

SUBMISSION TO
DEPARTMENT OF CHILDREN, EQUALITY AND DISABILITY
STATEMENT OF STRATEGY 2025 – 2027
19 May 2025

Introduction

Rehab Group welcomes the opportunity to make a submission on the Department of Children, Disability and Equality Statement of Strategy 2025 – 2027.

We note that since the previous strategy (2023- 2025) that the Department no longer has responsibility for Integration and Youth. We believe that this is a positive development.

Overall, the transfer of the specialist Disability services function to this Department from the Department of Health has been positive. At the time, Minister O’Gorman stated that the transfer would *“facilitate the transition from a medical model of support towards a holistic, rights-based approach that supports people with disabilities to live autonomously, in line with Ireland’s commitments under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).”*

The separation of disability functions from the Department of Health is a welcome first step. With fewer functions, the department will be able to streamline its priorities with a sharper focus on disability rights, child welfare and equality issues. The new structure will also work to strengthen the core identity of the Department with a clear policy focus on inclusion and equality for some of our most vulnerable people.

However, there is still a long way to go before the vision outlined by Minister O’Gorman is achieved. Disability policy in Ireland is still very much rooted in the medical model rather than a rights-based approach.

The Department’s Statement of Strategy 2025-27 presents a unique opportunity for the Department of Children, Disability and Equality to play a central role in the development of an equal and inclusive society.



1. Need for Whole of Government Approach

The last National Disability Inclusion Strategy covered the period from 2017 to 2022. The commitment to a whole of Government approach in that plan failed to materialise as there was no overarching coordinating structure. The establishment of the Department of Children, Equality, Disability, Integration and Youth was intended to provide that co-ordinating structure.

The UNCRPD has 50 articles covering all areas of life, from health, education and employment to equal recognition before the law, freedom from exploitation, violence and abuse, and accessibility. A whole-of-government approach is not only essential, it is long overdue. The new National Disability Strategy will need to operate effectively and coherently across numerous Government Departments to ensure its meaningful implementation.

Addressing barriers to equality and inclusion requires coordinated, cross-sectoral leadership and accountability that goes beyond any single Government.

We are particularly disappointed by the delay in the release of the new **National Human Rights Strategy for Disabled People**. We hope that when published, this strategy will provide a clear, measurable framework for systemic change.

The next strategy for the Department of Children Disability and Equality must set out an ambitious but realistic implementation plan that will:

- Embed a genuine whole-of-Government approach with clear responsibilities for across all departments.
- Ensure transparent reporting and accountability mechanisms.
- Respect the lived experience and leadership of disabled people.
- Provide sufficient resources to support implementation at both national and local levels.

Such an approach would ensure that disability inclusion is embedded across all public policy domains—from education and transport to employment, housing, justice, and healthcare.

We further welcome the establishment of a Disability Unit in the Department of An Taoiseach to facilitate this whole of Government approach. We would ask for clarity in the Department's strategy on the roles and functions of the Department vis-à-vis the Disability Unit in the Taoiseach's office.




2. Funding for Disability Services

The Department's Strategy Statement will be a key instrument to shape funding models that are fairer, more person-centred, and better aligned with Ireland's commitment to the UNCRPD.

By embedding strategic goals into how funding is planned, allocated, and monitored, the Department of Children, Disability and Equality can ensure that services truly meet the evolving needs of people with disabilities and their families. The Department's Strategy Statement should address the following funding goals:

- i. Multiannual Funding:** The Disability Capacity Review, the Report of the Independent Review Group, the Sláintecare Implementation Strategy and the HSE Corporate Plan (2021-24) all highlight the need for multi-annual funding which would ultimately be more cost effective, enable innovation and put individuals at the centre of the delivery of services.
- ii. Policy Alignment for Targeted Investment:** Directing resources to priority areas outlined in the Action Plan for Disability Services(2024-2026) —such as early intervention, access to required multi-disciplinary assessment and support, personal assistance, inclusive education, and independent living—will result in more efficient and effective service delivery. The Department will need to ensure that it obtains the funding necessary to achieve the ambition of the Action Plan.
- iii. Rights-Based Framework for Funding:** The Strategy Statement, rooted in the UNCRPD, can facilitate funding models that treat access to services as a right, not a discretionary benefit.
- iv. Facilitating equitable access to multi-disciplinary therapy supports and services:** Ensure that funding models for disability services are designed to promote equitable access to high-quality Multidisciplinary Team (MDT) supports across the lifespan, so that children, adults and families can access the coordinated care they need when they need it regardless of age, location, service status, etc.
- v. Integrated and Cross-Departmental Funding Approaches:** By fostering collaboration between Government Departments (e.g., Health, Education, Children, Housing), the Strategy enables the pooling of resources and co-funding of cross-sectoral initiatives.
- vi. Investment in Capital Projects –** The HSE Service Plan for 2025 references plans for the development of a disability multi-annual capital strategy. Capital funding must be made available on a recurring basis to ensure immediate repairs/maintenance and upgrades are facilitated across residential, respite and day services operated by S39 organisations.
- vii. Investment in Early Intervention and Prevention:** the Department's Strategy Statement can direct funding towards preventative services that reduce long-term care needs which in turn drives improved developmental outcomes for children and cost savings over time through reduced reliance on intensive and reactive models of support.



viii. Workforce Planning and equality for staff (S39) Quality disability services require proper workforce planning. The Department's Strategy Statement 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 present unmet and future needs, and to ensure timely and equal access to support across a person's lifespan.

ix. Strengthened Data and Evidence for Funding Decisions: By integrating enhanced monitoring and evaluation into the strategy, in collaboration across agencies, regulators and providers, the government can make more evidence-informed funding decisions. This would ensure funding is responsive to real needs and improves accountability and transparency in resource allocation.

3. Partnership Principles

In April 2023 the Minister of Health published the HSE Partnership Principles, building on the collaborative and integrated work between the State and the voluntary sector during the response to the Covid-19 pandemic. This has been a very welcome and positive initiative across the disability sector.

By embedding the HSE Partnership Principles in all levels of service planning and delivery, the Department of Children, Disability and Equality would further strengthen its commitment to inclusive, effective, and rights-based approach across its Strategy. This commitment would not only positively impact day-to-day service experiences but also contribute to systemic change, delivering long-term social and economic benefits.

Examples include:

- i. Stronger Collaboration Between Stakeholders:** By committing to open communication and shared goals, Government Departments, the HSE, NGOs, and advocacy groups can break down silos and work as unified teams.
- ii. Empowerment and Inclusion of People with Disabilities:** Partnership Principles emphasise equality and inclusion, ensuring that people with disabilities are active participants in shaping their own supports and wider service design.
- iii. Improved Policy and Strategic Planning:** Embedding Partnership Principles helps ensure that national disability strategies are grounded in real-world needs and are informed by ongoing feedback loops.
- iv. Compliance with International Obligations:** to strengthen Ireland's compliance with the UN Convention on the Rights of Persons with Disabilities (UNCRPD). The Partnership Principles align closely with the values of the UNCRPD, including autonomy, inclusion, and equality.



4. Safeguarding of Vulnerable Adults

In the new Strategy, we would welcome a focus on the Safeguarding of Vulnerable Adults, including adults with disabilities; to build an integrated approach to upholding UNCRPD Article 16: Freedom from Exploitation, Violence and Abuse.

Firstly, the Strategy should reflect current best practice in Safeguarding, to “make safeguarding personal”. This is a model of Safeguarding that emphasises the need for safeguarding to be person-led and outcomes focused. The HSE note that *"It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety"*.

Also, to develop legislation on Safeguarding of Vulnerable Adults and to pursue an integrated approach across agencies, not least

- HSE
- HIQA
- Mental Health Commission
- Decision Support Services,

that will allow for a seamless approach, in the manner that Children First legislation has provided for in the protection of children from harm and abuse. To provide an overarching legislation that mandates duties and actions as per various existing standards and regulations across various settings.

To set out clear statutory procedures, processes, duties and responsibilities to be followed by service providers (public and private), regulators, employers, An Garda Síochána, and any other relevant bodies or persons involved in the protection of vulnerable adults:

- i. Measures to protect vulnerable adults from the prevention of harm and abuse,
- ii. Mandatory procedures to respond to reports and disclosures of abuse that upholds Article 13 of the UNCRPD: Right to Justice.

For example, to replace the HSE Trust in Care Policy with a clear process that facilitates exchange of information and co-operation across agencies such as a service provider, HSE and An Garda Síochána; to enable the sharing of confidential information across agencies without the inhibitions posed by Data Protection legislation; to minimise disruptions based on conflicting legislation such as Employment Law.



5. Promoting an Equal Society.

Strategic Goal 4 in the current Department Strategy centres on developing a progressive, respectful and inclusive society. The next Statement of Strategy must include a strong focus on addressing poverty and unemployment among disabled people. People with disabilities in Ireland are substantially more at risk of poverty and deprivation than those without disabilities. EU SILC data for 2022 shows that while on average 28.8% of the EU population with a disability were at risk of poverty or social exclusion (AROPE), Ireland's rate was more than 10% higher, at 39.5%.

The 2021 Indecon Cost of Disability Report reported that the annual additional costs to manage disability fell between €11,579 and €16,284 or an additional €223 to €313 per week. The additional costs referred to included transport, communications, equipment, disability aids, assistive technology, medical care and personal care. The estimates provided in the report are based on pre-2020 data and thus will have escalated exponentially as a result of spiralling inflation.

Barriers to employment include lack of access to education, inaccessible workplaces, discrimination, inaccessible public transport and limited career development opportunities. Moreover, disabled people find themselves increasingly isolated from society within their own communities – being involved in arts, sports and other community programmes.

This underscores the importance of a whole of Government approach to disability and the pivotal role of the Department of Children, Disability and Equality in leading the charge on building an equal and inclusive society.

6. EU Presidency

Finally, the next Strategy covers the period of Ireland's EU Presidency from June to December 2026. The Department's Statement of Strategy should set out an ambitious plan to put disability matters at the heart of the EU agenda.