



National Disability Strategy call for written submissions

The Department of Children, Equality, Disability, Integration and Youth are leading the development of a new National Disability Strategy. They have requested the National Disability Authority to lead on certain elements of the consultation.

The consultation consists of a number of strands including online thematic focus groups, a national questionnaire and town hall style in person meetings. There will be more information [here](#) in the coming weeks. There is also an option to make a video submission – see [here for an ISL video on how to make a submission](#).

Disability organisations and in particular Disabled Persons Organisations (DPO)¹, are invited to make a written submission. The national questionnaire will be available for individuals but if you are not part of an organisation and would like to make a written submission you are welcome to do so.

We ask that in your responses you focus on solutions and tangible actions that can be done to improve the lives of persons with disabilities.

Please answer the questions below and submit to nda-events@nda.ie by **Friday 2 Feb 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.

¹ We recognise that some DPOs prefer the term Disabled Persons Representative Organisations (DPRO)

You can also post your submission to

NDS Consultation,

National Disability Authority,

25 Clyde Road,

Dublin 4.

What will happen to your submission

The written submissions will be summarised and included in a consultation report that will also include summaries from the national survey, video submissions and focus group discussions. The key themes emerging from all the consultation strands will continually be fed into the strategy development process. The consultation report will be published along with the strategy.

Views shared by DPOs will be distinguished from the views of others during the analysis process and the consultation report will summarise the findings of DPOs separately and highlight any unique views or particular emphasis of DPOs.

The consultation report will not identify any organisations or individuals but will use phrases such as ...a DPO suggested..., ...a disability organisation said..., a submission from an individual highlighted that...

Please go to the next page to start your submission

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:
- 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:

The Citizens Information Board (CIB), which has as part of its mandate a role to assist and support individuals, in particular those with disabilities, in identifying and understanding their needs and options and in accessing their entitlements to social services [Comhairle Act, 2000, S. 7 (b)].

Other functions of the Board include ‘the provision of information on the effectiveness of current social policy and services and to highlight issues which are of concern to users of those services.’

The CIB funds and supports the nationwide network of Citizens Information Services (CISs) and the Citizens Information Phone Service (CIPS). It also provides and manages the Citizens Information website (www.citizensinformation.ie). The National Advocacy Service for People with Disabilities (NAS) is funded and supported by the CIB as is the Sign Language Interpreting Service (SLIS).

The CIB welcomes the progression of actions over the lifetime of the NDIS, for example, those relating to improving access to public services for deaf people through the extended IRIS opening hours and a registration scheme for ISL interpreters provided by the CIB funded companies, SLIS and RISLI.

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, and equality.

- **Question 1:** 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)

Given the levels of poverty, and challenges in accessing employment for people with disabilities, the government should pay particular attention to Article 27 (work and employment), and Article 28 (adequate standard of living and social protection) of the UNCRPD. Ireland must ensure that its social protection system is adequately addressing the needs of people with disabilities, and keeping them out of poverty, including by addressing the extra costs of disability.

There has been little change in the labour market participation of people with disabilities over the period of the last NDIS. Just 34% of people aged 15 and over experiencing a long-lasting condition or difficulty were at work, compared to 56% of all people aged 15 and over². The low disability employment rate relative to other EU countries has previously been noted³. There is a need to focus actions on increasing the accessibility of work for those who wish to participate, as well as on improving the quality and type of work that can be accessed.

² [Census 2022](#)

³ European Commission (2023) 2023 Country Report – Ireland. [European Commission 2023](#)

The provisions relating to reasonable accommodation in general in the Equal Status and Employment Equality Acts need to be reviewed to more accurately reflect the principles of the UNCRPD.

CIB data indicates that many people on social welfare payments have multi-faceted problems associated with, and intersecting with disability, illness, mental health difficulties, inadequate housing or homelessness, addiction problems, or membership of ethnic minorities.

Article 19 in relation to living in the community is of critical importance to people with disabilities and the further investment in the types of services that support people to live independently in their own homes, including Personal Assistance (PA), home supports, respite, personalised budgets as well as transportation, and housing adaptations. More services to support community living are also required including for example, local area coordination, and tenancy sustainment supports.

More progress is also required in transitioning people with disabilities from living in congregated services to the community with supports, including people aged under 65 living in nursing homes.

The Task Force on Personalised Budgets reported in 2018 and its recommendations were accepted by the then Minister for Disabilities. Further progress in this area is an important action for the next NDS.

The failure to take account of the particular needs of people with disabilities accessing social housing has been identified including poor differentiation between the needs of differing individuals and differing disabilities; poor understanding or awareness of disability among some local authorities; little account taken of location, family and social networks; and perceived pressure on individuals to accept an inappropriate offer of accommodation because of fear of being removed from the waiting list⁴.

Notwithstanding section 42 (2) of the IHREC Act 2014, people with disabilities, continue to experience difficulties in accessing public services. Such problems relate for example, to difficulties with on-line applications, related digital exclusion and constraints, inadequate provision for Irish Sign Language interpretation, the

⁴ CIB/DFI (2022) The Right Home: the housing needs of people with disabilities.
https://www.citizensinformationboard.ie/en/publications/social_policy/research.html

ongoing inaccessibility of some public buildings and underdeveloped disability awareness among some frontline staff.

Inadequate personal and community transport supports, particularly for people living in rural areas, as well as the lack of action in introducing a transport scheme for people with disabilities, to replace the Mobility Allowance and other transport schemes is affecting their ability to live independently and participate in all aspects of life according to the UNCRPD.

- **Question 2:** What needs to happen for these changes to be achieved? (Maximum 500 words)

A stronger focus in the NDS is required on the funding of, and mainstreaming of public social services. Under-investment in public services is referenced in a European Commission Report on the 2022 National Reform Programme of Ireland⁵ which has expressed concern “in relation to the availability of social services for disadvantaged groups, and the situation for homeless people, people with disabilities, single parent and low work intensity households.” In Ireland, low-income households are more likely to rely on public services almost exclusively and lack the economic means to engage with private sector service provision, for example, in the areas of health, housing, education, childcare, social and residential care.

The mainstream first approach in the design and delivery of public services along with disability proofing of mainstream services and supports is important, as well as identifying where more specific supports are needed relevant to departmental areas/responsibilities in line with the UNCRPD, and national legislation.

The findings of the NDA/ESRI research on ableist beliefs also point to the importance of not treating people with disabilities as a homogenous group.

⁵ EU Report for Ireland 2022 https://ec.europa.eu/info/sites/default/files/2022-european-semester-country-report-ireland_en.pdf p. 48

CIB considers that intersectional discrimination based on a combination of grounds warrants inclusion in equality legislation as well as a stronger and more integrated response in the manner in which legislation is enforced.⁶

The Indecon report on the cost of disability concluded that there should be a multifaceted approach to addressing the additional costs of disability involving increased cash payments,⁷ enhanced access to service provision, and specific targeted grant programmes. The report and its conclusions have implications for many areas of public policy, requiring a whole of government response, and informing actions and commitments in the new NDS. Community supports such as PA, home supports, personalised budgets, digital and assistive technologies should be a central focus of the new NDS as they provide for, and enhance independence and choice.

CIB believes that targets in relation to the introduction of personalised budgets for disabled people should be included in the NDS. A continued policy focus on the application of universal design, lifetime adaptable and a futureproofing approach as well as the importance of ensuring adequate resources to implement the housing adaptation grants scheme. There needs to be stronger accountability mechanisms in respect of local delivery of social housing for disabled people and people with mental health difficulties ([The Right Home - CIB/DFI, 2022](#)).

Ratify the Optional Protocol to the UNCRPD.

Progress Mental Health legislation reform and Deprivation of Liberty legislation.

Progress on legislation on adult safeguarding underpinned by a whole of government approach to the legislation is required (beyond health and social care), in consultation with DPOs and other stakeholders.

The inter-departmental Transport Working Group should prioritise action in the provision of personal and community transport supports, and in addressing the delays in replacing the Mobility Allowance/Motorised Transport Scheme.

⁶ [equality-acts-review.pdf \(citizensinformationboard.ie\)](#)

⁷ Note the DSP's Green Paper on reform of disability payments draws from the Indecon report, i.e. the levels of disability payments and allowances should be changed to reflect the very different costs of disability by severity and type of disability.

Improving access to advocacy services to support services in safeguarding human rights in alignment with the UNCRPD. NAS has found there is an over focus on people with disabilities as ‘vulnerable customers’ in the finance sector, pointing to the importance of providing a human rights-based approach to banking in accordance with the UNCRPD/Equal Status Act recognising people with disabilities on an equal basis, as rights holders.

- **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 a five-year strategy?⁸ (Maximum 500 words)

Improvement in the lives of disabled people should at the end of the Strategy centre on the following domains of a person’s life:

- Disabled people supported to make decisions, as far as possible, about all aspects of their lives including, decisions about their healthcare, finances, and where and with whom they live.
- Providing people with an adequate income to live with dignity and without stress through progressing the implications for public policy of the Cost of Disability report.
- Being able to access work, for those who wish to, that is meaningful, flexible and pays a decent wage.
- Being able to participate in training, and education programmes as required on a flexible basis. Employment and training activation programmes tailored to the particular needs and circumstances of individual people with disabilities.
- The assisted decision-making capacity legislation fully implemented with particular reference to giving effect to its underlying principles (Section 8),

⁸ Please note that the length of the strategy has not yet been confirmed.

especially, that everyone is presumed to have capacity unless the contrary is shown.

- Providing choice in being able to access a personalised budget - disabled people who are able to and wish to manage their own publicly funded social and health care supports having access to a personalised budget in accordance with their assessed support needs.
- Providing an end to congregated services, through increasing transitions to community based residential services.
- Being able to access affordable and accessible housing in the community. A social housing needs assessment process in place that is fully attuned to the specific accommodation needs of individuals.
- Access to adequate supports to enable people with disabilities live independently in their local community, including for example, PA services, home supports, therapies, respite.
- Improvements in access to justice, involving for example, the introduction of intermediaries or court mentors to support people in court, the provision of access officers and assistive technology in courts; and ensuring that all Legal Aid Board solicitors and those engaged by it are trained and competent in communicating with people who communicate differently, those with an intellectual disability and those with reduced decision-making capacity.
- A life-cycle approach to assessing and meeting the costs of different types of disability and more engagement by relevant Government Departments with the multi-faceted factors that could help to alleviate poverty among people with disabilities.
- More effective measurement of progress and outcomes of the actions/targets in the next NDS, so that the change in people's lives can be more fully evidenced over the period of the Strategy.

- **Question 4:** If you have any other views that are relevant to the new National Disability Strategy please tell us? (Maximum 300 words)

CIB welcomes the opportunity to make a submission on the new National Disability Strategy and considers that its development and implementation is crucially important in order to give impetus to social inclusion, participation, and equality as these relate to people with different types of disability.

The Citizens Information Services (CISs) typically receive over three quarters of a million queries from the public each year. In 2023, queries on social welfare related concerns made up 45% of these queries, with over 57,000 queries specifically relating to disability and illness payments and supports. The most queried payments are Disability Allowance, Illness Benefit, and Invalidity Pension. Specific disability related concerns are also recorded under the general themes of Housing (85,000+), Health (58,000+), Employment (29,000+), Justice (16,000+) and Education (10,000+).

CIB believes that prioritising actions in the new NDS is important, to ensure their delivery over the lifetime of the strategy. In addition, actions that have not been achieved under the NDIS, should be identified as priorities for action in its successor. Some actions in the NDIS were too broad, and/or vague, e.g. action 42, and the learning from this should provide for more targeted, specific and achievable actions in the new strategy.

Delivery of a new NDS will involve the implementation of the UNCRPD which requires a coordinated approach, sectoral leadership, the involvement of a range of government departments, who will have responsibility for funding and oversight. Meaningful inclusion of disabled people in decision-making is essential. In the monitoring and oversight of the new NDS, representation by Local Authorities should be included in any steering group/oversight group mechanism. It may - depending on the outcome of the NDS consultations - be useful to consider aligning the new NDS more closely with the articles in the UNCRPD to assist in its implementation, rather than using the previous structure or devising a new one.