**Comprehensive Employment Strategy 2018:**

**NDA Year-end Review**

# Background and Introduction

The Comprehensive Employment Strategy for People with Disabilities 2015-2024 (CES) is a response by the government to address the obstacles that occur on the pathway to employment for those with disabilities who wish to work. 2018 is the final year of an initial three-year phase of foundational activity. This period of activity has sought to establish processes, systems, and tools to progress the overall ambition of the Strategy.

This paper sets out the National Disability Authority’s (NDA) assessment of progress during 2018 and is similar to independent reviews conducted by the NDA in 2016 and 2017. The assessment is informed by a review of the departmental reports to the Comprehensive Employment Strategy Implementation Group (CESIG)[[1]](#footnote-1) of which the NDA is a member. In addition, it is informed by the NDA’s own work on employment matters and its knowledge on other relevant policies and programmes concerning disability.

This paper is presented in two parts. Part 1 describes achievements to date and highlights areas that require additional focus, particularly in relation to 2018 activities. Part 2 comprises a more detailed assessment of the activity of individual, relevant Departments over the course of 2018.

Overall, the NDA acknowledges the progress that has been made in implementing the actions committed for completion or advancement by Departments and agencies over the 2015–2018 phase. While this report focuses on activity delivered within 2018 it is important to note that this year was the final opportunity for Departments to deliver actions identified in the first 3-year action plan. Where actions have been delayed beyond this plan this assessment highlights same, noting, however, that some actions in the plan have evolved from their original iteration, and may have been realised through another mechanism. This is most notable in actions under the Make Work Pay and Engaging Employer strategic priority areas[[2]](#footnote-2).

During this initial period of the CES the NDA believe that new ways of cross-departmental working have emerged and can be further advanced in the 2019 to 2021 action plan, currently in development. The NDA is advising on areas for attention for the new plan in a separate paper to the Minister.

As we come to the end of the first 3 year action plan it is important to reiterate that this strategy is for all people with disabilities whatever the kind of impairment – people with physical or sensory disabilities, those with mental health conditions, those who acquire a disability, those with intellectual disabilities and those with autism. Individual actions within the strategy will have had some impact on the lives of people with disabilities, such as changes to the earnings disregard for disability allowance recipients or changes such as Intreo becoming the activation gateway. Indeed some actions have had real impact on the lives of those with particular issues, such as the IPS model of employment support for those with mental health difficulties. However, actions that support those with complex or high support needs require further attention during 2019 to 2021.

Separately, the NDA has been providing advice and support to departments and agencies, in its role as the independent advisory body on disability matters. The development of the next 3 year action plan involves actions that Departments could advance as well as actions that the NDA has committed to support its delivery.

# What has been achieved to date?

Throughout 2018, Departments and agencies continued to make progress in a number of areas, building on work over the first 3 year action plan within the Strategy. The following section summarises some of the highlights, which are discussed in more detail later in this report. The achievements listed below highlight just a selection of the extensive activity that has taken place across departments and agencies.

## Achievements to date include:

* On-going delivery of the commitments in the Make Work Pay Report, including the introduction from December 1st 2018 of a significant increase to the earnings disregard for people with disabilities on Disability Allowance (DA) from €120 to €427 per week. This measure announced by the Minister for Health, will have an immediate impact on the lives of people with disabilities who wish to work and fear losing their medical card.
* Allocation by the Department of Employment Affairs and Social Protection (DEASP) of €16 million under the Ability Programme to 27 projects to test innovative approaches to pre-activation for young people with disabilities. This represents an increase of €6 million on the initial budget for a programme that aims to promote employment prospects and meaningful social roles for young people with disabilities and particularly those who are distant from the labour market. These demonstration projects provide an opportunity to develop services and approaches that can be scaled up for national implementation.
* Commitment on the part of the Department of Health/HSE and Department of Employment Affairs and Social Protection to the roll-out of the Individual Placement and Support (IPS) model of supported employment for people with mental health difficulties wishing to work. This action illustrates the potential for cross department and agency working.
* Introduction by the Department of Employment Affairs and Social Protection of a new Youth Employment Support Scheme (YESS). The scheme opened for applications in October 2018 and is specifically targeted at young jobseekers including people with disabilities aged 18-24 years of age who are long-term unemployed or who face barriers to employment. This scheme aims to give a person the opportunity to learn basic work and social skills in a supportive environment, while on a **work placement** in a host organisation. Participation on the YESS programme is wholly voluntary and participants will receive a weekly payment of €229.20 for 24 hours work per week.[[3]](#footnote-3)
* Commitment and commencement on the part of the HSE to trial a process to support people with disabilities who have access to an adult day place to defer taking that place while they explore mainstream work or further education options. This is an important development to support young people to access mainstream options.
* Continued implementation by DEASP of a number of recommendations contained in the Make Work Pay report (2017), including:
* Implementation of a ‘Fast Track’ return to payment for people with disabilities on DA, which allows people on DA to try out work with confidence that their payment will be speedily returned if work does not work out.
  + Delivery by the Department of a unique and effective co-designed consultation process to explore in depth the views of people with disabilities and their families on recommendations 9 and 10 from the Make Work Pay report. Those recommendations relate to proposed changes to the Disability Allowance Payment and development of early engagement on work in income support schemes. The findings from the consultation are being examined by the Department to guide next steps.
  + Development of a ’Ready Reckoner‘ to enable persons with disabilities to independently estimate the net benefits and financial implications of working.
* Delivery by the Department of Education and Skills of a comprehensive review of the career guidance provision, which included a focus on guidance for students with disabilities, particularly guided by input by CESIG and other stakeholders.
* The Employer Disability Information Service (EDI) continued work to promote awareness and provide a service to employers, delivering a range of actions including the ‘WorkABLE Future 2018’ Conference for employers held in March 2018. At this conference a Peer Network with over 80 employer members was launched by the EDI.
* Publication by NDA of guidelines for Employers and Line Managers on how to support staff with Autism, highlighting the advantages of recruiting employees with different skillsets, and also offering guidance on developing inclusive and supportive work-places.
* Publication and continued dissemination of NDA commissioned research on Good Practice in Employing People with Disabilities in the Public Sector[[4]](#footnote-4)
* The NDA recognises the importance of the initiative by the Minister for Transport, Tourism and Sport in 2018 to appoint people with disabilities to the boards of each of the public transport agencies as a means of driving continuous quality improvement in this sector.

## Areas where actions committed are at an advanced stage:

There are a number of areas where committed actions are being advanced but were not completed by end of 2018, the NDA recommend that they continue to be delivered under the next action plan 2019 - 2021. These actions include:

* On-going work by the Department of Public Expenditure and Reform (DPER) to explore the idea of expanding internships as a recruitment route for people with disabilities for both public and private sectors. While DPER have explored internship models currently in place, (e.g. Naas and Tallaght Hospitals offer a strong rotating workplace option for young people with Intellectual Disabilities) they have also examined potential uptake of such an internship scheme with a number of government departments. Links with the UK Cabinet Office have also been established to inform how such a scheme might be progressed in an Irish context.
* The NDA looks forward to the Inter-Departmental Working Group on CES Action 5.1 establishing the next steps to test, evaluate, and scale the agreed policy of coordinated supports for people with disabilities.
* While noting that work on Person Centred Planning is being progressed by HSE under the Transforming Lives programme, the NDA welcomes the fact that the Framework currently being scheduled for implementation across HSE-funded disability services, includes consideration of an individual’s work goals (if any), as per action 2.9 of the CES. The NDA looks forward to early implementation of this framework across both day- and residential services.
* There have been on-going developments in the collection and analysis of data on participation levels of persons with disabilities in full time employment (FET), including the establishment of a Social Inclusion unit in SOLAS and the development of a template for ETBs to establish learner pathways and targets over a three-year period. As this data is built up over time, it will be important to analyse it for trends and opportunities for future focus.
* SOLAS have recently published a review of pathways to participation on apprenticeships[[5]](#footnote-5). This review identified that 2.8% of people with disabilities are doing apprenticeships. SOLAS have described five action areas to increase participation rates including the promotion of a diverse pathway.
* Although the specific actions regarding vocational rehabilitation in Ireland, i.e. conducting and disseminating research, were completed in 2018, the NDA has continued to progress this work with a series of key stakeholder interviews and a roundtable discussion on the necessary steps for a programme of vocational rehabilitation in Ireland. This will inform the development of policy advice and associated actions in the 2019 to 2021 action plan.
* Development by the NDA of a suite of indicators to measure the impact of the Comprehensive Employment Strategy over its full lifetime. This work is well advanced and will be finalised in Q1 2019.

## Areas requiring further focus:

There are a number of areas within the first 3-year action plan of the CES where progress has been slower than anticipated. The NDA advises that these actions should also be carried over to the next 3-year plan, with due regard to developments and changes that have occurred within the system in the interim. Some areas to highlight where further consideration and focus is required include:

* Further work on the area of transitions between the various stages of the education continuum, but also between education and employment;
* Further work to improve the employment of people with disabilities who are not in work and who have moderate to high support needs;
* Development of career guidance supports that meet the needs of students with disabilities, informed by the findings of the Review of Career Guidance by the DES referenced above;
* On-going work across all relevant departments and agencies to engage employers, building on progress to date, and leveraging the foundational work developed by the Employer Disability Information service during its three year pilot;
* Continued work to review the Civil Service Code of Practice to ensure it supports the employment of persons with disabilities in the public service;
* Actions to improve the **communication** of changes in the system for people with disabilities, including a practical communications strategy to inform people with disabilities about the interplay between some of changes for example between the increase in earnings disregard and maintenance of the medical card;
* Setting out the milestones for delivering on these and new actions over the next 3 year period to facilitate better measurement of progress and early identification of obstacles.

# Key points from 2018

The purpose of this section is to present in more detail of some of the significant developments over the course of 2018, which may be helpful in guiding the next phase of the Strategy.

## Thematic approach to oversight by CESIG

The NDA’s assessment of delivery of CES in 2017 offered an outline of a series of thematic meetings in 2018 to support more in-depth discussion by the CESIG on how they could be progressed. Those themes included:

* A more detailed focus on the role of education in increasing expectations regarding employment, and preparing students with disabilities for same, with particular reference to issues such as career guidance across all school settings;
* A focus on the New Directions policy and how it interacts with mainstream services and supports for people with disabilities, particularly in terms of further education, training and employment;
* Consideration of retention of work for those who acquire disabilities, including an exploration of coordinated approaches to vocational rehabilitation;
* Consideration of ways of increasing the engagement of employers, including with regard to groups who may be considered ‘hard to place’ or in need of a high degree of support;
* Consideration of areas of focus for the next 3-year phase of implementation within the overall CES.

The NDA believes this thematic approach allows for a more focused discussion of the issues involved, including an opportunity to hear from a wider range of stakeholders than might otherwise be the case. The approach also provides space to consider solutions to issues where challenges or delays may have arisen. The NDA advises that this model could continue to serve the CESIG as it moves on to oversee the second 3-year action plan.

## Transitions

The importance of transitions for young people with disabilities and preparing for those transitions is consistently highlighted as a critical element of any success under the CES[[6]](#footnote-6). The NDA welcomes the discussion on the topic in 2018, as led by Department of Education and Skills (DES), but wishes to emphasise the importance of interaction and cooperation with other departments and agencies to improve and support the transition process. We note DES has ensured its own discussions are informed by the lived experience of persons with disabilities, obtained through close consultation and engagement through the Departmental Consultative Committee (DCC) mechanisms.

The NDA looks forward to continued progress against these aims, building on the significant body of evidence regarding the importance of timely and coordinated transition planning. Specific elements that may be necessary to advance in an Irish context include:

* A staged transition programme in Rehabilitation and Adult Day Services that recognises current levels of achievement and experience in the work environment and facilitates transition to meaningful employment opportunities.
* The development and enactment of a national framework for facilitating transition from formal education to further education and training, and employment for young people with disabilities.

The NDA believes that in addition to the above, the Department of Education and Skills could take the lead on the development of a series or suite of protocols that ensure people with disabilities successfully transition from education to the next phase of their pathway. The NDA advises that these protocols could usefully include, amongst others, the role of National Council of Special Education and the Department of Children and Youth Affairs and should set out the supports and processes required for a successful transition to occur.

## Engaging employers

Successfully engaging employers is paramount to raising the numbers of people with disabilities in employment. Strategic Priority 6 to date has dealt with actions to engage employers. A significant element of this employer engagement activity has been delivered by the Employer Disability Information Service (EDI), through a consortium of employer agencies consisting of Ibec, ISME and Chambers Ireland. This 3 year pilot programme provided a unique peer-led information support and guidance service.

Individual departments have also progressed some actions in this regard, including DEASPs regional information sessions for employers and DBEIs work on corporate social responsibility, however, at the end of the 3 year foundation period there is still a significant programme of work necessary to support employers to recruit and maintain people with disabilities in employment. In Q4 2018 the EDI service produced an employer survey that concluded the following:

* Employers reported that information resources and financial support would encourage them to employ people with disabilities[[7]](#footnote-7) –
* 47.8% opted for information and
* 46.7% said financial support
* There is still a lack of understanding about supporting different disabilities at work (60.5%) and how to access such supports (62.7%).
* The perceived potential legal consequences is still a concern for employers with 62.7% of respondents stating it would be a worry if the employment does not work out.

An independent review of the service and its model of delivery was commissioned and completed in 2018, highlighting the importance of a peer-to-peer service for employers.

## Alternative Employment Routes

The CES describes the potential of alternative recruitment approaches as a suitable mechanism for increasing employment possibilities for people with disabilities. During the foundation period the NDA gathered learning regarding good practice in other jurisdictions, and engaged in discussions with relevant departments on how this might be implemented in an Irish context. Some preliminary work progressed during the foundation period, including the Public Appointments Service (PAS) improving access to their website and in the processes for requesting reasonable accommodations.

The NDA would reinforce the content our most recent discussions with the Department of Public Expenditure and Reform, PAS and the Commission for Public Service Appointments (CPSA) was to consider the development of a pilot internship scheme for the civil service for people with disabilities, which will have the possibility of full time employment at the end of the internship. There is also scope to look at options for a pilot internship scheme in the private sector employers.

We suggest that there is good evidence for DPER to learn from the UK Cabinet Office Disability Inclusion unit who have a 6 pronged approach to recruiting people with disabilities to the UK civil service. Learning that may have application in an Irish context will include:

* Approaches to timely delivery of workplace adjustments
* Approaches to implementing mentoring, coaching and schemes in order to support talented employees to progress
* Approaches to supporting employees with mental health difficulties in the workplace.

## Mental Health and cross agency working

In February 2018 the final report on the mental health pilot project ‘Steps into Work’ was launched by Ms Regina Doherty, TD, Minister for Employment Affairs and Social Welfare. This pilot project tested the Individual Placement and Support (IPS) approach for developing opportunities for people with mental health difficulties to remain in, or to access, work in mainstream settings. With the IPS model, individuals are offered opportunities to access open market competitive employment based on their skills and interests. As a commitment to this model of support, further funding was agreed for 27.5 IPS Employment Specialists. The IPS steering group continues to foster cross-departmental working in support of this initiative, including the development of protocols and procedures to ensure a consistent national approach to the rollout of IPS in Ireland. The NDA welcomes the progress made with this supported employment model and the commitment to its continued roll out in 2019 to 2021, and suggest this work is a model of collaboration that could inform other areas of cross-departmental working.

## Coordinated programme of supports in employment

Year 3 of the action plan has resulted in an understanding of what better coordination of service and supports for people with disabilities looks like. This has been a central focus on the agreed policy of action 5.1. An inter-departmental group’s report setting out an agreed policy approach and associated and implementation plan was delivered to the Minister in Q1 2018. Key elements of the coordinated policy approach include:

1. Coordinated and **effective phase of preparation for work** so that individuals will be better placed to access employment. The Ability Programme will test and model aspects of pre-activation that can be scaled in this regard;
2. Development of a complementary policy regarding **provision of supports to find and keep employment,** which may include development of a complementary support service, informed by research and the outcome of a pilot project trialling an approach with specific target groups;
3. Development of effective **protocols for cooperation** between Departments and Agencies to support people with disabilities on their path to work, both now and as the coordinated policy is implemented.

There is learning for the development of employment supports from the work underway in HSE and DEASP from the ‘Steps to Employment’ project and the introduction of the IPS model of supported employment for those with mental health difficulties. The IPS steering group can offer insights on the development of generic Service Level Agreements (SLA’s), Standards Operating Procedures (SOP’s), and materials such as joint protocols to ensure a consistent national approach. The inclusion of the DES and in particular providers of further education and training will ensure that the coordinated approach is seamless. The NDA looks forward to continuing to support further developments in this area.

## Supporting a Return to Work

Earlier in 2018 the CES IG had a detailed discussion on Strategic Priority 4. This thematic discussion allowed for a focused examination of current practices on supporting staff with acquired disability to return to work; including addressing issues such as gradual return to work, requesting reasonable accommodations, and understanding the practices involved in specifically supporting those with acquired brain injury return to work[[8]](#footnote-8). A commitment was made to revisit these concerns as areas of activity in 2019 – 2021. The NDA has also continued to progress work in developing independent policy advice for consideration by relevant departments regarding a coordinated approach to vocational rehabilitation that would have due regard to current neuro- and medical rehabilitation processes. The development of this advice is on-going and is informed by findings of an NDA-hosted roundtable discussion in Q2 2018 that explored this area with relevant stakeholders.

## Make Work Pay

This report, while published in April 2017, has brought about significant changes for people with disabilities who want to work. Since its publication, 1300 people have exited the Disability Allowance payment scheme to take up work[[9]](#footnote-9).

Key actions include for example:

* the development of a fast-track return to benefits in the event of employment not working out;
* development and launch of the ‘Ready Reckoner’ tool to allow people with disabilities to estimate the financial benefits of taking up employment;
* revision of the ‘disregard’ amounts applying to both disability allowance and the medical card upon taking up employment;
* commencement of exploration on effective routes to early engagement.

In early December 2018, changes were introduced so that the earnings disregard for those who avail of a DA payment and are in receipt of a medical card increased from €120 to €427 per week. This increase means that the earnings of someone in receipt of Disability Allowance that can be disregarded has increased from €6,240 a year to €22,204, addressing one of the key financial disincentives to taking up employment.

## Enhancing pathway to work through Early Engagement

The NDA endorses the approach taken by DEASP to consult with people with disabilities regarding 2 recommendations from the 2017 Make Work Pay report. These recommendations stated that the Disability Allowance payment and other schemes should be reconfigured for new entrants aged 18 and over to ensure that their work ambitions could be explored systematically at an early age (‘principle of early engagement’). A unique consultation process was developed with the assistance of an external facilitator: a Stakeholder Focus Group and DEASP staff. The process was “co-created” to ensure that it was as inclusive and comprehensive as possible.

The consultation engagement phase is now complete and the NDA looks forward to publication of the consultation findings as soon as possible.

The NDA recommends that with regard to developing a useful and effective early engagement process, it would be helpful for the DEASP to connect with the HSE work to profile the support needs of School Leavers and, in particular, their commencement of work to trial deferrals of adult day service places. The DEASP will also need to link into the DES work to support the transition planning process to ensure the recommendations can be delivered.

## Developing 2019 to 2021 year action plan

As 2018 was the final year of the initial foundation phase of the CES, the CESIG and senior officials gave attention to the development of an action plan for the next phase of implementation of the Strategy. This process, initiated by the Department of Justice and Equality, and supported by the NDA, began over the summer of 2018. As part of this process, the NDA met bi-laterally with individual Government departments to identify priority actions for the next 3-year implementation phase, and particularly acknowledges the extent of the commitment shown to the overall goals of the Strategy. Each Department and agency reflected on actions that would:

* Build on progress to date;
* Address delays or gaps in delivering specific actions from the first 3-year action plan, understanding that some actions required substantial groundwork and implementation before measureable progress could be acknowledged;
* Consider new priorities or action areas that have emerged over the course of the Strategy to date;
* Identify mechanisms for continuing to foster inter-departmental working to ensure coordination in delivery of services;
* Consider approaches to data gathering and analysis in support of monitoring activity.

Senior officials continue to work on finalising the actions that they can commit to deliver on over the next 3 years and in October 2018 presented their early thinking in this regard at a consultation with a group of disability stakeholders. The final negotiations for the 2019 to 2021 action plan are now underway, with a view to the plan being finalised in early 2019.

# Summary

This report illustrates the progress made during 2018 and highlights key areas that require further action in order to achieve the aims of the Comprehensive Employment Strategy. This 3 year foundation phase has encouraged new ways of working between departments and agencies. The role of the Disability Stakeholder Group (DSG) membership in the CESIG has been important to ensure the understanding and consideration of the individual lived experience, and often to indicate gaps in current provisions.

During 2018 the thematic approach to CESIG meetings continued to prove effective and productive in terms of discussing key issues arising in the implementation of the Strategy. The NDA recommends that a similar approach should be taken during the 2019 to 2021 period, with themes such as:

* Agreeing the 2019 to 2021 action plan with improved data collection measures;
* Transition planning as a process, building on discussion thus far;
* Developing skills attainment options for young people with disabilities focusing on the Ability Programme, apprenticeships, traineeships and internships;
* Mental health and employment, lessons from the IPS supported employment model;
* Delivering alternative recruitment options for private and public sector employers

The NDA would be happy to support DJE in considerations regarding same.

# Section 2: NDA Review of Departmental Activity in 2018

In this section, the NDA reviews progress and outputs in year 3 of the CES for each individual Department or agency with responsibility for delivery of actions.

Departments and agencies include

* Department of Business, Enterprise & Innovation
* Department of Education and Skills
* Department of Employment Affairs and Social Welfare
* Department of Health/HSE
* Department of Justice and Equality
* Department of Public Expenditure and Reform
* Department of Transport/National Transport Authority
* National Disability Authority

# Department of Business, Enterprise & Innovation Review

During 2018, the Department of Business, Enterprise and Innovation (DBEI) continued to work on key actions under Strategic Priority 1, 2 and 6 of the Strategy. The NDA particularly welcomes the support of senior officials within the department for the implementation of CES, and the work the Department has done to establish its Disability Consultative Committee and ensure the CES is an agenda item for same.

## The NDA acknowledges progress on the following activities in 2018:

* The Department of Business, Enterprise and Innovation (DBEI) developed a clear programme of work for its Disability Consultative Committee (DCC) including a mechanism for departmental units and agencies to share information and practice on disability business and employment issues. The NDA welcomed the opportunity to present to the DBEI on areas of potential focus for the DCC and looks forward to being able to support this work as relevant and appropriate in the coming year. During 2018, Enterprise Ireland (EI) worked to develop a strategy for encouraging entrepreneurship for people with disabilities and a report was prepared for Enterprise Ireland’s Executive Committee (Management) in October 2018. This programme of work has been supported by the NDA and informed by EI research, a roundtable with key stakeholders and input from an expert mentor in the field of disability and entrepreneurship.
* The network of 31 Local Enterprise Offices (LEO) is overseen by the Department, they provide advice, information, and support for those interested in starting a new business or already in business including entrepreneurs, early stage promoters, start-ups and small businesses looking to expand. This mainstream information provider is key for people with disabilities wishing to pursue their own business. While some accessibility training has been delivered between 2015 and 2018, it is necessary that LEOs are fully accessible for people with disabilities in the provision of information. It will be useful to build on the initial training during the 2019 to 2021 action plan with a detailed programme of work that identifies accessibility targets for the future.

## NDA would like further progress for the DBEI and associated agencies, in the following areas:

As Ireland has ratified the United Nations Convention on the Rights of People with Disabilities (UNCRPD) the Department of Business, Enterprise and Innovation has a role to deliver commitments described in article 27 section (f) which is to promote opportunities for people with disability for **self-employment, entrepreneurship, the development of cooperatives and starting one’s own business**. Over the 2019 to 2021 timeframe, DBEI and its agencies can continue to work to ensure that UNCRPD goals are being met.

* In 2017, the DBEI highlighted the publication of a new National Plan on Corporate Social Responsibility 2017-20, which included actions to support businesses in Ireland to embrace more responsible and sustainable business practices, including the promotion of diversity and accessibility in workplaces. The NDA suggest that actions in this area could be supported by the Employer Disability Information service (EDI), which would help to develop more disability confident employers and businesses. In particular, EDI could offer support to the relevant Government Departments and Agencies on the design and provision of information for employers.

# Department of Education & Skills & associated agencies Review

The Department of Education and Skills (DES) and agencies under its remit are involved in actions across each of the strategic priority areas within the CES over the foundation period.

## The NDA ac knowledge’s progress on the following activities in 2018:

NDA welcomes the renewed focus on detailed reporting, aligned to specific actions within the CES, during 2018. This was particularly helpful in terms of the detailed discussion of transitions led by DES at the July meeting of the CESIG. We also note the extent of constructive engagement the DES has had with the disability sector, especially through its Disability Consultative Committee (DCC).

* The NDA welcomes the SOLAS review of pathways to participation in apprenticeships[[10]](#footnote-10). This review identified that only 2.8% of people with disabilities are currently undertaking Apprenticeships. SOLAS described 5 action areas to increase participation rates including the promotion of a diverse pathway. The potential of pre- apprenticeship courses and their benefit to some people with disabilities was captured in the NDA submission and in further consultation with SOLAS. The NDA would like to see this option added to the measures under review to increase the participation rate of people with disabilities in apprenticeships.
* The gaps in the provision of career guidance in special and secondary education were discussed by the CESIG in 2018. DES presented information on the development of Guidance in Further Education and Training during 2018 which is now delivered through the Education and Training Boards (ETBs). Within each ETB, there is a dedicated Adult Education Guidance Service (AEGS) which provides guidance to Further Education and Training (FET) learners and potential learners before, during and after FET training. Guidance is also provided to apprentices and trainees through the training centre network. In addition, the ’Guidance, Counselling and Psychological Service in Youthreach and Community Training Centres‘ provides supports for young people on these programmes. In addition to the provision of AEGS, DES described the Advocacy Service which provides a network of full-time advocates whose role it is to support participants in the Youthreach programme[[11]](#footnote-11) on decision making, referral, progression and placement. Advocates are instrumental in organising and monitoring students. There is significant learning from this model of supporting people with disabilities in FET.

## NDA advises further progress or increased activity for DES and agencies in the following areas:

* We note the extent to which the Department heard and engaged with concerns expressed by a range of stakeholders with regard to the scope of the review of career guidance and that it should include a focus on students with disabilities. The NDA notes that the CES had initially planned for training to be developed and rolled out to Guidance Counsellors but this appears to be overtaken by the review. It is important, therefore, that these actions are continued into the next 3 year plan, informed by the recommendations stemming from the review, and that they adequately address the needs of all young children in accessing appropriate, adequate and accessible career guidance and supports that enable them to make choices regarding their futures as adults and employees.. It would be helpful, therefore, to see the agreed action plans and specific targets arising out of the review, while also addressing the current guidance actions.
* The Higher Education Authority (HEA) report annually sets targets and numbers of new entrants to college with a disability. In December 2018 the Minister for Higher Education launched the HEA Progress Review of the **National Access Plan** and Priorities to 2021[[12]](#footnote-12). This report shows that action is necessary to address gaps within the access model, for example supporting access to higher education for students with Intellectual Disabilities, Autism and Mental Health concerns.

In bilateral discussions with DES and in NDA advice papers on subject matters such as Apprenticeships[[13]](#footnote-13), YouthReach, and Career Guidance[[14]](#footnote-14), the NDA advised that the DES disability-proof their approach to apprenticeships, internships and work placements to increase the numbers of people with disabilities in employment. As we reach 5 national unemployment, and the shortage of trained workers becomes increasingly problematic, the NDA strongly reiterates the need to establish meaningful targets to include learners with disabilities within apprenticeship programmes during 2019 to 2021 as a useful next step.

## Coordinated programme of supports in employment (5.1)

The cross-departmental working group that agreed the policy approach under Action 5.1 of the Comprehensive Employment Strategy will, during the 2019 – 2021 timeframe, proceed with the implementation of the policy.

A key aspect of the policy’s recommendations is the development and evaluation of a demonstration project to test an approach to the provision of supported employment that can be scaled and implemented at the national level. With this demonstration project, the Department of Education and Skills and agencies such as the NCSE and ETBs can through their involvement in the cross departmental working group:

* Assist the Design and delivery of the project to test ‘agreed policy’;
* Evaluate outcomes of the test project;
* In line with other departments, ensure the involvement of personnel from appropriate services.

## UNCRPD

The NDA advises that, similar to, and in conjunction with all departments, the DES will need to ensure that its planned actions are aligned with relevant articles in the UNCRPD, particularly article 27, which mandates that the actions:

* Enable persons with disabilities to have effective access to general technical and vocational guidance programmes, placement services and vocational and continuing training;
* Promote vocational and professional rehabilitation, job retention and return-to-work programmes for persons with disabilities.

The NDA strongly recommend that a series of actions be delivered over the course of the next 3 year plan to ensure that the vision behind these goals can be realized in an Irish context, noting that this may require further cross-departmental cooperation.

# Department of Employment Affairs & Social Protection Review

The Department of Employment Affairs and Social Protection has responsibility for a large number of actions within the Strategy, and have done much to drive progress, including: building capacity within its mainstream employment service – Intreo – to meet the needs of people with disabilities; the publication of the ‘Make Work Pay’ Report in April 2017, and implementation of its recommendations. Year 3 of the CES saw the Department of Employment Affairs and Social Protection (DEASP) continue delivering work on significant actions.

## The NDA acknowledges progress on the following activities in 2018:

These actions include those mentioned in the first part of this report, namely:

* The additional allocation of €6 million to the Ability Programme, bringing the total budget to €16 million, thereby enabling the funding of 27 projects[[15]](#footnote-15);
* The Department’s development of a ’Ready Reckoner’ for persons with disabilities and the creation of a web link to new disability information;
* The co-designed consultation on 2 recommendations from the ‘Make Work Pay’ report. This consultation is to inform an ‘early engagement process’ and the NDA look forward to the viewing details of such an engagement process;
* Putting in place protocols to ensure that persons with disabilities may, on a **voluntary basis,** seek an appointment with a case officer to discuss their employment goals and develop an appropriate personal progression plan;
* On-going development with local groups in the midlands, involving designation of four case officers as contacts for people with disabilities in Longford, Mullingar, Athlone and Portlaoise.

Over the course of the 2015 to 2018 timeframe, the DEASP has continued to improve its engagement with people with disabilities and this is especially noted in the Department’s work on supporting people with mental health concerns to access and sustain work through the commencement of programmes utilising the Individual Placement and Support model of supported employment. It is this type of tailored support programme that is necessary to appropriately support people with disabilities including those with mental health difficulties to access and sustain employment.

Since the publication of the ‘Make Work Pay’ Report in April 2017, 1300[[16]](#footnote-16) people with disabilities have terminated the Disability Allowance scheme to take up work.

## NDA advises further progress or increased activity for DEASP and agencies in the following areas:

The NDA advises that during the next action plan period it would be helpful for the DEASP to have an action plan with agreed annual targets and timelines and a description of the steps involved in the delivery of the action areas outlined below. The NDA advises that during the next 3 year action period, the DEASP should tailor an action plan for their department with agreed annual targets and timelines, as well as a description of the specific steps in the delivery of the action areas outlined below. The NDA notes that delivery of some of these actions will involve the DEASP working solely to achieve an outcome, however many of the actions require cross-departmental cooperation to improve the coordination of services and supports for people with disabilities. This is most clearly identified in Action 5.1, learning from the Ability Programme and in recommendations related to the 2017 ‘Make Work Pay’ Report.

## Building an accessible and supportive Intreo service:

Further action is necessary to ensure that all Intreo staff - not just Case Officers - are trained and capable of supporting people with disabilities who want to work or wish to explore their employment and further education options, since Intreo is the gateway for people with disabilities (Action 2.6). The extended services available to people with disabilities, such as the Local Employment Services, should also undergo a programme of training to adapt their practices and increase accessibility for people with disabilities.

## Ability Programme

There are 27 Ability Programme projects each addressing an element of pre-activation and the NDA welcomes the commitment by the DEASP to evaluate learning from the Ability Programme from its commencement. The NDA would welcome access to the learning emerging at regular intervals from the individual projects. This learning should help to inform what an organised pre-activation phase of activity for people across the spectrum of disability could look like. This learning will impact service delivery across a number of settings including education, health, benefits and community support.

## National Skills Strategy

As mentioned in our assessment of both the DBEI and the DES it is important that the DEASP works with these departments and private sector employers to develop apprenticeship/internship programmes and Transition Year (TY )placements for persons with disabilities as a method of developing skills and in keeping with research that for some people with disabilities skills are developed while at work. Under this strategy the DEASP could look at its own practices to support people with disabilities to become self-employed.

## Create links to the Employer Disability Information Service

In order to ensure the Employer Disability Information Service (EDI) service has mainstream credentials, it would be helpful if the DEASP Employer Engagement unit and the DBEI consider assigning personnel to contribute to the EDI’s Advisory Board in order to guide on potential programmes of work.

## Coordinated programme of supports in employment (Action 5.1)

The cross-departmental working group that agreed the policy approach under Action 5.1 of the Comprehensive Employment Strategy will, during the 2019 – 2021 timeframe, proceed with the implementation of the policy.

A key aspect of the policy’s recommendations is the development and evaluation of a pilot project to test an approach to the provision of supported employment that can be scaled up and implemented at the national level. With this pilot project, the DEASP through its involvement in the cross departmental working group can:

* Assist the Design and delivery of the project to test ‘agreed policy’;
* Evaluate outcomes of the pilot project;
* In line with other departments, assign personnel from the DEASP divisions, relevant units, and the employAbility service.

# Department of Health & HSE Review

## The NDA acknowledges progress on the following activities in 2018:

The HSE operates two distinct areas with relevance to CES: under the social care division, a disability unit, and under the mental health division. During 2018, the mental health team in the HSE progressed a detailed programme of work that encourages recovery through work as an option for people with mental health difficulties. This activity included the implementation of the Individual Placement and Support (IPS) approach to developing opportunities for people with mental health difficulties to remain in, or access, work in mainstream settings. Individuals have been offered opportunities to access open market competitive employment based on their skills and interests. The success of the pilot phase resulted in a commitment by both the HSE and the DEASP to resource an expansion of the programme.

The disability unit has made progress on activities that will have a significant effect on the lives of people with disabilities, including the following:

The HSE advanced some work on Action 1.1 to develop key messages for young people with disabilities between the ages of 16 and 25 years. The messages are to emphasise each person’s positive potential and will be delivered to people with disabilities by the HSE and HSE-funded multi-disciplinary staff. The NDA believes that key to the successful implementation **of this positive messaging action** is a work plan outlining a monitoring and review component. This plan should entail:

* Training for staff who need to develop necessary competencies in this area;
* Linking staff who operate the Children’s outcome framework goals with this action;
* Creating a champions initiative whereby HSE staff who have developed and practiced positive messages can share their work and approaches with others.

## Preparing for work

The HSE developed a process to address the needs of school leavers and people leaving Rehabilitative Training programmes each year that require a HSE funded day service. **Action 1.2 (a) and (b)** outlined this process. The HSE have also acknowledged that a guidance service is necessary to support young people identified as having the potential to progress to vocational training or employment and that they are provided with the necessary contact details to undertake such training and employment, and encouraged to advance these options. People with disabilities leaving school who wish **to defer a place in adult day services** will also require a guidance service. In fact, both groups of young people with disabilities require HSE personnel to plan their referral to either specialist or mainstream programmes[[17]](#footnote-17).

It was noted, in previous NDA reviews of CES activity, that current constraints on HSE guidance services[[18]](#footnote-18) have restricted their effectiveness. In the next CES action plan the NDA strongly recommends that the HSE gives further consideration to how it can provide supports in this space, and in particular:

* Develop clear guidelines for New Directions day services for referrals and outline protocols with other state agencies and providers of support to access work or vocational training;
* Outline of supports available to young people with disabilities who have/will avail of a deferral of adult day service place. This action is in keeping with New Directions.

The NDA has also supported the development of a person centred planning (PCP) framework (Action 2.9) to underpin the delivery of all HSE funded disability services, including New Directions. The NDA now advises the importance of implementing this framework nationwide and the establishment of an evaluation process that measures the impact of PCP as a process for capturing and supporting the achievement of work goals. It would be helpful if the HSE could publish an evaluation of the implementation of PCP and outcomes associated over the course of the next 3 year action plan.

The NDA suggests further focus would be beneficial, in the following areas:

Linking the learning from IPS project to HSE funded disability services.

The Department of Health/HSE and the Department of Employment Affairs and Social Protection ran a successful pilot of the peer reviewed Individual Placement Support (IPS) Model of Supported Employment (action 4.2 a, b and c), for clients with mental health difficulties. The model allows for **the employment specialist/job coach to sit within the community mental health team** and in doing so keep work on the agenda for the person experiencing mental health difficulties[[19]](#footnote-19). The HSE 2018 plan for this action included the development and implementation of standard operating procedures (SOP) and the introduction of increased access to the IPS.

**Coordinated programme of supports in employment (5.1)**

The cross-departmental working group that agreed the policy approach under Action 5.1 of the Comprehensive Employment Strategy will, during the 2019 – 2021 timeframe, proceed with the implementation of the policy.

A key aspect of the policy’s recommendations is the development and evaluation of a demonstration project to test an approach to the provision of supported employment that can be scaled and implemented at the national level. With this demonstration project, the HSE, both in disability services and mental health services, can through its involvement in the cross departmental working group:

* Assist the Design and delivery of the project to test ‘agreed policy’;
* Evaluate of outcomes of the ‘agreed policy’ project;
* In line with other departments, involve personnel from HSE funded services to participate in 5.1 Local Area Networks as and when relevant.

# Department of Justice and Equality Review

The Department of Justice and Equality (DJE) and agencies under its remit have an important role in supporting the delivery of the CES.

DJE in particular have an overall coordination role for implementation and monitoring structures as set out within the CES document and responsibility for the following:

* Ensuring an annual review by the Comprehensive Employment Strategy Implementation Group (CESIG) of overall progress and cross-cutting issues, which can then be reported into National Disability Inclusion Strategy Steering Group.
* Ensuring that relevant actions for a given year will be included in that year’s Action Plans for Jobs, and monitored and reported on through that structure under the Department of Business, Enterprise and Innovation.
* The Annual reporting of implementation of the Strategy to two Cabinet Subcommittees both chaired by an Taoiseach:
  + the Cabinet Subcommittee on **Economic Recovery & Jobs,** and
  + the Cabinet Subcommittee on **Social Policy and Public Service Reform**

The NDA welcomed the thematic meeting approach adopted for the CESIG supported by the DJE as secretariat, which worked to good effect in 2018. This approach was particularly useful in discussions regarding education, including transitions and career guidance, and on the theme of supporting employees to return to work.

## During the next action plan timeframe 2019 to 2021, the NDA recommends the following:

To support the ongoing review of progress by CESIG and discussion on areas for attention, it is advised that DJE:

* Ensure that Departmental Disability Consultative Committees (DCCs) have timely meetings to facilitate the development of a consolidated progress report relevant to CES actions;
* Ensure that the monitoring processes for NDIS and CES are aligned, thus ensuring coordination of scheduled meetings of DCCs in order to agree reporting, thereby facilitating the identification of issues of concern, and escalation as appropriate for solution finding.

# Department of Public Expenditure and Reform Review

The DPER has continued to explore ways in which recruitment practices can be made accessible to ensure that people with disabilities can apply for public sector roles. Over the foundation period, the DPER have examined ways in which the public sector can implement a pro-active approach to employing people with disabilities in line with Part 5 of the Disability Act 2005.

## The NDA acknowledges progress by DPER on the following activities in 2018:

* **Internship Scheme**

The DPER activity to develop a pilot internship scheme for the civil service for people with disabilities, which will have the possibility of full time employment at the end of the internship. It is intended that the pilot scheme will launch in 2019.

* **Willing and Able Mentoring Program (WAM)[[20]](#footnote-20) Internship 2018**

40 candidates placed on the WAM panel. 7 assigned to date and the other 33 are with departments and offices for consideration.

* Dissemination of good practice materials from the DPER hosted seminar ‘Excellence in recruitment - focusing on employing people with disabilities’

## NDA advises progress for the DPER and Public Appointments Service (PAS), in the following areas:

* Civil Service Code of Practice – 2007: Action 6.7 which required **the** DPER to review the Civil Service Codes of Practice for the employment of people with a disability. The last code was issued in 2007.

The NDA also notes and welcomes the recently advertised role of Diversity and Inclusion Lead in PAS. We look forward to the inclusion of actions in the next 3 year action plan that will embed progressive Diversity and Inclusion systems, processes and practices across all of the PAS business areas. It will be important for this work to have specific targets on the delivery of systems to increase the employment of people with disabilities within the public sector.

# The Department of Transport, Tourism & Sport and the National Transport Authority Review

The Department of Transport, Tourism & Sport (DTTAS) and the National Transport Authority (NTA) are responsible for actions in the CES all under the strategic priority 2 to provide pathways and supports to work. People with disabilities, when consulted on topics such as access to work and education or training, frequently mention the lack of accessible travel options as an obstacle. It is therefore under this understanding the activity of the DTTAS and the NTA are viewed.

## The NDA acknowledge some progress on the following activities in 2018.

However, the NDA supports:

* The commencement of the project to improve information for disabled users; developing options for a step-free journey on the journey planner platform;
* The development of information tools that are available, such as the National Journey Planner on [Your Journey Starts Here | Transport for Ireland](https://www.transportforireland.ie/) to ensure that they contain information relevant to a person with a disability availing of public transport services;
* The development of the Real Time Information System on-street, online, and via smart phone applications, to be more accessible and to include real time information that is of value to people with disabilities. The development by Irish Rail of an Accessibility App[[21]](#footnote-21) which will assist people with disabilities to plan and book a journey, get assistance where needed and provide support in the event of an emergency;
* The 6 months DART Pilot Project to reduce advanced notice period for assistance for people with disabilities from 24 hours to 4 hours which was launched on 29 January 2018. Following the successful pilot it was made permanent on DART and rolled out on the Maynooth and Northern commuter lines. Additional measures to improve rail station signage have also begun;
* The commencement of a scoping project for the upgrade of DART communications system and in-station information;
* The continued funding under the Accessibility Retro-fit Programme of accessibility upgrades at rail stations. In 2018, €1 million was allocated for projects planned for the Dublin-Sligo Route, Dublin-Wexford Route, Mallow-Tralee Route, Athlone-Westport/Ballina Route, Dublin-Maynooth Route, and Limerick-Ennis Route;
* The commencement of a full audit of bus stops and standardisation of stop names to facilitate ‘next stop’ announcements;
* The continued funding under the Accessibility Retro-fit Programme, €0.8 million in 2018, of accessible bus stops and accessibility upgrades to bus stations. An audit of bus stops in towns with a population in excess of 5,000 has been carried out. The purpose of the audit was to identify at least one stop in each town over 5000 in population that could be used for the high floor coaches, and if there was no such stop, to prepare a sketch showing works required to make it fully accessible for wheelchair lifts, where possible;
* The procurement of new single deck buses for use on regional commuter routes up to 50km which will allow wheelchair users to board with normal ramp access in place of the high floor type coach which requires an external wheelchair lift, thereby eliminating the requirement for advance notice on these routes;
* The development of proposals that will set out minimum accessibility standards for licensed commercial bus services;
* The continued funding of the Wheelchair Accessible Vehicle (WAV) grant scheme: €2.2 million was allocated in the 2018 scheme. Currently, 8.1% of the small public service vehicle fleet is wheelchair accessible, the highest ever level of WAVs in the fleet. The NTA is on target for their 10% goal set for 2020;
* The continued availability of funding to Local Link offices for the Voluntary Car schemes as these schemes are important transport mechanism for people with disabilities. Therefore it is important to ensure that these cars are accessible. The Local Link offices are also being funded to deliver a range of pilot evening services in rural areas.

It is important that the NTA continue to deliver on these commitments to ensure that persons with disabilities throughout the country can have access to transport but also in particular easy access to accurate and timely information about services so that they can avail of them to get to and from work or education and training with confidence. A related aspect of this will be the communication of information about developments in the area of transport so that people are aware of the progress underway.

Finally, while we recognise the extent to which investment in transport infrastructure is a multi-annual programme of work, the NDA advises that it may be helpful to agree incremental targets for any projects underway, against which progress can be measured.

# National Disability Authority

During 2018, the NDA continued to deliver on specific targeted actions and on providing guidance and support to the CES process. Specifically the NDA made progress in the following areas:

* Continued to disseminate the research reports ‘Good practice in public sector employment’ (6.15) and ‘Assisting People with Autism in Employment: Guidance for Line Managers and HR Professionals’, plus materials from the seminar on alternative recruitment approaches. The NDA offered guidance to the DPER on learning from the UK Cabinet Disability Inclusion Office experience of supporting staff with disabilities;
* Continued to report on Compliance with Part 5 of the Disability Act 2005. The latest figures show that the number of people with disabilities currently employed in the public service has increased to 3.5%;
* Continued to provide funding to the pilot Employer Disability Information (EDI) Service, and commissioned a review of the project;
* Continued to support Enterprise Ireland’s work on researching the entrepreneurial journey for people with disabilities;
* Continued to facilitate cross departmental working group to implement 5.1 policy, including guiding the testing and evaluation phase of the new policy;
* Conducted a bilateral meeting with the DES on the issues relevant to all learners with disabilities in the review of Guidance for All and made a formal submission on same;
* Prepared a suite of indicators to inform CES progress;
* Prepared an independent advice paper on CES IG activity for 2017;Prepared an independent advice paper on developing the next CES 3 year action plan 2019 to 2021. The NDA undertook work to inform that action plan including bilateral meetings with relevant individual departments and through hosting and facilitating a consultation with disability stakeholders.

1. The CESIG is made up of senior officials from relevant departments, members of the Disability Stakeholders Group, and is independently chaired by Fergus Finlay [↑](#footnote-ref-1)
2. A cross departmental working group chaired by Prof Frances Ruane reported on Make Work Pay in 2017 and the NDA funded the EDI consortium to deliver actions in SP6 [↑](#footnote-ref-2)
3. [gov.ie - Youth Employment Support Scheme](https://www.gov.ie/en/service/4774e4-youth-employment-support-scheme/?referrer=https://www.welfare.ie/en/Pages/Youth-Employment-Support-scheme-YESS.aspx) [↑](#footnote-ref-3)
4. http://nda.ie/Publications/Employment/Employment-Publications/Research-in-Good-Practice-in-the-Employment-of-People-with-Disabilities-in-the-Public-Sector.html [↑](#footnote-ref-4)
5. http://www.solas.ie/SolasPdfLibrary/PathwaysApprenticeshipReviewNov18.pdf [↑](#footnote-ref-5)
6. Page 16 Comprehensive Employment Strategy for people with disabilities 2015 to 2024 [↑](#footnote-ref-6)
7. <http://www.employerdisabilityinfo.ie/about/submissions/deasp-report> [↑](#footnote-ref-7)
8. Presentations from MS Ireland and Acquired Brain Injury Ireland [↑](#footnote-ref-8)
9. Number available in November 2018 [↑](#footnote-ref-9)
10. http://www.solas.ie/SolasPdfLibrary/PathwaysApprenticeshipReviewNov18.pdf [↑](#footnote-ref-10)
11. Youthreach is an option for learners who leave school early and includes young people with disabilities. [↑](#footnote-ref-11)
12. http://hea.ie/assets/uploads/2018/12/HEA-Progress-Review-NAP-2021.pdf [↑](#footnote-ref-12)
13. http://nda.ie/Policy-and-research/Policy-Advice/Policy-Advice-Papers/Review-of-Apprenticeship.html [↑](#footnote-ref-13)
14. http://nda.ie/Policy-and-research/Policy-Advice/Policy-Advice-Papers/NDA-Submission-to-Department-of-Education-and-Skills-Consultation-on-Review-of-Career-Guidance.html [↑](#footnote-ref-14)
15. EU, European Social Fund, Programme for Employability, Inclusion and Learning (PEIL) [↑](#footnote-ref-15)
16. From April 2017 to July 2018. [↑](#footnote-ref-16)
17. This action is in keeping with New Directions 9.4.2. [↑](#footnote-ref-17)
18. The National Occupational and Career Guidance is not available across all CHOs NDA review of DoH HSE activity 2017. [↑](#footnote-ref-18)
19. Please see commentary for Department of Employment Affairs and Social Welfare Action. [↑](#footnote-ref-19)
20. https://www.ahead.ie/wamgraduates [↑](#footnote-ref-20)
21. http://www.irishrail.ie/travel-information/accessibility-onboard-trains?a=814 [↑](#footnote-ref-21)