



Disability Federation of Ireland

Submission on Disability Issues

**To inform examination of Ireland's Fourth Report
under the International Covenant on Economic,
Social and Cultural Rights**

**For consideration at the 75th Session of the
Committee on Economic, Social and Cultural
Rights**

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Introduction

Disability Federation of Ireland (DFI) is a federation of member organisations working with people with disabilities to implement the UN CRPD and ensure their equal participation in society. Our vision is an Ireland where people with disabilities are participating fully in all aspects of society. Over 120 disability organisations across Ireland are affiliates or associates of DFI.

DFI welcomes the opportunity to make a follow-up submission, updating our 2022 submission, to inform the ICESCR Committee's examination of Ireland at the 75th Session. In the interest of focus and brevity, our submission focuses on some key areas, although many other issues are worthy of attention. We also endorse and echo the concerns raised by other disability and civil society organisations in their submissions.

Employment (Article 2, 6, 7)

Ireland continues to lag significantly behind on the employment of people with disabilities, despite describing itself as being at 'full employment'. A recent European Disability Forum report, "[The Right to Work: The employment situation of persons with disabilities in Europe](#)" shows that Ireland ranks the lowest in the EU for both its disability employment rates, and for its disability employment gap. The disability employment rate in Ireland, at 32.6%, is almost 20% below the EU average of 51.3%, which in turn is significantly lower than the 75.6% employment rate of those without disabilities across the EU.¹

Ireland's disability employment gap, ie the gap between the employment rates of people with and without disabilities, is also the worst in the EU. The average disability employment gap in the EU is 24.4%, but in Ireland this gap is much higher, at 38.6%. The disability employment gap for women is even higher again, at 45%.²

It is regrettable that Ireland's reply to paragraph 10 in the 'List of issues' on the Right to Work (paragraphs 53-59), and in the Annex, provides only average data on employment levels, and does not provide the relevant information "disaggregated by factors related to the most disadvantaged and marginalized groups" as requested by the Committee. Nor does it provide a meaningful update on "legislative and policy measures taken in order to increase the employment rate, especially among the groups particularly affected by unemployment and underemployment, such as

¹ https://www.edf-feph.org/content/uploads/2023/05/hr7_2023_press-accessible.pdf, p.30.

² https://www.edf-feph.org/content/uploads/2023/05/hr7_2023_press-accessible.pdf, p. 32, 35.

[...] persons with disabilities". While some employment projects have been undertaken in recent years, and some important policy reviews, no significant progress has been made to redress the low employment levels of disabled people. The third Action Plan for the *Comprehensive Employment Strategy (CES) for People with Disabilities* was originally due for publication in 2022, but is still awaited.

The Department of Social Protection has recently published a *Green Paper on Disability Reform* which aims to reform disability payments in Ireland, and which also addresses the issue of employment. The Green Paper proposes to divide recipients of disability-related social protection payments into three 'tiers' according to their 'capacity to work'. It proposes that those assessed as tier 3 ('moderate to high capacity to work') would be required to engage with employment services. This would be a significant change to Ireland's approach to social protection for people with disabilities - thus far engagement with employment supports has been optional. This proposal has caused grave worry amongst many disabled people in Ireland, who are concerned that they may be assessed as tier 3, and compelled to take up work despite ongoing health issues. This is also concerning given that Green Paper does not acknowledge or engage with the many structural barriers that prevent disabled people from securing and retaining employment.

Suggested Inquiries

- What measures, actions, strategies and timelines is Ireland adopting to improve its very low employment rates for disabled people, and the very high disability employment gap?
- What update can Ireland provide on the third Action Plan of the Comprehensive Employment Strategy for Disabled People 2022-2024?
- How is Ireland addressing the many structural barriers that prevent disabled people from securing and retaining employment?
- How is Ireland addressing the extra Cost of Disability issues (see section below for more on this) that can make it difficult and risky for disabled people to take up employment?

Poverty and the Extra Cost of Disability (Article 2, 9, 11)

Poverty

The most recent 2022 poverty data from Ireland's Central Statistics Office³ illustrates the very high levels of disability poverty. In 2022 people unable to work due to long-standing health problem (disability) had:

³ <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2022/poverty/>

- The highest consistent poverty rate of all economic groupings, at 19.7%. This is almost four times the national average (5.3%).
- The second highest at risk of poverty rate at 35.2%, compared to the national average of 13.1%.
- A much higher risk of living in deprivation, with 44.3% living in deprivation, compared to the national average of 17.7%.

The data also show that people unable to work due to long-standing health problems (disability) live with extreme deprivation:

- 19.6% are unable to afford to keep the home adequately warm, compared to 5.6% of employed people or 6.5% of retired people.
- One in five (19.7%) went without heating at some stage last year.
- Are eight times more likely to be unable to afford a meal with meat, chicken, fish, or vegetarian equivalent every second day than the national average.

Moreover, things have worsened in recent years - the percentage unable to afford to keep their home adequately warm increased by more than 10% in two years – from 8.5% in 2020 to 19.6% in 2022, showing that the government’s ‘cost of living’ measures in recent years have been insufficient to protect people with disabilities from increased deprivation.

Ireland has made significant commitments to address disability poverty. The *Roadmap to Social Inclusion 2020-2025* commits to “reduce the [disability] AROPE (At Risk of Poverty and Social Exclusion) rate from 36.9%, first to 28.7% (2025) and then to 22.7% (2030)”. However the *Second Roadmap for Social Inclusion Progress Report* (2022) shows that despite these very clear targets, things are in fact getting worse.

Ireland’s disability AROPE rate actually *increased* in 2021 - from 34% in 2020 to 38.9% in 2021.⁴ Ireland’s ranking for disability poverty also declined to 24th of the EU 27, even though Ireland is one of the wealthiest EU countries - the Roadmap aims for Ireland to be in the top 10 by 2025. Of the 17 EU indicators that the Roadmap tracks, this is one of only five indicators where Ireland’s ranking has disimproved. It is also one of only two EU indicators where Ireland ranks outside the top 20 for the second year in a row.

And yet no significant action was taken in this year’s budget to address this, with increases in core social protection rates not even matching inflation, and the meagre cost of living supports for disabled people reduced by 20%, despite the fact that there is no evidence showing that the extra costs disabled people live with have reduced. The Irish [Economic and Social Research Institute’s Budget Analysis](#) shows that

⁴ <https://www.gov.ie/en/publication/ca8bf-roadmap-for-social-inclusion-2020-2025/>

disabled people will remain the group most at risk of poverty in 2024, and that there will actually be a small increase in the 'at risk of poverty' rate for people with disabilities next year. It also shows that the gains for disabled people in Budget 2024 are only due to the temporary one-off cost of living measures, while there are less gains for those with a disability from permanent tax and welfare changes as compared to those who are not disabled. This is alarming given the much higher poverty rates of people with disabilities, which clearly indicate that specific measures targeted at reducing this are urgently needed.

It is disappointing that the state's reply to the list of issues does not engage meaningfully with, or reply to, the request (in paragraph 18) to "please provide information on the measures taken by the State party to address poverty and social exclusion among groups disproportionately affected by it, such as [...] persons with disabilities". The information provided in the Annex does not engage with the specificity of this request either. Nor do either documents acknowledge the above outlined lack of progress on the Roadmap for Social Inclusion targets, despite the request from the Committee to "please specify whether these groups [including people with disabilities] are the subject of specific poverty reduction targets and resource allocations in the Roadmap to Social Inclusion 2020–2025".

The extra Cost of Disability

This poverty is exacerbated, and in many cases created, by the many additional Costs of Disability that disabled people face. A recent wide-ranging report, *The Cost of Disability in Ireland (2021)*, commissioned by the Department of Social Protection, provided comprehensive evidence that people with disabilities have extra costs across areas including mobility, transport, communications, care and assistance services, equipment, aids and appliances, and medicine.⁵ The report runs to over 150 pages, and is based on a statistically significant survey of more than 4,000 people with disabilities (mostly recipients of social protection payments), and econometric modelling. The report concluded that "there are significant additional costs faced by individuals with a disability *which are currently not met by existing programmes or by social welfare payments* [our emphasis]". The report indicates extra annual costs in the range of €8,700–€12,300, as well as unaffordable extra costs of €2,706 a year.⁶

It is important to note that the basic Disability Allowance and similar social protection payments have not been increased to keep up with the

⁵ Indecon International Research Consultants (2021). *The Cost of Disability in Ireland*. <https://www.gov.ie/en/publication/1d84e-the-cost-of-disability-in-ireland-research-report/>

⁶ Ibid.

significant inflation in recent years, leaving disabled people who are unable to work more exposed to economic vulnerability. [The Vincentian Minimum Essential Standard of Living Research Centre](#), analysing the most recent Budget, has warned that it will continue to trend of increased income inadequacy for those who rely on our social protection system to survive: “the purchasing power of core social protection supports has not been maintained, as a result the adjustments are a real term cut. [...] These measures are likely to compound the deepening and widening of income inadequacy that developed this year.”⁷

Moreover, the basic annual income currently provided by the state through the Disability Allowance, €12,064, would in some cases not even cover the additional disability-related costs that someone faces as outlined above, let alone all the other everyday living costs that all people live with, including rent, food, heating etc. Disability organisations in Ireland have called for a weekly Cost of Disability payment for decades, to address this issue. While it is true that, as the state replies, “a whole-of-Government approach is required to address the cost of disability” (para 105, p.14), nevertheless a significant response is required from the Department with the poverty reduction mandate, to address the income-related aspects of Cost of Disability.

The recently published *Green Paper on Disability Reform* proposes that some people would receive increased payments, in some acknowledgement of this extra cost. However the proposal conflates two very different issues, the extra Cost of Disability and the question of ‘capacity to work’. Moreover the social protection rates proposed in the Green Paper, even the highest ‘Tier 1’ rate of €277.30, are still significantly (27%) below the standard poverty line in Ireland,⁸ and those recommended by the Minimum Essential Standard of Living Research Centre, a standard that is widely endorsed across civil society. That is without also factoring in the extra Cost of Disability (an extra weekly cost of €167 to €236.54, as per the report cited above). These inadequate rates will not be anywhere near sufficient to reduce disability poverty.

Resource Allocation on Social Protection

On average EU countries spend 2% of their GDP on social protection for disability. Ireland spends 0.8%, the second lowest in the EU.⁹ It is regrettable that in its reply on the list of issues, Ireland has not explicitly provided “within total public expenditure, the proportion of the public

⁷ https://www.budgeting.ie/download/pdf/mesl_impact_briefing_-_budget_2024.pdf

⁸ <https://www.socialjustice.ie/system/files/file-uploads/2023-10/SJI%20Poverty%20Focus%20November%202023.pdf>

⁹ European Disability Forum, Human Rights Report 2020, p.26. <https://www.edf-feph.org/publications/european-human-rights-report/>

budget that is allocated to social spending, including social security”, as requested in paragraph 6e.

Suggested Inquiries

- Given that people with disabilities consistently have disproportionately high poverty rates in Ireland, what measures, actions, strategies and timelines has Ireland taken to specifically address the poverty rates of disabled people?
- What corrective measures and resourcing will Ireland take and allocate, in order to deliver its disability poverty reduction targets in the Roadmap for Social Inclusion, which are currently way off?
- Why has Ireland not increased its social protection rates in line with inflation, in order to protect those at risk of poverty?
- How does Ireland intend to implement the recommendations of the Cost of Disability report – both from a whole of government perspective, but also particularly addressing the core issue of income inadequacy?

Health and Social Care Services (Article 2, 12)

Disabled people have a right to services that enable them to live independently in their communities. However, there are ongoing high levels of unmet need for specialist disability services in Ireland, with waiting lists for many supports high and not reducing. Currently around 56,000 people are supported through specialist disability services¹⁰ - only 5% of the 1,109,557 people who indicated that they have a disability to any extent in Census 2022. Community based services that support people to live independently, including personal assistance services and home support are particularly underfunded, with the majority of funding going to residential services.

Increased and multiannual funding is required to support equal access to services and supports, in line with demographic trends in disability and population growth. Disability services that are essential to deliver the right to independent living, including Personal Assistant Services (PAS), home supports, alternative forms of respite, personalised budgets etc. are underfunded and overstretched. Funding is also required to deliver equal access to healthcare and other social care services regardless of

¹⁰ Department of Health (2021). *Disability Capacity Review to 2032: A Review of Social Care Demand and Capacity Requirements to 2032*, p. 16.

geographical location – currently people in some areas of the country have access to more and better services than those in other areas.

The government's *Disability Capacity Review to 2032* outlines the investment required in disability services over the next ten years. It estimated that a further €550m to €1,000m investment is required.¹¹ Concerningly, despite this clear evidence of need, there has not been sufficient annual investment in disability services since this Review was published. The *Action Plan for Disability Services, 2024-2026* was finally published in December 2023. It is essential that the necessary investment and robust implementation and monitoring mechanisms now follow.

The delivery of disability supports in Ireland is reliant on voluntary organisations, who provide upwards of 70% of disability services. Therefore, resourcing and supporting a sustainable voluntary sector is essential. These services are currently particularly threatened by a widespread recruitment and retention crisis. This crisis is impacting on the healthcare sector as a whole, with a particular impact on disability services.

The recruitment and retention crisis is having a particularly severe impact on voluntary organisations, due to the insufficient pay and working conditions that they can offer as a result of ongoing underfunding by government. Voluntary organisations (termed 'Section 39' organisations) cannot compete with the significantly better pay and conditions available for similar roles in Ireland's public national Health Service Executive (HSE). Ireland is at full employment and the issue of supply of workers to fill posts is a disability sector-wide concern. Ongoing underfunding is threatening the ability of voluntary disability organisations to provide adequate services to people with disabilities. Many disability organisations may not be financially viable into the future, hugely impacting people who rely on these services to live their daily lives.

In addition to specialist disability services, mainstream services must be accessible to people with disabilities. Over 90% of disabled people are supported by general community health and social services such as primary care, acute hospitals, mental health services etc. Almost all people with disabilities will depend on mainstream health services at some point in their life. Ensuring integration between specialist disability services and mainstream health services is a key concern. Ongoing issues with access to mainstream health services include staff shortages, lack of

¹¹ Department of Health, Capacity Review, p. 28

disability awareness among healthcare staff, long waiting lists and lack of funding and resources. Addressing the needs of disabled people must be a central element of Sláintecare implementation - Ireland's policy for reforming the healthcare system and introducing universal healthcare. This must also be carefully considered and planned for in the development of the Healthcare Regions, which will be rolled out in 2024.

Suggested Inquiries

- What measures, actions, strategies and timelines has Ireland taken to address unmet need for specialist disability services, particularly community services such as personal assistance, home support etc.?
- How does the government intend to implement the findings of the *Disability Capacity Review* and the *Action Plan for Disability Services 2024-26*, and put in place the funding required to deliver the commitments?
- How will the government ensure appropriate resourcing of voluntary disability organisations to ensure that they can deliver services that are essential to vindicate the social rights of disabled people?
- How does the government plan to address the recruitment and retention crisis in the healthcare sector, including the specific impact this is having on voluntary disability organisations?
- What has the government done to improve the accessibility of mainstream services for people with disabilities?

Housing (Article 2, 11)

The housing situation of disabled people is a crisis within the broader housing crisis in Ireland. 27% of the homeless population have a disability, double the rate of the general population.¹² A social policy report jointly published by DFI and the Citizens Information Board, [*The Right Home: the Housing Needs of People with Disabilities \(2022\)*](#) found that people with disabilities face significant challenges finding a suitable home. While acknowledging the severe housing crisis, the report documents the disproportionate extent to which disabled people are failed by the system, and the range of challenges they continue to experience.

The vast majority of people with disabilities in Ireland live in the community and experience many housing challenges – mostly related to lack of sufficient resources, universally designed housing and joined up policymaking. On the current social housing waiting list, 9.5% of households list disability as their main need. Disabled people spend far longer on social housing waiting lists due to a lack of suitable and fully

¹² Central Statistics Office. Census 2016.

accessible options - the disability waiting list is reducing at half the rate of the general housing waiting list. Between 2016-2020 the number of people on the general housing list reduced by almost a third. However, the number of people with a disability basis of need reduced by significantly less (12%) over the same period.¹³

There are also huge levels of uncaptured housing need - such as young people living with their parents with no prospect of moving out and people living with elderly carers. Moreover, given the ongoing demographic trends of rising numbers of people with disabilities, ensuring that all housing policy considers disability will be crucial to deliver effective strategic planning, and to future-proof Ireland's housing stock.

Reducing institutionalisation is another important issue. The most recent data from Ireland's Health Information and Quality Authority indicates that over 25% of Ireland's residential disability places are in congregated settings.¹⁴ 2,279 people still live in these settings, despite Ireland having originally committed to end congregated living by 2018. Aswell as this, many younger people with disabilities are living in nursing homes, due to a lack of any alternative. This issue was investigated by Ireland's Ombudsman and a report, [*Wasted Lives: Time for a better future for younger people in nursing homes*](#) was published in 2021.¹⁵ Sufficient progress has not been made in addressing this issue – recent figures obtained under Freedom of Information request show that 1,250 people with disabilities under 65 are still living in nursing homes.¹⁶

Delays in the publication of the Implementation Plan for the *National Housing Strategy for Disabled People 2022-2027*, up to June 2023, require redress through sufficient resourcing to enable immediate action. To ensure the positive ambitions of the this strategy are realised it must now be rigorously implemented. People with disabilities should have the same opportunity to live in and be part of a community as everyone else. This is still not a reality for many, who have very limited housing choices. Adequate funding, effective inter-agency and inter-Departmental collaboration, and robust implementation is essential to support all disability housing needs – the de-congregation process, moving people out of nursing homes, but also delivering sufficient fully accessible housing and the necessary support provision (including social care packages) for those who wish to live independently.

The UN CRPD commits Ireland to promoting Universal Design. The significant level of building taking place under Housing for All must factor

¹³ Analysis of Households with a Disability Basis of Need for Social Housing 2016 – 2020, <https://www.gov.ie/en/publication/60d76-national-housing-strategy-for-disabled-people-2022-2027/>

¹⁴ HIQA (2022). <https://www.hiqa.ie/sites/default/files/2023-06/HIQA-Annual-Report-2022.pdf>

¹⁵ Ombudsman (2021). *Wasted Lives: Time for a better future for younger people in nursing homes*. <https://www.ombudsman.ie/publications/reports/wasted-lives/>

¹⁶ <https://www.rte.ie/news/2023/0515/1383629-nursing-homes-under-65/>

in disability and include sufficient universally designed and wheelchair liveable homes to future-proof Ireland's housing stock. Another key issue is the need for better joined-up planning between housing and health and social care services, as disabled people require both an accessible house and appropriate social care packages to live independently.

Suggested Inquiries

- What is Ireland's plan to ensure access to appropriate housing in the community for people with disabilities? Can the government give a clear timeline for such a plan?
- How will Ireland ensure that people with disabilities are fully included in the *Housing for All* strategy and that Ireland's housing stock incorporates universal design?
- How does Ireland intend to implement the recommendations of the Ombudsman's *Wasted Lives* report and end the practice of accommodating people with disabilities under 65 in nursing homes?
- What measures and resourcing has and will Ireland put in place to support the implementation of the *Housing Strategy for Disabled People 2022-2027*?
- How will Ireland ensure better cross-governmental working to ensure that housing and social care services are planned in a coordinated way?

Conclusion

Despite being a wealthy country with significant resources at its disposal, there is still a long way to go before it can be said that Ireland is delivering and protecting the economic, social and cultural rights of its disabled citizens, or delivering on its ratification of the UN Convention on the Rights of Persons with Disabilities in 2018.

It is troubling that, in 2024, poverty levels for disabled people continue to rise, employment levels are not increasing, and many disabled people wait on social housing lists for years. People with disabilities who require support from the state's disability-specific and mainstream health service, and/or social care supports, find themselves faced with long waiting lists and a system in crisis.

We urge the Committee to carefully scrutinise and question Ireland's fourth report on its work towards ensuring the full realisation of economic, social and cultural rights for all. There is a long way to go before this is the case for disabled people - Ireland can and should do much better.



DFI is about making Ireland fairer for people with disabilities.

We work to create an Ireland where everyone can thrive, where everyone is equally valued.

We do this by supporting people with disabilities and strengthening the disability movement.

There are over 120 member organisations in DFI. We also work with a growing number of other organisations that have a significant interest in people with disabilities.

DFI provides:

- Information
- Training and Support
- Networking
- Advocacy and Representation
- Research, Policy Development and Implementation
- Organisation and Management Development

Disability is a societal issue and DFI works with Government, and across all the social and economic strands and interests of society.

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