https://www.un.org/en/hrc/44/30)

⁴ [Global Action Plan, Climate Change and Disability, \(2023\)](#)