

NDA Submission on the Roadmap for Social Inclusion: Mid-Term Review

October 2022

Introduction

The National Disability Authority (NDA) is an independent statutory body that provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities.

The NDA acknowledge that addressing social inclusion requires a whole of government approach. With regard to the lived experience of disabled people, the cross cutting nature of poverty and social exclusion requires effort across a number of relevant government departments. However, ensuring people do not live in poverty involves an adequate social welfare response. In addition, as employment is an established route out of poverty, further investment and more tailored responses are required.

We outline our responses to the questions below and are available for follow up on any of the issues raised.

Question 1: What progress do you feel has been made in reducing poverty and social exclusion since publication of the *Roadmap for Social Inclusion 2020 – 2025* in January 2020?

Over the last few years the NDA were involved in a number of research projects that highlight the higher poverty, employment and related measures for people with disabilities.

We funded the ESRI to produce a report – **Identification of Skills Gaps among Persons with Disabilities and their Employment Prospects.**¹ Using SILC data the study found that the proportion of people with disabilities at work decreased slightly between 2004 (33%) and 2019 (31%) (it was 26% in 2011). When looking at various poverty measures the proportion of people with

¹ [Identification Of Skills Gaps Among Persons With Disabilities And Their Employment Prospects | ESRI](#)

a disability who are income poor and in consistent poverty decreased between 2004 and 2019 (although there was an increase between 2011 and 2019). However, the proportion of disabled people who are classed as deprived increased from 27% in 2004 to 36% in 2011 and to 37% in 2019. These trends are consistent with those for people with no disability although the gap between people with and without a disability is very stark in terms of both employment and poverty measures. For example, in 2019, 14% of the non-disabled population were deprived compared to 37% in the disabled population (see Figure 3.11 in above ESRI report).

The ESRI research also used econometric techniques to examine the impact of having a disability on being an employee. It found that it has a negative effect and reduced an individual's probability of being an employee in 2016 by 19 percentage points compared to those with no disability.

Other analysis done by the NDA found that among young people aged 16-24 years who are 'Not in Education, Employment or Training' (NEETs) over twice as many were young people with a disability (23%) compared to those without a disability (10%).² These figures highlight the importance of supporting young people early with information and guidance in relation to careers and further education and training to avoid falling into a poverty trap.

NDA advised the CSO in the development of their paper on **Income, Employment and Welfare Analysis of People with a Disability 2019**.³ The study was unique in that it linked data from a number of different sources to Census 2016 disability data. This study found that for those in employment the median earned income of people with a disability aged 15-65 (i.e. working age) was €20,212. This figure is significantly lower than for the population as a whole.

The studies outlined above used data from years prior to the development of this roadmap. However, with COVID-19 and the current cost of living crisis it is doubtful that there has been any major improvement in these figures. Census 2022 data will be key in examining whether there have been any improvements and setting new targets.

Recently the NDA conducted its own survey on Wellbeing and Social Inclusion with a focus on disabled people. The report is due to be published in late 2022 but the data indicate higher levels of difficulties, poorer outcomes and lower

² [NDA Factsheet 3: NEET | The National Disability Authority](#)

³ [Income, Employment and Welfare Analysis of People with a Disability 2019 - CSO - Central Statistics Office](#)

levels of wellbeing across a wide range of measures for respondents with a disability to a great extent compared to those with a disability to some but not great extent or those with no disability. The proportion of respondents that indicated a disability that had wellbeing scores indicative of mild and clinical depression is of concern. Survey data was used to explore the impact of the intersection of marginal identities on wellbeing. The analysis of the intersection of identity markers such as disability, being a member of the LGBTQ+ community, facing a constant struggle to pay bills and being single reveals that intersectionality can have a negative impact on wellbeing.

Question 2: In your experience, what has worked well in reducing the number of people in Ireland experiencing poverty and social exclusion?

The forthcoming increase in the minimum target for the employment of disabled people in the public service from 3% to 6% is to be welcomed. In order to achieve this, a concerted effort will be needed across the public sector to reach this new minimum. This will include scaling up some of the existing successful initiatives such as the Oireachtas Work and Learning (OWL) scheme⁴ and the Willing Able and Mentoring (WAM) scheme.⁵

There was a largely positive review of the Ability programme published earlier this year.⁶ The Ability Programme supports people with disabilities between the ages of 15 to 29 to prepare for an access education, training or employment based on their interest skills and goals. The learning obtained through this programme must not be lost as this programme ends, for example, the early engagement process underway in Intreo should be informed by this learning.

The HSE's school leaver's assessment process piloted allowing school leavers who were offered a place in a day centre to defer that place so that they could experience further training or employment in a mainstream setting. Due to the success of the pilot phase this is now a permanent feature and many young people have taken this opportunity and thus potentially becoming more independent.

⁴ [OWL programme – Houses of the Oireachtas](#)

⁵ [WAM - AHEAD](#)

⁶ [Ability-Programme-Evaluation-Report-2018-2021-Final.pdf \(pobal.ie\)](#)

Evidence shows that tailored approaches to supporting disabled people into employment are necessary. The EmployAbility model whereby a job coach assists both the individual and the employer is one such model. This tailored approach has also proven successful in the Individual Placement and Support model in the area of mental health. The new National Access Plan in Higher Education has adopted a similar tailoring in announcing funding to increase opportunities for people with an intellectual disability and or autism to attend third level institutions through the Path 4 funding.⁷ By using a universal design approach student can access campuses and learning and therefore improve their employment opportunities.

Question 3: And in your experience, what has not worked so well or is challenging in reducing the number of people in Ireland experiencing poverty and social exclusion?

The Indecon Cost of Disability in Ireland Research Report⁸ examined the extra spending needs that people with a disability face in their day-to-day lives that others in society do not face. The report found that there can be significant costs of disability across a number of areas including additional living expenses; mobility transport and communications; care and assistance services; equipment, aids and appliances; and medicines. These findings are in line with previous research conducted by the NDA and from what we have heard from disabled people during our various consultations and interactions.

The costs for individuals vary depending on a number of factors and this means that a one size fits all approach does not work. The recent budget announcement of a one off €500 payment and a weekly increase for those in receipt of disability related allowances while welcome must be accompanied by measures that are more targeted to those that face the biggest expenses.

There are regular reviews of supports to persons with disability by the Department of Social Welfare such as revising the earnings disregard for disability payments at budget time. However, often entitlements are not well communicated and there is often a misperception among people with disabilities that they would be worse off in employment due to losing their medical card or travel card which may not be the case. There is a need for better communication in this space.

⁷ [Programme for Access to Higher Education | Policy | Higher Education Authority \(hea.ie\)](#)

⁸ [indecon_report_on_cost_of_disability_in_ireland.pdf](#)

As referenced above the route out of poverty and social exclusion can often be employment. The DSP review of the Reasonable Accommodation Fund is ongoing and while the review findings are yet to be published, it is clear that some initial conclusions can be drawn. For example, the NDA submission made the point that the scheme is bureaucratic and needs to be reformed to better meet the needs of those who could benefit from the fund. One key change that would align the fund with the United Nations Convention on the Rights of People with Disabilities is to ensure that the fund goes to the disabled person and not the employer.

There is room for improvement for supporting employment. The supports available to people with disabilities who are or wish to be self-employed or entrepreneurs is underdeveloped and there are some system and process issues that present barriers. For example, people can find it difficult to predict their income when setting up a small business to allow their disability benefits to be adjusted. The systems in place to support people with more severe disabilities to find work is also underdeveloped with very limited access to job coaches who can provide that intensive support required, particularly at the beginning of a placement. People wishing to returning to work after acquiring a disability find they are often unsupported either in determining what reskilling or accommodations they require and in negotiating with their employer. The NDA has previously provided guidance around developing a comprehensive vocational rehabilitation system in Ireland.⁹

As shown in the NDA funded OECD report **Disability, Work and Inclusion in Ireland: Engaging and Supporting Employers**¹⁰, many employers have a misconceptions about employing people with disabilities that can be a barrier to their employment. The OECD report stated that:

Employer engagement and support for employers are critically important for the improvement of the labour market situation for persons with disabilities in Ireland. Effective strategies for employer engagement are critical, to overcome disability-related misperceptions and discrimination and to raise awareness about available support programmes and subsidies. Yet, Ireland has an underdeveloped employer engagement structure with respect to

⁹ [Vocational Rehabilitation Policy Paper & Consultation | The National Disability Authority \(nda.ie\)](#)

¹⁰ [Disability, Work and Inclusion in Ireland: Engaging and supporting employers | The National Disability Authority \(nda.ie\)](#)

information and support for the employment of persons with disabilities.

There are opportunities to strengthen the employer engagement activities through the provision of more support, guidance and information.

Question 4: What would you like to see prioritised in terms of moving people out of poverty and social exclusion, up to the end of the *Roadmap for Social Inclusion 2020 – 2025* in 2025?

Through the National Disability Inclusion Strategy Departments have been asked to report on the steps they are taking to address the Cost of Disability report findings. While this is welcome there is no coherent approach to this and it might be possible to develop some specific actions and targets in relation to this in the revised Roadmap, particularly in relation to targeted as opposed to blanket measures as mentioned earlier. While the Cost of Disability Report requires a whole of government response we advise that DSP play a leadership role in ensuring that the Cost of Disability recommendations relevant to the welfare system and access to work are implemented. Some reforms and improvements with the social protection system that were may in response to the Make Work Pay¹¹ recommendations are welcome but there is further to do particularly around supported employment, supporting entrepreneurship, supporting return to work following acquiring a disability, and incentivising employment as a route out of poverty.

Question 5: If there are any specific aims, ambitions, commitments or targets in the *Roadmap for Social Inclusion 2020 – 2025* that you would like to comment on, please provide details. This can include identifying gaps in what is included in the Roadmap, or any other comments you may have.

In this section we focus on the Employment Target for persons with disabilities.

¹¹ [gov.ie](http://www.gov.ie) - [Make Work Pay Report \(www.gov.ie\)](http://www.gov.ie)

The RSI sets out the aim of increasing the employment rate of people with a disability over two inter-censal periods. This aim is described as increasing “the employment rate of people with a disability from the current level of 22.3% (Census 2016) to 25% by Census 2021 and 33% by Census 2026.”¹²

In order to ensure coherence of national statistics, and the comparability of official national statistics with those developed across the EU within the European Statistical System (ESS), standardised concepts, definitions, classifications and other types of standards are consistently applied by the Central Statistics Office (CSO), Ireland’s national statistical authority.¹³ The definition of the employment rate is often provided by the CSO in the annexes to statistical publications, and is provided below:

“The employment rate is the number of employed aged 15 to 64 expressed as a percentage of the total population aged 15 to 64”¹⁴

This definition, which calculates the employment rate with reference to the standardised definition of the working age population (15-64), represents an international standardised definition which is used by national statistical agencies across Europe, Eurostat¹⁵, the UN¹⁶, the OECD¹⁷ and the World Bank¹⁸.

The Irish Census of the population 2016 records the total number of persons with disabilities in the 15-64 age range as 359,657. A total of 121,968 of these persons with disabilities described their Principal Economic Status as being at work.¹⁹ This amounts to an employment rate of persons with disabilities of 33.9%, which is substantially higher than the employment rate of persons with disabilities of 22.3% reported in the RSI for the same Census year. Moreover, the

¹² See: Government of Ireland (2020) ‘Roadmap for Social Inclusion’ pgs. 18, 56. Available: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/46557/bf7011904ede4562b925f98b15c4f1b5.pdf#page=1>

¹³ See: CSO (2021) ‘Handbook of Quality Standards and Guidelines’ https://www.cso.ie/en/media/csoie/methods/A_Handbook_of_Quality_Standards_and_Guidelines_2021.pdf

¹⁴ See: <https://www.cso.ie/en/releasesandpublications/ep/p-tah/tenureandhouseholdsinireland2016-2019/definitionsandnotes/#:~:text=The%20Employment%20Rate%20is%20the,Rate%20as%20of%20Q2%202015.>

See Also: <https://www.cso.ie/en/methods/surveybackgroundnotes/labourforcesurvey/>

¹⁵ See: <https://ec.europa.eu/eurostat/databrowser/view/tipslm15/default/table?lang=en>
https://ec.europa.eu/eurostat/databrowser/view/lfsa_epgan6/default/table?lang=en
<https://ec.europa.eu/eurostat/statistics-explained/index.php?oldid=411116>

¹⁶ See: https://www.un.org/esa/sustdev/natinfo/indicators/methodology_sheets/demographics/dependency_ratio.pdf

¹⁷ See: <https://data.oecd.org/pop/working-age-population.htm>

¹⁸ See: <https://databank.worldbank.org/metadataglossary/gender-statistics/series/SP.POP.DPND>

¹⁹ See CSO ‘E9009 - Population Aged 15 Years and Over 2011 to 2016’

Available: <https://data.cso.ie/table/E9009>

employment rate of persons with disabilities of 33.9% recorded in Census 2016 actually exceeds the rate of 33% described as the target to be reached by Census 2026 in the RSI.

As outlined in Table 1, the Census 2016 employment rate of persons with disabilities of 22.3% reported in the RSI stems from the inclusion of individuals in the '65 years and over' age range category in the calculation of the employment rate.

Table 1: Census 2016 Employment Rate of Persons with a Disability by Working Age Population (15-64) and Persons Aged 15+

15-64	Total Persons With Disabilities	359,657
	Total Persons With Disabilities at Work	121,968
	Employment Rate of Persons with Disabilities	33.9%
15+ (incl. 65+)	Total Persons With Disabilities	584,045
	Total Persons With Disabilities at Work	130,067
	Employment Rate of Persons with Disabilities	22.3%

The significant impact of the inclusion of individuals in the '65 years and over' age group on the level of employment of persons with disability stems from the significantly higher prevalence of disability among individuals aged 65+ (See Figure 1), as well as the very low levels of employment among persons aged 65+ due to retirement. The higher prevalence of disability in older persons means that a far larger share (34.9%) of persons with disabilities were in the 65+ age range during the 2016 Census, while a far smaller share (13.4%) of the total population²⁰ were aged 65+ (Figure 2).

²⁰ 'Total population' here implies the population as a whole, i.e. inclusive of both persons with disabilities and persons without disabilities.

Figure 1: Prevalence of Persons with Disabilities by Age Group and Disability Type

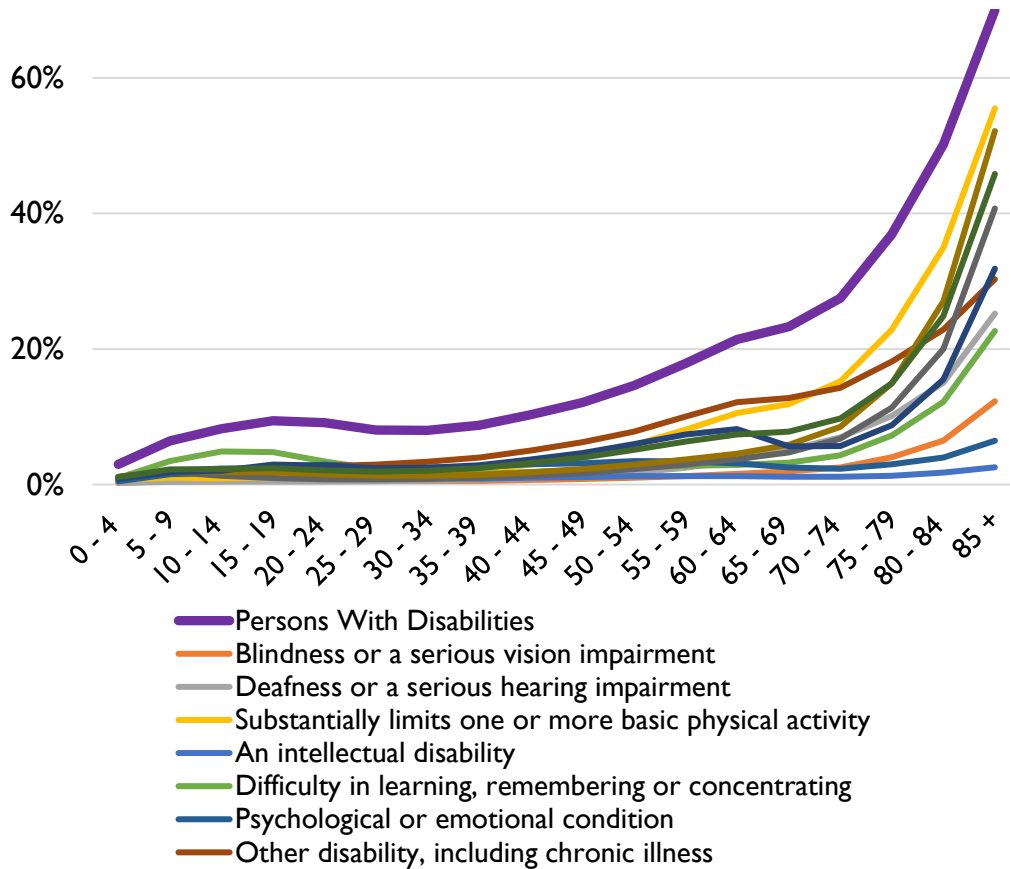
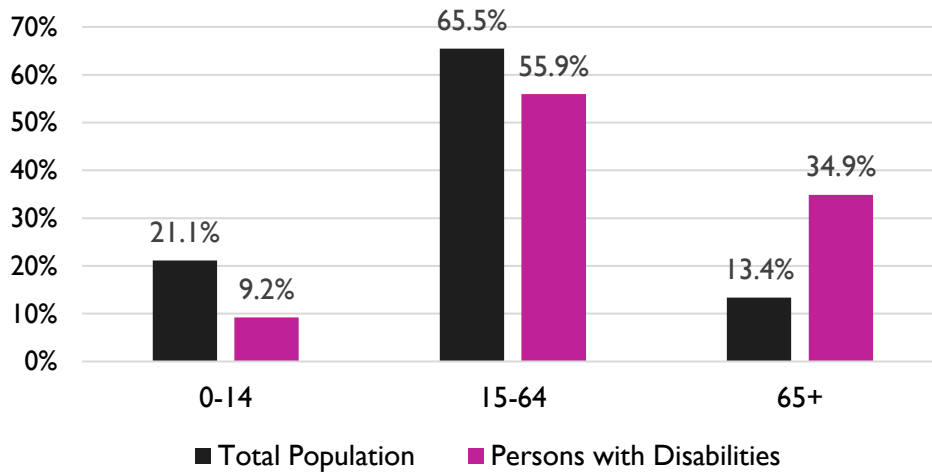


Figure 2: Total Population and Persons with Disabilities by Working Age and Other Age Groups



The capture of a large group of individuals that are of retirement age in the calculation of the employment level of persons with disabilities within the RSI makes the achievement of the long-term targets set therein largely unachievable. If progress in increasing the employment level of persons with disabilities is continually tracked while including individuals that are aged 65 years and over for Census 2022 and Census 2026, it will remain the case that a large share of those persons with disabilities included will be of retirement age. Such an outcome would not be appropriate to the task, since the purpose of the employment rate target should be to establish an ambitious target to increase levels of employment for individuals of working age and measure progress in meeting this target. One means to resolve this issue would be to establish a revised set of targets based upon the employment rate of persons with disabilities of working age as outlined in Table 2.

Table 2: Revised Targets

	Census 2016	Census 2022	Census 2027
Employment Rate of Persons with Disabilities (15-64)	33.9%	Request data	Set revised target

Before setting a revised target the NDA advises requesting a headline figure of the employment rate of persons with disabilities aged 15-64 for the 2022 census. Our understanding is that this is not due to be released until Q2 2023 but we feel it would be valuable to request this figure sooner in order to set a meaningful revised target. It should also be noted that Census 2026 is being postponed to 2027 and it is likely therefore that this target will be carried into the next roadmap. Consideration could also be given to introducing a target around self-employment or at least being able to disaggregate the overall target by whether someone is employed or self-employed.

It should also be noted that there is an employment target associated with the Comprehensive Strategy for Persons with Disabilities (2015-2024) and while this target uses 20-65 years rather than 15-64 years, we would advise that there is some coherence between the targets.

The NDA are happy to engage further on this issue.