



DISABILITY FEDERATION OF IRELAND

**Submission on Departmental Statement
of Strategy**

Department of Social Protection

March 2025

1. Introduction

The Disability Federation of Ireland (DFI) welcomes the opportunity to make a submission to the Department of Social Protection (DSP) on its Statement of Strategy for 2025-2028. The DSP is one of the most important state bodies when it comes to disability, most notably in its responsibility to provide social protection to those who rely on its payments to live, as well as more generally to the 21.5% of people in Ireland who live with disabilities, and their families.

Disability is an issue that by its very nature is impacted by policy areas covered by a range of different Departments, and thus requires strong and consistent cross-departmental coordination and policymaking. In this context we welcome the pending publication of the National Human Rights Strategy for Disabled People, NHRSDP, and note that DSP will need to work very closely with other Departments to ensure effective implementation of the NHRSDP in the coming years. Equally the Roadmap for Social Inclusion is an important strategy with key disability commitments which DSP anchors but which requires cross-Departmental delivery and implementation - the delivery of its final year and successor strategy will be crucial during the period of DSP's strategy.

Given that many people with disabilities cannot work and thus rely on DSP for their basic economic survival, and others wish to work but struggle to do so due to structural barriers, lack of integrated and coordinated supports, and our society not being fully accessible or inclusive, the role of DSP is absolutely crucial and fundamental in supporting and advancing Ireland's delivery of its responsibilities to disabled people under the UN CRPD, as well as Irish and EU law, including Public Sector Duty.

In particular the work, policy and practice of DSP is crucial in securing the rights of people with disabilities under the UN CRPD [Articles 27](#) which protects the right of persons with disabilities to work, on an equal basis with others, and [Article 28](#) which recognises the right of persons with disabilities to an adequate standard of living for themselves and their families. These rights are fundamental to ensuring the active participation and inclusion in society of disabled people, which must be part of DSP's Mission. To secure these rights DSP will need to:

- Embed an understanding of the UN CRPD as the foundation and starting point of any work the Department does to support disabled people and their families and households.
- Develop and/or contribute to a Cross-Departmental Strategy and Action Plan on Cost of Disability and Poverty. DSP should work with DCED, along with disabled people and disability organisations, to co-design a plan with clear, annually reported poverty reduction

targets, specific actions to achieve the targets and measures to address the cross-cutting nature of the Cost of Disability. The plan must also acknowledge that employment is not viable for all people with disabilities. This can potentially be integrated into the National Human Rights Strategy for Disabled People or the successor strategy to the Roadmap for Social Inclusion.

- Address the need for benchmarking and indexation of social protection rates to bring them above the poverty line, and move to deliver the Minimum Essential Standard of Living.
- Reform social protection provision and supports for people with disabilities, including the approach to means-testing, based on the significant learnings from the recent Green Paper on Disability Reform process, and [recommendations in submissions made to DSP by DFI](#) and others.
- Work to improve Ireland's very low disability employment rates by addressing structural barriers to taking up employment and Cost of Disability issues. Continue to improve, review and strengthen supports and policies around employment and social protection for people with disabilities. Set clear and measurable targets, which are reported on annually.
- Ensure that all DSP staff, and particular those dealing directly with people with disabilities, are sufficiently regarding the rights and entitlements of disabled people.
- Strengthen and deepen DSP's Public Sector Duty plan's content on, and consideration of, its duties in relation to the rights of people with disabilities.

2. Relevant Government Commitments

Programme for Government

The Programme for Government has committed to "a step change in disability policy", which imposes obligations on DSP (and other Departments in a cross-governmental approach) to reflect this in its Statement of Strategy. In areas specifically relevant to DSP's responsibilities, it commits to:

General Commitments

- Advancing the rights and improving the lives of people with disabilities (p. 92).
- Working in partnership with disabled people and their representative organisations in co-designing improvements to services and prioritising what measures are most important to them (p. 92)

- Ensuring that available resources are targeted at vulnerable groups who are unable to work such as carers, people with disabilities and pensioners (p.100).
- Improving supports and ensuring that the social welfare system is progressive and empowers people with a disability to live full and independent lives (p. 100)

Addressing the Cost of Disability (pp. 100-101)

- Reform the Disability Allowance Payment and remove anomalies in the current means test for the payment.
- Progressively increase weekly Disability Payments and the Domiciliary Care Allowance.
- Introduce a permanent Annual Cost of Disability Support Payment with a view to incrementally increasing this payment.
- Promote training initiatives to raise awareness and understanding of disabilities amongst Intreo staff.
- Examine the 'ability to work' criteria for certain payments and ensure that ongoing medical assessments are not carried out in respect of people with lifelong conditions that are not going to change.
- Protect the Free Travel Pass and examine extending it to children in receipt of Domiciliary Care Allowance.

Employment Commitments (p.s 17, 93 and 100)

- Develop a Code of Practice to support the hiring of workers with a disability.
- Work with employers and across Government to improve employment of people with disabilities and ensure that supports for entrepreneurs and enterprise are accessible to all, including people with disabilities with a goal of reaching at least the EU average.
- Ensure citizens with disabilities can access employment on an equal basis to others by focussing on building skills, capacity and independence, and develop bridges from special schools into employment.
- Continue to ensure employers make reasonable accommodation for people with disabilities in the workplace.
- Expand and build on successful programmes like WorkAbility, Employability, and the new Work and Access Programme to support people with disabilities into employment.
- Examine ways to make it easier to regain Disability Allowance if employment ceases.
- Review the minimum hours requirement under the Wage Subsidy Scheme for people with disabilities and examine an increase to the payment rate.

Roadmap for Social Inclusion

The Department's new strategy will take effect in the final year of the current Roadmap for Social Inclusion, which contains important poverty reduction and employment targets for people with disabilities. We remain very concerned about the delivery of these targets – while the goal was to reach an AROPE of 28.7% by 2025 and be in the top 10 EU countries, the fourth progress report shows that last year's AROPE for people with disabilities was 32.7% and we ranked 20th out of the EU 27, just one year out from 2025. Urgent corrective action will need to be taken, and we made many recommendations in [our most recent Pre Budget submission](#).

It is crucial that the Department's new strategy reflects and plans to deliver the targets in the current Roadmap, and anticipates the successor plan, which should be more ambitious and action-oriented in terms of delivering measurable and significant poverty reduction for disabled people. In setting the strategic objectives, DFI emphasises the need for ambition both in these targets and in the Department's strategy and actions to achieve them. By embedding ambitious targets in the strategy, the Department will ensure progress towards a more inclusive society for people with disabilities.

Public Sector Duty

The Public Sector Duty is a legal obligation requiring public bodies to actively promote equality, prevent discrimination, and protect human rights in their functions, including employment. All public bodies, including DSP, are required to have a public sector duty plan that outlines how they will implement their responsibility to ensure and protect principles of non-discrimination, equality, and human rights.

DSP, like other Departments, must develop and publish a detailed plan to take actions to improve the human rights situation of its customers. The Irish Human Rights and Equality Commission, IHREC, says that this plan, ideally, should be part of the DSP's strategic plan, making the drafting of a statement of strategy the perfect time to consider this in more detail. Any plan should take account of and provide specific actions to individually address all nine grounds found in the Equal Status Act. This includes disability.

In their most recent Statement of Strategy, IHREC has stated that it will spend the next three years working to ensure that all public bodies have a public sector duty plan. They will do this through training and awareness raising, but also through the use of their enforcement powers, which include the equality review and the public sector duty review.

It appears from DSP's website that its 2024-2025 Public Sector Duty plan was published in February this year, a welcome development as despite the requirement many government Departments do not appear to have developed a plan. It is also very positive to see that the Department had already exceeded its 6% employment quota for disabled staff by 2023.

That said, the plan mostly appears to describe existing areas of work, and does not contain any disability-specific action/s, as it is supposed to. Nor does it outline any plans to address issues such as poverty (a word which appears a surprisingly low number of times in the plan – 7 in the main text - given the Department's poverty reduction mandate), or to take actions to address the much higher risk of poverty of certain groups, including disabled people. Moreover DFI is not aware of any consultation that took place to inform this plan, which was not discussed at the Disability Consultative Forum.

DFI would thus urge DSP to work this year to develop a stronger and more considered plan to incorporate disability into its Public Sector Duty plan for 2026, and to make sure that this plan follows the principles of co-creation with marginalised groups, including people with disabilities and the organisations that work to support them. As part of its Statement of Strategy, the Department should lead by example in fulfilling this important duty, given the high extent to which it provides supports to people who fall under the nine equality grounds, including disability.

3. Key Disability Issues

Poverty and Income Adequacy

People with disabilities live with extremely, disproportionately high rates of poverty. Ireland's AROPE rate for people with disabilities is 32.7%, almost 20% higher than for those with no disability. We rank 20th of the 27 EU member states for disability poverty, despite the stated commitment in the Roadmap for Social Inclusion to reach the top 10 by 2025. CSO annual SILC data shows that 2 in 5 people with a disability who depend on DSP payments live in enforced deprivation, and 1 in 5 live in consistent poverty – these rates are 3 to 4 times higher than those of the general population.

During the tenure of the last government, while overall poverty rates generally decreased year on year, many of the improvements in recent years are clearly due to the one-off cost of living measures, which will not be retained into the future. Moreover, the much higher rates of poverty for disabled people and those unable to work due to disability have not

been tackled, while consistent poverty and deprivation rates are higher now than they were in 2021.

The most recent estimate of the poverty line by Social Justice Ireland puts it at €323.99 a week. Civil society and anti-poverty organisations remain united in their call to the government to bring social protection payments up to the level recommended by the Minimum Essential Standard of Living.

The introduction of the €350 PUP and Enhanced Illness Benefit during the pandemic highlighted the inadequacy of core social protection rates, and yet almost five years later, people with disabilities are still expected to survive on a rate more than €100 less indefinitely. The withdrawn Green Paper on Disability Reform had posited a highest rate of €277.30, still significantly below the poverty line, and not reflecting the extra costs of disability sufficiently (see below).

The higher cost of living with a disability, combined with inadequate support, deepens poverty and increases the likelihood of other costs to the state in the longer-term. In developing its strategy, DSP must proactively support already impoverished groups like people with disabilities, and ensure they are not left behind during this time of economic prosperity. These supports should include practical interventions such as increasing payment rates and income thresholds, and structural measures such as reforming means testing, indexing social welfare payments above the poverty line and bringing in and continually increasing the new Cost of Disability payment. The Department should also spearhead ambitious poverty reduction targets, overall at a national level, but also for specific sub-groups who have much higher deprivation levels, like disabled people. The poverty currently endured by people with disabilities emphasises the need for a departmental strategy with clear actions laid out to achieve the targeted poverty reductions in the Roadmap for Social Inclusion, and the new poverty reduction strategy that will follow it.

The Extra Cost of Disability

These extraordinarily high poverty rates are inextricably linked with the (often hidden) extra cost of disability, which people with disabilities and their families live with. On average, disabled people spend more on heating and utilities, travel and transport, mobility aids, healthcare and medical expenses, social care, assistive technology, housing and home adaptations, amongst other disability-specific expenditure.

This issue has been raised by disability organisations for many years, and one very positive contribution of DSP during the last government was the development and publication of the Indecon report on this issue. The Indecon Report on the Cost of Disability (2021) provided comprehensive

policy evidence that disabled people have extra costs across numerous areas. 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 evidenced extra costs in the range of €8,700-€12,300, as well as unaffordable extra costs of €2,706 a year.

In our Budget 2025 submission DFI updated these figures to reflect recent inflation by applying the Consumer Price Index Inflation Calculator to the original Indecon estimate, showing that the range had likely increased to approximately €10,397 – €15,177. However, these costs can be significantly higher for those with multiple disabilities or chronic illnesses.

The recent commitment in the Programme for Government to introduce a permanent annual Cost of Disability payment, building on one-off payments in recent years, is a positive acknowledgment of this cost which is currently borne by disabled people. DSP’s strategy must commit to address and factor this extra and onerous cost into its social protection provision, and act on the many recommendations of disability organisations to address this issue, which have been provided in their Budget submissions and those to the Green Paper consultation.

Moreover, it is important to note that as the SILC data is a measure of income only, and does not take into account the extra Cost of Disability - this means that current poverty figures outlined above actually significantly *underestimate* the level of poverty experienced by people with disabilities, as the ESRI has pointed out over the years. This issue, like many others in this submission, also impacts on carers, and the Cost of Disability should be addressed for carers too, many of whom also live financially precarious lives. DSP should in particular reflect on the most recent ESRI-IHREC report (March 2025) which shows how dire the situation is, how much extra income disabled households need to secure a similar standard of living to non-disabled households, and how much higher AROP rates would be if the Cost of Disability was included in calculations.

Employment and Employment Supports

Just like everyone else, people with disabilities wish to seek employment, undertake training, or take up and achieve education opportunities, yet they frequently encounter many social and accessibility barriers, and a lack of joined-up policymaking. Ireland’s employment rates for disabled people are amongst the lowest in the EU and the OECD, and the disability employment gap is 37% compared to the EU average of 21%, making it one of the worst in the EU. This is deeply concerning given the strength of

the Irish economy and official indications that Ireland is at “full employment”.

DSP’s strategy must thus capitalise on Ireland’s economic well-being to prioritise addressing and removing the structural and other barriers to employment that disabled people face. It can do so (in collaboration with other relevant Departments, including in particular DCED and DETE, and potentially also involving supportive actions from DEY and DFHE) by setting clear transparent ambitious employment targets that are measured and reported on annually. Supporting people with disabilities in this area requires aligning the strategy with the employment pillar of the forthcoming NDHRS (which requires strengthening, and clear SMART objectives), and learning from the problems that occurred regarding the Comprehensive Employment Strategy in its final years. To ensure an ambitious delivery of the pillar’s aspiration in this area, the DSP must commit to a cross-governmental approach that guarantees the pillar is adequately funded, and take a co-ordinating role in the collaborative implementation of the pillar’s actions. Moreover DSP should monitor annually the number of people who are taking advantage of the income disregard, and at what level, and the number of people who move off Disability Allowance into full employment, in order to spot patterns and trends to support further refining of policy. Equally, action to support employment plans will need to address and factor in the previously outlined issues of income, poverty and deprivation, and the extra Cost of Disability, in order to support disabled people to make working financially viable.

The labour force shortages that Ireland is experiencing offer an opportunity to develop, promote and strengthen inclusive employment schemes for people with disabilities. The DSP strategy must ensure that employment support schemes like Work and Access, WorkAbility and EmployAbility are funded, implemented, actively promoted and carefully and thoughtfully evaluated and refined in due course.

A positive development in recent years has been the reform of the Reasonable Accommodation Fund, and the development of the new Work and Access Fund. This scheme should be actively promoted, enthusiastically and proactively rolled out, reviewed for operational issues in due course, and see growing funding as it develops – the drawdown and application rates should also be tracked and published annually, and any issues affecting implementation addressed speedily.

All and any activation measures must be disability proofed to ensure that people with disabilities can benefit from and are supported to realise, where appropriate, employment opportunities. To ensure that the cost of taking up employment is not too high, income disregards should be

reviewed and increased on an annual basis. This should also be part of a broader reform of disability payments that offers flexibility and security to people with disabilities who have the capacity to take up employment and do so, while also addressing anomalies in means-testing for those who will never be able to work. It will also be important to continue to improve flexibility and processes, such as the Programme for Government commitment to develop a fast-track return to payments should a person no longer be able to work.

Given that the Cost of Disability can be an employment barrier or risk, secondary social welfare benefits such as the medical card and the free travel pass should be provided to disabled people based on disability need, not income – as has been recommended by the OECD to support increased employment. The five-year post-employment validity for the travel pass should be removed. The Department's strategy for boosting employment must examine and action on insidious employment barriers like these if it is serious about achieving the employment targets it sets – obviously this will require action from other Departments who make the policy decisions in these areas, with DSP administering the schemes.

Increased supports to disabled people interested in becoming entrepreneurs is another area to focus on. Positively, the increased prevalence of remote working post-COVID also offers positive opportunities to promote the employment of people with disabilities.

However, it must always be remembered that many people with disabilities simply cannot work due to their disability, and the social protection aspect of DSP's responsibilities should be to the foreground in these contexts. Moreover, there should not be financial disadvantages for those who are in receipt of Disability Allowance and cannot work, as compared to those who can avail of the income disregard – for example people who might be in receipt of their parents' pension payment after their death. Disabled people deserve, and are entitled to, an adequate standard of living, equal to others, no matter whether they can or cannot work, and it falls to the Department to deliver this in the main through adequate income supports.

Energy Poverty

Ireland had the highest electricity prices in the EU in 2023, and the fourth highest energy price levels. These ongoing extremely high costs continue to be devastating for people with disabilities. For many disabled people who have to use significant amounts of electricity daily, even throughout the summer, to charge assistive technology, essential medical equipment, power wheelchairs etc, there is no way to reduce their energy

consumption. The Indecon report and annual SILC data on deprivation show that disabled people live with a higher level of energy poverty.

The electricity credits since 2022 were extremely welcome for disabled families, to whom they provided a lifeline, but they will not be repeated. It is also important to note that only about 50% of Disability Allowance recipients qualify for Fuel Allowance, the core rate of which did not increase in recent years despite highly escalating costs.

While energy prices are declining, MESL and others have shown that they still remain significantly higher, and unfortunately prices will not reduce back to pre-crisis levels. In this context supports can and should be more carefully targeted into the future, in order to use resources efficiently, and to support those with higher levels of energy poverty, like disabled people.

Given the interconnected issues involved and the extent to which energy poverty is a subset of poverty overall, and often arises as a result of inadequate income, co-ordinated and joined up policy making will be required on energy poverty across and within multiple Departments – including in particular the Department of Social Protection and the Department of Environment, Climate and Communications.

More detail in our submissions

For more detail on any of the above key areas, DSP can see DFI's recent submissions, including:

- [DFI's submission to the Green Paper on Disability Reform Consultation](#)
- [DFI's submission to the consultation on the revision of the Energy Poverty Action Plan](#)
- [DFI's Budget 2025 submission to DSP](#)
- [DFI's General Election Manifesto 2024](#)

4. DSP Mission and Objectives

Simply put, if the mission of DSP is to promote active participation and inclusion in Irish society, then it will need to do its part to dismantle the barriers to this that exist for people with disabilities. Most crucially, this will necessitate the following strategic focus areas in the years to come:

- Addressing the income inadequacy issues that prevent and exclude people with disabilities from participating actively in Irish society and see disabled people and their households living with much higher poverty rates than the general population.

- Delivering on and further strengthening the targets in the Roadmap for Social Inclusion, and its successor strategy. Setting, monitoring and delivering on ambitious poverty reduction targets for disabled people, particularly those who rely on the Department for their income.
- Developing and rolling out the new government commitment of a Cost of Disability payment, applying the learnings from the Green Paper process to ensure effective consultation and co-creation.
- Developing, working to support and advocating for a Cost of Disability package (along with DCED) that addresses the extra cost of disability not just in the context of Social Protection, but across Departments including Transport, Employment, Housing, Community, Health etc.
- Working specifically to address the structural and societal barriers to employment for those with disabilities who do wish to work. Setting, monitoring and delivering on ambitious employment targets for disabled people.
- Advocating across Departments for greater understanding of the linkages between poverty and disability.
- Actively participating and contributing to the development, implementation and monitoring of the National Human Rights Strategy for Disabled People, including working at a cross- and inter-Departmental level.
- Tailoring supports and services to break down these barriers to inclusion and participation, and ensuring all DSP staff, especially those working in Intreo, have significant and ongoing disability rights training.

In setting its strategic objectives, the Department has been informed by its mission to “promote active participation and inclusion in society through the provision of income supports, employment services and other services”. It identifies its key objective from 2023 to 2026 to be “to continue putting the people we serve at the centre of all we do: designing, developing, building and providing efficient and effective service...” and is led by five values, two of which are particularly relevant:

- a. Customer Focus: exemplified by a commitment to the positive difference DSP can make to their customers’ lives and Irish society.
- b. Innovation: demonstrated by having the attitude and environment to adapt and innovate is core to our future success.

DSP’s Strategic Objectives

1) Put the Customer at the Centre of Policy and Service Delivery;

People with disabilities are not a homogenous group. Thus, DSP's policy must be flexible and sensitive to the complex and diverse needs of disabled people, particularly around safeguarding payments for those that move in and out of the labour market, and activation schemes. DSP's strategy should reflect an understanding of the previously outlined issues and the impact they will have on the employment and social protection needs of people with disabilities and their families. Moreover, there was huge learning in the Green Paper process from 2023-2024, and the recommendations of disabled people (DSP's 'customers') and the organisations that support them in their submissions to that consultation should strongly influence the operational, and policy and reform, approach of the Department into the future.

The value of people living with disabilities to society must not be determined by or understood as being related to, their work status. All disabled people must be guaranteed a minimum income, which ensures that they can live with dignity and autonomy. Being unable to work due to a disability or health condition should not equal economic hardship or deprivation (as it does now, with 1 in 2 living in enforced deprivation) – the adequacy of payments for our disabled community must be tackled during this strategy's duration.

The experience of interacting with the Department should also be one where the customer feels supported and protected – sadly this is not always the case for disabled people in the community.

DSP's Strategy must also work to improve and develop mainstream inclusive policies that will increase the participation rates of people with disabilities in the workforce, in addition to the provision of specialist supports, and must ensure that disabled people's needs are not deprioritised in the years ahead should the economic and employment context change, as currently seems possible.

The ongoing work to create an employment and social protection support system that is flexible and responsive to the needs of people with disabilities must continue. This includes creating capacity in the system to support those who move in and out of work at short notice and to guarantee return to benefits when employment does not work out. All new activation supports must be designed to be inclusive, for example by making changes to eligibility criteria, minimum working hours, as well as other measures.

Fundamentally, DSP should put the UN CRDP at the centre of its approach to service delivery, and policy development and implementation, when supporting disabled customers, as previously outlined above.

2) Drive Cost Efficiency and Effectiveness;

While it is important to address cost and efficiency, a long-term systemic viewpoint should be used here, and an understanding that investment is sometimes required in the short and medium term to ensure success, effectiveness and reduced costs in the future. In 2020, Saint Vincent de Paul published ground-breaking research which estimated that the public service cost of poverty to the state is almost €4.5 billion (while the report does not specifically highlight disability costs, its overall conclusions are highly relevant).

It is imperative that the Department, in its attempts to deliver efficiencies, not lose sight of its primary responsibility: to deliver social protection and social inclusion policies that support equal participation and inclusion of all, and that support those who are most economically vulnerable in Irish society. Without strategic and planned multi-annual investments to tackle the issues that disabled people experience now, substantial amounts of public money could be required for decades to come, with ongoing structural unemployment and poverty continuing to affect future generations.

In particular, DSP will need to make provision for emerging societal changes in its new strategy. The nature of work continues to be transformed with changes in technology and the development of artificial intelligence, as well as the creation of a more level playing field for some people with disabilities to participate via the move to remote access and home working for some roles. Assistive technology (AT) has the capacity to enable more disabled people to participate in the workforce, engender social inclusion, and provide greater long-term cost efficiencies. Moreover, as technology advances, the cost is reducing in many areas. The revision of the Reasonable Accommodation Fund last year to become the 'Work and Access' scheme was a very positive development. This scheme should be actively promoted, enthusiastically and proactively rolled out, reviewed for operational issues in due course, and see growing funding as it develops – the drawdown and application rates should also be tracked and published annually, and any issues affecting implementation addressed speedily. It can potentially offer significant value for money.

DSP might also like to consider the administrative and other costs of both the means-testing system which can block disabled people and their families from accessing essential supports (and which does not sufficiently factor in the extra Cost of Disability in its approach), and in particular reflect on the costs of the long-drawn out process related to appeals of disability-related social protection payments. It is evident that issues exist with the current assessment process - every year significant numbers of applicants for disability related payments that are originally refused are subsequently awarded payments on appeal. For example, in 2022 43.2%

of appeals for Disability Allowance were allowed, 1.3% were partially allowed, and 13.3% saw a revised Deciding Officer decision – meaning almost 60% of appeals were successful. The ‘allowed’ % rate for Disability Allowance is the highest across appeals under all payment types. This pattern has been evident and consistent for many years. Addressing this issue early in the process could save time and administrative effort, and costs to the Department, and also result in less delays and wait times for applicants.

DSP must also continue to develop its early activation supports for young people and those who acquire a disability in work, and understand these as an investment in efficiency and effectiveness. Ireland’s overall low unemployment level masks the disproportionately high unemployment rates among young people with disabilities, which points to serious problems with current intervention schemes to help young people with disabilities to find work.

DSP will also need to plan for ongoing demographic changes and challenges that will continue to occur in Ireland. The most recent census shows a significant increase in the number of people identifying themselves as disabled – from 13.5% in 2016 to 21% in 2022. Other data in recent years, including from Growing Up In Ireland and other studies, shows increasing disability prevalence in young people. This requires a strategic and long-term approach from the Department (and from the government – as addressing this issue will require cross-Departmental efforts) to make sure that all supports and reforms needed to tackle barriers to employment are addressed urgently, to support cost efficiency and effectiveness.

3) Develop Staff, Structures and Processes;

We welcome the focus on developing staff as a core part of DSP’s strategy for the coming years. Unfortunately, DFI frequently hears from people with disabilities and their families who have had difficult, stressful, humiliating or otherwise challenging experiences when navigating Ireland’s social protection system, and who have encountered some staff who show a lack of sympathy and understanding of the issues faced, and of the many obstacles to inclusion that disabled people face.

DSP can address these difficulties by providing ongoing and strengthened disability rights training across all its staff, and in particular those who work in customer-facing roles. However, training alone will not resolve long-standing issues of trust between the Department and those who are genuinely seeking work but fear losing benefits, particularly in the context of the Green Paper reform process and the fear it created in the disability community.

DSP must be seen to recommit to ongoing processes and relationships, and show a greater understanding of, and empathy regarding, the complexities of employment and social protection issues experienced by people with disabilities in order to restore their confidence and reduce their fear of engaging with officials. Disabled people are not taking the easy way out when they are not working - they are faced by multiple systemic barriers and lack of state provision of the supports needed to deliver their right to live independently equal to others. Until these issues are addressed, they will continue to experience significant obstacles to employment. DSP staff should be supported and trained to understand this, and the many societal and structural barriers to inclusion, participation and employment that people with disabilities face. If DSP staff see their role as being an 'enabler' and develop a more collaborative and understanding way of working with disabled jobseekers, this will also be more effective.

The Department must also ensure that it has structures and processes in place, and undertakes regular reviews, to ensure it is delivering on its mission. In particular it must have monitoring processes in place to ensure that all DSP staff, and in particular those working in Intreo and processing payment applications, are fulfilling their responsibilities to people with disabilities under the UN CRPD, Public Sector Duty etc.

DSP must also plan to maintain funding to crucial support agencies, such as the National Advocacy Service for People with Disabilities (NAS) and Citizens Information which provide such essential community supports, and to promote full enactment of relevant disability legislation.

Equally it is very positive that DSP had already exceeded its 6% employment quota for disabled staff by 2023. It should build on this positive achievement to increase the number of staff with disabilities in the years to come, and to make the Department an excellent place for disabled people to work. A greater number of disabled staff members can also contribute to a better understanding of the impact of the Department's actions and processes on disabled community members.

5. Conclusion

People with disabilities have lived with extremely high levels of poverty, inequality and low employment opportunities for too long. They did not benefit from the post financial crisis recovery years, nor is the current Irish scenario of 'full employment' a reality for them.

DSP is one of the most important Departments which can make a positive difference in this regard, and which can through its work address and reduce this inequality and social exclusion. To deliver on its core mission of promoting inclusion and active participation, the Department's strategy

must address the specific and unique needs, contexts and challenges that disabled people live with, which exclude them from participation.

In particular the strategy must proactively address and develop a time-bound action-oriented plan to reduce the ongoing income adequacy and low levels of employment, and the shockingly high poverty rates that prevent people with disabilities and their families from participating fully in society. In 2025 we cannot continue to accept that disabled people have disproportionately higher levels of disadvantage and social exclusion than their non-disabled fellow citizens. DSP has the opportunity to make a positive contribution, and change this troubling situation, by increasing and improving its supports to people with disabilities in the years to come.

To do so, the Department should address the key issues outlined above, of disproportionate poverty and deprivation, the extra Cost of Disability, low levels of employment and structural barriers, as well as energy poverty and the need to reform the system to focus and re-orient on delivery of rights under the UN CRPD and Public Sector Duty. To contribute to progress in the years to come, DSP should be ambitious and prioritise disabled people as a group who need tailored, targeted and co-created supports. The Department should integrate SMART goals into its strategy (and any specific strategies it publishes over the years -including the successor to the Roadmap for Social inclusion). It should implement monitoring and reporting mechanisms to track progress and ensure accountability, and take corrective action where targets are off track. To make progress on disability issues, it will also need to proactively tackle challenges of inter and cross-Departmental coordination, notably in the National Human Rights Strategy for Disabled People and Roadmap for Social Inclusion successor strategy), but also in terms of its Cost of Disability and energy poverty mandate, amongst others. By embedding these commitments into its strategy, the Department can drive meaningful change, internally and across the wider public sector, and contribute strongly to vindicate the rights of disabled people under the UN CRPD to employment, Cost of Disability supports, and an adequate and continuously improving standard of living.

Appendix 1 – Articles 27 and 28 of the UN Convention on the Rights of Persons with Disabilities

Article 27

Work and employment

1. States Parties recognize the right of persons with disabilities to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities. States Parties shall safeguard and promote the realization of the right to work, including for those who acquire a disability during the course of employment, by taking appropriate steps, including through legislation, to, inter alia:

(a) Prohibit discrimination on the basis of disability with regard to all matters concerning all forms of employment, including conditions of recruitment, hiring and employment, continuance of employment, career advancement and safe and healthy working conditions;

(b) Protect the rights of persons with disabilities, on an equal basis with others, to just and favourable conditions of work, including equal opportunities and equal remuneration for work of equal value, safe and healthy – 20 – working conditions, including protection from harassment, and the redress of grievances;

(c) Ensure that persons with disabilities are able to exercise their labour and trade union rights on an equal basis with others;

(d) Enable persons with disabilities to have effective access to general technical and vocational guidance programmes, placement services and vocational and continuing training;

(e) Promote employment opportunities and career advancement for persons with disabilities in the labour market, as well as assistance in finding, obtaining, maintaining and returning to employment;

(f) Promote opportunities for self-employment, entrepreneurship, the development of cooperatives and starting one's own business;

(g) Employ persons with disabilities in the public sector;

(h) Promote the employment of persons with disabilities in the private sector through appropriate policies and measures, which may include affirmative action programmes, incentives and other measures;

(i) Ensure that reasonable accommodation is provided to persons with disabilities in the workplace;

(j) Promote the acquisition by persons with disabilities of work experience in the open labour market;

(k) Promote vocational and professional rehabilitation, job retention and return-to-work programmes for persons with disabilities.

2. States Parties shall ensure that persons with disabilities are not held in slavery or in servitude, and are protected, on an equal basis with others, from forced or compulsory labour.

Article 28

Adequate standard of living and social protection

1. States Parties recognize the right of persons with disabilities to an adequate standard of living for themselves and their families, including adequate food, clothing and housing, and to the continuous improvement of living conditions, and shall take appropriate steps to safeguard and promote the realization of this right without discrimination on the basis of disability.

2. States Parties recognize the right of persons with disabilities to social protection and to the enjoyment of that right without discrimination on the basis of disability, and shall take appropriate steps to safeguard and promote the realization of this right, including measures:

(a) To ensure equal access by persons with disabilities to clean water services, and to ensure access to appropriate and affordable services, devices and other assistance for disability-related needs;

(b) To ensure access by persons with disabilities, in particular women and girls with disabilities and older persons with disabilities, to social protection programmes and poverty reduction programmes;

(c) To ensure access by persons with disabilities and their families living in situations of poverty to assistance from the State with disability related expenses, including adequate training, counselling, financial assistance and respite care;

(d) To ensure access by persons with disabilities to public housing programmes;

(e) To ensure equal access by persons with disabilities to retirement benefits and programmes.



DFI's vision

An Ireland where people with disabilities are participating fully in all aspects of society.



DFI's mission

DFI is a federation of member organisations working with people with disabilities to implement the UN CRPD and ensure their equal participation in society.



Four-year goal

Member organisations are actively involved in DFI, working to implement the UN CRPD and to achieve the equal participation of people with disabilities in society.

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