



**INCLUSION IRELAND**

National Association for People with an Intellectual Disability

# **Pre-Budget Submission 2021**

**To the Department of  
Employment Affairs and Social  
Protection**

**July 2020**

**This document is written in font 12 Verdana in line with Inclusion  
Ireland plain English guidelines**

# Easy to Read Summary



The Department of Employment Affairs & Social Protection looks after employment supports, people's social welfare and how included they are in society.



## What is the Budget?

The Budget is the Government plan of how money will be spent for the coming year.

Inclusion Ireland is asking the Department to:



## Jobs

Put in place the supports that people need to get a job, keep a job and progress in their workplace.



## Cost of Disability

We are asking for a cost of disability payment for people with disabilities.

This is because people with disabilities can have less money and extra costs than people without a disability.



## Social Welfare Applications

Speed up applications and to make sure there are less refusals and appeals of applications.



## Public Sector Duty

Make sure that all decisions made for Budget 2021 promote equality and human rights and prevent discrimination

# About Inclusion Ireland

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

The vision of Inclusion Ireland is that of people with an intellectual disability living and participating in the community with equal rights.

Inclusion Ireland's work is underpinned by the values of dignity, inclusion, social justice, democracy and autonomy and we use the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) to guide our work.

## Introduction

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The current Covid-19 period has resulted in drastic changes to the lives of people across the country, and none more so than people with disabilities. It is important that during this challenging time the next Government, through the Budgetary process makes commitments to promote the rights of people with disabilities.

This must include eliminating discrimination, providing equality of opportunity, supporting people in maximising their potential, removing barriers which impact on access to services, education, work or healthcare, and targets improvements in welfare.

Inclusion Ireland believes that persons with disabilities should live self-determined lives and Budget 2021 provides an opportunity to create a more equal & just society and to develop pathways into a life in the community for people with a disability.

Inclusion Ireland has identified 4 areas of reform for Budget 2021 that fall within the remit of the Department of Employment Affairs and Social Protection. These are;

1. Employment
2. Cost of Disability
3. Social Protection Application reform
4. Public Sector Duty

# 1. Employment

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Article 27 of the UN Convention on the Rights of Persons with Disabilities affirms the right of persons with disabilities to work, on an equal basis with others.

People with disabilities experience multiple barriers to accessing employment, including financial barriers, negative societal attitudes, environmental barriers, the education system and lack of opportunity.

Just 36% of people with disabilities of working age and 17% of people with an intellectual disability are in employment<sup>1</sup> and this indicates a societal problem that needs urgent addressing using a range of strategies.

## **Employment supports**

Finding employment is only one part of the process, workplace supports are crucial to sustaining employment over the medium and long term.

The Comprehensive Employment Strategy for People with Disabilities (CES) notes that some people with disabilities may require a high level of support to obtain and retain employment. Recent research by Inclusion Ireland indicates that those with complex needs can obtain and keep a job, with the right supports.<sup>2</sup> A job coach can be one such support.

The Comprehensive Employment Strategy also sets out the value of individualised support from a job coach in supporting people with intellectual disabilities to find and keep jobs. A job coach, as described by the CES, works to prepare a person for employment, makes links with employers, and supports the person in the workplace in settling in and managing tasks.<sup>3</sup>

Job coaches are currently available through the Employability programme. However, from our advocacy work, Inclusion Ireland is aware of people with intellectual disabilities who have not been able to access Employability supports because they are not 'job ready'.

The Ability Programme funds projects that are aimed at supporting young people with disabilities who are not currently job ready through the provision of a range of person-centred supports.

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<sup>1</sup> CSO (2017). Census 2016

<sup>2</sup> Magee, C., Murphy, T., Turley, M., Feely, M., García Iriarte, E., McConkey, R. and Inclusion Ireland (2019). 19 Stories of Social Inclusion – Ireland: Stories of belonging, contributing and connecting.

<http://www.inclusionireland.ie/sites/default/files/attach/basic-page/1673/19-stories-socialinclusion-ireland.pdf>

<sup>3</sup> Government of Ireland (2015). Comprehensive Employment Strategy for People with Disabilities 2015-2024

With the Ability Programme due to cease in mid-2021, the projects should be evaluated to assess what has worked and what hasn't and those projects that have demonstrated positive outcomes for people with intellectual disabilities should be mainstreamed. It is important that the pilot projects are not an end in themselves but translate into real jobs for persons with intellectual disabilities, with good support when transitioning into the open labour market.

The progress of the Ability Programme and any potential future roll-out nationally of this programme would be supported by developing capacity within Intreo offices across the country. Such a step is supported by Action 2.2 of the Second Action Plan of the CES which outlines that capacity must be built to support people with disabilities to get into and maintain employment<sup>4</sup>.

According to recent figures in results broken down by broad age group, the CSO have said the new Covid-19 adjusted measure of unemployment is 52.8% for those aged 15 to 24 years and 24.8% for those aged 25 to 74 years.<sup>5</sup> As the effects of the Covid-19 period become clearer and the employment figures for disability become available, it is vital that people with intellectual disabilities are not left behind in any future drives to get people back into employment.

It is imperative that the Department does not allow the progress made in recent years with schemes such as the Ability Programme to be lost as a result of the Covid-19 period. People with disabilities must be given equal opportunities to regain and maintain employment in the coming months and years.

### **Raising Awareness**

The post-Covid period, and the upcoming Budget provide an opportunity for the Department to promote the inclusion of people with disabilities by investing in providing supports for people to gain employment. There is also an opportunity to raise awareness with employers of the benefits of employing people with disabilities

As part of the Mid-Term Review of the National Disability Inclusion Strategy (NDIS), Action 47 has been amended to state there will be implementation of the Second Action Plan of the CES. Within this action plan there are specific actions for the Department of Employment Affairs and Social Protection.

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<sup>4</sup> Comprehensive Employment Strategy Phase Two Action Plan 2019- 2021

<sup>5</sup> DEASP consultative committee communication as of 10.06.20

One such responsibility for the Department is to raise awareness among employers of the services and supports for the recruitment of people with disabilities through the planning and implementation of an employer information campaign<sup>6</sup>.

Raising awareness among employers will promote greater understanding within the employer community of the benefits of employing people with disabilities, promoting greater inclusion, and providing opportunities for people with disabilities to get into employment over the coming months and years.

### **Public sector employment**

The National Disability Inclusion Strategy includes a target to increase the public sector employment target of persons with disabilities from 3% to 6% by 2024. According to the Department, 5% of employees of the Department were persons with disabilities as of the end of 2018.<sup>7</sup>

While this is a positive step towards achieving the 6% target, it's important also to know what positions and grades they occupy so as to ascertain whether persons with intellectual disabilities are advancing in the workplace. The Department should progress work with the NDA on developing a way of reporting on this that respects the privacy of employees.

### **Reasonable accommodation**

The prioritisation of reasonable accommodation measures is necessary for persons with disabilities to get and keep jobs and is required under law.<sup>8</sup> The 'Reasonable Accommodation Fund' for People with Disabilities is designed to support persons with disabilities to access further training and employment opportunities. It is a demand led scheme and is not advertised widely and therefore demand has been almost non-existent.

A mere €1200 was spent on employee retention grants as part of the Fund in 2018, with zero expenditure on this in the previous two years.<sup>9</sup>

Inclusion Ireland understands that the Department is currently reviewing the Reasonable Accommodation Fund with a view to making it more effective. Following the review, the department should allocate funding to advertise the scheme in order to raise public, employer and employee awareness of the supports available.

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<sup>6</sup> Comprehensive Employment Strategy Phase Two Action Plan 2019- 2021

<sup>7</sup> DEASP consultative committee communication as of 31.12.18

<sup>8</sup> Employment Equality Acts & United Nations Convention on the Rights of Persons with Disabilities.

<sup>9</sup> <https://www.kildarestreet.com/wrans/?id=2019-01-15a.2953&s=%22reasonable+accommodation+fund%22#g2954.q>

## **What people said in our consultation about employment**

"The government need to invest in us and helps us become more skilled. We need more training and support"

" Our bosses in work need to know how to support us in work. We can do more and do a good job. They are afraid of letting us do more because we might make a mistake, but we are hard workers".

"Provide the same opportunities for people with a disability to return to work"

"All businesses should be encouraged to do training courses on dealing with people with disabilities and be encouraged to employ them"

## **Inclusion Ireland asks for Budget 2021**

1. Ring-fence funding to use the good practice and learning from evaluation of the "Ability Programme" and apply through INTREO offices
2. Fund the recruitment of job coaches for Intreo offices to provide 'on the job' support to enable those with high support needs to obtain and maintain employment
3. Work with the National Disability Authority to get accurate figures relating to public sector employment rates and the grades at which people are employed.
4. Invest in an advertising campaign for the 'Reasonable Accommodation Fund' to ensure that employers and people with disabilities are aware of the support available

## **2. Cost of disability**

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The UNCRPD, is clear on the need to eradicate poverty for persons with disabilities. Article 28, which is concerned with an adequate standard of living and social protection, requires States to "ensure access by persons with disabilities...to social protection programmes and poverty reduction programmes".

Research on minimum incomes indicates that current social welfare rates and minimum wages are not sufficient to provide a minimum essential standard of living for some sectors of the population. For example, a single adult of working age, living alone in an urban area and on social welfare supports would require an additional €42.39 and a person working and earning minimum wage would require an additional €129.36 to have

an adequate income. Their counterpart in a rural area would require an additional €81.07 or €32.31, respectively<sup>10</sup>.

In Ireland, people with disabilities are more than three times as likely to experience consistent poverty as the general population<sup>11</sup>. Persons with a disability experience much higher rates of deprivation which means they go without some of the basic necessities for living<sup>12</sup>.

While the MESL and SILC work provide valuable indications of income adequacy and poverty, neither take into account the extra costs experienced by people with disabilities. The ESRI has said that “policies that reduce poverty among the general population do not adequately address deprivation experienced by vulnerable groups” and targeted interventions are needed in households where there is a disabled person<sup>13</sup>.

People with intellectual disabilities are less likely to attend further education or be in employment. If they do have a job, they are likely to have lower earnings. Persons with disabilities also face additional costs such as specialist disability aids, home adaptations, higher energy costs or an increased need for taxis due to inadequate public transport and these costs are estimated as being between €207-€276 per week<sup>14</sup>.

Specific measures to address the cost of disability are necessary in order to reduce poverty among persons with disabilities and these measures must assess and address the extra costs that people face as well as increasing income.

The recent introduction of the Covid-19 Pandemic Unemployment Payment (PUP) and its set rate of €350 per week has given an indication of the income needed to have an adequate standard of living during this Covid-19 period. There appears to have been recognition from Government that without the introduction of such a payment, many individuals and families across the country would be at risk of sustained poverty both during and after the pandemic, due in part to the cost of living.

People with disabilities are a group that have been experiencing these extra barriers, and have been subject to poverty. Inclusion Ireland would hope that a recognition of the income necessary to avoid poverty, as indicated by the introduction of the PUP, will result in an urgent

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<sup>10</sup> [https://www.budgeting.ie/download/pdf/mesl\\_2019\\_update\\_report.pdf](https://www.budgeting.ie/download/pdf/mesl_2019_update_report.pdf)

<sup>11</sup> In 2017, 24% of people with disabilities experienced consistent poverty as compared with 6.7% of the general population.

<sup>12</sup> CSO (2019). SILC 2017.

<sup>13</sup> ESRI (2018). <https://www.esri.ie/news/irelands-deprivation-gap-is-large-and-increased-over-time>

<sup>14</sup> Cullinan, J., Gannon, B. and Lyons, S. (2008) Estimating the Economic Cost of Disability in Ireland. ESRI

addressing of the experiences of people with disabilities through the introduction of a Cost of Disability payment in the near future.

Inclusion Ireland notes that in the Department's 'Roadmap for Social Inclusion', there are targets outlined to reduce the percentage of people with disability at risk of poverty or social exclusion from a rate of 36.9% in 2018 to no more than 28.7% for the year 2025 and to no more than 22.7% by 2030<sup>15</sup>. However, more progress must be made and research into the costs of disability and the appropriate actions that need to be taken will be informed by this research.

A report published by Indecon/the NDA in 2004 found sufficient evidence for the introduction of a cost of disability payment. It is important that following the publication of the next report, that action is taken and that the recommendations from the report are implemented.

Inclusion Ireland welcomes the current ongoing research being carried out by Indecon through tender from the Department. This research is due to be published by the end of 2020, and it is hoped that it will help to determine what the drivers of extra costs are for persons with disabilities in an Irish context and how the extra costs can be addressed.

Indecon are in the process of surveying thousands of people in receipt of disability allowance for their experiences of the extra costs associated with disability. While such consultation with people is welcome, it is important that the experiences of people not in receipt of disability allowance are sought and taken into account in the development of any policy in relation to cost of disability.

Inclusion Ireland believes that a cost of disability payment should be available to all eligible persons with a disability, not just those in receipt of a social protection payment, in acknowledgment of the extra costs accrued by those who have a job.

An individually assessed, non-means tested benefit payment, similar in nature to the Personal Independence Payment in the UK should be introduced to support mobility and daily living.

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<sup>15</sup> Roadmap for Social Inclusion 2020 - 2025

### **What people said in our consultation about cost of disability**

"I have to pay for taxi's all the time because I find it hard to stand and wait for the bus and some bus stops don't have any seats".

"Yes the costs are higher, medical, heating, outings, car expenses as can't use public transport. People with disabilities should be getting more than 203 a week and also they shouldn't be means tested for their disability allowance or medical card."

"For a child with disability there are hidden costs for families particularly in terms of social outlets, diet requirements, premiums attached to one to one lessons (example swimming) as group activities might not work, transport as public transport might not work, clothes etc. "

"Childcare is a huge cost ...and then the more obvious direct costs around education, health and procuring therapies and tutors, transport to and from same to try recover ground lost by an unsupportive system. To improve these there should be a more supportive system, better ambition and expectations and accountability"

### **Inclusion Ireland asks for Budget 2021:**

1. Introduce an individually assessed, non-means tested cost of disability payment to offset the additional costs associated with having a disability.
2. Improve targets for reducing poverty as set out in the 'Roadmap for Social Inclusion'

## **3. Social Protection Application reform**

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### **Accessibility**

Inclusion Ireland welcomes that the Department have committed to reviewing the structure of long-term disability payments<sup>16</sup> to make them more accessible for people with disabilities. It has been highlighted that an issue with the Disability Allowance application form is that there is little guidance on how to complete the form for persons with intellectual disabilities, with many questions focused on physical or mental health needs.

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<sup>16</sup> Roadmap for Social Inclusion 2020 - 2025

Under Article 4 of the UNCRPD, States Parties are obliged to “provide accessible information to persons with disabilities” and all departments have committed to provide public sector information in easy to understand formats as part of the National Disability Inclusion Strategy.

A more accessible and relevant application process is needed with guidance for individuals with intellectual disabilities, similar to the UK Department of Work and Pensions Capability for Work questionnaire which describes the support needs people with intellectual disabilities may have, such as learning simple or complex tasks, starting or completing tasks, coping with small changes to your routine, getting about, coping with social engagement, making yourself understood, awareness of danger and so on<sup>17</sup>.

A welcome next step would be for the Department to consult with people with disabilities on the accessibility of processes and forms and to work towards easy to read materials for people with intellectual disabilities.

### **Waiting times**

Inclusion Ireland has, through its advocacy work, learned of what people describe as “almost an automatic rejection” of Social Protection payments. Applicants for Carers Allowance waited an average of 16 weeks for an initial decision and 24.3 weeks for the outcome of an appeal in 2018<sup>18</sup>.

For Disability Allowance (DA), there has been a reduction in the waiting period for awarding new claims from last year where it took on average 17 weeks waiting time, compared to the current average waiting period of 6 weeks<sup>19</sup>. Disability Allowance also had the highest number of appeals of any scheme at 6,242<sup>20</sup> in 2019 with 58% of appeals allowed or partially allowed.

Coupled with the high rate of appeals, the waiting time means that people who require social protection payments are placed in a potentially vulnerable position financially. This waiting time is still unsatisfactory for the many people with disabilities across the country, in particular those who are at risk of or experiencing poverty. These figures represent, not an ineligibility of applicants, but an inaccessible system.

The Department’s statement of strategy includes a commitment to ensure speedy access to accurate decisions, payments and reviews for all schemes and services, which are clearly communicated to the client.

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<sup>17</sup> UK Dept of Work and Pensions, Capability for work questionnaire – Mental, cognitive and intellectual capabilities

<sup>18</sup> Minister Regina Doherty. Tuesday, 26 March 2019. Response to PQ [13221/19]

<sup>19</sup> DEASP consultative committee communication as of 10.06.20

<sup>20</sup> Social Welfare Appeals Office Annual Report (2019)

These waiting times must be continued to be addressed in the next Budget.

### **What people said in our consultation about social protection applications**

“If some people are waiting for social welfare payments, they should not have to wait too long”

“I didn’t know there were any other payments that I could get. They need to do more information meetings on this because a lot of people like me wouldn’t know”

“They should have easy to read information for anything to do with social protection applications”

“Try to reduce wait times”

### **Inclusion Ireland asks for Budget 2021:**

1. Allocate resources to consult with people with disabilities on their experiences of social protection payment applications and to road-test any new forms or processes.
2. Develop easy to read guides to filling in application forms.
3. Allocate additional Deciding and Appeals Officers within the Department to reduce waiting times for applications and appeals

## **4. Public Sector Duty**

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In its most recent strategy statement, the Department notes its obligations under Section 42 of the Irish Human Rights and Equality Commission Act, 2014. The development of a new departmental strategy in the coming months provides the department with an opportunity to further develop and progress its commitments under the Duty.

Inclusion Ireland would encourage the Department to ensure that all decisions made for Budget 2021 are in line with this duty by being proactive in promoting equality; ensuring human rights are realised and eliminating discrimination.

Of importance in fulfilling its public sector duty, the Department of Social Protection must do more to become accessible and inclusive.

## **Inclusion Ireland asks for Budget 2021**

1. Progress and build on previous PSD commitments in the new department's strategy statement to be developed
2. Carry out audit of the Intreo service to examine how the service might be improved for people with disabilities

## **Conclusion**

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The Department of Social Protection is a key player in the promotion of equality and social inclusion for persons with disabilities, however there are clear areas in which the Department can improve on its support for people with disabilities.

The Department must improve the accessibility of its social protection payment procedures, as well as the rate of appeals. It is unacceptable that individuals who are reliant on social protection payments should wait 4 months for an appeal and it is an indictment of the process that almost two thirds of those appeals are successful.

Being in employment, and having career progression remain key indicators for people moving out of poverty. Removing barriers and facilitating supports for people with disabilities must be a priority for the department, so that they can be more included in their communities,

The cost of disability can make taking up employment prohibitive and must be addressed for all people with disabilities be they in the labour force or not and measures must be taken to address the cost.

There have been significant and welcome progress made in the past number of years; such as the Make Work Pay recommendations, the roll-out of the Ability Programme, and others. Progress made to date must not be lost as a result of Covid-19.

Inclusion Ireland receives support from the Scheme to Support National Organisations (SSNO) for this work. The SSNO is government funding administered by Pobal.



Rialtas na hÉireann  
Government of Ireland

**For further information, contact;  
Robert Murtagh, Advocacy (Policy) Coordinator, Inclusion Ireland.**

**01 855 98 91 / [robert@inclusionireland.ie](mailto:robert@inclusionireland.ie)**

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