

INCLUSION IRELAND

National Association for People with an Intellectual Disability

Submission to the National Disability Authority (NDA)

**On Action 5.1 of the Comprehensive Employment
Strategy**

Date

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Ireland plain English guidelines.**

1. About Inclusion Ireland

Established in 1961, Inclusion Ireland is a national, rights based advocacy organisation that works to promote the rights of people with an intellectual disability.

Inclusion Ireland uses a human rights-based approach to its work. This recognises persons with an intellectual disability as rights holders with entitlements, and corresponding duty bearers and their obligations. Inclusion Ireland seeks to strengthen the capacities of persons with an intellectual disability to make their claims and of duty bearers to meet their obligations.

The vision of Inclusion Ireland is that of people with an intellectual disability living and participating in the community with equal rights as citizens, to live the life of their choice to their fullest potential. Inclusion Ireland's work is underpinned by the values of dignity, inclusion, social justice, democracy and autonomy.

2. Introduction

The Comprehensive Employment Strategy (CES) is a cross-government strategy that brings together actions by different Departments and state agencies in an effort to address barriers and challenges that impact on the employment of people with disabilities. The CES aims to ensure that there are joined-up services and supports at local level to support individuals to obtain and retain employment.

The CES sets out six strategic priorities. Strategic priority 5 aims to provide coordinated and seamless support to people with disabilities. Action 5.1 of the CES obliges the responsible bodies to work together to

develop an effective, coordinated policy approach to assist people with disabilities, including those who require a high level of support, to get and keep a job.

Action 5.1 is a key element of the CES and Inclusion Ireland welcomes the opportunity to contribute to the consultation process. The remainder of this submission sets out Inclusion Ireland's response to the draft model proposed by the 5.1 Working Group.

3. Recommendations for the Comprehensive Employment Strategy (CES) Action 5.1:

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

Section 1 - Co-ordinated and effective pre-activation so that people will be better placed to access employment:

Inclusion Ireland welcomes the presumption of capacity for individuals with a disability. This is consistent with the Assisted Decision Making Capacity Act 2015 and will challenge the way some people think that persons with disabilities are not able to work. This is important for all people with intellectual disabilities. When we assume people have capacity, it raises expectations and gives individuals the opportunity to have real and specific hopes, dreams and goals in their lives and in their future careers.

Research also shows that what parents expect of their children has an impact on achievement for children and adults with a disability¹.

¹ ESRI Research Series (2016). *Parental Educational Expectations of Children with Disabilities*.

However, the model fails to include some important issues. It also fails to give detail on actions that need to happen on many issues. Some of these issues include; having an effective monitoring process of the model itself, problems relating to school leaver transitions and the importance of including an effective awareness campaign with the implementation of the model. (See Question 2 for more on this)

Section 2 - Supports to find and keep employment:

The model gives a general outline of the supports people might need to find and keep a job. However, it is how government departments and employers resource and manage these supports that will make this model a success.

- [Name the supports people need](#)

The model does not specifically name any supports that would enable people with high support needs to access employment. This is a big gap in the model. The supports already in the model are very like the Employability Model which is geared toward people who are 'job ready'.

In a recent report by Indecon², they advised Employability to be more selective in who can access the programme in order to improve their targets for the organisation. All people with intellectual disabilities deserve supports to help them get and keep a job, not just those who are job ready and no matter how high their support needs are.

- [Onsite support and job coaching](#)

² Indecon (2016). *Evaluation of EmployAbility (Supported Employment) Service*.

The model does not include an onsite support for people who may need to be trained into a job at the beginning. It also does not include ongoing onsite support for people who might need support to do their job every day. A job coach should be available at the beginning of a job to provide hands-on support for employees who may need it. A job coach could model the employee's tasks required in their job to help the employee learn. The job coach could also support the employee to get the training they need. The support of a job coach could be phased out as the employee becomes more competent in the role.

- [Public sector duty](#)

The model should be consistent and in line with the Public Sector Duty. As outlined in the Act there is a duty for all public bodies to eliminate discrimination, promote equality, and protect human rights, in their daily work³.

- [Real work for real pay](#)

All work, even if it is for a few hours a week must be real work with real pay. People with disabilities must not work for free or remain on work experience programmes for years on end.

- [Transport](#)

The model's recommendation on transport needs to be better. There is a difference in public and private transport services between the main cities and more rural areas. We need to make sure that all transport services have very good accessibility for people with different types of disability. This means making more bus routes especially in rural areas. It also means making sure there are accessible ramps and spaces on busses and trains. This recommendation is supported by a recent report by the

³ Irish Human Rights and Equality Commission (2016). *The Public Sector Duty*.

National Platform of Self-Advocates⁴. They also highlighted how transport services need to work together to provide a service where people with disabilities can travel safely and in comfort.

Section 3 – Effective protocols for co-operation

Inclusion Ireland welcomes the commitment to ensure that communications from departments and agencies reach people with disabilities. The publication of the 'Make Work Pay' report in multiple accessible formats is a good example of this. As required by the Public Sector Duty in the Irish Human Rights and Equality Commission Act 2014⁵ information must be available in a variety of formats including plain English, easy to read and audio. It is important that this becomes common practice for all departments and agencies if they are to properly engage people with disabilities.

However, the lack of involvement of the Department of Jobs, Enterprise and Innovation in this protocol is worrying and will damage the future success of the model. (See response to Question 2 below).

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

2.1 How supports will work for employees

The model needs to explain how the supports will be resourced and managed. The model includes an assessment of supports an employee will need to achieve goals. This is good but it needs to go further. There should be a right to a support or a service once it is recommended in an assessment. We need to know how the supports will work once an employee takes a job.

⁴ National Platform of Self Advocates and Centre for Disability law, Galway (2017). 'Our Lived Experience of Housing and Transport'.

⁵ Irish Human Rights and Equality Commission (2016). *The Public Sector Duty*.

Under the Assessment of Need in the Disability Act, individuals are only provided with the assessment. Many people are left waiting for the services long after the assessment is finished. We need to make sure this does not happen with support in jobs too. The model must include how supports will work for employees to make the model successful

2.2 The Department of Jobs, Enterprise and Innovation as Leader of the Model

The Department of Jobs, Enterprise and Innovation should not only be a key partner in this model, but should be the department leading this action. As outlined in Action 5.1 of the CES there is a requirement for departments and agencies “to work together to develop an effective and coordinated policy approach” to support people with disabilities to access and retain employment. However, the main department responsible for employment in Ireland is absent from the working group that is developing models to deliver on this action. Improving the experience and pathways to work for people with disabilities requires a genuine commitment to whole of government working to make it happen.

2.3 Monitor and Review the Model

Once it starts, we must monitor and evaluate how the model is working in supporting people to access and retain employment. Disaggregated data should be collected so that the outcomes for different groups of people with disabilities can be examined to see if the model is working well or if there are groups of people with disabilities not benefiting from the model. There also needs to be a way to review and change the model if it is not working well.

2.4 Options if employment does not work out

The model fails to address the HSE school leaver issue. Currently, only school leavers get funding to attend a HSE funded Day Service. If a young

person chooses to follow the mainstream route into employment and it doesn't work out there is no HSE option open to them as they are no longer a school leaver. This system actively discourages people who wish to enter mainstream employment because if they try and it does not work well for them, they will not get any place in a day service. This is frightening for people who want to try to find a job. Any model should allow young people to defer taking a place in day services for a year or two and support them to access mainstream training, employment or employment activation supports after leaving school. This will give everyone a chance to try to get and keep a job. Students going to university and colleges can defer places to work. This option should be available to all people with disabilities too.

2.4 Support before and at transition points

Supporting people with disabilities at key transitions points, such as when they are leaving school is critical. Currently, there is no career guidance in special schools for people with disabilities, making it very difficult for those who may wish to go on to 3rd level education or gain employment to know what to do or how to do it. Having a transitional programme for the two years leading up to school leaving, as well as having input from career guidance professionals would be a great support for people wishing to enter the mainstream route.

Students with disability should also be given the opportunity to participate in Transition Year. Through our advocacy work Inclusion Ireland is aware of many children not being allowed into mainstream transition year programmes, and many special schools do not even have the year as an option. Transition year is often where young people get their first opportunity to get work experience. Having a transitional programme that begins in Transition Year would make it easier to support the individual and highlight the areas in which they need supports and services to manage well.

2.5 Accessible web support

An additional support which could be added to Section 2 is an online accessible website which a person with a disability could access for information. A website could include accessible information on how to develop a CV, interview skills, and a list of companies and jobs that are disability friendly.

2.6 Awareness Campaign

Any programme or model that aims to get more people with disabilities into work needs to go hand in hand with an awareness campaign as recommended in the Strategy for Equality⁶. An awareness campaign will help everyone in Irish society understand the supports people with disabilities need to access work, but will also show what people with disabilities have to offer as employees. It will help to improve attitudes towards disability as noted by the National Disability Authority (NDA)⁷.

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

3.1 Need for coordinated policy for all levels of ability

It is welcome that Action 5.1 and the proposed model to address it, recognises the importance of including people with varying levels of support needs. The consultation document acknowledges that a coordinated policy should support those with varying degrees of capacity, including those that may need support on an ongoing basis.

3.2 Name specific supports needed

While it is welcomed that the model acknowledges the need to support people with varying degrees of education, training or work experience, it

⁶ A strategy for equality (1996). 'Summary of the report of the commission on the Status of people with Disabilities'.

⁷ Public attitudes to disability in Ireland – NDA, 2011.

is worth pointing out the model does not specifically identify any supports that would enable people with high support needs to access employment should they wish to do so. The supports identified seem to be based upon the Employability Model which is geared toward people who are 'job ready'. In a recent report by Indecon⁸ Employability were advised to be more selective in who can access the programme in order to improve their targets. Therefore, it is important that the CES model does not follow a similar pattern and is a model that will actively support those with high support needs to find employment.

3.3 Ongoing support

It will be important that resources are committed to enable ongoing support. For example, people with very high support needs may require the support of a personal assistant/support worker for their employment. Also, it will be important that those working in support roles are familiar with the Assisted Decision Making Act.

3.4 Transport

Transport is a very important issue for people with disabilities. Many people with high support needs will need to be supported to travel and may not be able to travel by themselves. As a result, the physical accessibility of buses and other forms of transport remains an issue for many with a disability. There is also a big difference between the availability of transport services between urban and rural areas with many living in rural areas having no transport at all. This was compounded when two grants (the Motorised Transport Grant and the Mobility Allowance) which supported those with disability to travel were closed in 2013. A replacement was promised but this grant has still not arrived. It is vital that those living in more rural areas are supported to travel when and where they like, with a grant being provided to these people as soon as possible.

⁸ Indecon (2016). *Evaluation of EmployAbility (Supported Employment) Service.*

It might be worth considering for the 5.1 action group to examine what has worked well in other countries and pilot it here to examine how effective it could be in supporting people with high support needs in the workplace.

3.5 Job Matching Database

A “job match” database could be set up consisting of employers who require a specific skill set and individuals who may have such a skill set. Employers often find it difficult to find an employee to work for just a few hours per week while people with high support needs similarly can often only work for a few hours a week. Having a resource such as this “job match” website could work well for both parties.

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

4.1 A Strong Implementation Plan for the CES led by the Department of Jobs, Enterprise and Innovation

A strong implementation plan that specifies who is responsible for actions and the timeframe in which they will be delivered along with a budget to implement them is necessary. This model is focused on employment and jobs so the inclusion of the Department of Health ahead of the Department of Jobs is a concern. These are employment issues, not health issues. The Department of Jobs, Enterprise and Innovation needs to be a key partner leading this model and working with other departments.

4.2 Effective Participation of People with Disabilities in Decision Making

It is vital that people with disabilities are included in decision making processes from the early stages. It is not just a matter of holding an open

consultation, but of really including people in all aspects of the policy planning, development and implementation processes.

Currently, participation in decision making for people with disabilities and their families is minimal at best. Working Group 3 of the Transforming Lives programme (set up to implement the recommendations of the Value for Money and Policy Review of Disability Services in Ireland), will shortly present its plan, entitled 'Ordinary Lives in Ordinary Places' – a plan for effective participation in decision making for people with disabilities and families.

The plan will help support the emergence of decision making fora for people with disabilities and families and will support them to participate in decision making at local, regional and national levels. The recommendations of Transforming Lives, Working Group 3 on supporting effective participation of people with disabilities in decision making should be adopted.

4.3 National Transition Programme for Young People

When implementing the model it would be good to accompany it with a national programme that engages with young people in relation to employment and career aspirations. For example, Walkinstown Association (WALK) currently run programmes called "WALK PEER" where they work with students in special schools from the age of 16 over the two years leading up to leaving school⁹. Some of these students often get a part-time job while in school. A programme such as this could lay out the different pathways and supports available for these young people as they leave school and are about to enter the workforce.

5. Describe the activities your organisation is engaged in regarding supporting people with disabilities in applying for, gaining and/or retaining jobs?

⁹ Velthuis (2015). *WALK PEER Programme, Evaluation*.

Inclusion Ireland provides information and signposting on employment options and supports to persons with disabilities and their families.

6. Describe the challenges/difficulties your organisation has experienced in supporting people with disabilities to access work?

6.1 Low expectations

One of the main obstacles we regularly encounter from talking to people with disabilities and their family members is the low expectations that people with disabilities and in particular intellectual disabilities face in Ireland today. A recent study from Dublin City University (DCU)¹⁰ indicated that, of all kinds of disabilities, employers expressed the view that they would find it most difficult to have an employee with an intellectual disability. This finding is supported by previous research from the National Disability Authority (NDA)¹¹ showing negative attitudes towards people with intellectual disabilities.

6.2 High Support Needs

Many people we have contact with have difficulty in getting work or even being considered for work because they have high support needs. Currently, job coach schemes are mainly for people who require no on-the-job support.

6.3 Lack of Career Guidance

The scant amount of career preparation, work experience and vocational training courses for people with disabilities is a recurring issue for people contacting our organisation. This also ties in with the absence of transitional planning in schools resulting in people directly accessing

¹⁰ Scanlon, G. & Kamp, A. (2016). Transitions from Education and Training to Employment for People with Disabilities. Dublin: NDA/DCU.

¹¹ Public attitudes to disability in Ireland – NDA, 2011.

disability services post-school, thereby not getting the opportunity to enter further education, training or employment.

6.4 Lack of Accessible information

People with intellectual disabilities often fall through the cracks because they do not have all the information they need to take the next step. This is also true of employment. There needs to be clear guides made of all the options available including any models and policies. They need to be available in a range of formats, plain English, easy to read and audio/video.

4. Conclusion

The success of the model will rely heavily on the coordination between the departments mentioned and on these links working well. As mentioned above the absence of the Department for Jobs, Enterprise and Innovation from the proposed model is a real concern. If people with disabilities are to be treated as equal persons and given opportunity to progress into meaningful employment in Irish society, it is important that the department responsible for jobs is leading the implementation of this model.

The model also lacks detail outlining how the supports identified will be resourced and if this will be sustainable. This is concerning as previous rights to support services has resulted in long waiting lists for services, as we have seen with the Assessment of Need. There must be a plan put in place to ensure accountability when it comes to the provision of these services and supports.

Finally, as outlined above there are issues that are not directly addressed by the model that organisations such as Inclusion Ireland encounter from people on a daily basis. The challenges people with disabilities face in

relation to transport and when leaving school are examples of this. If a model and a new approach to employment for people with disabilities is to be successful, issues such as these need to be addressed. The model must ensure that the voices of those with lived experience are included at all stages of the process, from the planning to the implementation. For people with disabilities to progress to mainstream employment and have work that is meaningful to them, any model must have at its centre the voice of the person, their individual need and an opportunity to have choice.

Appendices

Easy-to-read Submission

From people with lived experience



Voice of people with disabilities:

Where are the voices of people with disabilities in this process?

We see the Department of Health, Education and Social Welfare ... but where are the people with disability themselves?

They seem to be missing from the conversation.

Department of Jobs:

The department of jobs should be a part of this process.

It doesn't make sense that they are not part of this model and other departments are.

It is important that people with disabilities get equal pay and equal rights in work.



An Roinn Post, Fiontar agus Nuálaíochta
Department of Jobs, Enterprise and Innovation





Leaving school:

Schools need to do more for people with disabilities so they can go further with their education.



Schools should also help prepare people for work by having training and work experience programmes for students.



There should be career guidance for students with disabilities, so that they receive support and can plan for future employment.



People with disabilities should be supported and encouraged to go to college, so that they can learn the skills to get a job, just like everyone else.



People with disabilities were ignored and not supported years ago when they left school.

These people went to workshops and Day Services or stayed at home and never got the chance to go to work.



These people didn't have the opportunity at the time and should be supported to go back to college now.

They should be supported to go to work and not be forgotten about any longer.

Transport:

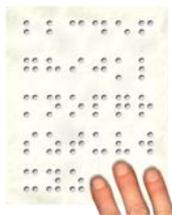


There needs to be proper transport provided for people with disabilities.

All busses and trains need to be accessible and provide for people with different needs.



People living in the country will find it very hard to get to work because there are not enough buses.



Information on transport needs to be accessible for people with different needs.



All buses and trains should take the bus pass, no exceptions.

Work:



There should be more job coaches for people with disabilities.

There are not enough at the moment.



If more people with disabilities got jobs, it would help make it 'normal' that people with disabilities can go out and work in the community.



People with disabilities should be supported to get work experience so that they can learn skills which could help them get a job.