Comprehensive Employment Strategy 2017

NDA Year-end Review

# Background and Introduction

This document sets out the assessment by the National Disability Authority (NDA) of progress in implementing the first 3 year action plan under the Comprehensive Employment Strategy for People with Disabilities 2015-2024 (CES). It is focused on progress at the end of its second full year of implementation. A summary of the highlights is followed by a more detailed discussion of some key points for the year.

The CES was developed as a whole of government approach to providing seamless routes to employment for those with disabilities who wish to work. It was envisaged that an initial three-year phase of foundational activity would be necessary in order to establish processes, systems and tools to progress the overall ambition of the Strategy. Progress under the Strategy is monitored by a Comprehensive Employment Strategy Implementation Group (CES IG); with an independent chairperson – Fergus Finlay, comprising officials from relevant Departments and representatives of the disability sector.

The NDA welcomes the progress that has been made in implementing many of the actions committed for completion or advancement by Departments and agencies before the end of 2017; and advises the importance of advancing the remainder over 2018, as the foundation phase ends and the next action plan is devised for delivery over the three year period 2019 to 2021.

The NDA has examined the reports made available to the CES IG and other information to guide its assessment. It is noted in particular that given the foundational stage of actions committed it had been recognized at the start of the strategy that it may take some time to see the impact of those actions in terms of increased numbers in work. The NDA will continue to monitor data to guide on trends and areas for attention, as part of its statutory function.

The NDA notes that in Census 2016, the overall number of people with disabilities has increased, comprising 13.5% of the total population compared to 13% in 2011. 11.8% of the total population of working age people (20-64) have a disability.

The numbers of people with disabilities in work have also increased since 2011, from 33.2% to 36.5%. The improving economy will have been a major factor in this, but while increased employment levels are welcome, it is noted that the gap between the rate of people with disabilities in employment and the rate of employment of those without disabilities has not reduced.

A significant proportion of the increased numbers of people with disabilities in employment is made up of those with psychological or emotional difficulties and this may be on foot of improving attitudes to mental health and a greater willingness to disclose same in the Census, all of which is welcome. There was a 20% increase on the numbers of people with psychological or emotional difficulties in employment in 2016 (27.5%) when compared to 2011 figures (22.8%).

We note, however, that some persons with disabilities have not benefited from increased job opportunities, particularly those with intellectual disabilities, but also those with vision impairments and other physical disabilities and this will need to be an area for future focus. Overall, people with intellectual disabilities are least likely of all categories of disability to be in employment. Only 4.8% of the 120,775 people with disabilities of working age who were classified as ‘in work’ in Census 2016 figures are people with intellectual disabilities.

# What has been achieved to date

As of the end of 2017, progress has been made across a number of areas of the first three-year action plan within the Strategy, which are summarised below and discussed in more detail later in this document. The achievements listed below highlight just a selection of the extensive activity that has taken place across departments and agencies.

## Achievements to date include;

* Continued work to increase the capacity of the Intreo service – the national employment service - towards supporting customers with disabilities, which is a particularly welcome development.
* The Make Work Pay group, established by Department of Employment Affairs and Social Protection (DEASP), agreed a report of recommendations to tackle disincentives to employment for persons with disabilities. This report was launched in April 2017 and a number of the 24 recommendations for action are currently well advanced.
* Development and launch of the Ability Programme, led by DEASP. This programme will make up to €10 million available for innovative proposals for provision of supports to young people with disabilities to improve their employability.
* Increase in numbers of people with disabilities reported to be employed in public sector bodies in 2016, to 3.6%.
* Government commitment to increasing target to 6% by 2024 in incremental phases.
* Implementation of a new model of allocating support resources in schools for those with special educational needs, with a view to enhancing education opportunities, which will in turn enable students to advance to further/higher education and work in the future.
* NDA research on vocational rehabilitation published, which will inform development of policy advice in 2018 for a national model of rehabilitation for those who acquire a disability during their working life.
* Establishment of the Social Inclusion Unit in Solas, driving improved reporting of data on students with disabilities in Further Education and Training, which in turn will inform planning and delivery of required programmes.
* Launch of the new National Plan for Equity of Access to Higher Education, providing additional funds (€2.5 million per annum) to widen access among disadvantaged groups, including people with disabilities, to third level education.
* Increased funding in the area of transport (€28m) for the accessibility retro-fit programme for 2018-2021; focused on the continued roll-out of the programmes to install accessible bus stops, the upgrading of train stations to make them accessible to wheelchair users and the grant scheme to support the introduction of more WAVs into the taxi fleet.
* Evaluation of the supported employment (Individual Placement and Support) project for people with mental health difficulties delivered by Health Service Executive (HSE) mental health services, in conjunction with DEASP, with a view to rolling out 27.5 DEASP-funded job coaches in mental health support teams across Community Health Organisation (CHO) regions in the future.
* Publication of a new National Plan on Corporate Social Responsibility 2017-20 by Department of Business, Enterprise and Innovation, which includes actions to support businesses in Ireland to create sustainable jobs and promote diversity and responsibility in workplaces.
* Continued development of the Employer Disability Information (EDI) service by ISME, IBEC and Chambers Ireland, including work to develop networks of employers to foster information sharing and support among peers.
* The HSE have progressed work on ‘raising expectations’ to develop key messages that will be delivered to young people (aged 16-25) with disabilities by HSE and HSE funded multi-disciplinary staff. This will emphasise each person’s positive potential. Following research and a review of current practices, which has been supported by NDA and FedVol, key messages will be drafted and a work-plan will be developed to support the delivery of these positive and empowering messages by relevant staff.

## Areas where work is at an advanced stage:

* The cross-departmental group working on Action 5.1(to provide seamless supports to people with disabilities in seeking and retaining employment), completed its considerations by end of 2017 and agreed a coordinated policy approach and associated implementation plan, which will be presented to Government in Q1 2018. While the report was completed later than originally committed, delivery of this action has demonstrated the importance and the outcome of effective, joined up working across departmental boundaries in consideration of some of the challenges facing people with disabilities who wish to work.
* The HSE is currently reviewing data on those in Sheltered Workshops in order to effectively plan for future transition to alternative supports in services or into work.
* The HSE is currently reviewing data on the destinations of those exiting Rehabilitative Training. This in turn will allow for effective planning and delivery of supports for this group of people towards reaching their goals in work, or in the transition to alternative supports in services.
* On-going development of systems across departments, including HSE and Solas as identified above, to capture and evaluate data on the numbers of people with disabilities accessing programmes or services. The availability of robust data will inform monitoring of this Strategy and also future planning.
* While delivery has been somewhat delayed, work to develop guidelines for line managers in supporting employees with autism is advanced, and the guidelines will be available in early 2018.
* Consideration of examples of good practice in public sector employment, informed by research commissioned by NDA, has been shared with a variety of stakeholders, including Department of Public Expenditure and Reform (DPER) and the Public Appointments Service (PAS). This will help to guide and inform public bodies as they work towards the increased employment target of 6%. The report of research will be available in Q1 2018.

During 2017, the CES IG adopted a thematic approach to meetings, which the NDA considers worked well in facilitating more in-depth discussion and examination of key areas of the Strategy with the relevant agencies. This assisted better understanding of the difficulties on the ground for individuals with disabilities and an opportunity for agencies to guide and consider how they can work to address these.

# Areas requiring additional focus

There are a number of areas due for delivery by end 2017, where an increased focus would be helpful in 2018, as we prepare for the next phase of implementation of the Strategy. Some of these areas include:

* Development of career guidance counselling. This is essential, so it will be important that a review of guidance provision in schools planned by the Department of Education and Skills includes considerations of the needs of students with disabilities in special education schools, special education classes and mainstream schools. We look forward to further details of the review and timeline for its completion and implementation of findings.
* Further development of guidance and protocols around key transition points between education, training and employment, building on previous work published by the NCSE, to ensure clarity around roles and responsibilities at these transition points. It would be timely to consider the extent to which previously published guidance on transitions has been disseminated, and to evaluate its impact as we move to consider future areas for focus under the Strategy.
* Employment in Civil Service through alternative methods of recruitment continues to be considered by DPER and PAS and it will be important that a roadmap to delivering same can be agreed.
* As part of this process, alternative recruitment, part-time work and job design need to be better understood in the wider public sector, and consideration given to ways of reaching public bodies not under the remit of DPER or served by PAS, e.g. local authorities
* The Government has committed to increasing the target of people with disabilities employed in the public sector to 6% by 2024, and we recommend that a full review of the process to monitor and report on Part 5 compliance should be undertaken in 2018 in order to support and advance this work.
* The employer engagement unit in the DEASP has an important role in supporting employer awareness and engagement to benefit those who are long-term unemployed and persons with disabilities who want to work. We look forward to its continued work to deliver on actions in the CES, including enhancing employer awareness, encouraging work experience opportunities and disseminating information of supports. Strengthening links and cooperation between EDI and the Employer Engagement Unit of DEASP and the Department of Business, Enterprise and Innovation will also be important ways of ensuring a mainstream focus on employment for people with disabilities is maintained.
* While the EDI service is progressing, we note that this pilot initiative concludes at the end of 2018, so consideration of any next phase will be required.
* As identified above, progress has been made in some areas in the development and implementation of systems to gather and report on data, this work will need to continue and be further advanced by the end of the foundation phase of the CES.
* While Departments have improved their reporting on activity under the CES, it will be important to consider development of systems to evaluate impact and outcomes of such actions.
* It will be important for Disability Consultative Committees within Departments to continue to include a focus on CES actions in meetings when engaging with stakeholders. These meetings could also usefully include relevant sections or agencies of other Departments where a particular topic of consideration indicates the necessity of a cross-sectoral approach.
* It will be helpful if the thematic approach to CES IG meetings continues into 2018, in order to allow for detailed discussion of issues emerging.

# Key points from 2017

In this section, we outline in further detail, a number of what the NDA believes to be significant developments over the course of 2017, and include consideration of areas where additional focus would be beneficial, including continued commitments to cross-departmental working and the on-going development of systems and infrastructure to support the activity in question. In doing so, we have drawn from departmental reports submitted to the Department of Justice and Equality as part of the overall implementation and monitoring process for the CES, as well as our own work on employment matters and on other policies and programmes concerning disability.

## Make Work Pay

The Department of Employment Affairs and Social Protection (DEASP) has responsibility for a large number of actions within the Strategy, and has done much to drive progress in many of these areas, including building capacity within its mainstream employment service – Intreo – to meet the needs of people with disabilities. Of particular note was the publication of the Make Work Pay Report in April 2017, containing a suite of 24 recommendations developed to address fears on the part of some people with disabilities that taking up employment might leave them financially worse off. A number of these recommendations are already advanced in terms of implementation, including: steps to raise the earnings disregard for those who are in receipt of disability allowance and who wish to work; steps to ensure medical card can be retained for longer on return to work; ensuring processes are streamlined to allow a prompt return to receipt of benefits if employment doesn’t work out; co-designed consultation on proposals to review the disability allowance in keeping with a commitment to raise expectations for young people regarding employment.

## Ability Programme

DEASP also led the design and delivery of the Ability Programme in 2017, a programme jointly funded by the Department and the European Social Fund. €10 million over 3 years will be made available to a range of services that identify and provide innovative means of support to young people to improve their employability. Proposals are currently invited, with the intention of funding and launching successful programmes in the summer of 2018. We note the extent to which an evaluation component has been built into the call for proposals to ensure that learning from the Ability Programme can be captured, reviewed and scaled and replicated as appropriate. This will increase the extent to which pre-activation activities can be coordinated and standardised across the system.

## Data and information

A number of Departments and agencies have used this foundation phase to put in place systems to collect data regarding the numbers of people with disabilities accessing their services, which the NDA welcomes as an important development. Prior to the launch of the CES, collection of robust and standardized data was not always a standard element of service provision, and this has made it difficult to predict or plan for future service needs. The NDA notes that the HSE is reviewing available data on those in receipt of services who are engaged in work, work-like activities, sheltered workshops and supported employment. Having this validated data would be helpful to informing future planning. We welcome the work to update the HSE databases on the destinations of people with disabilities exiting their Rehabilitative Training programmes (e.g. progressing to work, long-term illness benefits, or to another service setting). SOLAS, the unit responsible for overseeing Further Education and Training provision under the Department of Education and Skills, has recently established a Social Inclusion Unit, and has captured extensive data on the numbers of people with disabilities accessing training courses under their remit. Each of these developments provides information that allows relevant stakeholders identify opportunities and gaps in service provision, and plan for future levels of need.

NDA analysis of CSO Census 2016 figures identifies a number of groups of people with disabilities who continue to experience more difficulties in accessing employment than others. This includes people with ID, difficulties in learning and remembering, and people with physical disabilities that impact on their activities of daily living. We will continue to analyse these figures in 2018, in order to highlight these opportunities for further attention and focus.

## Understanding transitions

The CES IG adopted a thematic approach to its meetings in 2017, and this facilitated detailed discussion of key issues that was of benefit in progressing certain areas. The issue of managing smooth transitions between key stages of life has previously been recognized as an area where many people with disabilities can experience difficulties on the pathway to employment, e.g. between education and further education, training or employment. Early in the lifetime of the CES, the National Council for Special Education (NCSE) and Department of Education and Skills published helpful research and guidance on key transition points. It is suggested that would be timely to consider the extent to which this guidance has been disseminated, and to evaluate its impact as we move to consider future areas for focus under the Strategy.

## Career Guidance for Students with Disabilities

While the CES committed to advancing training for vocational or career guidance counsellors in schools by 2017, the NDA notes that the Department of Education and Skills aims to review the career guidance programme for all students before advancing same. It will be important that the review includes consideration of the needs of students with disabilities in special education schools, special education classes and mainstream schools.

## Coordinated programme of supported employment

Under Action 5.1 of the Strategy, a cross-departmental working group facilitated by the NDA, agreed a coordinated policy to provide seamless supports to work for people with disabilities; ranging from effective pre-activation measures, to a policy for supported employment, to coordinated protocols for managing referrals between agencies or at key points of transition. The group includes Departments of Health; Education and Skills; and Employment Affairs and Social Protection, as well as the HSE. We welcome the fact that the policy is agreed by all Departments and agencies involved and look forward to continued co-ordinated working through the implementation phase, including with due regard to the New Directions policy for adult day services.

## Alternative methods of recruitment: internships, apprenticeships and part-time working

The NDA has consistently advised that alternative methods of recruitment should be explored by public sector bodies, in order to offer routes to employment for some people with disabilities who may be disadvantaged by the traditional modes of recruitment. Research has shown that internships, placements and apprenticeships can all offer candidates with disabilities experience of the work-place that is beneficial in terms of acquiring relevant skills, as well as demonstrating the value of such employees to employers. The CES includes a number of actions to promote and expand each of these potential routes to employment for people with disabilities. It would be important that future workforce planning by DPER also considers employment for those with disabilities. We would welcome an update on the roadmap to alternative recruitment being planned by the Department.

### Internships

A number of public sector bodies, e.g. DEASP and Department of Education and Skills, implemented internship programmes in recent years, and it will be helpful to see if some consistent and standardised approaches for future development can be established in this regard. While traditionally, internships within the civil service have not been able to translate directly into employment opportunities, we would welcome the opportunity to review this in keeping with commitments under Action 6.6 of the CES to consider internships as a recruitment route for both public and private sectors. It would be helpful to understand any obstacles or concerns, so that these can be considered with a view to identifying solutions or routes forward.

### Apprenticeships

We welcome the announcement on the part of Department of Education and Skills to increase access to apprenticeships as a way of addressing skills shortages in the labour force. By 2020, the intention is to increase the number of new apprenticeships registered to 9,000, with 26 new skills areas covered. We note the development of Regional Skills Forums as mechanisms to promote engagement between local employers and education providers in order to identify and address particular skills needs, and we are delighted to be represented on the Dublin Regional Skills Forum. Through this body and elsewhere, we have promoted the idea that apprenticeships should be made available on an equal basis to people with disabilities, as they offer training and work experience in a manner that has been shown to be particularly effective for those with disabilities – namely ‘place and train.’ We advise that a specific quota from the overall 2020 target should be set aside for apprentices with disabilities, as this will both ensure the target is met and will provide new routes to employment for this group.

### Work-placements

The NDA notes the establishment of the Employer Engagement Unit within the DEASP, with its remit to ensure that there are employers available and ready to take on candidates who may have been supported by the Departments’ Intreo service. In particular, the unit’s work to advance a new job placement programme for those seeking work experience, the Youth Employment Support Scheme, has been particularly welcome. However, while the scheme targets young people who are long-term unemployed or face other barriers to employment, including disability, the NDA would previously have advised, that the fact that jobseekers will be required to work 30 hours a week, may prove to be a barrier to uptake among candidates with disabilities who may not have capacity to work on a full-time basis. We hope that this could be given further consideration as the scheme is readied for launch in 2018.

### Part-time working

The question of part-time working also arose over the course of 2017 when discussing alternative approaches to recruitment with DPER, the PAS and other relevant bodies. The presentation given by PAS on the process underpinning competitions for positions within the civil service was helpful in building understanding of recruitment for some public sector bodies. At present, most public sector bodies who are recruiting automatically advertise for full-time positions. However, for some people with disabilities, only part-time work may be feasible. It would be helpful therefore, to explore ways of encouraging and making part-time opportunities available to candidates. It will also be important to give consideration to ways of encouraging those public sector bodies that do not fall under the remit of DPER, or use the PAS, to consider work-force planning and provision of part-time opportunities.

## Engaging Employers

The NDA has continued to fund the consortium-run EDI service on a pilot basis during 2017. This initiative is led by ISME, IBEC and Chambers Ireland in order to provide peer-to-peer advice and information to employers on the subject of employing people with disabilities. We are pleased that awareness of the initiative continues to grow. It will be important to consider the future of this pilot initiative, also guided by its progress in 2018.

Other routes to increasing the engagement of employers in the private sector include the work of the Employer Engagement Unit within DEASP and we would welcome increased engagement between this Department and EDI, as well as interaction with the brief of the Department of Business, Enterprise and Innovation.

## Part 5 Monitoring

Under Part 5 of the Disability Act, the NDA has a role to monitor and report on the numbers of people with disabilities employed in public bodies. At present the target is a minimum of 3% and we welcome the fact that in 2016 the target was exceeded for the third successive year in a row, reaching 3.6%. We also welcome the Government commitment to increase this target in incremental phases to 6% by 2024. In preparation for this, we recommend a full review of the Part 5 process to ensure that data collection is efficient, robust and reliable; but also to provide guidance and support for public bodies as they seek ways to ensure they can meet the revised targets. We look forward to working with DJE to progress this review during 2018.

## Transport

Transport has consistently been raised as an issue affecting people with disabilities and impacting on their ability to access education, employment or social engagement activities. We welcome the increased budget assigned to retro-fitting accessible public transport in 2017, but would welcome a more detailed focus on the intended outcomes. While work is ongoing to streamline rural transport services, and progress has been made, it is nevertheless the case that people with disabilities in rural areas have fewer options with regard to accessible transport than those in urban regions, and the cost of accessing these options can be a barrier for people with disabilities. In urban areas, while the public transport fleet (buses, trains, trams etc.) is largely accessible, there are still issues in terms of excessive notice periods for travel, accessibility issues in terms of train platforms or competition for limited wheelchair spaces on buses etc. The NDA would welcome a detailed focus on solutions to some of these outstanding issues, in order to ensure that the physical journey to work does not continue to be a barrier to taking up employment for people with disabilities, and notes that hearings on the subject of transport for people with disabilities are being conducted by the Oireachtas Joint Committee on Transport, Tourism and Sport.

## Monitoring, Implementation and Reporting

We welcome that most Departments now have Disability Consultative Committees (DCCs) in place, which is an improvement on previous years. The DCCs offer an opportunity for departmental officials to discuss their current and their planned activities with representatives from the disability sector who bring the benefit of lived experience and the on the ground experience of existing policy implementation. However, it is important that there is consistency in how these committees are meeting their remit to consider matters relevant to the employment of people with disabilities as well as the wider commitments under the National Disability Inclusion Strategy.

Given the degree of cross-departmental and cross agency relevance of many of the issues, there is benefit in having other government departments and agencies represented in the membership of DCCs. This process enables departmental officials to identify any issues arising and where relevant and appropriate, to progress these with other departments. This will ensure that activity updates submitted to the CES IG have been considered with stakeholders, are timely and can inform the discussion and suggestions by the Implementation Group.

The NDA recommends that renewed attention be given to the scheduling of DCC meetings across all Departments, ensuring that these meetings can play their role as a mechanism for monitoring progress under both the CES and the National Disability Inclusion Strategy. It is also important that the agenda for DCC meetings be structured to enrich the reports to the CES IG.

We look forward to the continued implementation of the CES and further action plans under the Strategy, and will continue to advise and support their implementation as appropriate. We advise that this could be supported by a small suite of indicators, aligned to those of the National Disability Inclusion Strategy, that can be used to measure progress and outcomes against the overall objective of the Strategy, namely to increase the numbers of people with disabilities in employment.

# Conclusion

This review clearly shows some key highlights from the last year of activity under the CES, and demonstrates the range of activity that is underway, and the many associated achievements to date. It also signposts those areas where further attention and focus would be beneficial as we move into 2018.

In considering how the Strategy can be progressed in 2018, we believe that there are certain areas where a focused approach on the part of the CES IG could be very helpful. As discussed above, the thematic format of the meetings of this group in 2017 proved effective and productive in terms of discussing key issues arising in the implementation of the Strategy, and consideration of potential solutions. We believe that this would focus on the areas highlighted above, particularly a more detailed focus on increasing expectations of work in school years, preparing students with disabilities for work, further work on the pathway to work from disability services, a co-ordinated approach to vocational rehabilitation, transport and further actions to deliver on strategic priorities.