

## Consultation on the Comprehensive Employment Strategy, Action 5.1 ‘provision of coordinated and seamless support to people with disabilities’.

### *A Submission by the Citizens Information Board (May 2017)*

#### Summary of main points included in Submission

- A significant component of queries to Citizens Information Services by or on behalf of people with disabilities relate to disability income supports and welfare dependency — measures recently announced by Government are important in the context of implementing a coordinated approach;
- The model outlined provides a necessary and relevant context for bringing together the various strands relating to people with disabilities accessing and retaining employment;
- More emphasis should be placed on ensuring that the experience of and perspectives of people with disabilities on seeking, getting and retaining employment is reflected in the model and on ensuring that their voice is heard;
- In-work supports are required to enable people to sustain employment as well as providing an interface between employees experiencing difficulty in the workplace and employers who have to run a business and deliver a service to an appropriate standard;
- How to address the particular and multi-faceted needs of people with an intellectual disability, especially those transitioning from second-level schools to education, training and activation programmes needs more detailed consideration;
- There is a need to actively engage employers through their representative groups (IBEC and ISME) in identifying and addressing the employment support needs of people with disabilities – this is a major gap in the model as outlined;
- The three priority areas identified as requiring attention are:
  - Enhancing the transition from school to work

- The need to extend Personal Assistant (PA) services
- Exploring ways of improving transport for people with disabilities in employment or activation programmes

## **Introduction**

The provision of coordinated and seamless support to people with disabilities so that they can aim for, and benefit from, employment is clearly at the core of the Comprehensive Employment Strategy. The need for Departments and agencies to work together in this (as in other areas) has long been emphasised. Indeed, the Citizens Information Board (CIB) has frequently highlighted the need for stronger inter-agency collaboration throughout the Irish administrative system. Within the statutory sector nationally, the broader community and voluntary sector and the local development sector, there has been a strong emphasis in recent years on issues relating to partnership, coordinated services, networking, inter-agency co-operation and service integration. However, clearly, there is a substantial difference between, on the one hand, organisations coming together to exchange information and to network and, on the other hand, engaging in joint planning and funding for the delivery of integrated, coordinated services. This will almost certainly impact on the implementation of a coordinated approach in respect of the Comprehensive Employment Strategy. It is a topic that clearly needs to be kept under review at Government level.

The CIB is not directly involved in the provision of supports to people with disabilities seeking to access employment or in providing employment opportunities for people with disabilities other than on an individual basis. However, the Board through our delivery services – Citizens Information Services (CISs), the Citizens Information Phone Service (CIPS) and the National Advocacy Service for People with Disabilities (NAS) is very aware of the challenges and difficulties faced by people with disabilities in accessing and retaining employment.

A significant component of queries to CISs by or on behalf of people with disabilities relate to disability income supports, welfare dependency and how to get out of welfare traps. Thus, measures recently announced by Government under the Make Work Pay strand of the CES to support people with disabilities accessing and retaining employment are important in the context of implementing a co-ordinated approach:

- Retention of Free Travel Pass for five years after taking up work
- Allowing people to return to Disability Allowance seamlessly if work doesn't work out within a year
- The deployment of Case Officers in Intreo Centres

- Raising the earnings disregard which will allow people to earn more from employment while continuing to retain their medical card
- Eligibility for the Disability Allowance earnings disregard, regardless of whether or not the work is rehabilitative in nature

## Consultation Questions<sup>1</sup>

### 1. In your opinion is the proposed model a useful approach to help people with disabilities find and retain employment?

Yes, the model with its three strands (coordinated and effective pre-activation; supports to find and keep employment; effective protocols for cooperation between Departments and Agencies) provides a necessary context for bringing together the various strands relating to people with disabilities accessing and retaining employment.

The CIB makes the following points on the overall approach outlined in the model:

- More emphasis should be placed on ensuring that the experience of and perspectives of people with disabilities on seeking, getting and retaining employment is reflected in the process and on ensuring that their voice is heard;
- How to address the particular and multi-faceted needs of people with an intellectual disability, especially those transitioning from second-level schools to education, training and activation programmes needs more detailed consideration;
- The concept of developing a 'vocational profile' or 'passport' to capture all information about a person's employment goals, skills, qualifications, training and reasonable accommodation needs, is an important one – there is, however, a need for more emphasis on the linkages between school programmes, curricula and accreditation in mainstream schools in terms of equipping young people with disabilities in a realistic manner for available work opportunities;

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<sup>1</sup> CIB has responded to Questions 1- 4 in the Survey. As the Board is not engaged in direct employment support activities we have not responded to Questions 5-6.

- While presuming a capacity to work for people with disabilities and providing an assessment of career goals and aspirations at an early stage, ideally while still in school, is important, the reality is that some young people with disabilities almost certainly (because of cultural, attitudinal and family dynamic factors) will not be ‘work ready’ and will require some engagement at a more basic level.
  
- The model needs to reference and link with various relevant legislative and social inclusion provisions, including, in particular:
  - National Disability Inclusion Strategy 2016-2019
  - Social Inclusion and Community Activation Programme (SICAP)2015-2017
  
  - The Disability Act 2005 (A target of 3% of employees in the public sector will be people with a disability)
  
  - The Employment Equality Acts 1998 to 2015 (which outlaws discrimination in a wide range of employment and employment-related areas as well as vocational training and under which employers are obliged to make reasonable accommodations for staff with disabilities)
  
  - The Education for Persons with Special Educational Needs Act 2004 (EPSEN Act) which governs education up to age 18 for children with disabilities and special needs
  
  - The provisions for supported decision-making in the Assisted Decision-making (Capacity) Act 2015

**2. What would be helpful to add or subtract from the model to make it as effective as possible?**

- The implication throughout the document that a person needs to have the necessary training, education, motivation and ability to pursue work/career in the open labour market is problematic. Since many people with a disability are more likely to be limited in the number of job hours or work that they can comfortably do, there is a need for much greater emphasis on ‘on-the-job’ supports, e.g., for people with an intellectual disability, those experiencing mental health difficulties and those who communicate differently. Such supports are required to enable people to sustain employment as well as providing an interface between employees experiencing difficulty in the workplace and employers who have to run a business and deliver a service to an appropriate standard.

- The fact that many people with disabilities may have underdeveloped or weak literacy and numeracy skills (and are more likely to be unemployed) needs to be acknowledged and addressed through the provision of appropriate learning programmes;
- The geographical spread of support services, e.g. National Learning Network, needs to be re-examined to ensure equity of provision;
- The need to provide coordinated supports to people with disabilities wishing to pursue self-employment opportunities needs to be developed in conjunction with existing self-employment support initiatives;
- Additional mechanisms are required to support people whose current employment is at risk and whose ability to sustain employment is compromised due to an acquired disability or illness;
- There is a need for a proactive and targeted public awareness campaign to create better disability awareness within the workplace and in society generally relating to people with disabilities in the workplace;
- The bringing together of all stakeholders (workers, employers and public services and NGOs) in order to highlight the respective roles and responsibilities needs to take place in order to:
  - Overcome the barriers created by the fragmented and institutional structures of the state
  - Identify the measures required to create change and reduce barriers to employment, e.g.,
    - Cultural issues and ingrained patterns of thinking
    - Negative attitudes of employers
    - Inadequate transport infrastructure
    - Lack of communication supports
    - The need for some people to have in-work supports
- In the context of mainstream schools and integrated education, there is a need to better target educational activities and curricula for children/young persons with a disability towards employment and training;

- There is a need to actively engage employers through their representative groups (IBEC and ISME) in identifying and addressing the employment support needs of people with disabilities – this is a major gap in the model as outlined;

### **3. Do you foresee any specific issues for people with high support needs that would need to be taken into account?**

The work required to implement a truly inter-agency approach with shared goals and related funding continues to present significant challenges generally. Questions arise, for example, as to the implications of the compartmentalisation of service planning under categories of ‘health’ and ‘welfare’ for developing a holistic response to the employment and training support needs of people with disabilities.

While the proposed model will include mechanisms to ensure all agencies and offices communicate effectively with each other to provide the best supports possible for the person, the separate prioritisation of needs by different agencies in accordance with their functional responsibilities is likely to impact on the goal of providing people with seamless services.

The work currently under way across a number of Government Departments under the Comprehensive Employment Strategy to improve employment outcomes for people with disabilities would be significantly enhanced by a stronger integration of resource allocation.

Transport has always been a major barrier to the participation of people with disabilities in the workforce. Inadequate public transport, and unaffordability or non-viability of personal transport prevents people taking up employment opportunities. This barrier disproportionately affects people with disabilities living in rural areas. The availability of work opportunities obviously varies depending on geographical location and work availability in different locations can change over time.

### **4. What would be your 3 main priorities in relation to implementing the model?**

#### *Priority 1*

##### Transition from school to work

While mainstream education systems have been adapted to support people with disabilities to participate and while many young people have had constant support in schools in the form of SNAs, supplemental assessment and non-academic qualification systems – such supports are not typically available in workplaces and this limits the potential for employment. This means that many people simply cannot cope in a workplace environment. For example, some people may lack the ability to take instructions in the workplace and/or to manage in stressful situations. It is almost certain that the ability of some people with disabilities to cope in the workplace could be enhanced by a supportive infrastructure akin

to that available in schools or some rehabilitative training situations. While this is not likely to happen to any great extent because of resource considerations, there could be a much stronger focus on transitions from school to employment-based systems based on the concept of individually-tailored progression pathways.

### *Priority 2*

#### Personal Assistant (PA) services

Personal Assistant (PA) services have a potentially crucially important role in enhancing employment opportunities for people with disabilities. However, in Ireland, the service has not developed to any great extent and, indeed, the emphasis has shifted to providing for basic personal care needs, with less attention to supports for independent living and employment. There is a need to re-focus the PA service in the context of the Comprehensive Employment Strategy. Specifically, there is a need to move from the current system where the service is directed and funded by the Department of Health to a system which is more broadly based and cross-departmental and involves the Department of Social Protection and the Department of Public Enterprise and Reform.

### *Priority 3*

#### Transport

Transport and mobility support schemes play a centrally important role in enhancing access by people with disabilities to employment, training and activation programmes. Many people with disabilities depend on public transport, on family members/friends or on transport provided by disability service agencies. It is sometimes the case that transport is not available from any of these sources.<sup>2</sup>

#### **Implementing the 5.1 model: Need for a strong social inclusion perspective**

Since many of the policy shifts in recent years support a move towards greater choice, greater independence, community-based services, and supported, self-directed living by people with disabilities, there is a need for the Comprehensive Employment Strategy to develop stronger linkages with both existing policies relating to the social inclusion of people with disabilities and with mainstream employment training and activation programmes. To this end, there is a need to ensure local community and voluntary organisations that provide direct services to people with disabilities are fully involved in the inter-agency co-ordination structures.

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<sup>2</sup> The current Programme for Partnership Government merely commits to examining transport service provision for young people with disabilities and also states that work is underway on the drafting of new legislation for the introduction of a new mobility scheme to assist those with a disability in meeting their increased mobility costs – this must be progressed.

Crucially, there is a need to further identify and understand what most concerns people with disabilities in the area of getting and retaining employment.