



Pre Budget Submission 2023

MAKE OR BREAK DISABILITY BUDGET 2023

It is not tolerable or acceptable that progress on the government's commitments to its disabled people would be side-lined or curtailed as Ireland goes through another crisis.

August 2022

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Introduction

Disability Federation of Ireland, DFI, along with its 121 member organisations, make this pre-budget submission because this is needed now to reduce the poverty and exclusion that people and their families endure on a daily basis.

It is also needed to honour the commitments the Government has made to the disability community.

1. Delivery Context

Halfway through the span of this government, in the grip of an unprecedented cost of living crisis, disabled people and their families were already trying to live with chronic deficits across essential specialist services and supports for living. These pre-date Brexit and Covid. They include housing, unemployment, poverty and the cost of living with a disability, as well as chronically under resourced specialist disability services. The net result being confinement to where one lives and consequently routine exclusion from everyday community living.

The “**Programme for Government – Our Shared Future**” offered new hope to be free of these restrictions. Progress must be made in the year ahead. Progress that demonstrates how the 643,000 disabled people and their families will see their exclusion and poverty decrease. Ireland cannot credibly come out of the ongoing serious challenges we all face without placing the needs of these people and their families at the centre of this Budget.

This submission concentrates on four related areas:

- resourcing specialist disability services,
- solving the recruitment and retention issue,
- moving people out of poverty, and
- addressing housing and employment.

Removing the barriers set out in this submission will provide targeted support to people and families in every community in Ireland. Budget 2023 can choose to target support to those in our community who have substantial and ongoing extra needs.

This submission prioritises areas where that targeting can be most effective.

Budget 2023 can give much-needed support to those, mainly women, who provide family care and back up.

2. Day to Day Reality



Disabled people and their families live in poverty and exclusion in every community across Ireland. Barriers in accessing community participation, facilities not being accessible, extra costs, not being able to routinely get or use public transport, housing, education, unemployment, and the list goes on.

The experience of disabled people is one of poverty and social exclusion:

- 2 in 5 people not working due to disability are at risk of poverty, while 1 in 5 live in consistent poverty.¹
- These rates are now 4-5 times higher than the general population.
- The average annual extra cost of living with a disability is between €8,700 and €12,300. The annual means tested income provided by Disability Allowance is €10,816.²
- 22% of people with a disability are at work, compared to 53% of the general population.³
- 27% of homeless people have a disability - double the rate of the general population.⁴
- 31% of people with a disability who have completed their education did not progress beyond primary education, compared to 13% of the general population.⁵
- 24% of people with disabilities do not have access to a car or van, compared to 12% of the general population.⁶
- 43% of people with disabilities report being depressed, compared to the national average of 14%⁷

¹ CSO. Survey on Income and Living Conditions 2021.

² Indecon International Research Economists (2021). The Cost of Disability in Ireland- Research Report. <https://www.gov.ie/en/publication/1d84e-the-cost-of-disability-in-ireland-research-report/>

³ Census 2016

⁴ Census 2016

⁵ Census 2016

⁶ Census 2016

⁷ <https://www.cso.ie/en/releasesandpublications/ep/p-ihsd/irishhealthsurvey2019-personswithdisabilities/>

3. DFI Budget Proposals

3.1 Disability Services to support Independent Living



A recent Department of Health report estimated that a further €550m to €1000m investment in disability services by 2032 is required.⁸ The publication of the Disability Capacity Review, in 2021 laid out the significant level of investment and staffing needed. A Disability Action Plan is being developed which will set out implementation commitments until 2025. **This must be published urgently to better inform Budget 2023, the first of three remaining Budgets of this government.** The Action Plan will require multi-annual funding to enable long-term planning. Starting this year, Budget announcements should transparently show the level of progress year on year towards delivering the government's own estimates.

Note: The following tables outline the levels of investment needed, in disability supports, over the course of ten years to address demographic change and unmet need.

⁸ Department of Health, Disability Capacity Review, p.28.

Tables 1a and 1b from the Disability Capacity Review (p.29)

Table 1a: Estimate, additional annual funding required to meet demographic and unmet need – low

Type of disability service	Demography only			Demography + unmet need		
	2022	2027	2032	2022	2027	2032
	€m	€m	€m	€m	€m	€m
Residential – Minimum scenario	60	120	160	220	280	320
Day services	8	30	60	40	60	90
PA & home help	4	10	15	34	40	45
Therapies	3	5	6	48	48	54
Respite	2	3	4	18	21	25
Community services	3	6	9	3	6	9
Total (rounded)	80	170	250	350	450	550

Estimates are indicative only. Totals may not add up due to rounding

Table 1b: Estimate, additional annual funding required to meet demographic and unmet need – high

Type of disability service	Demography only			Demography + unmet need		
	2022	2027	2032	2022	2027	2032
	€m	€m	€m	€m	€m	€m
Residential – Pre-recession scenario	60	120	160	400	500	550
Day services	40	140	250	70	170	280
PA & home help	4	10	15	34	40	45
Therapies	3	5	6	74	74	80
Respite	2	3	4	18	21	25
Community services	3	6	9	3	6	9
Total (rounded)	110	280	450	600	800	1,000

Estimates are indicative only. Totals may not add up due to rounding

The services listed above are the basic and foundational services to make it possible for people to live independently and with dignity in their communities.

3.1.1 Funding for Disability Capacity Review Budget 2023:

The following investment is required. This is based on the funding needed to address demographic change and unmet need, in line with the higher estimate (table 1b, column 4):

- €400m for residential services
- €70m for day services

- €64m for PA and home support services⁹
- €74m for therapies, comprising:
 - €48m for adult and child therapy services
 - €26m to fully roll-out Specialist Clinical Rehabilitation Networks in every Community Health Organisation¹⁰
- €18m for respite services
- €10m for community services¹¹

These amount to €637m of which €600m is set out in the Capacity Review for 2022. We are seeking additional funding for PA and community services beyond what the Capacity Review outlines (€30m extra funding for PA and €7m extra for community services)

3.1.2 Funding for other health and social care supports

A number of other health and social care related measures are needed that are not set out in the Disability Capacity Review.

This support is needed:

- as 90% of disabled people are supported by general community health and social services.¹²
- due to the positive impact of assistive and other enabling technologies.
- for the 1,300 people with disabilities wrongly placed in nursing homes, whose plight was outlined in the Ombudsman's Wasted Lives report.
- to make mainstream health services accessible to people with disabilities. Within this, neurological services require a specific focus. (Neurology waiting lists now stand at over 24,117, almost a 20% increase over five years. 10,639 people have been waiting over a year.)¹³

⁹ This is higher than the amount recommended in the Disability Capacity Review (€34m). DFI believes that the Review underestimates the level of unmet need for PA as "data on unmet need has not been systematically recorded" (p. 74)

¹⁰ The €26m for specialist clinical rehabilitation networks is included in the €74m estimate for therapies (demography and unmet need) in table 1b

¹¹ The Disability Capacity Review recommends €3m funding for community services. However, this is a significant underestimation of need as that figure only accounts for demographic change, and not unmet need.

¹² Department of Health, Disability Capacity Review, p.6

¹³ National Treatment Purchase Fund. Outpatient by Speciality as of 30/06/2022. <https://www.ntpf.ie/home/outpatient.htm>

- to ensure that disability organisations receive sufficient funding to cope with the impact of inflation, which is greatly increasing costs such as fuel. This is having a particularly serious impact on smaller organisations.

Budget 2023:

- €17.5m to support 200 people under 65 to move out of nursing homes and to continue work to prevent any further admissions
- €2m for assistive technology supports, including a national network, loan library, national database, information system, training programme and peer support development programme
- €1.5m to appoint 20 more nurse specialists across adult neurology services¹⁴
- An inflation proofing package when allocating funding for 2023, with a process to review its impact throughout the year

¹⁴ To learn more see the Neurological Alliance of Ireland's 'Patients Deserve Better campaign' at patientsdeservebetter.ie

3.2 Recruitment and Retention of Staff



Disability organisations are struggling with a recruitment and retention crisis which is having a major impact on the lives of people who need these services. The cause is staff moving to other publicly funded employers where they continue to support disabled people, yet with better pay and conditions. This is having a major impact on the ability of Section 39 funded organisations to recruit and retain staff.¹⁵

The pay and conditions which Section 39 funded organisations can offer to employees has fallen far behind what is available in other comparable areas of employment, in particular the public sector. In recent months a series of work stoppages have been taken by health and social care workers (often supported by the disabled people who rely on these employees) seeking better terms and conditions.

Trade unions have been calling on the government to engage with them and to provide sufficient funding to community and voluntary organisations to enable them to address this serious service provision problem. Staff migration will continue to other publicly funded organisations, leading to ongoing service provision deficits to disabled persons, unless this issue is addressed.

State intervention is needed to resolve the unintended consequences that have surfaced over the past decade as a consequence of the public funding mechanisms being used.

¹⁵ Section 39 agencies are agencies under the Health Act 2004 that receive a grant by the HSE to provide services similar or ancillary to the HSE

This issue is constantly highlighted by our member organisations, who face an ongoing recruitment crisis across a range of critical areas, including therapy posts, personal assistants and day service staff. This high staff turnover is detrimental for the vital continuity of the relationship between the person with a disability and their support staff. It is heavily impacting on the ability to deliver services that enable people to fully live in the community. Workforce planning is needed to address this. The understaffing of these services is exacerbating the already high levels of unmet need which the Capacity Review Report was designed to address.

Not dealing with this issue will undermine the implementation of the Capacity Review. The impact is routinely seen in:

- difficulty for children and adults to access therapy,
- how hard it is for people to get a Personal Assistant,
- the lack of fully staffed Children's Disability Network Teams, and more.

Individuals with disabilities will remain unable to access the services they need for independence, with family members under further pressure, if recruitment and retention is not addressed in this Budget.

Budget 2023:

- Provide sufficient funding to ensure sustainable recruitment and retention levels across Section 39 funded organisations.



3.3 Cost of Living with a Disability and Poverty

Disabled people continue to live at extreme risk of poverty in Ireland. Last year their poverty rates increased significantly, while the national average reduced. The experience of both the pandemic and the cost of living crisis highlighted income inequality and the insufficiency of core welfare rates. The state provided a much higher level of social protection to people unable to work due to the pandemic, compared to those unable to work due to disability and chronic illness.

This policy choice exacerbated the already long-standing deprivation people with disabilities endure. The cost of living crisis and the inflation spiral are pushing people further into poverty. **One in five people who rely on Disability Allowance to survive live in consistent poverty, while two in five are at risk of poverty.**

There is clear popular support for ensuring people with disabilities have sufficient income to live a dignified and independent life, equal to others. This was evidenced by the Citizen's Assembly recommendations last year¹⁶, and by Oireachtas members when they unanimously adopted a motion calling for a €20 cost of disability payment and increases in core social protection rates to keep up with inflation¹⁷. The 2.5% increase (€5) of Disability Allowance in Budget 22 was completely insufficient to even match inflation, let alone address long-standing income inadequacy.

- The Department of Social protection's Cost of Disability report shows that disabled people face extra costs of €8,700-12,300, as well as unaffordable extra costs of €2,706 per year.¹⁸

¹⁶ Citizen's Assembly, Recommendation 10-14, ps 61-66, <https://www.citizensassembly.ie/en/previous-assemblies/2020-2021-citizens-assembly-on-gender-equality/about-the-citizens-assembly/report-of-the-citizens-assembly-on-gender-equality.pdf>

¹⁷

https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_disability_matters/reports/2022/2022-03-10_report-on-ensuring-independent-living-and-the-united-nations-convention-on-the-rights-of-persons-with-disabilities_en.pdf p 9.

¹⁸ Indecon, Cost of Disability Report.

- The basic annual means tested income provided by Disability Allowance is €10,816.
- Those unable to work due to disability are now five times more likely to live in consistent poverty (19.2% vs national average of 4%).¹⁹
- The CSO recently found that lower income households experienced inflation of 10.3%, 2% higher than those with the highest incomes.

The Programme for Government, and the Roadmap to Social Inclusion made commitments to improve outcomes and reduce poverty for disabled people.

Budget 2023:

- Increase core social protection rates by €20, to keep up with inflation and prevent a rise in inequality and poverty.
- Additional to the above, introduce a cost of disability payment of at the very minimum €20 a week to those on Disability-related payments, to start to address the extra cost of living with a disability.
- Pay a Christmas Bonus-style double payment before the end of October, along with other measures targeted at those on the lowest incomes to address the current unprecedented cost of living crisis.
- Ensure all budget decisions are subject to equality and poverty proofing, specifically assessing their impact on disabled people, including taking into account the cost of disability.

(see DFI's Pre Budget Submission to the Department of Social Protection for more detail on this area - <https://www.disability-federation.ie/publications/dfi-prebudget-submission-to-the-dept-of-social-pro/>)

¹⁹ CSO, SILC, 2021.



3.4 Housing and Employment

A home and work are two critical markers for participation.

Housing for disabled people was already a crisis before the housing crisis developed after the banking collapse. **Unemployment has always been the reality for disabled people and this continues while Ireland is at “full employment”.**

Housing: The housing situation of disabled people is a crisis within the broader housing crisis. 5,057 disabled people are currently on the housing list, many for 5-10 years, while many more with housing needs have not put themselves on the list as they do not see any hope of being housed. 2,914 live in congregated settings, and there are over 1,300 people under 65 inappropriately housed in nursing homes.

In 2022 an ambitious new Housing Strategy for Disabled People 2022-2027 was launched. That ambition needs resourcing.

Budget 2023:

- Allocate specific funding to Department of Housing, Department of Health, Department of Children, Equality, Disability, Integration and Youth budget lines, and to the Housing Agency, to resource the new Housing Strategy.
- Make the new Local Authority Housing and Disability Technical Advisor positions standalone roles and recruit new staff for these (€1.8m).
- €17.5m to support work to move people from nursing homes (see disability services section for more detail)
- Some people require both an accessible home and social care services to live independently, yet agencies often work in siloes. Operate a national mechanism to drive the inter-agency coordination needed between the Housing Agency, national HSE, Local Authorities, Department of Housing etc.

Accessible homes are needed so that disabled people can easily participate in the community:

- Increase Capital Assistance Scheme funding to €120m (cost: €24m)
- Amend Part M of the Building Regulations (2010) to include a percentage of homes to be built to Universal Design ++ standards, including wheelchair liveable homes and provide necessary funding for this.
- Allocate funding to deliver the targets for housing committed to in the new national Housing Strategy

Housing Adaptation Grants support some people, subject to means testing, to adapt their homes if they acquire a disability or their needs change. Increase investment in the Housing Adaptation Grants, to:

- Return the Adaptation Grant for People with a Disability to the 2010 level of €40m
- Increase the maximum grant amount, which has not been increased for 12 years, from €30,000 to €60,000.
- Increase the income threshold by at least €12,300, and consider only the income of the disabled person.

The Disability Capacity Review also estimates that the following investment is needed to meet the capital cost of additional housing places for people with disabilities. This funding is to address the capital costs of the additional residential places required, to address demographic change, tackle unmet need, and replace the current stock of congregated institutional and campus residential provision:

- €380m on housing capital for disability services
- €280m to fund decongregation

Employment: The employment rate of people with disabilities continues to be extremely low. By some measures Ireland has the lowest employment rate across the whole EU - 32.3%. This is almost 20% lower

than the EU average of 50.8%.²⁰ Ireland had the highest employment gap also: **disabled people are 42.1% less likely to be employed than persons without disabilities.**

People with a disability are paid less - the wage gap is 21.3%, which is high by EU standards.²¹ They also experience discrimination when seeking work, and are less likely to secure high-skilled positions.²² The ESRI has warned that people with a disability may be at risk of being 'left behind' without supports to address the systemic barriers they face.²³

The EU regularly highlights concerns regarding employment and poverty rates for people with disabilities. The 2022 Country Specific Report notes that "some vulnerable groups – especially lone parent households and persons with disabilities – are at a higher risk of poverty and social exclusion, often exacerbated by difficulties to participate in the labour market and find employment."²⁴

It highlights concerns including:

- The large disability employment gap,
- The need to improve the tax and welfare system to ensure low-income households aren't worse off due to withdrawal of benefits on taking up employment, and
- People with disabilities' disproportionate risk of poverty in Ireland.²⁵

Budget 2023:

- Raise the income disregard for Disability Allowance by €25 and increase the weekly means disregard to €15.

²⁰ European Disability Forum, *Poverty and Social Exclusion of People with Disabilities: European Human Rights Report: Issue 4 – 2020*, p26.

²¹ NDA, *Factsheet 2: Employment Briefing Information*, May 2019, p 15.

²² ESRI and IHREC, *Monitoring decent work in Ireland*, https://www.esri.ie/system/files/publications/BKMNEXT414%20%281%29_0.pdf

²³ Op cit.

²⁴ COMMISSION STAFF WORKING DOCUMENT 2022 Country Report - Ireland Accompanying the document Recommendation for a COUNCIL RECOMMENDATION on the 2022 National Reform Programme of Ireland and delivering a Council opinion on the 2022 Stability Programme of Ireland, p3.

²⁵ Op Cit, ps 15, 47, 48.

- Act on the recommendations of disability organisations to the review of the Reasonable Accommodation Fund and provide sufficient funding.
- Increase the rate of the Wage Subsidy Scheme to 65% of National Minimum Wage.
- Specifically examine the Cost of Disability report to understand the extra costs disabled people experience related to employment, and then develop and implement actions to address these.
- Develop stronger measures and policies to support self-employment.



4. Community Participation

Disabled people and their families need to have practical improvements that are impactful in their day to day lives in the year ahead. **It is not tolerable or acceptable that progress on the government's commitments to its disabled people would be side-lined or curtailed as Ireland goes through another crisis.**

It is a well understood reality that having a disability or disabling condition continues to bring poverty and exclusion. This submission sets out what can happen in the year ahead to turn that intolerable reality around, in keeping with Programme for Government commitments to progress implementation of the United Nations Convention on the Rights of Persons with Disabilities, UN CRPD.

Disabled people live with all the other issues and problems that their neighbours have. Yet the impact of disability for a person and their family comes on top of those.

Thousands of individuals and families will respond to Budget 2023 without considering disability. Yet over the year ahead disability will become part of their everyday life, as thousands of people acquire a disability in Ireland every year.

Removing the barriers set out in this submission will provide targeted support to people and families in every community in Ireland. Budget 2023 can choose to target support to those in our community who have substantial and ongoing extra needs. This submission prioritises areas where that targeting can be most effective.

Budget 2023 can give much-needed support to those, mainly women, who provide family care and back up.



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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