



**Disability Federation of Ireland**

**Submission to  
Department of Social Protection**

**Consultation on successor to the “Roadmap for  
Social Inclusion 2020-2025”**

**June 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 successor to the Roadmap for Social Inclusion 2020-2025. 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 supports also make up a significant portion of the Department's budget.

The Roadmap for Social Inclusion has been an important strategy with key disability commitments which DSP has anchored since 2020, but many of which required cross-Departmental delivery and implementation. This has been an important positive in the strategy's approach, but also a key implementation challenge given the busy period from 2020-2025.

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. There is still a way to go to achieve this, and in this context we welcome both the forthcoming National Human Rights Strategy for Disabled People, but also this opportunity to reflect on the first Roadmap's achievements, but also the learnings from challenges and failures that arose in its delivery.

The delivery of the final year of the Roadmap, and this consultation on its successor strategy is a crucial endeavour for this new government, as it charts a path towards inclusive growth, social development and inclusion, and continuing to tackle poverty.

## **2. Context: the Department of Social Protection's essential role**

Many people with disabilities cannot work and thus rely on DSP for their basic economic survival, while 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 provision of income supports, as well as employment supports, are essential for disabled people across the country.

Given the above, 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.

## **The UN Convention on the Rights of Persons with Disabilities**

The ratification by Ireland of the UN CRPD<sup>1</sup> in 2018 presents a huge opportunity for disabled people to realise the goals of independent and adequate standards of living. The Convention is a guide for policy-makers, and all disability-related policies developed since its ratification in Ireland should take the values, principles, rights and entitlements laid out in the UN CRPD as their starting point.

All principles of the convention are important, however in the context of the Department's mandate on poverty reduction and employment for disabled people, two articles are particularly relevant, namely:

- [Article 28](#)– which outlines the right to an adequate standard of living and social protection, including the continuous improvement of living conditions, poverty reduction programmes and to state assistance with the extra Cost of Disability.
- [Article 27](#)– which outlines the right to work on an equal basis with others, the right to training, return to work, and reasonable accommodation.

These rights are fundamental to ensuring the active participation and inclusion in society of disabled people, which is a fundamental part of DSP's Mission, and essential to any social inclusion approach.

Ireland's social protection policy for people with disabilities should deliver the above rights, and others codified in the UN CRPD (including the right to independent living, choice equal to others and to community participation), and should explicitly articulate how it will do so.

## **Public Sector Duty**

In addition, the Department of Social Protection, and the State in general, has a responsibility under Public Sector Duty, to have regard to eliminate discrimination, promote equality of opportunity and protect the human rights of service users. 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. DSP, like other Departments, must develop and publish a detailed plan to take actions to improve the human rights situation of its customers. The plan should take account of and provide specific actions to individually address all nine grounds found in the Equal Status Act. This includes disability. DSP does have an existing plan running until the end of 2025. However

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<sup>1</sup> [UN Convention on the Rights of Persons with Disabilities.](#)

the Department's Public Sector Duty plan could be strengthened significantly in its next iteration, in tandem with and complementary to the development of the new Roadmap.

### **3. Programme for Government**

Given that this successor Roadmap is being developed under a new government with a new Programme for Government, it is relevant to outline some of the most significant commitments on disability. It will be important for the Department, and the other Departments working on the new Roadmap, to factor in delivery of the following promises over the duration of the strategy.

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 deliver improvements in approach and stronger implementation. In areas specifically relevant to DSP's responsibilities and the Roadmap, it commits to:

#### **General Commitments** (pages 92, 100)

- Advancing the rights and improving the lives of people with disabilities.
- Prioritise the publication and fund a new National Disability Strategy, setting out a vision to 2030.
- Adopting a whole-of-government approach and advancing the implementation of the United Nations Convention on the Rights of Persons with Disabilities and the Optional Protocol to the Convention of Persons with Disabilities.
- 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.
- Ensuring that available resources are targeted at vulnerable groups who are unable to work such as carers, people with disabilities and pensioners .
- Improving supports and ensuring that the social welfare system is progressive and empowers people with a disability to live full and independent lives.

#### **Addressing the Cost of Disability** (pages 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** (pages 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.

There are also a number of commitments that are relevant across different Departmental briefs - for [all disability Programme for Government commitments, see here](#).

## **4. The status of disabled people in 2025**

Disabled people remain disproportionately likely to live with poverty and deprivation, even as we near the end of the tenure of the first Roadmap. The most recent annual statistical evidence shows the ongoing deprivation and economic precarity that disabled people live with, often unable to afford basic essentials. In 2024 one in five people unable to work due to long standing health difficulty (disability) lived in consistent poverty, a rate almost four times higher than the national average, and

10 times higher than the Roadmap target for consistent poverty by 2025. People with disabilities' poverty and deprivation rates are consistently two to four times higher than the national average.

The 2024 CSO national SILC poverty and deprivation data<sup>2</sup> shows that people unable to work due to disability:

- Have extremely high consistent poverty rates - nearly four times higher (19%) than the national average (5%). This rate increased by 2.5% last year. By comparison 1.7 % of employed people and 1.9% of those who are retired live in consistent poverty.
- Are at a much higher risk of poverty - 32.5%, compared to a national average of 11.7%. This rate increased by 5% since 2023.
- Have an enforced deprivation rate 3.5 times higher (38.5%) than employed people (11.6%).

Moreover, for people unable to work due to disability:

- 2024 CSO SILC data show that the at risk of poverty rate increased to 32.5%, compared to 5.4% of employed people, and 13.3% of those who are retired.
- The data again shows the extent to which improvements in poverty rates last year depended on one-off measures. Excluding one-off cost of living measures, the at risk of poverty rate would actually be 37.4% and the consistent poverty rate would be 22%.
- The EU Commission's 2025 Country Specific Report once again marked Ireland red ("critical situation") only once on its social scoreboard of 17 indicators, for the Disability Employment Gap of 38.2% (compared to the EU average of 24%).<sup>3</sup>
- Ireland now ranks 16<sup>th</sup> of the EU 27 on disability poverty, despite being one of the wealthier EU states.<sup>4</sup>

The above statistics do not indicate successful poverty reduction for disabled households. Our social protection system is still failing to deliver for disabled people. This is all the more concerning given Ireland's economic status, with ongoing wage growth and employment rates at an all-time high (though not for disabled people). Yet many people with disabilities have deeply inadequate incomes, and face insurmountable structural barriers when they try to secure and retain employment.

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<sup>2</sup> CSO (2025) [Survey on Income and Living Conditions 2024](#)

<sup>3</sup> EU Commission (2025), [2025 Country Report - Ireland](#), p.90, 91 and 105.

<sup>4</sup> [Eurostat 2024](#).

People unable to work due to disability also endure substantial deprivation:<sup>5</sup>

- 18.1% went without heating at some stage last year, compared with 7.3% of employed people or 4.5% of retired people.
- 23.4% were unable to afford new (not second-hand) clothes, compared to a national average of 6.2%.
- 24% were unable to afford a morning, afternoon or evening out in last fortnight, compared to a national average of 10.1%.
- 52.3% could not afford to go for a week's holiday away from home, compared to the national average of 22.9%.
- 28.5% couldn't afford to regularly participate in a leisure activity that costs money, more than twice the national average (13.5%).

A key cause of this financial vulnerability is the Cost of Disability. The many extra costs of being disabled, established by the government's Indecon Cost of Disability report, increased significantly in recent years due to inflation.<sup>6</sup> Moreover a recent ESRI study has updated these estimates, providing a much higher cost range. The study showed that households with a disabled member "face significant financial burdens related to disability and have very high at risk of poverty (AROP) rates."<sup>7</sup> The report added further evidence of an issue DFI and others have highlighted for years - given our income-based approach to measuring poverty, we are actually **substantially underestimating the poverty levels of disabled households**. The ESRI report establishes that:

- Disabled households are more likely than other household types to be at risk of poverty and have a lower standard of living.
- Disabled people face extra costs in the range of €488-€555 on average a week.
- Disabled households required between 41% to 93% extra disposable income to achieve the same standard of living as a similar household with no disabled members.
- The at risk of poverty (AROP) rate is substantially higher for disabled people - 24%, compared to 10% for non-disabled people.
- When Cost of Disability is factored in, their AROP rate increases to a staggering 65%-76%.

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<sup>5</sup> CSO 2024, [SILC Deprivation](#).

<sup>6</sup> The Indecon report, [The Cost of Disability in Ireland](#), quantified the annual Cost of Disability as €8,700 - €12,300 in 2020. Adjusted for inflation, this is now €10,651 - €15,059. The [Consumer Price Index Inflation Calculator](#) shows inflation of 22.4% from January 2021 to May 2025.

<sup>7</sup> ESRI (2025), [Adjusting estimates of poverty for the cost of disability](#).

The basic weekly income currently provided by Disability Allowance is €244 – covering at maximum half the additional costs people face, apart from all the other everyday living costs that people live with.

## **5. The first Roadmap for Social Inclusion**

The Roadmap for Social Inclusion was a wide-ranging and significant strategy. It set some ambitious targets, and measured them and other data regularly. It also aimed for a cross-Departmental approach, and addressed the fact that many areas of policy impact on this on social inclusion – including health, education, transport, housing etc. The Roadmap was implemented during an unusual time period with a number of unexpected challenges (COVID, the war on Ukraine, cost of living crisis etc).

Many elements of the Roadmap were positive, including the setting of clear measurable and specific targets. Equally the process of reviewing and reporting on them via the Roadmap Report card has focused attention on poverty reduction. The targeted focus on disabled people, acknowledging the fact that poverty rates continue to be much higher than average, was also very welcome.

During the early years of the Roadmap, during the covid-19 pandemic, we saw the power and capacity of Ireland's social protection system to protect people from poverty, through the use of the €350 PUP, which successfully protected hundreds of thousands of people and their families from poverty, as the 2021 SILC data showed. It was a striking reminder of the capacity of the state to protect people from poverty, but also prompted the question as to why other groups in society, such as those unable to work due to disability, are expected to live on a much lower income for the rest of their lives.

In more recent years we have again seen the potential of the social protection system to support people, with one-off "Cost of Living" supports to people struggling with price rises again successfully staving off increases in poverty. However such an approach is just temporarily plugging the gap, and we fear that if one-off measures are removed in the forthcoming Budget, we will again see increases in poverty.

The active and focused engagement of the Minister of State with responsibility for the Roadmap has been extremely important in securing attention, senior engagement and strong reporting against the Roadmap's commitments. The cross-Departmental approach has also been important and significant, and should be further strengthened in the next iteration.

The comprehensive reporting (albeit with an ongoing time lag) has been very useful, and in particular the focus on data has been effective to



support careful monitoring. The data tables in the Progress Report, the focus on EU rankings, and the summary and focus on which rankings improved or disimproved has helped to highlight areas needing further focus and attention (such as disability).

The civil society members of the Roadmap Steering Group have also done an excellent job of sharing information, monitoring the Roadmap, and securing input from broader civil society on the progress (or lack thereof) in delivery of the strategies commitments and goals.

## **6. Feedback on Roadmap commitments and achievements**

### **Consistent Poverty**

The Roadmap aims to reduce overall consistent poverty to 2% by 2025. As previously mentioned, most recent figures show the extent to which disabled people who cannot work are locked into poverty. While the national average for consistent poverty in 2024 was 5%, it was 19% for people unable to work due to disability. This rate is almost 10 times higher than the Roadmap target.

Moreover, alarmingly, under this metric the situation has disimproved over the tenure of the Roadmap. CSO SILC data for 2019 shows a consistent poverty rate for those not at work due to illness or disability of 18.1%. Five years later, near the end of the Roadmap, consistent poverty is almost 1% higher (and would be 22% if the one-off Budgetary measures were discounted). This demonstrates the urgent need to strengthen the approach to disability poverty reduction in the next Roadmap.

### **Disability Specific Commitments**

DFI offers the following observations reflecting on the achievements, failings and learnings from the four specific disability commitments in the Roadmap.

Overall, as previously mentioned, the particular focus on people with disabilities was strongly welcomed. Notably, the focus on disability poverty reduction was very positive, and much-needed, as a focus on averages can hide the urgent needs of specific groups. Equally the setting of targets and the careful and fastidious tracking of data and indicators in the data section of the Progress Report on an annual basis was very positive. This helped to emphasise trends and focus attention on areas where Ireland's performance is particularly weak when compared to EU averages (notably disability poverty and employment).

However by and large the delivery of meaningful positive outcomes and changes in disabled people's lives has not been achieved or demonstrated by the Roadmap, in particular given the significant focus on process commitments in most of the disability Chapter, rather than on outcome or impact measurement.

Equally a general observation is that the four disability commitments are deeply interconnected and intertwined, with the issues covered under each promise impacting strongly on delivery and change in the other areas. To some extent it is thus hard to give separate recommendations by theme, as the knock-on impact of areas tackled under one commitment is hard to assess separately from that under others.

In section 8B (pages 28-30) we outline our overall recommendations on disability for the future Roadmap, while below we include specific thematic recommendations under each existing commitment.

It is also relevant to note the ongoing establishment of a Disability Unit in the Department of An Taoiseach. It is too early to assess or recommend what role this unit might play in the implementation and monitoring of key disability commitments such as those in the Roadmap or the forthcoming National Human Rights Strategy for Disabled People. However we imagine this unit could potentially play a constructive role in mandating, requiring and supporting the cross-Departmental approach that is essential to secure progress on key issues which the Roadmap seeks to tackle, including disability employment, poverty and Cost of Disability.

Finally it is important to highlight that one piece of the disability policy approach is pending and currently unavailable. We understand that the National Human Rights Strategy for Disabled People (NHRSDP) will be published soon, but it has not yet been. It is thus a little difficult to fully and effectively comment on the Roadmap successor strategy, without sight of the final NHRSDP and its (highly relevant) goals and targets. In this context we lack the most recent information on commitments from this Department and others on disability employment, and other areas. However we were concerned that the most draft recent version of this strategy seen by DFI some months ago lacked ambition, and did not contain any poverty reduction commitments, or acknowledgement of DSPs crucial social protection role for disabled people who cannot work.

**Commitment 41: "The Government commits to the continued implementation of the National Disability Inclusion Strategy (NDIS) and Comprehensive Employment Strategies and to their review in 2021."**

This commitment was not a new commitment developed for the Roadmap. It essentially reiterated two existing policy commitments that were already in place - committing to continue implementing ongoing disability inclusion policies.

The National Disability Inclusion Strategy was in its time a welcome development, being Ireland's first disability inclusion strategy. It achieved important first steps. However there was agreement, after the ratification of the UN CRPD in 2018, that a move was required to a UN CRPD-focused, rights-based approach to disability inclusion in Ireland. Moreover the NDIS concluded at the end of 2022 (after a one-year extension), and two and a half years later we await the (pending) publication of the new National Human Rights Strategy for Disabled People. In the interim unfortunately many aspects of the NDIS infrastructure were not maintained or lost momentum – for example Departmental Disability Consultative Committees lapsed since 2022. It is important to note that the consultation process to inform the new National Human Rights Strategy for Disabled People has been comprehensive and taken time to really consider issues, something we hope will result in a stronger more considered strategy when it is finally published.

As regards the Comprehensive Employment Strategy (CES), it is difficult to justify the assessment of this commitment as being 'achieved with ongoing delivery'. The phase three final Action Plan for the CES for 2022-2024 was never agreed or published, and the CES seemed to lose momentum or even disappear in recent years – with no action plan to measure against, no clear reporting could be done and achievements could not be monitored. The implementation committee was not convened from 2022 onwards, and the independent chair of the CES implementation committee resigned in 2023 in frustration at lack of progress or movement on key issues.<sup>8</sup> This was all extremely concerning given ongoing evidence that Ireland's disability employment rate is one of the worst in the EU.

A final review of the CES was undertaken by the National Disability Authority, with a detailed report and assessment published in 2025. The report concluded that while the CES had shown some progress, the disability employment gap persisted, and people with disabilities still reported "continuing fragmentation in and inflexibility of support services" around employment. It also flagged concerns regarding "the siloed approach taken by Departments and the lack of clarity around where responsibility lay for supporting people into employment."<sup>9</sup> The review

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<sup>8</sup> Fergus Finlay (2023), Irish Examiner. [People with disabilities battling against a cruel and made system.](#)

<sup>9</sup> NDA (2025), [Final review of progress under the comprehensive employment strategy for people with disabilities 2015-2024.](#)

made several suggestions, including shorter time frames for future strategies (the CES ran for 10 years), greater monitoring, and greatly improved cooperation between government departments.

Recommendations for next Roadmap:

- A strong and ambitious National Human Rights Strategy for Disabled People (NHRSDP) is required.
- Clarity, coordination and complementarity around areas of responsibility and convergence between the NHRSDP and disability commitments in Roadmap will be necessary.
- Whichever strategy leads on employment, there should be an ambitious SMART employment target (eg quantifiable increase year or year of number of people availing of income disregards/increase of employment rates/reduction in disability employment gap etc).
- The employment commitment should outline clear measurable annual actions and targets.
- Much stronger coordination and collaborative working across the relevant Departments is necessary, and clarity on areas of responsibility.
- Act on the recommendations of the NDA and of disability organisations (for example to the Green Paper consultation) to address structural and systemic barriers to employment, including ensuring all Make Work Pay recommendations have been fully progressed.

**Commitment 42: Specific poverty reduction and employment targets will be set for people with disabilities:**

**1. Reduce the AROPE rate from 36.9% first to 28.7% (2025) and then to 22.7% (2030), and enter top 10 EU countries**

Fundamentally, at a level of principal, it is problematic to have a much less ambitious poverty reduction target for disabled people as compared to the general population. 2018 data, the most recent available when the Roadmap was drafted, showed an overall At Risk of Poverty and Social Exclusion (AROPE) for the general population of 20.8%. To set a poverty reduction target for more than ten years later (2030) that involves not even reaching the general AROPE average when the Roadmap was developed, clearly accepts and embeds a level of structural inequality, and an inevitability that being disabled will mean poverty and deprivation. DFI flagged this concern in its submission to the Roadmap mid-term review in 2022. "these targets are insufficient, and it is inherently unfair to have substantially less ambitious poverty reduction targets for disabled people than for the general population (the Roadmap aims to see disabled

people have significantly higher at risk of poverty rates in 2030 than the national average in Ireland right now)."<sup>10</sup>

However, as we wrote then, the Roadmap's commitments nevertheless represented "a welcome commitment to a target that can be monitored, and delivering on them would go some way to improving Ireland's dismal EU ranking on disability poverty." The existence of a tangible measurable target has made monitoring progress on an annual basis easier, and has focused attention on disability poverty.

The incremental improvements in social protection provision for people with disabilities in recent Budgets have been welcome, as have the disability specific one-off payments provided over the past three Budgets, a first acknowledgement and action on the extra Cost of Disability. However as we have already highlighted, many organisations including ourselves are deeply concerned that ostensible progress on poverty reduction in recent years is based on one-off supports, which if removed this year, will see poverty increase again as disabled people's income declines. Data from the CSO and ESRI analysis also confirms this.<sup>11</sup> Moreover disability is not a one-off, and until significant progress is made on addressing the significant income gap that disabled people experience between their income and their outgoings, including the substantial extra Cost of Disability, poverty rates will not fall sufficiently.

A fundamental concern regarding this target is that the Roadmap Progress Reports continue to mark it 'achieved with ongoing delivery'. This is a highly questionable designation, given that the poverty reduction amount targeted has not yet been achieved, nor the EU ranking stipulated. Moreover it is also premature, as 2025 data will not be available until 2026. That said, it has been positive to see the reduction in the AROPE rate in recent years – an indication that the one-off supports including the Disability Support Grant were necessary and helpful.

We have also pointed out on various occasions our concern that no actions or indicators underpinned the poverty reduction target mapping out *how* it would be achieved by 2025. This again made it hard to monitor in terms of its efficacy and delivery. Moreover at a general level, core social protection payments remain substantially below the poverty line, and the rate recommended by MESL. They were also significantly eroded during the recent inflationary years.

Recommendations for next Roadmap:

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<sup>10</sup> DFI (2022) [Submission on Roadmap for Social Inclusion Mid-Term Review](#).

<sup>11</sup> CSO, [SILC 2024](#). ESRI 2024, [Distributional impact of tax and welfare policies: Budget 2025](#). p. 13-14.

- Core social protection payments should be indexed and benchmarked to a MESL, factoring in inflation, wage growth and the Cost of Disability (see p31 for more on this).
- Given that there appears to be no poverty reduction target in the National Human Rights Strategy for Disabled People, it is essential that the Roadmap maintains a poverty reduction target for disability.
- As well as a target, the Roadmap should lay out at least some of the actions that will be taken over the duration of the strategy to achieve the poverty reduction target – recent submissions of disability organisations provide plenty of suggestions for areas that can make help to reduce disability poverty.
- A target should not be marked ‘achieved with ongoing delivery’ if a target has not yet been achieved.
- To achieve permanent reductions in poverty, action is needed to address the Cost of Disability. In particular, DSP should bring in a Cost of Disability payment, developed based on international best practice and co-designed with disabled people.
- When measuring and assessing disability poverty, DSP must factor in ongoing issues with current poverty assessment approaches being based on income alone, leading to significant underestimation of the poverty rates of disabled people and their households. This has knock-on impacts for means-testing, benchmarking etc.

## **2. Increase the employment rate (for those aged 20-64) in line with the Comprehensive Employment Strategy from 33.6% (in 2016 Census) to 38% by 2024.**

As has been discussed in recent years, the changes in the approach to the question on disability in the 2022 census has made comparisons to 2016 data challenging. As a result, as the NDA Comprehensive Employment Strategy (CES) review previously cited outlines, it is not possible to fully assess whether the above commitment was achieved, as the categorisation approach changed in the interim so like cannot be compared with like.

As regards achievements of the CES, please see comments above (pages 11-12) which provide feedback regarding the delivery of the strategy in recent years, the lack of functioning of its structures, and the lack of an Action Plan being published, let alone delivered, for 2022-2024.

Several of the structural barriers to employment for disabled people which were detailed in the Make Work Pay report remain relevant. Addressing these structural barriers requires cross and inter-Departmental coordination, including with the Department of Health, HSE, Department



of Children, Disability and Equality, Transport, Education and Higher Education, Employment etc to address issues that prevent disabled people from securing and retaining employment. These included lack of sufficient Personal Assistant hours, lack of accessible transport and workplaces, lack of right to flexible and remote working, insufficient assistive technology provision etc. Addressing the extra Cost of Disability meaningfully can also support more disabled people to take up work.

Work in recent years on employment by the Department, including the new Early Engagement approach, the launch of the new Work and Access scheme and the Wage Subsidy Scheme review and changes have been welcome and positive. Equally, a pillar of the forthcoming National Human Rights Strategy for Disabled People focuses on employment, and involves actions from multiple Departments. While this is indeed positive, earlier drafts seen showed a lack of ambition in the commitments outlined. Concerningly, there also seemed to be a regression in approach, in as much as there appeared to be no numerical targets for increased numbers or percentage of disabled people employed which could be measured, nor adoption of the NDA's advice following its final review of the CES that Ireland focus on the disability employment gap. This was very worrying, although we have heard indications that ambition has improved since.

As data shows, Ireland's employment rates still lag well behind our EU counterparts, and the OECD. The 2024 EU SILC data show Ireland's employment gap has increased to 38.2%, compared to the EU average of 24%.<sup>12</sup> This places Ireland fourth from the bottom, just ahead of Lithuania, Croatia and Romania. OECD studies confirm this issue - highlighting one of the lowest disability employment rates, largest employment gaps, and worst poverty statistics in the OECD also.<sup>13</sup>

For the first time in a number of years, this year's EU Commission Country Specific Recommendations highlighted disability poverty and low employment rates. The Commission recommended that Ireland "strengthen the labour market and social inclusion of disadvantaged groups, in particular persons with disabilities and single parents, by putting in place better targeted outreach and upskilling."<sup>14</sup> This is one of only four disability recommendations across all 27 EU member states.

The Commission's accompanying 2025 Country Specific Report emphasises the very low disability employment rates, with this being once

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<sup>12</sup> [Disability employment gap by level of activity limitation and sex.](#)

<sup>13</sup> OECD, [Disability, Work and Inclusion](#) and [Disability, Work and Inclusion in Ireland](#).

<sup>14</sup> EU Commission (2025), [Recommendation for a COUNCIL RECOMMENDATION on the economic, social, employment, structural and budgetary policies of Ireland.](#)

again the only indicator (out of a total of 17) on Ireland's social scoreboard marked red (critical situation) for the third year in a row. It also highlights Ireland's disability employment gap, noting that disabled people face "financial and non-financial barriers such as the cost of returning to education, ... [lack of] affordable housing options, [and] limited access to reasonable accommodation at work", as well as issues like insufficient accessible transport options. The Commission observes the low employment rate has been a "longstanding challenge, showing limited improvements." It notes that people with disabilities in Ireland "encounter bigger obstacles when seeking work" compared to those in other member states.<sup>15</sup>

Please note that recommendations under Commitment 40 are also relevant here, and so we have repeated them where relevant. Please also note that as previously observed, it is difficult to fully and effectively comment on the issue of employment when the forthcoming National Disability Strategy has not yet been published.

Recommendations for next Roadmap:

- A strong and ambitious National Human Rights Strategy for Disabled People (NHRSDP) is required.
- Coordination, complementarity and clarity around areas of responsibility and convergence between the NHRSDP and disability commitments in Roadmap will be necessary.
- Whichever strategy leads on employment, there should be an ambitious SMART employment target (eg quantifiable increase year or year of number of people availing of income disregards/increase of employment rates/reduction in disability employment gap etc).
- The employment commitment should outline clear measurable annual actions and targets.
- Much stronger coordination and collaborative working across the relevant Departments is necessary, and clarity on areas of responsibility.
- Act on the recommendations of the NDA and of disability organisations (for example to the Green Paper consultation) to address structural and systemic barriers to employment, including ensuring all Make Work Pay recommendations have been fully progressed.
- Examine and consider the learnings from other EU countries that are performing better, and feed into disability employment approaches.

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<sup>15</sup> European Commission (2025), [2025 Country Report – Ireland](#), p. 23, 91 and 90.



- Specifically examine the Cost of Disability report to understand the extra costs disabled people experience related to employment, and develop an action plan to address these.
- Continue to raise the income disregard and the weekly means disregard annually for disability social protection payments.
- Develop stronger measures and policies to support self-employed disabled people, including addressing inconsistencies regarding social protection income, means testing, employment supports etc.

**Commitment 43: Develop and consult on a 'strawman' proposal for the restructuring of long-term disability payments to simplify the system and take account of the concerns expressed in the Make Work Pay report.**

This was an important commitment in the Roadmap, and one which responded to various policy consultations and discussions over the years, where disability advocates pointed out problems with the social protection system, and the need for it to change.

The Department of Social Protection did develop a Green Paper on Disability Reform, and consult on its proposal in 2023-2024. Many aspects of the approach mooted by the Green Paper were highly criticised, including two fundamental weaknesses: it wrongly conflated the extra Cost of Disability with 'capacity' to work, and it did not adopt the cross-Departmental approach that is essential to tackle disability issues, especially those of poverty, employment and the extra Cost of Disability.

DFI welcomed the decision not to proceed with the Green Paper proposals, which unfortunately caused much anxiety and stress to disabled people. While the proposal tried to advance one way forward, it was silent on the many structural issues and social barriers that prevent disabled people from entering the labour force and retaining employment. The Green Paper also proposed social protection rates that were significantly below the poverty line, and were far from sufficient to address the extra Cost of Disability. It also did not address issues like the need for indexation of social protection supports, to deliver a Minimum Essential Standard of Living, and for a Cost of Disability payment. [DFI made a comprehensive submission to the consultation](#) which outlined these concerns and others.<sup>16</sup>

Any social protection reform on disability must adhere to Ireland's international obligations, and thus must have the UN Convention on the Rights of Persons with Disabilities (UN CRPD) as the foundation and starting point. Future reform approaches should adopt a social model of

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<sup>16</sup> DFI (2024), [Submission on Green Paper on Disability Reform](#).

disability, focusing on removing structural barriers to inclusion and participation. Reform should also be based on a series of agreed values, including support for independent living. Any new disability social protection changes should be developed based on principles of co-design and co-production.

A change of approach is required, and revising and developing new reform proposals will clearly take time. Positively, the Programme for Government does make a number of specific relevant commitments to review, reform and change aspects of disability supports. DFI's Green Paper submission outlined our longer-term asks and bigger picture recommendations for future policy approaches, based on the learnings and feedback from the Green Paper consultation.

Positive reform to address disabled people's needs is still urgently required, and we hope this can take place during the next five years. Once again the importance of a cross-Departmental approach is essential here, as many (although far from all) of the issues which were raised during the Green Paper consultation regarding barriers to employment and inclusion relate to policy areas not under the remit of DSP.

Finally, this commitment is marked 'achieved', as the process outcome was achieved, in as much as the proposal was developed and a consultation took place. However in terms of positive outcomes for disabled people or tangible impact on their life in this area and a positive restructuring of long-term benefits, this has not been achieved.

Recommendations for next Roadmap:

- Positive reform to disability social protection supports is urgently needed – the commitments outlined in the Programme for Government offer a starting point in this regard.
- Any reform approach should be based on delivering the rights outlined in the UN CRPD, as well as adhering to DSP's Public Sector Duty responsibilities. Future reform should centre the social model of disability, and should be developed through co-design and co-production processes with people with disabilities and disability organisations.
- Reflect on and integrate the significant learnings and recommendations from the Green Paper consultation – integrate these into any future reform process.
- Once again, a Cross-departmental approach is essential when addressing disability reform. Equally complementarity with areas addressed and commitments made in the NHRSDP is needed.
- No-one with a disability should be forced into work or training they do not feel capable of, but employment should be an option for

anyone who wishes to work. To support increased employment, focus on understanding and supporting disabled people's individual needs and desires around their working life and career.

- Disabled people's own assessment of their 'capacity' is paramount. Any assessment should be holistic, and ensure disabled people's participation, as per best practice recommendations.
- A sufficient income to support a life of dignity and inclusion must be available to all who cannot work due to health reasons.

**Commitment 44: Cost of Disability: "Consider the actions required by Government Departments on foot of recommendations contained in the Cost of Disability report."**

This commitment was revised based on feedback in the mid-term review. The previous commitment was to publish the Indecon research on the Cost of Disability, and this was marked 'achieved' once the report was published in late 2021. The Indecon report is a landmark report, and a very significant piece of work. It is an excellent, highly useful and rich research report, which added significantly to the policy evidence, both nationally and internationally, on the extra Cost of Disability. Delivering and publishing the report was a significant commitment from the Department of Social Protection, a substantial contribution on the issue, and the culmination of years of hard work. However publishing a report that documents and assesses a policy issue and problem is not the same as taking action to address that issue and the impact it has on, in this case, disabled people.

As we pointed out in our submission to the mid-term review: "What is missing from the Roadmap is commitment to a set of actions to address the problems and issues of income and poverty created by the Cost of Disability and documented so effectively by the report." Acting on this concern flagged by many disability organisations, this commitment was updated after the mid-term review, to the current one which promises to "consider the actions required by Government Departments to address Cost of Disability".

Unfortunately the same fundamental weakness remains with this commitment as with the earlier Cost of Disability commitment to publish the Indecon report – considering actions does not commit to actually doing anything to change things, nor does it lead to any material change in the lives of disabled families or households.

The Indecon report outlined a number of issues that need to be addressed and remedied through policy. Significant action is still needed across multiple Departments on these areas, and did not progress during the

period of the current Roadmap. For some time there appeared to be a lack of clarity on which Department held responsibility for this new action, although latterly it was assigned to DCEDIY (now DCDE). This commitment now appears to have been integrated into the process of developing the forthcoming National Human Rights Strategy for Disabled People. However earlier drafts of the strategy did not contain clear actions or specifically flagged commitments from any Department to address Cost of Disability, and did not include significant mention of the issue. DFI has argued that Cost of Disability should be one of the pillars of the strategy, and/or that each Department should have to identify actions it will take to address this issue.

Indecon themselves recommended a multi-faceted approach to addressing the significant extra costs, including increased cash payment, enhanced access to services and targeted grant programmes. They advised that these provisions should focus on alleviation of poverty, reducing inequality, and improving social inclusion and quality of life of disabled individuals – these aspects clearly fall squarely within the remit of the Roadmap’s aims, and of the Department of Social Protection.

A key issue highlighted by the Indecon report is inadequate income. While some disabled people can be supported to work, and there is clearly great scope to increase our disability employment rates, we know also that many people with disabilities will never be able to work due to their disability. Social protection recipients who undertook the survey that formed part of Indecon’s methodological approach to establishing the Cost of Disability strongly indicated that the most helpful way for the state to help with the extra costs would be to increase their income.

As we have observed in recent years, the Indecon figures are now out of date, post-inflation. As previously mentioned, a significant ESRI study has recently shown that costs are now higher.<sup>17</sup> The study established that:

- Disabled households are more likely than other household types to be at risk of poverty and have a lower standard of living.
- Disabled people face extra costs in the range of €488-€555 on average a week.
- Disabled households required between 41% to 93% extra disposable income to achieve the same standard of living as a similar household with no disabled members.
- Disabled people’s at risk of poverty (AROP) rate is substantially higher (24%) than non-disabled people’s (10%).

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<sup>17</sup> ESRI (2025), [Adjusting estimates of poverty for the cost of disability](#).

- When Cost of Disability is factored in, their AROP rate increases to a staggering 65%-76%.

Yet the basic weekly income currently provided by Disability Allowance is €244. This exposes the deep inadequacy of current disability social protection supports – Disability Allowance would cover at maximum half the additional weekly costs established by the ESRI study.

As we have previously acknowledged, some very positive progress was made by this Department in the past three budgets. One welcome small step forward has been the creation and retention of the *Disability Support Grant*. Budget 2023 for the first time acknowledged the extra Cost of Disability, providing a once-off payment of €500 to those who qualified for Disability Allowance, Invalidity Pension and the Blind Pension. This was welcomed by many disabled people as an important symbolic step forward, although it was clearly insufficient to address Cost of Disability with a one-off payment which only addressed about 1/20<sup>th</sup> of the Indecon cost range. Budget 2024 and 2025 saw this grant retained, albeit with a (very questionable, given escalating costs) reduction of 20% to €400.

In this context, the Programme for Government commitment to build on this by providing a permanent Cost of Disability payment is very welcome. There is huge scope to build on the positive first step, and there is an opportunity for Ireland to be a global leader by bringing in a Cost of Disability payment.

However, one concern about the commitment is that it refers to an annual payment. Disability organisations have been clear that the Cost of Disability payment needs to be weekly. The many extra costs that people experience occur not once a year, but on a daily, weekly and monthly basis. Moreover, as we have shown, a one-off annual payment of €400 would not even cover one week's extra costs. To provide meaningful and predictable financial support with the extra costs, this payment needs to be provided weekly – this would support disabled people to budget, provide financial predictability and stability, and ensure that they are not forced to use their annual payment to pay for whatever is the most urgent cost due at the time the payment is received. In our submission on the Green Paper last year, DFI recommended that the Department “work to develop a graduated Cost of Disability payment scheme that offers more tailored supports, based on differential and changing needs and best practice internationally, in consultation with people with disabilities.”<sup>18</sup>

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<sup>18</sup> For more on our recommendations in this area, see pages 27-28: DFI (2024), [Submission on Green Paper on Disability Reform](#).

Delivery of this important task and government commitment can potentially be integrated into the next Roadmap.

A second related concern which DSP must address in the next Roadmap, is the fact that we are clearly significantly underestimating the poverty experienced by those living with a disability, due to not adjusting our income-based measurement approaches to factor in the Cost of Disability. Poverty measurements and poverty reduction approaches into the future should develop mechanisms to adjust poverty tracking to factor this in.

More broadly we remain concerned that Cost of Disability as an issue appears to be sitting between two Departments (DSP and DCED), without responsibility always being clear or fully owned. It is undeniable that many areas of services and supports that impact on Cost of Disability are far beyond DSPs's remit and will need to be addressed by other Departments. Fully addressing the many extra costs will require coordinated and considered action across numerous government Departments and policy areas (including, for example Health, Housing, Transport).

In this broader context, working with other Government departments, there is an opportunity and need for a longer-term strategic approach to these issues. The government should develop and resource a clear cross-Departmental Action Plan to fully address the Cost of Disability– this can be integrated into either the new National Human Rights Strategy for Disabled People or the next Roadmap.

Notwithstanding the above, income supports and poverty fall squarely within the Department's mandate and brief, and the Cost of Disability content of the new Programme for Government is outlined in the social protection section. DSP has a key and essential role to play in addressing this long-standing issue that locks disabled people into poverty.

Recommendations for next Roadmap:

- Bring in a recurring, universal, non-taxable Cost of Disability payment, starting at €55 a week, for disabled people. Initially this should be rolled out to all those in receipt of a disability-related social protection payment. This should be understood similar to Child Benefit, a universal non-taxable payment that is paid by the Department of Social Protection.
- Work to develop a graduated Cost of Disability Payment scheme based on differential need and best practice internationally, in consultation and through co-design with people with disabilities.
- Convene a series of policy discussions, considering in detail the findings of the Indecon Cost of Disability report and the recent ESRI

research, with disability organisations and disabled people, to inform future Cost of Disability actions.

- Work with other government Departments to develop and resource a cross-Departmental Action Plan on Cost of Disability, co-designed with disabled people and disability organisations. This plan should include actions, timelines and measurable targets which are reported annually.

## **7. Other policy areas and disability relevant Roadmap commitments**

As previously mentioned, social inclusion is a broad and cross-cutting issue, and to support inclusion of disabled people a number of government Departments and policy areas need to be considered. A large number of barriers exist to full community inclusion and participation for people with disabilities. These include the lack of fully accessible housing, public transport, public buildings and community and public services. The ongoing chronic lack of independent living supports and Personal Assistance services available to disabled people also needs to be addressed to deliver real social inclusion.

Other specific Roadmap commitments and areas of focus are also relevant to disability – notably those with broader impact on poverty which are covered in the next section. Other commitments from the current Roadmap which could more strongly reflect and consider a disability perspective in the successor strategy include the following.

**Commitment 35: free GP care for children.** The move towards free GP care for children was a positive and impactful one. There is a long-standing call for medical cards to be made available to disabled people on the basis of their health need, as per OECD recommendations. DFI continues to call for medical cards to be awarded permanently due to medical need and disability status, rather than means-testing. This would also support increased employment for disabled people, who would no longer be worried about not qualifying for a medical card should they end up over the income thresholds (which have not been updated in 20 years, despite significant inflation and wage growth).

**Commitment 40: child poverty reduction target.** Given significant literature in recent years indicating very strong links between child poverty and disability<sup>19</sup> (see also DFI’s annual Budget submissions to this

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<sup>19</sup> See for example Pobal (2024), [Disability and Deprivation Investigating the Relationship between Health Inequalities and Geographic Disadvantage using the Pobal HP Deprivation Index](#), ESRI (2025), [Child poverty on the island of Ireland](#), p. 34, and ESRI (2025), [Deprived children in Ireland: Characterising those who are deprived but not income-poor](#), p. x. Also ESRI (2021), [The dynamics of child poverty in Ireland: Evidence from the Growing Up in Ireland survey](#), p. 42.

Department), future child poverty reduction targets should reflect a particular disability consideration and element.

**Commitment 45: Loneliness.** Loneliness is a key issue, and many disabled people face significant structural and financial barriers to social inclusion. 2024 CSO Wellbeing indicators show that three in ten (30.9%) respondents unable to work due to long-standing health problems reported feeling lonely at least sometimes in the last four weeks. The comparable rates for employed and retired respondents were 12.5% and 13.5%. Equality deprivation indicators show that one in four people unable to work due to disability couldn't afford a morning, afternoon or evening out in last fortnight, compared to one in 10 at a national level. Therefore policy on loneliness should integrate a disability lens into its approach.

**Commitment 49: Community Employment (CE).** Many disability organisations rely on Community Employment schemes to support their work, sometimes experiencing difficulties with the requirements of the scheme. An active consideration of the schemes' role in supporting disability inclusion, and flexibility where appropriate, will be positive.

**Commitment 50: Sports inclusion.** Positive strides have been made during the Roadmap's timeframe, but a lot more needs to be done to provide equal access to sports for disabled people.

**Commitment 52: government engagement with Community & Voluntary sector.** Some positive steps forward were taken, including the development of the Values and Principles for collaboration and partnership working with Community and Voluntary Sector document, the Dialogue Forum between the HSE and voluntary organisations, and the recent WRC pay deal that agrees to re-instate pay parity for Section 39, 56 and 10 workers in community and voluntary organisations. Nevertheless substantially more could be done to strengthen the levels of engagement with these organisations, who often bridge gaps in state provision of essential services. Equally, a move towards co-design and co-production in policy development, and stronger evidence of consultation actually influencing policy development would further advance this commitment.

**Commitment 54: Sláintecare.** While again some progress has been made, overall implementation of Sláintecare has been concerningly slow. Over 90% of people with disabilities access mainstream health and social care services under the remit of the Department of Health. There has been a siloing of disability concerns into specialist disability services, whereas a mainstreaming approach to disability is essential. This can be built into future progress on rolling out Sláintecare.

**Commitment 55: Inclusion Healthcare policy.** Any inclusion healthcare policy that is developed should consider disability, given that



as per above, the vast majority of disabled people engage with and rely on mainstream health services. Equally, the clear link between deprivation/poverty and ill health and disability shows why disability should be an aspect of any health policy focused on inclusion.

**Commitment 59: housing.** It is concerning that the main commitment on housing in the Roadmap does not mention housing for disabled people (despite a National Housing Strategy for People with Disabilities existing at the time of the Roadmap's development), or the need to prioritise Universal Design in the delivery of social housing. This is surprising given the level of housing need amongst disabled people, and the difficulty finding accessible housing. As Ireland continues with an ambitious programme of house building, the government should remember that building fully universal design (UD)++ and wheelchair liveable homes is essential to ensure social inclusion. This would be a wise investment in future-proofing Ireland's housing stock, saving money on retrofits and adaptations in the long term. The disability aspect of housing delivery can be strengthened in the next Roadmap.

**Commitment 60: energy poverty.** Disabled people are disproportionately likely to experience energy poverty. Energy poverty received increased attention during the Roadmap's implementation. The development of the Energy Poverty Action Plan (EPAP), and in particular the stakeholder consultation process from 2023 onwards, was very positive. The first EPAP didn't include sufficient targeting, and we fear that the abandonment of the second EPAP may see a weakening of focus - with the emphasis now on energy affordability. A targeted focus on groups most at risk into the future, and increased supports from all relevant Departments (DSP, Department of the Environment and Climate Change and Department of Housing), would strengthen our capacity to eliminate energy poverty. DFI and other civil society organisations have made a range of recommendations for positive action on this issue.<sup>20</sup>

## **8. Recommendations for Roadmap for Social inclusion successor strategy**

Poverty is not inevitable and different policy choices can be made. There is also a strong public and political mandate to be ambitious and really deliver poverty reduction during the tenure of this government, as we have outlined previously.<sup>21</sup> This mandate relates to tackling broader issues of poverty, deprivation and income adequacy, and also disability-

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<sup>20</sup> See [Warm homes for all manifesto](#) and [Joint civil society submission to energy poverty action plan](#).

<sup>21</sup> See for example p.s 12-13 of [DFI's Green Paper submission](#) for more on this, and Appendix 2 of the same document for more details.

specific poverty, which is linked to the extra Cost of Disability and other structural barriers to inclusion and employment. At a time of wealth and economic growth in Ireland, this is a moment to invest in social inclusion and development, to support ongoing social cohesion and progress.

Previous poverty reduction commitments have not been delivered. The government should now develop a strong, ambitious and action and outcome-oriented Roadmap to Social inclusion successor, one that reflects the social will to eradicate poverty in our lifetime. In this context DFI offers the following recommendations for the successor strategy:

### **A) Key overall recommendations**

- **The new Roadmap should centre and name relevant conventions and human rights responsibilities which will govern its approach.** It should list relevant governing human rights instruments (eg the International Covenant on Economic, Social and Cultural Rights, the EU Pillar on Social Rights etc). The disability section should explicitly mention Ireland's responsibilities under the UN CRPD, and all commitments and actions should adhere to the approach laid out by it. The Roadmap can also be integrated into and reflect DSP's Public Sector Duty approach.
- **A focus on averages** (for example the goal to reduce consistent poverty to 2%) needs to be complemented by **a strong focus on sub targets and the poverty and deprivation rates of certain groups**, in particular those which remain disproportionately high, like people with disabilities (whose consistent poverty rate is 19%).
- The new Roadmap should **retain and strengthen the annual data tracking approach**, which provided strong evidence to the system (albeit that it did not seem to fully influence resource allocation). Equally, there was a time-lag in reporting against the Roadmap, and this can be addressed for the successor strategy.
- **Commitments and goals should focus on outcomes and impact, rather than on process. They should also be SMART.** The current Roadmap frequently commits to publish or implement a report or strategy, or to consider an issue. However it has no underlying actions attached to the commitment that show *how* targets will be achieved, by when and through what steps strategies will be implemented, what action will be taken on issues a report or a process considers, or what the outcomes of processes committed to will be. Goals should aim to have a positive measurable impact on the lives of those living in poverty and exclusion.
- **A strengthened and effective inter-departmental, and cross departmental, approach** is key. This is the case in general, but also particularly for disability commitments. This approach was not

always evident during the implementation of this Roadmap. In this context **high-level political monitoring – at government and Oireachtas level** - is also essential to ensure this.

- **Provide a rationale for assessment of commitments.** A clear rationale should be provided on how and why commitments are assessed as being, for example, 'achieved with ongoing to delivery' or 'achieved', especially where evidence appears to indicate differently. The assessment of civil society and others who monitor the Roadmap should also be reflected in the annual tracking.
- **Strengthen the governance of the Roadmap.** While commitment 65 indicated that attendees at the Roadmap Steering Group would be at Assistant Secretary level, this level of seniority was not consistently reflected in practice at meetings. Often updates were not forthcoming from relevant Departments. Placing the Roadmap under the oversight of the Minister of Social Protection would strengthen governance, especially in light of changes to responsibilities of relevant Junior Ministers.
- **Build on and strengthen civil society engagement on monitoring structures.** It was not entirely clear how or on what basis the civil society representatives to the Roadmap Implementation Group were chosen. Notwithstanding this, their presence had a strong impact on civil society being able to track the Roadmap, and helped to ensure feedback from civil society reached the implementation group. However given the breadth of the Roadmap, the small number of civil society representatives had a huge number of issues to cover. The next Roadmap might consider having a more specific structure which would include and support thematic civil society representatives with a focus on the areas the Roadmap targets. These representatives might participate when the steering group looked at specific themes – note that no disability organisations were present when Implementation Group had a session focused on disability in 2024. There should also be a way that civil society can actively comment on DSP's assessment of whether commitments are achieved or in progress or not.
- **Mainstream the approach to the Roadmap across all DSP units.** Responsibility for the Roadmap implementation sat with the 'Social Inclusion' unit, a small unit which does not have significant Budgetary allocation. Yet the themes addressed relate to many key areas of DSP's work, and so responsibility, reporting and discussion on the Roadmap should be mainstreamed across the Department. For example, the disability commitments should be discussed, reported on and subject to critical feedback at least annually in the Disability Consultative Forum, as well as at the Social Inclusion

Forum and annual Pre-Budget Forum workshop. The same should happen for other thematic areas.

- **Integrate Roadmap concerns and key goals into DSP's approach to equality and poverty proofing, as well as performance reporting.** The annual approach to equality and poverty proofing of Budgets, and to performance budgeting and reporting, can be integrated into the Roadmap and its tracking and reporting of progress. This can strengthen oversight and consistency, and clarity on the connection between Budget choices and Roadmap priorities. The indicators chosen to be reported on by DSP and other Departments under these processes can be sharpened to reflect key concerns, and to support more targeted approaches and corrective action being taken where, for example, poverty rates are not reducing sufficiently.

## **B) Specific Disability Recommendations**

We have already outlined specific disability recommendations for the successor strategy under our earlier assessment of the existing Roadmap commitments. In complement to these recommendations, DFI also offers the following general recommendations on disability for the successor Roadmap:

- Any and all disability commitments should be **governed by Ireland's commitments under the UN CRPD**, and show progressive realisation of the relevant Articles, including Article 28 (social protection), 27 (employment) and 19 (independent living).
- The current disability targets and commitments in the Roadmap have no actions underneath them showing how those targets will be reached. **Actions, timeframes and resources are needed to deliver on commitments** and the successor strategy should be clearer in articulating what actions will be taken to achieve the commitments indicated.
- **Strengthen and update the disability commitments based on feedback from disability organisations.** A number of the commitments in the current Roadmap were already out of date by 2022. Any future Roadmap that has, for example, a five-year duration should commit to policy frameworks, strategies and approaches that will have an equivalent time-span. Disabled people and disability organisations can provide more detailed feedback.
- **Retain and strengthen the disability poverty focus. Given their disproportionate risk of poverty**, and the amount of people unable to work due to disability who live in consistent poverty, **a specific poverty reduction strategy, approach** and set of actions is required for disabled people. This should outline

**specific steps and actions to be taken each year** to deliver the reduction targets, and **allocate sufficient funding** to deliver them.

- Equally, and complementary to the above, **action is needed on the Cost of Disability**. Delivering a **Cost of Disability payment must be a key priority in the new Roadmap, in continuation of the previous commitment**. A comprehensive strategy to address all aspects of this issue must also be developed - potentially under the National Human Rights Strategy for Disabled People (NHRSDP). The crucial income aspect of Cost of Disability must be addressed by the Department of Social Protection.
- Given that **employment is key pillar of the forthcoming NHRSDP, we assume that this policy may well be the primary vehicle for tackling disability employment** rates. Recommendations in this submission, and in other relevant submissions (DFI's Budget 2026 submission, and last year's Green Paper submission) should be considered. Earlier drafts of the NHRSDP disappointingly lacked ambition, and **notably lacked measurable numerical targets** – whichever strategy governs disability employment, this weakness must be addressed.
- Relevant to the above, **the interconnections, complementarity, and division of areas of responsibility between the National Human Rights Strategy for Disabled People (NHRSDP) and the Roadmap need to be clear**. Given the lack of focus thus far on poverty in the NHRSDP, this should be a key focus of the Roadmap.
- **The specifics of the Roadmap commitments on disability should be discussed and reported on in relevant thematic fora – for example the Disability Consultative Forum**. Over the duration of the Roadmap DFI raised the Roadmap regularly in these quarterly meetings and requested that updates be provided. However there seemed to be a disconnect on whether the Roadmap should be discussed and reported on in these meetings, because overall responsibility sat with a different part of the Department (the social inclusion unit). Reporting on delivery on disability commitments should happen annually into a disability-specific space – progress and challenges can be rigorously discussed there.
- **Strengthen the reporting on achievement of targets, and do not assess a target as achieved prematurely**. A target cannot and should not be deemed 'achieved' until the target indicated has actually been reached and evidence shows this (for example target 41 is deemed 'achieved with ongoing delivery', when available data does not show the poverty reduction rate aimed for has been achieved). Civil society inputs should impact on the assessment of the Roadmap's progress under each thematic area.

- The new **Disability Unit in Department of an Taoiseach** is currently being set up, and its connection to the Roadmap commitments should be considered. It could potentially play a constructive role in mandating, requiring and supporting the cross-Departmental approach that is essential to secure progress on key issues which the Roadmap seeks to tackle, including disability employment, poverty and Cost of Disability. Equally there is potential convergence and connection with the Child Poverty unit's ongoing work – given the link between disability and child poverty.

### C) Broader Poverty Recommendations

Given DFI's focus we have primarily emphasised disability issues in this submission. However we are a member of EAPN Ireland and endorse its broader submission which focuses on and highlights a range of systemic issues that perpetuate poverty. We also support the broader points made by SVP, Social Justice Ireland and other anti-poverty and civil society organisations in their submissions. We note the strong emphasis on the need for an outcome, impact and action focus under each target and commitment, and the need to drill down beyond averages to focus on at risk groups in any future Roadmap. We also offer the following inputs on some key areas that impact on disability poverty.

#### 1. Child poverty

Given the focus in the Roadmap and of the previous government, on child poverty, we again highlight the 2021 ESRI research on the dynamics of child poverty which found that children with disabled parents are more likely to live in persistent poverty, and that this is especially true where the parent cannot work due to their disability.<sup>22</sup> The report also found that children living in poverty are twice as likely to have a chronic condition or disability. It concludes that families where the primary caregiver is disabled, and particularly where the mother is disabled, "are at a high risk of becoming trapped in poverty and this warrants additional policy intervention."<sup>23</sup> More recent research looking at intergenerational poverty and at various aspects of child poverty reach similar conclusions, as we have highlighted earlier.<sup>24</sup> These findings should be integrated into any and all child-poverty focused approaches in the successor Roadmap.

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<sup>22</sup> ESRI (2021) [The dynamics of child poverty in Ireland: Evidence from the Growing Up in Ireland survey](#), p42. "The model allows us to differentiate between different types of non-employment and reveals that the mother's inability to work due to illness or disability is the strongest predictor of both transient and persistent EV. While this is a small group (circa 1 per cent of families in wave 1), **their very high risk of poverty is of policy concern** [our emphasis]".

<sup>23</sup> ESRI, op cit, p 74.

<sup>24</sup> ESRI (2022), [Childhood poverty associated with higher risk of material deprivation and income poverty in Irish adults](#). Pobal (2024), [Disability and Deprivation Investigating the Relationship between Health Inequalities and Geographic Disadvantage using the Pobal HP Deprivation Index](#),

## **2. Benchmarking Social Welfare Rates: Minimum Essential Standard of Living (MESL) – Commitment 25**

Developments in recent years, most notably the setting of the Pandemic Unemployment Payment at a much higher rate than our standard social protection payments (and the clear positive impact this had on poverty rates), as well as the one-off cost of living measures to tackle the cost of living crisis, again highlighted the ongoing question of the indexing and benchmarking of social welfare rates. This issue is consistently highlighted by anti-poverty groups, and is the key consensus issue across attendees every year at the Department of Social Protection's Pre Budget Forum. To really start to tackle and reduce poverty, this area needs to be addressed.

Our current social protection rates are significantly below the poverty line, and did not keep pace with inflation in recent years. Benchmarking of social welfare payments should be set at the rates recommended by the Minimum Essential Standard of Living (MESL) Research Centre, in order to ensure everyone has enough to live a decent and dignified life. The benchmark rate must be set above the poverty line and must take the Cost of Disability into account (see earlier section). Once the benchmark is established, it will be possible to index social welfare rates for people with disabilities. To move to benchmarking payments without doing this first would have the unintended consequence of locking people into greater structural poverty.

## **3. Individualisation of welfare payments and supports: Commitment 36**

The individualisation of social protection payments was recommended by the Joint Oireachtas Committee on Gender Equality, and the Citizen's Assembly. Currently, a disabled individual may see their Disability Allowance reduce or be stopped entirely if they move in with a romantic partner. They will then be assessed jointly, with their partner's income now being considered part of their 'means', despite them being an independent individual, with all the same costs they had before. This is sometimes referred to as the disability 'love tax'. As the European Disability Federation has outlined, this leads to "people with disabilities being punished unfairly when they get married or register a partnership, on the basis of the income or even the disability allowance of their spouse."<sup>25</sup>

Similar issues occur for people who live with family members, or indeed share a house with friends, flatmates or others – in many cases

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p. 23. ESRI (2025) [Child poverty on the island of Ireland](#), p. 34 ESRI (2025), [Deprived children in Ireland: Characterising those who are deprived but not income-poor](#), p. x.

<sup>25</sup> <https://www.edf-feph.org/content/uploads/2022/03/Social-Protection-for-Persons-with-Disabilities.pdf>, p.11.



individuals with whom they have no financial connection, or claim over their income. This creates and perpetuates negative stereotypes, and crucially, creates financial dependency. It is assumed that family members or partners will subsidise the extra costs that disabled people live with, something which is unfair to everyone involved.

This is also particularly worrying in a romantic context, especially given disabled women are more likely to experience domestic violence, and may find it harder to flee an abusive relationship, for a number of reasons. Moreover at the most fundamental level, disabled people should not have to choose between living with a partner and losing some or all of their social protection supports. As the National Women's Council have pointed out, at a broader level reviewing the approach to social protection and 'dependent adults' would also be welcome given its gendered impacts.

This commitment in the Roadmap seems to have been deprioritised, and reinterpreted in recent years. A renewed focus on this issue in the new Roadmap would be welcome, and could contribute to progress on disability poverty. A particular area where individualisation is relevant from a disability point of view is in the implementation of means-testing. Where means testing or assessment takes place, a disabled person should be assessed based on their own income and means only, not that of their family member, romantic partner or anyone else they live with.

## **8. Conclusion**

The Roadmap for Social Inclusion had notable strengths, including an ambitious overall poverty reduction target, a focus and careful tracking of data and evidence, a strong cross-Departmental vision, and a dedicated Minister of State who drove attention and focus. The Roadmap shone a much-needed spotlight on how far behind Ireland was on disability poverty, and aimed to improve key disability metrics where Ireland lags at EU level.

But equally, the Roadmap lacked a clear action focus, and a focus on outcomes, rather than process commitments. While some progress and first steps were made on key issues, a lot more remains to be done to effectively and permanently reduce and ultimately end poverty in Ireland, including for the disabled community.

The ESRI has recently emphasised how important social inclusion is at multiple levels for Ireland, especially at this particular moment in time. They wrote that "given the ongoing economic and political volatility,



maintaining social inclusion as a policy priority remains essential for fostering resilience and equity in Irish society.”<sup>26</sup>

The 2021 Citizen’s Assembly showed the huge level of public support that exists for a social protection system that really protects and enables people to live a dignified life. The members of the assembly recommended that Ireland should: “set social protection payments and/or supports at a level that lifts people above the poverty line, prevents deprivation and supports an adequate standard of living.” Importantly, in terms of the resourcing of these recommendations, 95.6% of citizens said “if necessary, we are also prepared to support and pay higher taxes based on the principle of ability to pay, to make a reality of our recommendations”.<sup>27</sup> While often a focus is put by the State on its limited resources, there is in fact a popular mandate to increase Ireland’s tax take in order to take measures to eradicate poverty. The assembly also made significant recommendations specifically on disability.<sup>28</sup>

It is thus clear that there is broad and comprehensive public support to take action to address poverty and to ensure that Ireland’s ongoing economic growth supports all people living in the country. There is so much potential and positive change that can be achieved in the years ahead – if the resources and the political and administrative will and commitment needed are provided. DFI sincerely hopes that the successor to the Roadmap for Social Inclusion can deliver on this potential, and contribute to strengthening social inclusion and significantly reducing poverty, notably for disabled people, in the years ahead.

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<sup>26</sup> ESRI (2025) [Barriers to social inclusion in Ireland: Change over time and space, 2016-2022](#). p.44.

<sup>27</sup> Citizens Assembly (2021) [Report of the citizens assembly on gender equality](#). p.14 and Question 49, p. 138.

<sup>28</sup> Recommendation 10, p 61-62, op cit.



## **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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