



Submission on a Comprehensive Employment Strategy for People with a Disability

Recommendations:

- Publish an implementation plan to accompany the Comprehensive Employment Strategy
- Include measures to address the cost of disability as a barrier to employment
- Include measures to remove employment support services from health and social care providers
- Make mainstream labour activation programme available to people in receipt of disability allowance
- Include measures to make employment support services more accessible to people with an intellectual disability
- Include actions to promote clear progression from segregated, adult day services to open, community-based employment
- Include measures to address promote the capabilities of people with a disability
- Include actions to raise awareness among employers of the supports available to them
- Introduce measures to support for people with a disability to make the transition from training to employment

1. By the Numbers

It is essential that the Strategy addresses the extremely low numbers of people with an intellectual disability in employment.

Of the 104,609 people with a disability at work, only 5,200 are people with an intellectual disability (5%). Only 603 young people with an intellectual disability (ages 20-24) are at work.

The statistics from the National Intellectual Disability Database (NIID) also records the number of people with an intellectual disability *in employment*. People attending day services are registered on the NIDD. The number of people registered on the NIDD that are in open employment is remarkably low (Table 2.)

Table 1. No. of people with an intellectual disability at work (CSO)¹

Age Group	No. of people with ID	No. at work
20 - 24 years	4,149	603
25 - 34 years	6,711	1,501
35 - 44 years	6,822	1,375
45 - 54 years	6,841	1,119
55 - 64 years	5,737	621
Total	30,260	5,219

Table 2. No. of people with ID in open employment (NIID)²

Number of people with ID attending a day service ³	17,924
Number of these in open employment	165
Participation rate of people with ID in open employment	0.92%

2. Mainstream Labour Activation

Inclusion Ireland is concerned that the exclusion of people in receipt of disability allowance from mainstream labour activation programmes may give the impression that people with a disability are unwilling or unable to work. The Strategy must include measures to address the exclusion of people in receipt of disability from these programmes.

The following are some of programmes that are open to people in receipt of disability allowance:

- **Momentum** – the programme providing free education and training projects to jobseekers;
- **Tús** – the community work place initiative;
- **Job Bridge** - Until recently, people in receipt of disability allowance were excluded from participating on the programme;

¹ CSO, Census of Population 2011

² HRB, National Intellectual Disability Database Annual Report 2011

³ Aged 18+ and registered on the NIDD

- **Gateway** – the local authority labour activation scheme;
- **Community Employment** – Only 1,041 (4.5%) of the 22,794 people on CE schemes in 2011 were in receipt of disability allowance.⁴

3. Employment Supports

Inclusion Ireland wants people with an intellectual disability to be actively encouraged and supported to engage with employment support services. To this end, employment support services must be open and accessible to people with an intellectual disability. Inclusion Ireland is particularly concerned at the low referral rates to employment support services. For example, only 6% of referrals to EmployAbility in 2011 came from adult day services.⁵ Less than 1% of people attending adult day services are in open employment.

Another issue is that people with an intellectual disability are often considered by employment support services as not 'job ready'. Inclusion Ireland is concerned with how this concept it is being applied to people with an intellectual disability.

New Directions identifies a clear role for providers of adult day services to support adults with an intellectual disability to access mainstream employment support services. To this end, the Strategy needs to include actions to facilitate a much more co-ordinated approach between adult day services and employment support services.

The Strategy may consider targets for employment support services in respect of people attending adult day services. The capacity of employment support agencies, like EmployAbility, may need to be increased.

People with a disability should be accessing employment supports from mainstream employment services. Responsibility for employment programmes and supports provided by the HSE should be transferred to the Department of Social Protection, Department of Jobs and Innovation.

Employment support programmes in the UK have some in for some strong criticism from people with a disability and their advocates. *Taking Control of Employment Support*, published by Disability Rights UK (October 2013), found that 'employment support programmes, including the Work Programme and Work Choice, are largely failing to help disabled people find and keep jobs, - especially those who face the most significant labour market disadvantage'.⁶ A survey conducted as part of the research found that that an overwhelming majority of people with a disability wanted control over decisions on how money on their employment support is spent. The report calls for personalised employment supports.

The Strategy should learn from what is happening in the UK and consider how personalised and individualised employment supports can be provided to people with a disability in Ireland.

⁴ Of the 22,794 people on CE schemes as at the end of August 2013, only 1,041 were in receipt of Disability Allowance immediately prior to commencing the CE scheme. Figures obtained from the Department of Social protection, September, 2013

⁵ Figures obtained from the Department of Social Protection, September 2013

⁶ Neil Crowther and Liz Sayce, 'Taking Control of Employment Support', Disability Rights UK, October 2013

In addition, the Strategy must include measures to improve awareness amongst people with a disability, parents, family members, day service providers, special and mainstream schools and employers of the programmes of support available to them.

4. End Segregation

The centrality of sheltered workshops as a type of day service for adults with a disability has reduced significantly in recent years. The most recent data indicates that 2,367 people with a disability are currently engaged in some form of sheltered work. The majority of sheltered work takes places in commercial workshops designated for that purpose. The most HSE figures are from 2010 and show that 1,521 adults with a disability continue to work in commercial, sheltered workshops.⁷

The need for reform in this area has been well documented:

*The absence of legislation in this area means that participants in these programmes have the sole status of service users, and they lack the range of legal protections affording to employees, e.g. rights to minimum wage, pension entitlement, security of employment, rights to collective bargaining.*⁸

There is also the situation of the 400 people with an intellectual disability that are engaged in External Work (Like-Work) placements. These arrangements allow for people with a disability to engage in work in an open employment setting without payment. The employer can make a discretionary payment, either directly to the individual or to the service provider.

The Strategy must include immediate actions to end the practice of sheltered workshops and work-like placements where the person with a disability only receive discretionary payments and do not enjoy employment rights.

The National Intellectual Disability Database continues to identify adults with an intellectual disability as in need of sheltered work. The NIDD service codes were devised by the HRB and clinicians back in 1995 and need to be revised.

The Strategy should include actions to address how data on unmet need of people with an intellectual disability in relation to employment is collected and collated.

5. Cost of Disability

The Strategy needs to address the direct and indirect costs associated with having a disability. Particularly as they relate to employment. The direct costs of having a disability are substantial and can be estimated.

The Commission on the Status of People with Disabilities first recommended the introduction of a variable, non-taxable cost of disability payment. A recent study has found that addressing the extra economic costs of disability would be 'a logical step

⁷ New Directions, HSE, 2012

⁸ Sheltered to Open Employment for People with Disabilities in Ireland, NDA, 2009

towards alleviating elements of social exclusion for people with disability'.⁹ The NDA has, on a number of occasions, advocated for the introduction of a cost of disability payment.¹⁰

The loss of essential secondary benefits is related to the cost of disability discussion. The loss of medical card and travel pass are clear impediments to people in receipt of disability allowance taking up employment.

6. Attitudes

Inclusion Ireland is also concerned with the negative attitudes towards people with a disability. Respondents to the NDA's 2011 national survey of public attitudes to disability in Ireland found an increase in the number of people reporting to be less comfortable working with people with different disabilities.¹¹

The Strategy should include measures to highlight the valuable role people with a disability play in society and their right to participate in employment on the same basis as people without a disability.

7. Meaningful Involvement

A key strategic pillar of the outline for an employment strategy for people with a disability, published by the NDA in 2006, was the 'development of a systematic process of engagement with people with disabilities in order to assist them articulate and realise their employment aspirations.'

Inclusion Ireland endorses this strategic priority and asks for its inclusion in the proposed Strategy.

Information campaigns specifically targeting people with an intellectual disability are necessary to ensure they are aware of their right to be in employment and aware of the supports available to them. These measures should be included in the Strategy.



10 October 2013

⁹ John Cullinan, et al., 2011, 'Estimating the extra cost of living for people with disabilities', *Health Economics*, 20: pp. 582–599

¹⁰ Speech by Angela Kerins, NDA, April 2004, Dublin and in A Strategy for Engagement, NDA, 2006).

¹¹ National Survey of Public Attitudes to Disability in Ireland 2011, NDA 2012