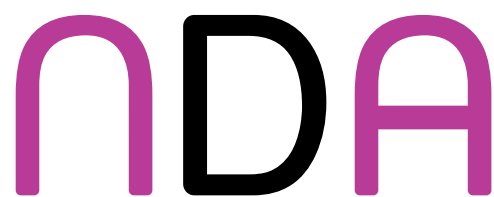


Údarás Náisiúnta Míchumais  
National Disability Authority

# Annual Report 2023





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# Annual Report

## 2023





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# Chairperson's statement

**I am delighted to present the annual report for the National Disability Authority for 2023, in which we highlight the activities and outputs of the organisation at the mid-point of our Strategic Plan 2022-2024.**

2023 was also the first full year of operation for the Authority appointed by Minister of State with Responsibility for Disability, Ms Anne Rabbitte TD, in November 2022. I want to thank all my colleagues on the Authority for their hard work and commitment during the year.

There were a number of significant legislative developments during 2023, not least the enactment, following amending legislation, of the Assisted Decision Making (Capacity) Act 2015 in April 2023. This allowed for the full operationalisation of the Decision Support Service and a new approach to supported decision making to recognise the will and preferences of individuals who may have diminished capacity for decision making due to age or disability. Late in the year we also saw the transposition of the European Accessibility Act (EAA), which aims to ensure that specified goods and services procured across the European Union are accessible for all. I welcome these developments as part of the ongoing process to build a more inclusive and accessible society in Ireland, and the NDA will continue to work in support of this goal through its provision of evidence-informed advice and guidance to government, its monitoring and evaluation work, and its promotion of the take-up of Universal Design.

Key in this will be the development of a National Disability Strategy to guide ongoing efforts to implement the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in Ireland. While the Strategy will not be published until 2024, a significant amount of work was progressed during 2023 to engage with relevant stakeholders and explore potential implementation structures and content for this Strategy. The NDA looks forward to playing its part in the work to develop, implement and monitor progress under this Strategy in the coming years.

In advance of 2024, a year in which a number of electoral events will take place, the NDA was pleased to centre its Annual Conference 2023 on the theme of Article 29 of the UNCRPD – Participation in Political and Public life. In this, our second fully hybrid conference, we were pleased to highlight some of the barriers to participation, including inaccessible polling stations and the challenges for disabled people who wish to stand for election themselves. We hope this conference has been of some use in guiding the considerations of An Coimisiún Toghcháin as they prepare for a busy year.

Our annual listening event for 2023 focused on another important topic in the context of the development of a new National Disability Strategy. This event, designed to hear directly and only from disabled people and their representative organisations, focused on Article 8 of the Convention – Awareness Raising – and we acknowledge the insights provided on how to build positive awareness of the rights of disabled people as part of this event.

I hope you enjoy reading the many other updates set out in the pages that follow, and in closing I would like to pay tribute to all the staff at the NDA who work tirelessly to bring high quality research, advice and guidance that is valued across government and the public sector. I know you will see evidence of this hard work in this report, and I look forward to further collaboration with the team in 2024.

Yours

**Kathryn O'Donoghue**  
**Chairperson**



# 2023 in Review

**In 2023, the NDA continued to deliver work under the five Strategic Priorities identified in its Strategic Plan 2022-2024:**

1. **Deliver independent evidence-informed advice and guidance, and support policy coordination, to advance implementation of national strategies and policies, as well as realisation of the goals of UNCRPD;**
2. **Deliver independent assessment, monitoring and evaluation of progress against policies, strategies and codes of practice across government;**
3. **Advance activities to promote awareness and wider take-up of Universal Design across Ireland;**
4. **Foster strong and open processes for engaging and consulting with persons with disabilities and the wider disability community;**
5. **Maintain and enhance organisational effectiveness.**

The NDA developed its work-plan for 2023 in alignment with these priorities, and informed by consultation with a wide range of stakeholders, including Disabled Persons' Organisations, and also by the broader policy context in Ireland during the year.

## UNCRPD

During 2023 the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) advanced work to develop a National Disability Strategy as a successor to the National Disability Inclusion Strategy (2017-2022), and to become a primary mechanism for realisation of the goals of UNCRPD in the Irish context.

The NDA was asked to support the department in this work by facilitating a wide-ranging consultation process, including initiatives to reach seldom-heard voices. The NDA carried out much of this work in late 2023, with further engagements planned for the first quarter of 2024. We look forward to the publication of the new Strategy as early as possible in 2024, and to playing our part in advising on a suitable monitoring and oversight structure.

To inform considerations in relation to the priority actions under the new Strategy, the NDA was pleased to publish its final independent assessment of progress under the National Disability Inclusion Strategy that ended at the end of 2022. This report was also accompanied by a report of progress against a series of indicators agreed at the start of the Strategy. The intention was to track progress over the lifetime of the Strategy, and a mid-term report had been published in 2020. Due to delays in the availability of some data sources, for example, the Census was postponed from 2021

to 2022 so it was challenging to measure the full extent of progress in the available timeline. It was also difficult to directly attribute particular areas of progress to the Strategy itself. However, each report offers areas of learning for the development of the new Strategy, and in particular, the importance of developing a monitoring framework at the same time as the Strategy itself.

We were also pleased to continue our recent practice of devoting our Annual Conference theme to a single article of UNCRPD, and in 2023, the theme was Article 29 – Participation in Political and Public Life. The conference provided an

opportunity to focus on good practice from other jurisdictions in developing and promoting an accessible franchise system, and to hear from the new An Coimisiún Toghcháin about their planning for 2024 – a year in which a wide number and type of electoral events will take place.



## Employment

The NDA has consistently advised that employment is a critical enabler of socio-economic inclusion as well as playing a part in addressing poverty experienced by disabled people to a greater extent than their non-disabled counterparts. We were therefore disappointed that further progress on agreeing a final action-plan under the Comprehensive Employment Strategy could not be made during 2023. We note the intention that employment will be a key pillar of focus under the new National Disability Strategy and look forward to seeing meaningful commitments and targets set out in this pillar.

While there was no meeting of the CES Implementation Group during 2023, the NDA did publish its independent assessment of progress during 2022, identifying areas where further focus would be required. It is important that these areas are picked up under the National Disability Strategy so that progress achieved to date is not lost. We also gave careful consideration to how targets for the employment rate of disabled people could be agreed and set, and how progress could be tracked over time. We have shared a paper developed on this topic with key stakeholders, and look forward to discussing it further during 2024 as part of the process to agree a monitoring framework for the NDS.

During 2023 we were also pleased to note continued progress in relation to the employment of disabled people in the public sector. The NDA's annual report on compliance with Part 5 of the Disability Act for 2022 showed that 4.1% of the public sector employees declared that they had a disability. While this progress is very welcome, we continue to engage with public bodies and Departmental Monitoring Committees to advise on the increased targets provided for in the Assisted Decision Making (Capacity)(Amendment) Act which was fully commenced in 2023. By 2024, 4.5% of the public sector workforce should be made up of people with disabilities, and this will increase to 6% by 2025. We also look forward to gathering this data



through a revised survey instrument during 2024, having piloted a new approach during 2023, further to the recommendations of a review of the Part 5 monitoring process conducted over 2019 and 2020.

### Assisted Decision Making

Following the enactment – subsequent to amending legislation - of the Assisted Decision Making (Capacity) Act 2015 (ADMA), the NDA was pleased to see the way cleared for the full operationalisation of the Decision Support Service (DSS), and the commencement of the process to discharge people who had been Wards of Court. Recognising the transformative nature of this legislation, the NDA commenced a research project on the discharge process during 2023, with the aim of understanding how the process was experienced by people who had been Wards of Court, their Committees and other key stakeholders. The purpose is to document the processes, including areas where improvements or enhancements could be made, and to understand how people can transition to supported decision-making arrangements, or return to full autonomy, exercising their will and preference. The project will continue into 2024, and there may be learning to inform the ongoing discharge process, which is scheduled for completion by the end of 2026.

### Oireachtas Committee Hearings

During 2023 the NDA was invited to present before a number of Oireachtas Committees on topics ranging from Assisted Dying to Autism to Ireland's performance in relation to UNCRPD. We were pleased that our information and advice continue to be helpful to the work of these Committees, and that we are recognised as trusted advisors in the variety of complex areas under consideration.



*Senior Policy / Public Affairs Advisor Dharragh Hunt speaks to the Oireachtas Joint Committee for Disability Matters*

## Standards and Monitoring

Our work to monitor compliance with statutory obligations continued during 2023, and we were pleased to be able to publish a report on the levels of compliance with Part 3 of Disability Act 2005 (Section 26(2)), in relation to the availability of Access Officers in public bodies. While an initial survey in 2021 showed 34.9% of public bodies had an Access Officer, and publicised details of how to contact this officer on their websites, we offered public bodies the opportunity to review their performance and take additional steps if required. We were pleased to see the rate of compliance increase to 58.7% by late 2022, at which point we prepared our report for publication in 2023. While this shows the degree to which a monitoring exercise can prompt further focus and attention on a matter by a public body, we note that 41.3% per cent still need to take mitigating steps to appoint and publicise the position of Access Officer in their organisation in order to ensure that members of the public can be supported to access the services provided.

Monitoring of the EU Web Accessibility Directive (WAD) also showed some modest improvements over time, and the 2022 monitoring report was published in early 2023. We found that many public bodies have more to do to address a range of basic accessibility errors on their websites, and we continue to engage with the public sector to raise awareness of the provisions of the Directive, and how websites can be designed from the outset to be accessible so that everyone can use them. As government continues towards its 'Digital First' goal, the importance of this is obvious.

In recognition of the importance of accessibility across our public services, the NDA also carried out extensive work on the development of a Code of Practice for Accessible Public Buildings during 2023, informed by consultation and engagement with a range of disabled persons and their representative organisations. The Code will offer practical guidance to public bodies on how to make their buildings accessible, and a series of indicators against which performance can be assessed has been developed in parallel. We look forward to presenting the final version of the Code to the Minister in 2024, and to commencing monitoring activities at the earliest opportunity once it has been approved.

The European Accessibility Act (EAA) was transposed into Irish legislation in late 2023. In advance of this, the NDA has been supporting the work of developing and harmonising a range of technical standards that will underpin implementation of the Act. These standards are intended to provide detailed guidance on how economic providers can achieve compliance with the Act in the development of their products and services. Separately, we have also progressed work on a Universal Design Standard for Housing, as part of the continued work to advise on how housing should be developed to be lifetime homes for disabled and older persons rather than requiring costly adaptations as someone's ability changes over time.



## Data and Statistics

Census 2022 results were published during 2023 and showed a significant proportion of the population (21.5%) experience a long-lasting condition or difficulty. While direct comparison with previous Census waves is not possible due to a change in the questions asked, the figures show clearly that disabled people comprise a significant group within society. For the first time people were asked if they had their long lasting condition or difficulty to some extent or to a great extent. Almost 8% (7.9%) reported having at least one condition or difficulty to a great extent and many of these people will require a variety of supports.

The NDA was pleased to publish its own report on a survey of Wellbeing and Social Inclusion during 2023. This report details the experiences of 2,052 respondents - two thirds of whom had a disability - in relation to participating in social activities, and their perceptions of their own well-being. It found that disabled people are more likely than their non-disabled peers to experience barriers to social inclusion and lower feelings of well-being. A follow-up detailed report on barriers to social inclusion was published at the end of the year, and highlighted the extent to which issues around transport and accessibility in the built environment were significant in preventing people from participating in the life of their local communities. We hope this information will be useful in informing considerations in these areas during the development of the National Disability Strategy.

We were also very pleased to continue our partnership with the ESRI during 2023, and to publish two reports on a project that explored innovative ways of capturing and measuring public attitudes to disability. The reports identified the extent to which people can over-state their positive attitudes in some circumstances, and considered ways in which more accurate data could be captured. The findings highlight the extent to which attitudes are more positive when people have close contact with disabled people, underlining the importance of continued work to ensure disabled people can live, work and participate in our communities.

## Universal Design

The Centre for Excellence in Universal Design (CEUD) is an integral part of the NDA. There was extensive work conducted through the Centre in 2023 to drive awareness and take-up of Universal

Design across sectors, and we welcome the growing familiarity with the principles of Universal Design in key professional groups. Our work in this space ranges from educating students on good design from the earliest possible stage in their educational journey, through to providing Continuous Professional Development for those engaged in relevant careers. We also work to ensure Universal Design is embedded in standards, which serve as vital technical guides for professionals in areas ranging from ICT to product development to service design.



**Centre for Excellence  
in Universal Design**

The Universal Design of the built environment is a critical enabler of social inclusion for disabled people, and the NDA has continued to advise relevant departments and professional bodies on how this can be achieved in housing and other infrastructural developments. Work commenced during 2023 on a standard for Universal Design housing will provide a useful toolkit for departments, local authorities and developers on how to ensure our housing stock is delivered to be liveable for everyone, and form part of sustainable communities.

The CEUD staff also spent significant time engaging on the topic of accessible transport during 2023, reflecting the importance of this area across people's lives. The advice and submissions provided to the Department of Transport, National Transport Authority and local authorities, reiterate common concerns regarding the importance of meaningful and accessible consultation events, taking a co-design approach to transport projects, and considering the most vulnerable road-users – i.e. pedestrians – from the outset. The NDA hopes that this advice will be considered and applied in projects currently under consideration and development in the transport space.

### Ways of working

2023 saw the transfer of functions related to specialist disability services from the Department of Health to the Department of Children, Equality, Disability, Integration and Youth. The NDA welcomes this transfer as a clear signal that disability is considered an equality matter rather than a medical/health-related matter. We recognise the importance, however, of maintaining links with those sections in the Department of Health that focus on older persons and mental health, as there can be significant cross-over between these domains, and it is important to develop policy in a joined-up and coherent manner across the lifecourse. We look forward to seeing the impact of further transformation in 2024 as the HSE embarks on a structural re-organisation.

More locally, the NDA enjoyed its first full year of operation under its Blended Working Policy during 2023. The policy was agreed in 2022, and is aligned with the overall Civil Service framework, but maximises the flexibility available to staff, while balancing this with the need for the engagement and cooperation with internal and external stakeholders that is such a feature of our advisory work.

We also managed a significant internal change project during 2023, when we migrated our IT systems from the Department of Justice to the Office of the Government Chief Information Officer (OGCIO). We hope this transition will allow us to explore opportunities to leverage technology to a greater extent in the delivery of functions in the years to come.

Finally, we were delighted to launch a revised [universaldesign.ie](https://universaldesign.ie) website in late 2023, marking the completion of a major project to ensure the organisation's websites are both accessible and fit for purpose as a key communications vehicle for the outputs of the NDA and CEUD.

We hope you enjoy the detailed updates that are set out in the pages that follow, and which include key highlights such as:

- Launch of ESRI research on measuring attitudes to disabled people
- Final assessment of progress under NDIS 2017-2022, and associated indicators report
- Work to develop guidance on Changing Places toilets
- Drafting of Code of Practice for Accessible Public Buildings
- Blended annual conference on Article 29 of UNCRPD
- Universal Design Grand Challenge 2023
- Launch of 3rd edition of Customer Engagement Toolkit for Services to the Public
- Publication of guidance on collaborative research with disabled people
- Publication of research reports from the Wellbeing and Social Inclusion survey findings
- Independent evaluation of the Disability Consultation and Participation Network
- Work to support consultation in relation to new National Disability Strategy
- Publication of research on experiences of disabled students of sexual harassment and violence in higher education institutions
- Report on 2022 compliance with Part 5 of Disability Act 2005
- Report on 2022 compliance with EU Web Accessibility Directive
- Report on compliance with Part 3, Section 26 of Disability Act 2005 (Access Officers)
- Launch of [universaldesign.ie](https://universaldesign.ie) website

# Strategic Priority 1



# Strategic Priority 1:

**“Deliver independent evidence-informed advice and guidance, and support policy coordination, to advance implementation of national strategies and policies, as well as realisation of the goals of UNCRPD”**

**Continue to deliver research to high standards, informed by the latest academic developments, practice in Ireland and other jurisdictions, and the lived experience of persons with disabilities**

## Wards of Court Research

The commencement in April 2023 of the Assisted Decision-Making (Capacity) Act 2015 and amending legislation triggered the start of the end of the system of adult wardship. The legislation provides for a three-year period during which all adults must be discharged from wardship.

The NDA is conducting research that aims to evaluate the cessation of the system of wardship in Ireland and to document the experiences of persons who have been Wards of Court as they transition to a supported decision-making system. The research is framed by Article 12 of the UNCRPD: Equal recognition before the law. The research has been granted ethical approval by a Research Ethics Committee established specifically for this study and has received a consent declaration by the Health Research Consent Declaration Committee (HRCDC). A declaration from the HRCDC was required as the research participants are expected to include people who may be unable to provide informed consent. Recruitment of research participants began in Q4 2023. Efforts to increase awareness about the research and to encourage participation will continue in 2024. The study includes observation of High Court hearings to discharge people from wardship. Interviews with stakeholders involved in the process of ending wardship and the transition to the Decision Support Service will be conducted in 2024.

## Research Promotion Scheme 2023-2024

The NDA runs a Research Promotion Scheme (RPS) approximately every two years, subject to availability of budget.

## Formal Review of the Research Promotion Scheme

A formal review of the NDA's Research Promotion Scheme (RPS) was undertaken to establish whether the RPS was fit-for-purpose in its current format. A secondary aim was to review the literature and examine how other small funding schemes operate to identify guidance or recommendations for best practice in managing research funding schemes.

In general, it was found that the Research Promotion Scheme has many benefits and is filling an important gap in the Irish research landscape. The RPS is the only scheme which focuses specifically on promoting research with a disability focus. For this reason, the overall recommendation was that the scheme should be continued. However, a number of amendments were recommended to ensure that the scheme is efficient and in line with up-to-date research funding practices. Recommendations included recruiting an Expert by Experience to join the NDA review panel to review the applications received. There are also several recommendations for streamlining the administrative processes involved in managing the RPS.

### **Research Promotion Scheme 2021/22**

The theme for the 2021/22 Research Promotion Scheme was 'Assistive Products and Consumer Products that Support Choice and Control for Persons with Disabilities'. The NDA awarded funding to two research projects that were both published in 2023:

#### **Award 1: University College Cork: "A User-Centred Exploration of the Assistive Potential of Digital Voice Assistants for People with Disabilities in Ireland"**

This research explored the potential of a range of Consumer Products such as Digital Voice Assistants (DVAs) and smart home-based technology to support the participation of people with disabilities and older people to live independently and be included in their communities as articulated by Article 19 of the UNCRPD. This research was comprised of a literature review and two empirical studies.

A range of consumer technology were installed in participant's homes for a 6-week period, including lights, sockets, and a TV controller. Ten participants trialled the technology. Study 1 was a qualitative examination of the experiences of participant's use of the technology installed in their homes. Study 2 used a mixed methods approach referred to as Q-methodology to examine the perceptions that people with disabilities and older people held about the potential of consumer digital technologies.

Participants quickly adapted to using the smart-home functions they trialled and the use of smart-home functions increased. Participants expressed a preference for using mainstream, consumer technologies instead of dedicated assistive technologies. Factors such as cost, availability and ease of installation were highlighted as impacting upon their choice of technologies.

#### **Award 2: The National University of Ireland, Galway: "Assistive and Consumer Products for as Supplementary Reading Instruction for Children with Disabilities: Current Status & Potential for Application in Practice"**

This research explored the use of Assistive Technology (AT) and Consumer Products (CP) to support reading instruction for children with neurodevelopmental disabilities. There were three phases to this study. Phase I consisted of a systematic review of the literature evaluating literacy interventions using APs/CPs for improving literacy

skills with children with neurodevelopmental disorders. In Phase II, a survey was distributed to teachers in Ireland to explore the acceptability and feasibility of the use of APs/CPs in the classroom for literacy instruction. Phase III explored the preferences and perspectives on the use of AT versus paper-based lessons via a survey with children.

A high proportion of respondents to the teacher survey reported using APs and CPs for children with disabilities for literacy instruction, assessment, and/or progress monitoring. Most respondents believed that there are benefits to using AT in their classroom for supporting literacy instruction and/or assessment. All students indicated that they liked reading on the iPad. When offered the choice between the paper-based literacy lesson and the AT-based literacy lesson, the majority of students selected the AT literacy lesson.

### **Research Promotion Scheme 2023-2024**

The theme for the 2023-2024 Research Promotion Scheme is 'Disability in Marginalised Groups and Communities'. Disabled Persons Organisations were invited to comment on a list of proposed themes and their comments were considered in selecting the final theme. The aim is to fund research that examines the intersectionality of being a disabled member of marginalised groups. For the first time, an Expert by Experience joined the review team in assessing applications and choosing the successful applicants.

The funded projects under the 2023-2024 scheme are:

1. University of Galway: Professor Eilionóir Flynn and her team will examine the barriers for disabled people with multiple marginalised identities in political candidature or in holding elected office.
2. Trinity College Dublin: Dr Julie Broderick and her team will investigate the scale and impact of physical disability in people experiencing long term homelessness in Ireland.

The projects will run over the next 12-18 months. Many of the recommendations from the review of the scheme mentioned above have been implemented for the 2023-2024 scheme.

### **ESRI Partnership Project**

The NDA and the Economic and Social Research Institute (ESRI) have undertaken a partnership research programme on matters relevant to disability over recent years. There was a no-cost extension to the project in 2023 due to delays in finalisation of some work programmes. The primary goal of the programme is to create, improve and enhance knowledge on specific policy areas relevant to the lives of disabled people. Placing a particular emphasis on key issues in the context of Ireland's realisation of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), to date the programme has covered:



- Academic and Socio-Emotional Outcomes of Students with Special Needs
- Community Living and Personal Assistance (PA)
- Public Attitudes to Disability
- Employment of Persons with Disabilities

### Personal Assistance

In March 2023 the ESRI published a working paper on Personal assistance services for disabled people in Ireland: [‘they meet the criteria for supports but we don’t have the resources to provide the services’](#). This was followed in October by an [academic publication](#). Personal assistance (PA) services have been an evolving part of Irish provision for people with physical and sensory impairments for roughly three decades, but the lack of national standards for allocation, provision or data collection have made it an opaque system characterised by piecemeal or ad hoc local solutions to increasing need. This study approached the system through the perspective of institutional insiders, eliciting the views and experiences of state and NGO-based institutional stakeholders about the PA system and its challenges. A two-step exploratory mixed-method design, incorporating a series of qualitative interviews and a survey of HSE disability managers, provides rich insights into the nature of PA provision in Ireland. The findings illustrate and explore several chronic issues facing the PA system, most notably around under-funding, inadequate administrative data records and variation in allocation and provision across the country.

### Public Attitudes to Disability

Surveys show the general public hold positive attitudes towards policies that seek to enable disabled people to overcome these challenges, but standard survey methods are susceptible to response biases that may overestimate this support. In April 2022 the ESRI published [Experimental tests of public support for disability policy](#). This study aimed to test whether two such biases influence support for disability policy in Ireland: social desirability bias (i.e. the tendency for survey respondents to alter their responses in order to present themselves in a positive light); and inattention to the implications of policy support (e.g. that welfare policies require funding). A nationally representative sample of 2,000 adults were asked about their opinion of a range of different disability policies. In the first experiment, one group was asked directly about their support for policies while another group could express their opinion more anonymously.

The study revealed that support for increased social welfare payments for disabled people was lower (66%) when respondents had more anonymity than when they were asked directly for their support (77%). Anonymity made a bigger difference to people with higher levels of educational attainment: 76% supported increased social welfare payments when asked directly, compared to just 59% when given more anonymity. This finding suggests that respondents who are better educated may be more likely to respond to standard surveys in ways that they view are socially desirable.



A second experiment showed that support for disability policies is much lower when questions specify how policies will be funded or potential trade-offs. There was almost universal support (98%) for children with disabilities to get the support they need using a standard survey question, but this dropped to 85% when the question specified the policy would be funded through budget reallocation. Support dropped further, to 64%, when the policy was to be funded through a tax increase.

A second part of the study, [Ableism differs by disability, gender and social context: Evidence from vignette experiments](#), was published separately, firstly as a working paper and subsequently as an [academic paper](#). This paper explored prejudice and discrimination towards disabled people (i.e. 'ableism'). Research has conceptualized ableism as a general attitude, obscuring the role of social context in its manifestation. This part of the study aimed to investigate whether and how ableism manifests differently depending on the nature of the disability, the disabled person's gender and the social context of the interaction. A nationally representative sample of 2000 adults read a series of vignettes about issues faced by disabled people (e.g. employment, relationships). Vignettes varied by presence and type of disability and the disabled person's gender. Judgements about how a disabled person was treated showed clear evidence of ableism towards some conditions (e.g. autism) but not others (e.g. a spine disorder). Judgements about the actions of a disabled person were more nuanced. A disability-gender intersectionality effect was observed for judgements about romantic relationships, with physically disabled women penalized compared to men but no gender difference was observed for intellectual disability. No intersectionality or ableism was observed on a vignette about refusing poorly paid work. The study found clear evidence that ableism manifests differently depending on the nature of the individual's disability, their gender and the social context, questioning previous conceptualizations of ableism as a general attitude.

**Translate research findings and policy analysis into practical and actionable policy advice for government and public sector bodies, informed by consultation with persons with disabilities and other relevant stakeholders**

### Career Guidance Policy Advice

The lack of availability of career guidance for school going learners with disabilities was acknowledged and described in the original 3-year action plan of Comprehensive Employment Strategy for people with disabilities 2015 -2024 which required the Department of Education and Skills to 'work together to consider how Guidance Counsellors can effectively support students with disabilities in guiding them on further education, training, and career options, for example:

- Guidance and training provided for Guidance Counsellors
- Counsellors provided with the skills to develop individual FET options'<sup>1</sup>

<sup>1</sup> CES 2015 to 2018 action plan

The delivery of these two distinct actions was subsumed into a Department of Education commissioned review of career guidance in Ireland. The review, conducted by Indecon, was submitted to the Minister of Education and Skills in 2019 and published in 2020.<sup>2</sup> NDA advised at the time that the attention paid in the report to students with disabilities or additional educational needs was limited and that some of the recommendations may not be fully supportive of an inclusive approach for these students. NDA therefore decided to develop an advice paper for the Department of Education on career guidance in secondary education entitled [NDA Independent advice on the provision of Career Guidance in schools for learners with disabilities in Ireland](#).

The NDA through this policy advice paper outlined the development of a career guidance approach that is inclusive of all learners with disabilities including those who are in special education and/or a special class in a mainstream school. This paper is informed by a [Literature Review](#) examining career guidance for learners with disabilities in second level education. Consultation took place with two groups of young disabled people who had recent experience of mainstream post-primary school, special classes within mainstream and of special education schooling. There was also engagement with stakeholders including a midpoint roundtable discussion with practitioners in the career guidance space. The policy advice sets out clear actions for classroom provision and for wider guidance change underway across a number of government departments and was submitted to the Department of Education in April 2023.

### **Key NDA submissions**

The NDA made 41 submissions to a wide range of consultations during 2023. Included were 10 submissions to Government departments who were developing new Statements of Strategy. Some key submissions are outlined below and the reminder are listed in Appendix 4.

### **Census 2027**

The Central Statistics Office (CSO) held a consultation during 2023 to inform questions for Census 2027. The NDA made submissions in relation to the need for more data on autism and consulted with a number of stakeholders to inform this submission. We also made submissions in relation to the categorisation of communal establishments to allow more in-depth analysis of this variable for disabled people. We also made a recommendation to adjust a question to capturing Irish Sign Language users more accurately. Finally, we proposed a question to capturing those using mobility aids to fill a data gap which could inform policy advice in relation to the built environment. Subsequently the NDA were invited to join the Census Advisory Group and have had ongoing engagement with the CSO on these and other potential census questions.

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<sup>2</sup> <https://www.education.ie/en/Publications/Education-Reports/indecon-review-of-career-guidance.pdf>

### **EPSEN Act Review**

The NDA made a [written submission](#) in response to the Education for Persons with Special Educational Needs Act (EPSEN) 2004. Despite a very significant expansion of special education funding and provision in recent years, there has been considerable expansion in demand for special education placements. The significant expansion in investment in both mainstream and special education settings has taken place in the absence of data on outcomes for children with disabilities and special education needs. The NDA made the point that this expansion of investment has taken place in the absence of a clear vision for inclusive education and what the role of inclusive education is / should be in the Irish education system and in Irish society. The NDA noted that there is an opportunity to discuss and agree a vision of inclusive education for Ireland and for how it can be progressively realised. NDA also emphasised that Disable Persons' Organisations and children with special education needs and disabilities are central to these discussions.

### **Regulations for Providers of Home Support Service**

The Department of Health ran a consultation on their Draft Regulations for Providers of Home Support Services. Drawing on the work on Personalised Assistants (PA) done in collaboration with the ESRI, the NDA in their [submission](#) noted that the unique supports provided by PA's need to be carefully considered and recommended extensive engagement with PA users.

### **Review of the Wage Subsidy Scheme**

The objective of the Wage Subsidy Scheme is to increase the likelihood of people with disabilities obtaining and sustaining employment in the open labour market by providing financial incentives to private sector employers. The incentives of the Wage Subsidy Scheme are effective in increasing employment for disabled people but not in the generation of new jobs. In its submission to the Department of Social Protection's Review of this scheme the NDA noted that a minimum of 21 hours per week was required and that the scheme could only extend for 12 months. The NDA recommended that the length of the scheme is extended and the number of hours per week reduced. The lack of an inclusive supported employment programme remains a key gap in employment supports for some disabled people in the Irish context including those who might benefit from the Wage Subsidy Scheme. The NDA recommends that the Wage Subsidy Scheme is part of the employee's transition to a national programme of supported employment, which would include access to a job coach and training grant.

## OECD Skills review

NDA provided key information to the OECD review of the Irish National Skills Strategy. NDA made a submission and attended a consultation workshop. The [main OCED findings](#) covered four priority areas, providing a high-level strategic policy direction for Ireland:

- Securing a balance on skills through a responsive and diversified supply of skills
- Fostering a greater participation in Lifelong Learning in and outside of the workplace
- Leveraging skills to drive innovation and strengthen firm performance
- Strengthening skills governance to build a joined upskills ecosystem.

## Interactions with Oireachtas committees

During 2023 the NDA made seven appearances at five Oireachtas committees to discuss issues in relation to disability that are within our remit. These included issues related to autism, assisted dying, rights-based approaches to disability and the arts and disability. In addition, two submissions were made in advance of the invitation to be a witness. The committees are listed in Appendix 4.



**Work across the public sector to support co-ordination of disability policy and provide independent facilitation and guidance to drive solutions for cross-sectoral challenges**

## Department of Justice Inaugural Access Officer Network Meeting

Following on from the issuing of NDA's draft report on compliance with section 26(2) of the Disability Act and the Code of Practice on Accessible Services and Information Provided by Public bodies concerning the provision of Access Officers by public bodies and Departments, the Department of Justice has established a network for Access Officers under the aegis of this Department.

The first meeting was attended by staff from NDA/CEUD to provide information on resources, regarding access officers, customer communication, universal design, and consultation with persons with disabilities. NDA/CEUD staff also provided the network with an overview of the draft Monitoring Reporting Process and high-level findings looking at Access Officer provision across the public sector.

## Update on the NDA's eLearning module on disability equality

The consultation on Phase One of this project to find out stakeholders' opinions of the current eLearning module was completed in Q2 2023. NDA/CEUD consulted

with diverse stakeholders including DPOs, disability stakeholders and public bodies. The key findings from the consultation suggested:

- Updating the content and the technology to make the module more accessible and interactive and to improve the users' experience
- Updating the content to include information on UNCRPD; a more diverse depiction of persons with disabilities and current guidance on creating an EDI work culture using a Universal Design approach and providing information on accessible mainstream public services
- Including guidance on consulting with DPOs, persons with disabilities and disability stakeholders from the outset regarding the development and provision of services, products, communications and the physical environment
- Using animation along with video in the module
- Rebuilding the eLearning module to make necessary changes and to ensure clarity and relevance.

The importance of including disabled people in the design and development of a new eLearning module was emphasised during the consultation process, and an advisory group has been formed to inform the next steps of the project and be involved in user testing.

These key findings informed the NDA's procurement processes to identify a contractor to produce an eLearning module on disability equality. Eligible tenders received were evaluated by a panel comprising persons with disabilities and representatives from public bodies. A preferred contractor has been selected, with work commencing in 2023 and scheduled for completion in 2024.

### **Inclusive Consultation on a mobile app to capture the travel experience of persons with disabilities**

In May 2023, CEUD staff consulted with a diverse group of stakeholders including public bodies, Disabled Persons Organisations (DPOs), disability stakeholders and persons with disabilities on exploring the feasibility of using a mobile app to capture the experience of persons with disabilities using transport services. The project aims to capture the lived experience of persons with disabilities in relation to this important area as an enabler of socio-economic participation in Irish life. Throughout Q1 and Q2, NDA hosted online information webinars for public bodies, public sector trade unions, universities, DPOs, disabled stakeholders and persons with disabilities.

NDA is aware that some people may not feel comfortable speaking at workshops. We therefore provided stakeholders with the opportunity to have bilateral meetings with us. Stakeholders who wished to make videos and/or written submissions also had the opportunity.

The findings from the consultations, including key recommendations and including risks regarding the feasibility of developing a mobile app or an alternative approach



to capture the experiences of persons with disabilities using transport services will inform the NDA on the next steps in advancing this work.

### Norway Study Visit

In December 2023 NDA staff participated in a study visit to Norway to examine their systems of providing assistive technology to disabled people. NDA were part of a delegation that included the Minister of State for Disabilities, staff from the HSE, staff from DCEDIY and representatives from the World Health Organisation (WHO) offices in Copenhagen. The delegation visited regional and municipal assistive technology centres and visited the national rehabilitation hospital. Key learnings from the visit are how well structured and resourced the Norway model are on delivering AT. There are three levels, with a national centre, 19 regional centres and local municipal centres that are dedicated to delivering AT across the whole population. All citizens are entitled to AT products and services and in excess of 50% of products are recycled, refurbished and reused. A report on Ireland's AT provision is being developed through a collaboration between WHO and DECDIY with a view to all stakeholders inputting into an improved process in Ireland.

**Develop Codes of Practice and guidance, and contribute to standards that can support the implementation of legislation, policies and programmes across the public sector**

### New Directions: HSE outcomes-focused monitoring system for Adult Day Services

The HSE has asked the NDA to support the development of an outcomes-focused monitoring system to support the implementation of New Directions in Adult Day Services. The NDA has previously worked in partnership with the HSE to support the development of the New Directions Interim Standards (published in 2015) and an accompanying self-assessment and quality improvement tool to assist services to assess their progress in meeting these standards called Evaluation, Action, and Service Improvement (EASI), which was published in 2019. To progress this, the HSE has initiated a project to develop an objective and outcomes-focused monitoring system to assess day services' progress towards achievement of the New Directions Interim Standards. The NDA is a member of the project Steering Group and is chairing and providing project support to the Outcomes-focused Working Group. This working group aims to devise an outcomes-focused methodology to assess each Day Service location's compliance with the New Directions Interim Standards.



### Presentation to European Standards Committee

CEUD, as an expert member of the European Standards Committee [CEN-CENELEC JTC 12](#), responded to a request to deliver a presentation on two of the new standards

to be developed under its work plan. JTC 12 is under obligation for parts of the Standardisation [Mandate M/587](#) regarding revising and development of harmonised standards in support of [DIRECTIVE \(EU\) 2019/882](#) European Accessibility Act (EAA). The presentation provided guidance on how to understand, navigate and find key content in the above publications for use during the development of the two new standards for: Non-Digital Information and for Support Services. CEUD will participate in the development of these standards of the coming years through its membership of relevant Working Groups under the [National Standards Authority Ireland](#) (NSAI).

### **I.S EN 17161 standard at Irish Rail**

CEUD assisted the Enterprise Process & User Experience Designer at Irish Rail to obtain copies of the Universal Design for All standard [I.S. EN 17161](#). CEUD welcomes the interest in Irish Rail in applying the standard - which aims to ensure that any future policies and procedures are inclusive by ensuring that Irish rail engage with and include a diverse range of users in their development and implementation. CEUD look forward to continuing to work with Irish Rail on how the standard is being built across all levels of the organisation. CEUD chaired the development of the European standard EN 17161 and works to promote its uptake in Ireland.

### **TC 293 WG 12 Mirror Committee**

TC 293 WG 12 Accessible systems for living independently – Guidelines and Requirements is a standard being developed by [CEN](#), the European Committee for Standardisation.

This standard aims to specify the requirements, recommendations, and guidance on aspects of accessible systems for living independently (ASLI) in relation to technical solutions, service design provision and information. An ASLI is designed to meet multiple user's needs and works in an interconnected way that is used in an identified context of use such as a person living on their own and ensuring that the various devices such as door openers, telephones, alarms systems are all interconnected. It also facilitates the performance of activities for those who interact with it. CEUD staff are participating on this committee at a European level and have supported the drafting of the ASLI standard through the various standard development stages.

At the same time [National Standards Authority Ireland](#) (NSAI) has set up a national mirror committee to follow the work of the European Committee and ensure that Ireland has an input into the drafting of this standard from an Irish and diverse perspective. CEUD liaised with NSAI to help identify individuals and organisations that would be suitable to participate on this committee. This committee was established and had input on the drafting of this standard. The Standard is now out for final consultation and planned to be launched by the end of Q2 2024. The Standard is to be used within the health care sector in particular in relation to telehealth, telecare etc.

## **Irish Standard on Universal Design Dwellings – Requirements and Recommendations**

CEUD have been working with the NSAI on a new project – to develop an Irish Standard for Universal Design Dwellings – Requirements and Recommendations. This was approved by the NSAI board in February 2023. In April, NDA presented at a NSAI webinar on the new Irish Standard to be developed on Universal Design Dwellings. The webinar was an information session to explain the background and need for the standard. CEUD believes that a standard on Universal Design Dwellings is necessary, given the lack of regulation in this area (Part M only covers ‘visibility’ in dwellings). The [Universal Design Guidelines for Homes in Ireland](#) developed by NDA/CEUD will be a key publication to inform the standard.

It was also a call for technical experts to join the Working Group to develop the standard. There was an excellent response, and the first meeting of the Working Group was held in May.

Work progressed on the development of the standard led by NSAI, in partnership with NDA. The Working Group to develop the standard is chaired by the CEUD Senior Built Environment Design Advisor and NDA/CEUD staff are drafting the content. The Working Group has representatives from DPOs, Department of Housing, The Royal Institute of the Architects of Ireland (RIAI), Land Development Agency (LDA), National Federation of Voluntary Bodies (NFVB), and a range of other organisations and individual experts. To date, the Working Group has met seven times. The current programme for the work is to go to public consultation in Q3 2024 and for publication of the standard in Q2 2025. This standard is to be used by the Department of Housing and all local authorities as approved social housing organisations in designing and building new dwellings.

## **Implementing National Standard IS 374**

CEUD and the National Standards Authority Ireland (NSAI) met with Commission for Regulations of Utilities (CRU) about initiating auditing of IS 374. The [NSAI IS 374:2019 Customer Communications for Utilities — A Universal Design Approach](#) standard requires that utility suppliers’ communication with their customers is Universally Designed. The meeting included the background to IS 374, discussion about auditing options for suppliers and follow-on plans.

CEUD also assisted CRU in preparing text that was included in the [Suppliers’ Handbook \(version 4.2\)](#) that came into force in June 2023.

On Page 14 the Handbook states the requirement 1.2.1 “Suppliers and their representatives are required to apply the principles of Universal Design (SI 463/2011) as set out in the current Irish Standard (6), when implementing the requirements of and developing the services referred to in the Codes of Practice and Customer Charters and in all associated communications with customers.”



Footnote (6): '6 To clarify, the current Irish Standard the CRU will use is the NSAI Standard I.S. 374:2019 Customer Communications for Utilities – A Universal Design Approach (or relevant version) to assess whether suppliers have met the requirements of Universal Design with respect to their household customers.'

CRU stated that following the NDA/CEUD submission it prompted them to conduct an audit on the implementation of IS 374 in Q4 2023 and Q1 2024. NDA/CEUD are awaiting the results of the audit and appropriate next steps.

### **Code of Practice for Accessible Public Buildings**

The Minister for Children, Equality, Disability, Integration and Youth formally wrote to the NDA in November 2020 to request the NDA develop a Code of Practice for Accessible Public Buildings in accordance with Section 25 of the Disability Act, and as committed to in Action 105 of the National Disability Inclusion Strategy. A Technical Expert Group (TEG) was established in June 2021 to provide expert advice and feedback on the content of the draft Code of Practice during each stage of development. The TEG has met a number of times to review draft content and structure of the standard and advise accordingly.

In parallel, the NDA developed a set of indicators against which performance in relation to the Code could be measured over time. A public consultation on the draft Code of Practice on Accessible Public Buildings and draft set of monitoring indicators ended in June 2023. NDA sent 447 notification emails to disability organisations and services, and public sector bodies. 49 submissions were received, including a number from DPOs.

The feedback received was overall very positive. The majority of comments have been addressed in the next version of the Code of Practice. This version was presented to the TEG in September 2023 for their comment.

ACE Communications have been contracted to carry out consultation with children on the draft Code of Practice. This is to be completed in Q1 2024 and feedback integrated into the draft Code of Practice. The intention is to submit the Code to the Minister in Q2 2024 for approval and subsequently for publication.

In parallel to the development of the Code of Practice, a draft User Experience Audit Tool has been created as a helpful mechanism to support public bodies in carrying out their duty of engaging with people with disabilities about the accessibility of their public buildings. This draft tool was discussed at the last TEG meeting and received very positive feedback with a number of TEG group members volunteering to pilot the tool. It is intended that the tool will be revised and updated following these pilots in Q2 of 2024.

### **NDA Guidance on Implementation of the European Accessibility Act (EAA)**

The European Accessibility Act (EAA) applies to manufacturers and providers who wish to sell goods and services within the European Union. It applies to private sector operators as well as public sector. It obliges providers to ensure the products or services they are marketing are accessible for disabled people – i.e. that they can be easily and readily used by disabled people. In this regard, it is similar to Section 508 of the Americans with Disabilities Act. The EAA is scheduled to come into operation on June 28th, 2025.



The NDA engaged with DCEDIY to advise on key points relevant to the implementation of the EAA, in particular, highlighting the long-standing commitment NDA/CEUD has had in the development of standards, and the intention to continue these activities throughout their forthcoming re-development. Another key role identified in this submission is in the domain of training and guidance provision in keeping with the statutory obligations of NDA/CEUD.

The EAA was transposed at the end of 2023, and it is envisaged that the NDA/CEUD will play a significant role in supporting its implementation. In furtherance of this, several bilateral meetings have been held with Coimisiún na Meán, The Department of Transport, and other Government bodies to offer advice and guidance on resourcing and other pertinent aspects of the EAA. This role will be resource-intensive, and likely to evolve over the period leading up to implementation.

### **NDA Submission on a review of Part B of the Building Regulations (Fire safety)**

The Department of Housing, Local Government and Heritage issued a draft new Part B building regulations and technical guidance document for public consultation. The NDA made a submission in response to the consultation, highlighting key issues related to accessibility and fire safety. The submission noted that it is essential that fire safety is recognised as an integral element of accessibility in TGD B. This is in line with the definition of accessibility in the standard IS EN 17210:2021 Accessibility and usability of the built environment - Functional requirements, which defines accessibility as: provision of buildings, parts of buildings, or outdoor built environments for people, regardless of disability, age or gender, to be able to gain access to them, into them, to use them and exit from them.

### **NSAI Webpage – Universal Design and Inclusion**

CEUD works closely with the [National Standards Authority Ireland](#) (NSAI) to develop and promote standards on Universal Design and accessibility. In Q1 2023, NSAI created a new webpage on their website, titled Universal Design and Inclusion. The webpage outlines what [Universal Design and Inclusion](#) are, the role of standards, how they are developed and how standards can support Universal Design. The webpage also gives information on the ongoing standardisation work happening

between 2023 and 2025. This is particularly important information that will inform key stakeholders on the role of standards that are critical elements in the implementation of the European Accessibility Act (EAA).

### **ZERO Project Conference 2023**

The NDA were asked to present as part of a panel on the use of the new WHO/ITU (World Health Organisation/ International Telecommunications Union) joint international Standard on the Accessibility of Telehealth Services. NDA presented on previous research done in this area, but also on how this standard needs to be integrated into other standards that NDA have been engaged with at a European Level, such as the Design for All Process Standard and the new European Accessibility Act, so that it can be applied within the health services nationally, as well as internationally.

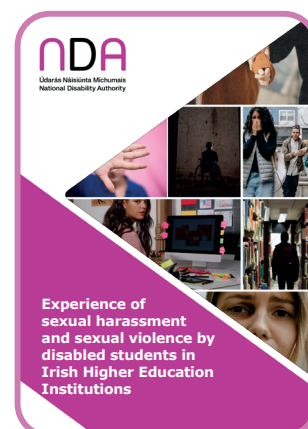
**Continue to drive and support the collection and use of disability data to inform policy decisions**

### **Article 29: Participation in political and public life**

Continuing our series of UNCRPD Article briefing papers, which collate available information, data and statistics to support individuals and organisations who seek to have a greater knowledge of progress in relation to specific articles, we developed a paper on [Article 29](#). This Article sets out the framework for persons with disabilities' participation in political and public life and stipulates that state parties shall "guarantee to persons with disabilities political rights and the opportunity to enjoy them on equal basis with others." This paper examines the legislation, policies and services in place for disabled persons participating in political and public life in Ireland. It also looks at data available to give further context to the realisation of this Article.

### **Experiences of sexual harassment and sexual violence by disabled students in Irish Higher Education Institutions**

The NDA conducted secondary analysis of data collected by the Higher Education Authority examining students from Higher Education Institutions (HEIs) experiences of sexual harassment and sexual violence. This data allows disaggregation of the experiences of sexual violence and sexual harassment by respondents with and without a disability. Although this sample is not representative of the general population, the data yields important findings about the experiences of sexual violence and sexual harassment amongst students in HEIs.



The Higher Education Authority survey was distributed online in April/May 2021 and was completed by 7,901 students, of which 19% (n=1,523) indicated they had a

disability. The majority of respondents with a disability had mental health difficulties (62%). Considering this, and the fact that mental health difficulties may be directly caused by experiences of sexual harassment or violence, the cohort of disabled students was divided into two groups for all analyses: students with a disability (not mental health difficulties) (n=536) and students with mental health difficulties (n=914).

This report finds that from the entire sample of respondents to this survey, 10% (n=780) had a disability and had experienced sexual violence and 15% (n=1,185) had a disability and had experienced sexual harassment. A large majority, 85%, of those with a mental health difficulty had experienced sexual harassment by someone associated with their HEI and 68% had experienced sexual violence since enrolling in their HEI. Those with a mental health difficulty were significantly more likely than those without a disability to have experienced all forms of sexual harassment, all forms of sexual violence, and all sexual violence perpetrator tactics. [This report](#) increases available national data on the experiences of sexual violence and sexual harassment amongst people with disabilities.

### Transport Submissions

The NDA make a number of submissions every year relating to various aspects of transport, reflecting the importance of this sector in the lives of disabled people. These are summarised below:

#### NDA's Submission to Department of Transport Statement of Strategy

NDA drafted a submission on the Department of Transport's Statement of Strategy 2023-2025 in March 2023. In this submission the NDA highlighted the need for a Universal Design approach, and a focus on accessibility with regards to actions stemming from the Department's sustainable mobility policy. In particular, the NDA recommended the expansion of parties responsible for delivery of the goals and that actions under the People Focussed Mobility section of the policy, to include all transport operators and local government agencies as a joined up, multi-disciplinary and inter-agency approach, this seen as vital to ensuring coherency and consistency. The NDA also stressed that examination of design infrastructure according to Universal Design principles, and the hierarchy of road users model as part of this policy be progressed as urgently as possible.

In this submission, the NDA noted that with the roll out of significant works to promote active travel across the country, many infrastructure works prioritise cycling needs and safety over needs of pedestrians. We expressed our concern that many schemes currently being rolled out nationally have been pursued without proper consultation with persons with disabilities and their relevant organisations and without conducting a Disability Impact Assessment.

The NDA also noted that at present, there is an absence of guidelines, standards and supporting legislation in this area which will allow for a range of solutions to be developed for road space reallocation/redesign to accommodate more journeys being

undertaken using sustainable modes of transport over private car use. The NDA has recommended this to be examined by the Department.

### **Submission to Galway Metropolitan Area Transport Strategy**

NDA/CEUD responded to a call for submissions on this transport strategy. At present this is a very high-level strategy with no specific plans in place, however the National Transport Authority (NTA) has stated that the Strategy will cover the following areas:

1. Public transport infrastructure and service proposals (rail, bus, public bikes and taxi);
2. Measures to facilitate and promote walking;
3. Measures to facilitate and promote cycling, including cycling infrastructure;
4. Planning policies aimed at closer integration between land use development and sustainable transport;
5. Traffic Management policies including potential changes to traffic circulation in Galway City Centre;
6. Demand Management measures including policies related to parking and tolling;
7. Behavioural Change and Mobility Management Plan measures;
8. Measures to promote integration between all modes, including Park and Ride;
9. Policies related to the management of freight; and
10. Road infrastructure

In the NDA/CEUD submission, we stressed the legislative requirements in place surrounding consultation under the UNCRPD, with regards to the proposed strategy and provided information and advice as to how to provide Universally Designed information and how to facilitate universally designed consultation with a wide range of stakeholders. This submission also stressed the legislative requirements in place around the completion of a Disability Impact Assessment and requirements around accessibility of access to services as well as the built environment.

CEUD recommended in the submission that consultations on all aspects of the strategy and subsequent designs are done prior to making a decision, to ensure that changes and updates are likely to serve everyone.

In keeping with other recent submissions to local authorities and the NTA, NDA/CEUD pointed out the importance in recognising that the transport strategy will have an impact on the entire population of an area – including older people, disabled people, people with buggies/young children etc. It is important that the needs of all pedestrians are not only considered but are central to the updated transport strategy. This submission then highlighted recent issues with the roll out of certain aspects of 'active travel' infrastructure, which contains disabling design and highlighted once again the need for consultation, co-design, and user testing in addressing these issues.



### **Meeting with Dart + West project Team**

Members of NDA/CEUD team met with Dart + West project team to discuss a submission to An Bord Pleanála concerning designs as part of this project. Particularly, NDA/CEUD raised the issue of station design for new or updated stations as part of this project which follows the design of Pelletstown station's new design.

The design of this station was highlighted by several Disabled Persons Organisations (DPOs) and other stakeholders as having poor accessibility. While ramps were installed at this station, these ramps are very long due to the height of the pedestrian bridge over the platform which presents barriers to accessibility for a lot of people, particularly wheelchair users, and people with health or mobility related issues which would make climbing steps or taking a long ramp difficult. A key issue highlighted was the absence of any lifts at the station.

In the previous submissions on this project and the submission to An Bord Pleanála, the NDA pointed out requirements under the Disability Act (separate to building regulations) which should be considered in designing transport infrastructure. These were discussed again at the meeting with the project team:

- Section 25 of the Disability Act, 2005 states that public bodies should ensure that public buildings are, as far as practicable, accessible to persons with disabilities. And,
- Section 26 of the Act states that integrated access be provided to services provided by public bodies by persons with and without disabilities.

In addition to these requirements NDA/CEUD staff reminded the project team of the requirements under UNCRPD with regards to consultation with people with disabilities and their representative organisations.

The Dart + West project agreed to send on a revised detailed plan of works which NDA/CEUD can comment and further advise on, which we are currently awaiting.

### **Meeting with NDA/CEUD and Dublin City Council**

Following on from the NDA's 2022 submissions to the Dublin City Council (DCC) active travel scheme and correspondence detailing key concerns surrounding the active travel network, NDA/CEUD met with DCC's Active Travel Unit in April 2023.

In this meeting the Active Travel unit detailed the plans currently underway for the active travel network across Dublin, and common issues and concerns they encountered with regards to accessibility and safety. NDA/CEUD staff provided members of the unit with information and advice in relation to several areas. Most notably, the requirements to engage with DPOs and persons with disabilities as early as possible, how to engage with persons with disabilities and DPOs, and universally designed consultations and communication.

More specific examples of active travel infrastructure and accessibility concerns were discussed, for which NDA/CEUD provided research and information. These examples related to bus stop bypasses (including information from the city of Victoria, Canada) and kerb height.

As a result of this meeting, continued engagement between NDA/CEUD and the DCC Active Travel Unit was agreed. NDA/CEUD staff also agreed to assist with training of DCC Active Travel Unit staff on legislative requirements, consultations, and Universal Design in the future.

### **NDA Submission to DCC Active Travel Network and Letter to Ministers**

Following on from earlier submissions to various schemes of the DCC Active Travel scheme roll out, NDA provided a more overarching submission.

In this submission, NDA pointed out the following key areas of concern in relation to this project:

- Prioritisation of cycling infrastructure over the needs of pedestrians which is not in keeping with the Government of Ireland's [Design Manual for Urban Roads and Streets](#) and the hierarchy of road users.
- Lack of Cycling Infrastructure available which would support adapted cycles.<sup>3 4</sup>
- Design of pedestrian crossings of cycle lanes possibly increasing the risk to disabled pedestrians, older people and children crossing the cycle lane. This is particularly acute at bus stops.<sup>5</sup>
- Design of bus stops (in particular 'floating' or 'island' bus stops) as part of the Active Travel Network potentially creating more unsafe crossing points.<sup>6</sup>
- Moving or removal of accessible parking spaces or changing surrounding environment of these parking spaces.
- The proposed introduction of Toucan Crossings (where both pedestrians and cyclists use the same crossing).

In submissions, the NDA strongly advised DCC that, in order to get a full view of the potential safety impacts and barriers, consultation with Disabled Persons Organisations (DPOs) and disabled people as necessary. Meaningful engagement

<sup>3</sup> Wheels for wellbeing UK provides [a guide on inclusive cycling](#) which details various kinds of adapted cycles and details the design of inclusive cycling networks

<sup>4</sup> Transport for London (TfL) previously consulted with Wheels for Wellbeing UK in the development of the [London Cycling Design Standards](#) which includes detail on how to design infrastructure which can be used by those using adapted cycles.

<sup>5</sup> Cardiff City Council, for example, has recently had to install [controlled pedestrian crossings across cycle ways](#) as a result of serious safety concerns.

<sup>6</sup> Island or 'floating' bus stops have been rolled out in Edinburgh and have been [observed to increase incidences of dangerous interactions](#) between pedestrians and cyclists a summary of recent studies can be found [here](#)

would include making adjustments to proposals or designs where relevant and appropriate, informed by this consultation.

At present, the NDA can see no evidence of targeted, early engagement with DPOs and people with disabilities.

In addition to this submission, the NDA issued a letter detailing the concerns about the active travel network plans to Ministers Eamonn Ryan and Anne Rabbitte. This letter was also sent to the CEO of NTA and Chief Executive of DCC.

### **Meeting with NDA/CEUD and City of Victoria BC, Canada**

The NDA met with Sarah Webb – Manager of the Transportation Planning & Development Engineering & Public Works Department at the City of Victoria British Columbia. The NDA wanted to discuss a recent human rights tribunal case in British Columbia which had resulted in a ruling that bus stop bypasses<sup>7</sup> (otherwise referred to as ‘floating’ or ‘island’ bus stops) were an infringement of the rights of persons with visual impairments.<sup>8</sup> As bus stop bypasses are being rolled out as part of active travel schemes in Ireland the NDA wanted to learn more about the case and to get details on solutions enacted in British Columbia to improve accessibility and safety. The city of Victoria provided a copy of their active travel design manual, with additional contact information and they took part in a Webinar we delivered in partnership with the EU Accessible Hub in June on this topic.

### **Engineers Ireland Roads and Transportation Annual CPD Seminar 2023**

The Engineers Ireland Roads and Transportation Society held their annual CPD Seminar in March 2023 in Engineers Ireland. The topic was Inclusivity in Transportation. CEUD staff were invited to present on Inclusive Public Transport: A Universal Design Approach. This presentation provided attendees with an overview of universal design, as well as introduce the concept of thinking about accessibility through a whole journey approach.

CEUD staff provided examples of barriers to accessible transportation, particularly focussing on current project infrastructure to support active travel. This presentation also provided practical examples of universal design and consultation resulting in changes to transport and infrastructure design.

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<sup>7</sup> Bus stops where the cycle track bypasses the bus stop by moving in nearer to the pavement and around, thus requiring pedestrians to cross a cycle path when accessing the bus stop.

<sup>8</sup> <https://www.cbc.ca/news/canada/british-columbia/bc-floating-bus-stops-human-rights-tribunal-1.5811152>



### Presentation and Involvement in Panel Discussion at TCD's Cycling and Society Symposium 2023

NDA/CEUD were invited by Dublin City Council's Active Travel Department to be part of a panel exploring the benefits of active travel and the importance of inclusive network delivery to the Active Travel Department's plans.

CEUD gave a short presentation as part of this panel which focussed on diversity in active travel, the barriers to diversity and promotion of Universal Design approaches as a way of delivering active travel networks that are truly diverse and accessible to all. This presentation focussed on both the lack of cycle track space available to adapted cycle users, as well as the barriers introduced by some cycling infrastructure. CEUD presentation highlighted the universally designed walkability audit tool as a way of ensuring active travel is universally designed.

### Public Appointments Service – You Count – Building and Inclusive and Diverse Public Sector

NDA/CEUD staff were invited to attend this event that took place in Dublin Castle in March 2023, and to have a stand at this event to increase public awareness about the work of the organisation, and to promote our advice and guidance, particularly regarding creating equitable, diverse and inclusive work cultures that prioritises increasing the recruitment and retention of persons with disabilities and supporting employees to feel comfortable sharing their disability status. The Customer Communications Toolkit, guidance on Universal Design, the Report on Compliance with Part 5 of the Disability Act 2005 for 2021 and the Participation Guidelines were very popular with attendees at the event.



*NDA staff and attendees at the You Count event*

The You Count event featured insights drawn from data analytics from the Public Appointments Services' Equality Monitoring Dashboard project. This event also featured persons with disabilities and persons from other underrepresented groups sharing their experiences about the workplace and recommending models of good practice.

The objective of this conference was to highlight how this data can drive action and positive change in the workplace.

### **Meeting with the Public Appointments Service**

In Q1 2023, the NDA met with the Head of EDI in the Public Appointments Service (PAS) to discuss a number of recent issues that have emerged regarding the recruitment and retention of persons with disabilities. NDA advised that the current system of psychometric testing for some public service jobs needed to be reconsidered and reviewed as it was still inaccessible to persons with disabilities. NDA also advised that HR managers and line managers in the public sector should receive training in how to effectively manage, communicate and support all employees, including employees with disabilities and to examine the possibility of having a model of supported employment in the Public Appointments Service. In the United Kingdom, Denmark and Australia there are models of good practice where the supported employment model is embedded in the Public Employment Service.

### **Public Appointment Services' (PAS) project on Transforming the Approach to Reasonable Accommodations for Disabled People**

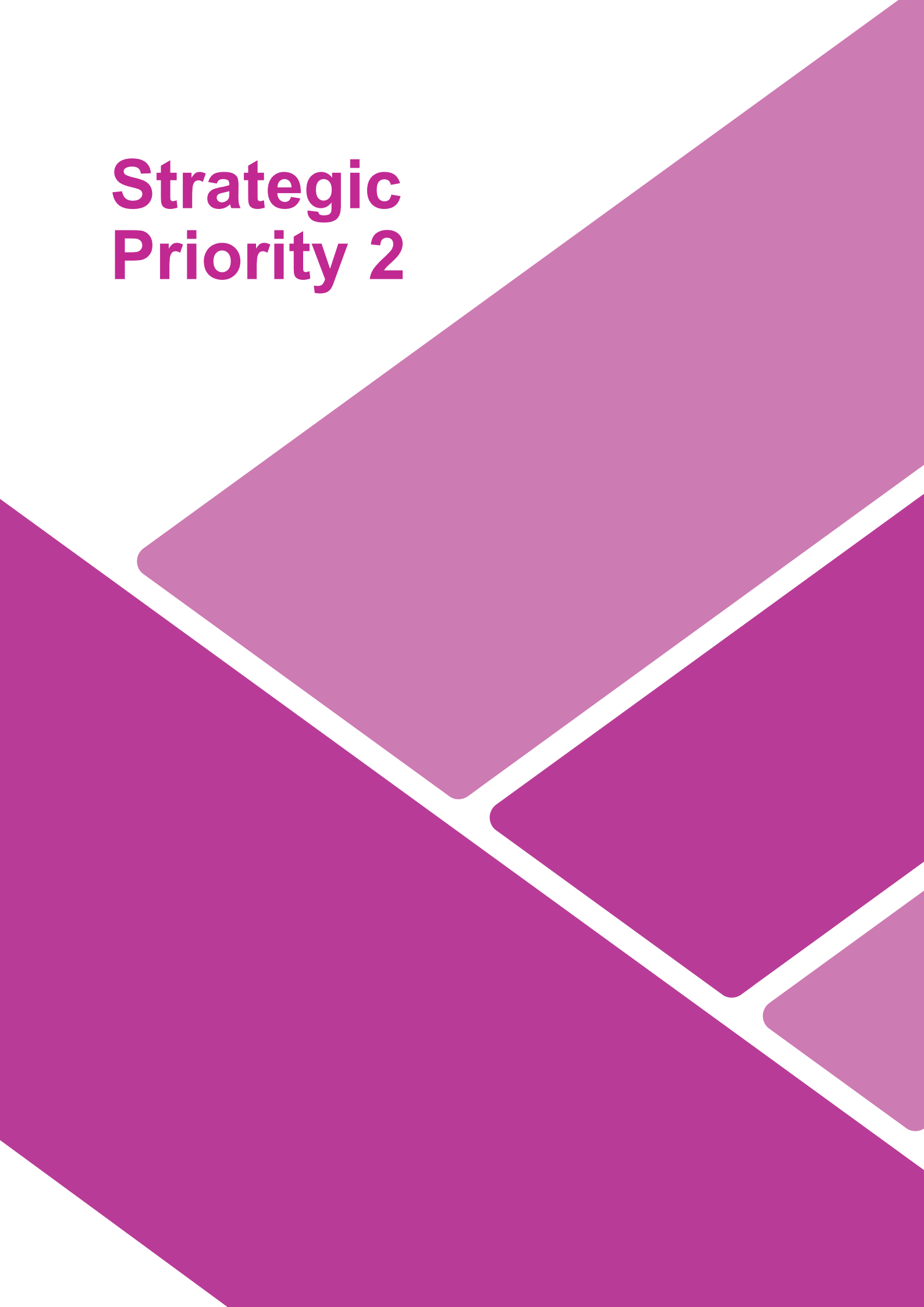
In 2023, PAS was awarded €45,000 under the Our Public Service (OPS) Innovation Fund for their project 'Transforming the Approach to Reasonable Accommodations for Disabled People'. The objective of this project is to use person-centred, universal, and creative design thinking to transform the approach to, and experience of, reasonable accommodations for candidates with disabilities during the recruitment and on boarding process into a new job in a civil or public service organisation.

PAS commissioned an external expert in Universal Design to lead this project. PAS also identified local civil service/public sector HR teams to collaborate with, to ensure that any new process works for both large scale competitions at PAS and smaller, localised recruitment in departments and organisations across the civil and public sector.

CEUD are on the advisory board for this project, and we have advised PAS regarding DPOs, disability stakeholders and persons with disabilities that should also be invited onto the advisory board. We have also provided feedback on the Request for Tender for this project. In 2023, CEUD sat on the evaluation panel for the three tenders received for this project, which was funded by the Innovation Fund. A disability-led company called Tilting the Lens, founded by Sinéad Burke, a disabled educator,

advocate and author was chosen to carry out this project. A guide/toolkit will be developed which can be used by public bodies to improve recruitment of persons with disabilities and persons who may require reasonable accommodations. We have provided feedback on the draft toolkit. In 2024, the Public Appointments Service will be piloting the toolkit in the public sector and integrating the learning into the toolkit before it is published and disseminated.

# Strategic Priority 2



## Strategic Priority 2:

**“Deliver independent assessment, monitoring and evaluation of progress against policies, strategies and codes of practice across government”.**

**Monitor and report on implementation of national strategies and policies relevant to disability, to identify areas requiring further focus and attention including NDIS and CES, and delivery against goals of UNCRPD**

### National Disability Inclusion Strategy Assessment Report

Each year, the NDA independently assesses progress on outputs under the National Disability Inclusion Strategy (NDIS). As 2022 was the final year of the NDIS the [2022 NDA Independent assessment of implementation of the NDIS](#) also provided an overview of the five years of the strategy. Our report is informed by consideration of reports from departments, as well as information and evidence gathered by the NDA in the course of its membership of working groups and departmental consultative committees, and regular engagement with persons with disabilities both through these committees and in other areas of its work-programme. The assessment also drew on the end of strategy indicators report (see below).

Our assessment paper noted that at the end of the NDIS in 2022, 30 actions were marked by Departments as ‘complete’ and 74 are marked as ‘on track’ for completion. Fifteen were classified as facing a minor delivery issue and two actions were facing a significant delivery issue. These were related to work to address access to, or affordability of, necessary aids, appliances or assistive technologies required for everyday living and challenges with the Personalised Budgets demonstration project.

Over the five-year lifetime of the NDIS, it is clear that there has been much progress made in terms of new legislation, policy and programmes in relation to the rights of disabled people. In addition to ratifying the UNCRPD, several important pieces of legislation have been enacted or have progressed significantly, including the Irish Sign Language Act 2017, the Assisted Decision Making (Capacity) (Amendment) Act 2022, and the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022.

However, progress under a number of actions has been slower than planned for a number of years. For example, an end to segregated settings has not been achieved and the potential of the Personalised Budgets programme has not been realised. Delays in the development of a UNCRPD strategy, following a one-year extension of the NDIS, has resulted in a gap in a national-level, coordinated government policy instrument in relation to disability.

The lifetime of the NDIS has coincided with significant unforeseen challenges including the COVID-19 pandemic and the war in Ukraine. The challenges faced by departments and agencies in relation to these crises were, and continue to be, significant. While these events were unprecedented, there are no guarantees that we will not face similar challenges in future. The NDA recommended that the State should take measures to ensure to the greatest extent possible that external shocks do not impact of the promotion and protection of rights for disabled people. Meaningfully including disabled people in decision making, including in emergency response plans, is one way in which to mitigate against this.

As noted under Strategic Priority One, work on a new National Disability Strategy got underway in earnest during 2023.

### **National Disability Inclusion Strategy Indicators Report**

The NDA published a [Final review of Progress on Indicators of the National Disability Inclusion Strategy](#) in 2023. This was based on the NDIS indicator set developed for the strategy. A mid-term review was conducted in 2020. The indicators are primarily process or structural indicators with only a few outcome indicators. Because the census was delayed by a year the results that many of the outcome indicators were dependant on are not available. A weakness of the original indicator set is that it is not possible to robustly state the impact of many NDIS actions on the lives of disabled people because of a lack of measurable targets and accompanying outcome indicators. However, the report provides a sense of progress under particular themes and provides significant learning for how to develop a more meaningful monitoring framework for the next strategy, which is currently under development.

### **Comprehensive Employment Strategy Assessment Report**

The NDA published its seventh [Independent assessment of implementation of the Comprehensive Employment Strategy for People with Disabilities](#) (CES) 2015–2024 on activity over the course of 2022. The NDA continued to express its concerns to DCEDIY during 2023 on the lack of progress on the development of the final three-year action plan. It proved challenging to demonstrate ambition while also considering the short timelines remaining, and in the context of developing commitments under a new National Disability Strategy. The NDA recognises the intention to focus on employment as a key pillar under that strategy but has also advised the importance of formally marking a conclusion to the CES, and acknowledging the work done to date.

Notwithstanding the lack of an action plan, many departments and agencies continued to progress CES actions during 2023. Within the strategic priority theme of ‘building skills, capacity and independence’ 2023 saw the continued implementation of two ‘transition pilot projects’ The ‘engaging employers’ strategic priority saw the minimum employment target for the public sector increase from 3% to 6% (to be achieved by 2025) through the enactment in 2023 of the Assisted Decision Making (Capacity) (Amendment) Act 2015.



The review of the reasonable accommodation fund (RAF) conducted by the Department of Social Protection was completed in 2022, and Budget 2023 allocated an additional €1 million to this fund. The NDA made submissions to other DSP consultations including on the Wage Subsidy Scheme, the Pathways to Work mid-term review and Pay Related Benefit. In all these submissions the NDA focused on the supports required for disabled people to access work. During 2023 DSP continued the early engagement process targeted at young recipients of disability payment and explored options available to them.

The NDA is highlighting key employment issues to DCEDIY for the new National Disability Strategy arising from the consultation and from a review of the academic literature conducted throughout the year. For example, the development of a vocational rehabilitation system and the provision of coordinated and seamless support to people with disabilities to access employment require further focus. These are in line with CES actions that have not been advanced.

**Monitor and report on compliance with legislation and codes of practice, to provide independent and robust assessments of progress, including ISL, WAD, Disability Act Parts 3 & 5**

### **Monitoring Part 5 of the Disability Act 2005**

NDA has a statutory role in monitoring the employment of persons with disabilities in the public sector, arising from Part 5 of the Disability Act 2005. This is the 17th report NDA has produced on the employment of persons with disabilities in the public sector. This report was published on NDA's website in Q1 2024.

### **Report on Compliance with Part 5 of the Disability Act 2005 for 2022**

NDA is pleased to note that for the first time:

- The number of employees reporting a disability passed 4%. In 2022, the number of employees reporting a disability was 10,631 (4.1%), an increase of 1,620 (+18.0%) from the 2021 figure which was 9,011(3.6%)
- All five types of public bodies achieved the minimum 3% target (Commercial Bodies, Government Departments, Local Government, Non-Commercial Bodies, and Public Bodies staffed by Civil Servants). In 2021, four types of public bodies achieved the minimum 3% target. One type of public body (Non-Commercial Bodies) did not achieve the target.
- In 2022, 103 (48.4%) public bodies reported that a minimum of 6% of their employees were persons with disabilities. This is an increase from 2021, when 78 (36.6%) public bodies reported that a minimum of 6% of their employees reported a disability.
- Overall, the public sector exceeded the minimum target of 3% for the twelfth successive year.



The Health Service Executive (HSE) the largest body in the public sector reported an improvement in its performance. In 2022, this public body reported an increase of 4,345 employees from 96,675 employees in 2021 to 101,020 employees in 2022. NDA is pleased to note that this public body also reported an increase in the number (+823) and percentage (+0.7%) of employees reporting a disability from 2021 to 2022. In 2021, 1,508 (1.6%) employees reported a disability and in 2022 this increased to 2,331 (2.3%). Although the HSE has not yet met the minimum target of 3%, this is the largest number and percentage of employees with a disability that the HSE has reported to date. The increase in the number of employees reporting a disability in the HSE accounted for over half the overall increase in the number of employees reporting a disability in the public sector, thus making a significant contribution to the overall 4.1%.

### **Final Determination of non-compliance under Part 5 for the HSE for 2018 and 2019**

In 2018 and 2019, the total number of employees in the HSE increased from 87,821 in 2018 to 88,215 in 2019 (+394), but the number and percentage of employees reporting a disability decreased from 1,176 (1.3%) in 2018 to 464 (0.5%) in 2019 (-712, -60.5%).

Under Section 49 of the Disability Act 2005, NDA can request further information from public bodies who have not made the current minimum 3% target for two consecutive years and who have not provided sufficient evidence in their Part 5 returns of the measures they have in place to meet their obligations under Part 5. The HSE was initially issued with a draft determination of non-compliance for 2018 and 2019. Based on the response the HSE provided NDA to this draft determination, the Authority decided that this public body warranted a final determination of non-compliance for this two-year period. NDA has sent the HSE a letter regarding this determination and future measures for this public body to implement to help it improve its performance under Part 5.

### **No determination of non-compliance for the HSE for 2019 and 2020**

The HSE did not make the minimum 3% for 2019 and 2020. NDA sent them a S.49 request for this two-year period while noting that the COVID-19 pandemic hit during this reporting period and had a significant impact on the HSE, in particular. In its response to the S.49 request the HSE provided considerable evidence of the unprecedented disruption managing the COVID-19 pandemic had on this public body's operations. All non-COVID-19 related work was deprioritised, including the measures the HSE had started to implement in 2019 and 2020 to improve its performance under Part 5. In the context of the significant impact the COVID-19 pandemic had on this public body, the Authority decided that the HSE did not warrant a determination of non-compliance for 2019 and 2020. NDA has sent the HSE a letter in this regard.

### **No determinations of non-compliance for 2020 and 2021**

NDA presented a report to the Authority in Q3 2023 as to whether the following public bodies, who had not made the minimum 3% target in 2020 and 2021, warranted draft determinations for 2020 and 2021:

- National Council for Special Education (NSCE)
- Oberstown Children's Detention Campus

The Authority decided that the National College of Special Education (NCSE) and Oberstown Children's Detention Campus did not warrant a draft determination of non-compliance for 2020 and 2021, because they had been engaged in significant organisational restructuring which had an impact on their capacity to achieve the target and evidence that they had measures in place to improve their performance under Part 5 over time.

### **Revising the Part 5 questions**

NDA's paper on the Review of Part 5 was published on the NDA website in Q4 2022 and several recommendations from the Review have been implemented to date.

One of the key recommendations from the Review was to revise the questions public bodies had to answer regarding the measures they had in place to meet their obligations under Part 5. We had previously advised Monitoring Committees and public bodies that we would be implementing this recommendation in 2023.

NDA had also advised the public sector that these questions would be transferred from Microsoft Word and Excel documents to an online survey tool. This move to an online format was another key recommendation in the Review of Part 5. It is also in line with the Government's Digital and ICT Strategy 2030.

In December 2023, NDA hosted 4 accessible online consultations on a draft set of these quantitative and qualitative questions. Over 140 representatives from the public sector participated in these consultations. The feedback from these consultations informed the development of a second draft of the relevant questions. These questions will be finalised for issue to monitoring committees in Q1 2024, ensuring that data gathered on the 2023 reporting period will be collected through this medium. These questions have been designed with multi-choice options, to make it easier for public bodies to answer them and to provide more accurate data. This will help streamline data collection and reduce the number of queries that need to be addressed during the annual process.

### **Monitoring Report on Code of Practice on Accessibility of Services and Information Provided by Public Bodies – Part 3, Section 26 Access Officers Report Launch**

As set out under Section 26 of the Disability Act 2005, public bodies have a statutory requirement to appoint an Access Officer in the organisation. Each head of a public

body shall authorise at least one of their officers (referred to in this Act as “access officers”) to provide or arrange for and co-ordinate the provision of assistance and guidance to persons with disabilities in accessing its services.

To assess the provision of Access Officers across the public service, the NDA monitored the websites of each public body with responsibilities under the Disability Act with regards to the provision of information for the statutory requirement laid out in Section 26(2) of the Disability Act 2005.

The Code of Practice explains what is necessary to be deemed compliant under Section 26(2) of the Disability Act 2005 and states that a public body can achieve this by:

“Promoting the appointment and availability of Access Officer(s) and how they may be contacted, so that the general public is made aware of them and knows how to avail of their assistance.”

The websites of each public body were monitored against the following indicators to evaluate if the required information was promoted with regards to the Access Officer:

- The promotion of the appointment of an Access Officer
- Information on how to contact the Access Officer
- A variety of communication channels for contacting them.

The NDA monitoring team evaluated the information provided on the websites of 292 public bodies (later adjusted to 282) and made an assessment on conformance against the above indicator derived from the Code of Practice. The findings were recorded into a database. These findings were then analysed and presented in a draft report, which were provided to the Offices of the Secretaries General for each Department. Departments were asked to circulate the draft reports to public bodies under their aegis and were given the opportunity to respond to the draft report.

Following the issuing of the draft report, public bodies were invited to engage with the NDA:

- with any queries they may have,
- to provide addresses of pages containing information on the Access Officer in the instance information was missed in the NDA’s initial inspection,
- provide updates on the status of public bodies, and,
- let NDA know of any updates to the website following the report.

Initial findings show, that of 282 public bodies, 134 (47.5%) promoted the appointment of an Access Officer on their public website, whereas 148 (52.5%) public bodies appeared to have no information on their public websites concerning Access Officers.

Following the issuing of the draft report and allowing public bodies to update websites and respond, improvements were seen. Final analysis shows that of 282 public bodies, 192 (68.1%) promoted the appointment of an Access Officer on their public website, whereas 90 (31.9%) public bodies appeared to have no information on their public websites concerning Access Officers. This represents a 43.3% increase in promotion of Access Officers on public body websites monitored. In addition, there was a marked improvement in the provision of Access Officers' contact information, facilitating written and spoken communication and therefore meeting all criteria under this indicator. This improved from 98 (34.9% of public bodies monitored) to 165 (58.7% of public bodies monitored) representing a 68.4% improvement.

Full results and overview of monitoring impact is available in the final report on Section 26(2) - Access Officers, which was officially launched at an online event in October. This event was well attended with 129 online attendees excluding speakers. The launch event focussed on accessibility of information and services, including digital information and services, the role of the Access Officer in ensuring accessibility of same, and provided insights on the day-to-day role, responsibilities, and best practice for Access Officers. The report launch was opened by the Secretary General for DCEDIY, Kevin McCarthy and Dr Aideen Hartney, Director of the NDA and featured presentations from Naomi Oldenburg from NDA/CEUD team on the Section 26(2) Monitoring report, Donal Rice who leads the Web Accessibility Directive (WAD) team on web accessibility and the Access Officer's role, and Colin Flood who is the Access Officer in the Department of Housing on the roles, responsibilities and best practice of Access Officers.

### **EU Web Accessibility Directive (WAD) - Monitoring**

The NDA is named in Irish regulations as the National Monitoring Body under Directive (EU) 2016/2102 on the accessibility of the websites and mobile applications of public sector bodies. The Directive mandates Member States must ensure that public sector websites and mobile apps are fully accessible to persons with disabilities. In 2023, NDA's Web Accessibility Monitoring Unit conducted a total of 263 reviews on public sector websites and mobile apps. These reviews were conducted against the standards required under the Directive EN 301 549, which is broadly equivalent to the more commonly known Web Content Accessibility Guidelines (WCAG) 2.1 AA.

NDA, in consultation with disability stakeholders, identified 32 priority websites and mobile apps and these were subject to In-depth Reviews. These ranged from eGovernment sites such as [MyGovID.ie](https://mygovid.ie) and [MyWelfare.ie](https://mywelfare.ie), to education websites such as [UCD's Access and Lifelong Learning](https://ucdaccessandlifelonglearning.ie) (ALL) and University College Cork's virtual learning environment, CANVAS, to priority public service websites such as [GARDA.ie](https://garda.ie) and [HSE.ie](https://hse.ie).

[NDA's monitoring report for 2023](#) highlights notable progress made by organisations such as HSE Digital, the Office of the Government Chief Information Officer, the UCD digital team, and Houses of the Oireachtas digital team, which actively engaged with NDA during the monitoring period. Larger websites like [HSE.ie](https://hse.ie) and [GOV.ie](https://gov.ie)

demonstrated significant reductions in errors, with a focus on addressing outstanding issues.

The WCAG 2.1 AA Success Criterion with the largest number of errors detected by In-depth Reviews were:

- Incorrect “Name, role value” on certain elements on a webpage page. In these errors, HTML is not used in a way that facilitates accessibility and these errors typically are found on interactive elements of a website such as forms, cookie banners and widgets.
- Poor Colour contrast, where the colour of the text is not sufficiently legible against the background colour of the page or text next to it.
- Inaccessible ‘Non-text content’, where elements like images do not have the correct ‘alt text’ added that describes information in the image or its function.

However, most websites subject to Simplified Review showed static performance and public bodies are encouraged to move beyond focusing on issues identified through automated testing alone. In the transport sector, Dublin Bus achieved a milestone with almost no errors detected in a Simplified Review. Some Local Authorities significantly reduced the number of automated errors from the Simplified Reviews, and many reported using these reviews as an internal metric by which to measure improvements in accessibility. The NDA emphasises the importance of user testing and accessibility reviews beyond automated means.

An Accessibility Statement is required under the Directive to be published for each website and mobile app. It should provide useful information including the level of compliance achieved, areas for improvement and how people can ask for assistance or make a complaint. A majority of websites (85%), and all mobile apps subject to In-depth review did not contain an Accessibility Statement in line with the requirements of the Directive.

The NDA participated in events such as WADEX (Web Accessibility Directive Experts’ Group) and engaged with the Accessible EU network to enhance monitoring practices and learn from experts across Europe. Capacity building and training initiatives, including webinars with the Irish Computer Society, covered topics like Irish Sign Language videos, accessibility in InDesign software application, and involving users in website testing.

Despite some positive developments, NDA’s monitoring report emphasises the need for ongoing efforts by public bodies to enhance accessibility and compliance with the Directive, with a focus on early consideration of accessibility in content creation and continuous improvement in user testing and engagement. The NDA will submit its next national monitoring report to the European Commission in December 2024, incorporating the monitoring results from the 2022-24 period.



**Robustly evaluate the impact of policies and programmes to ensure they are achieving intended objectives**

### **National Wellbeing and Social Inclusion Survey**

In 2023, two reports on the findings of a national survey on wellbeing and social inclusion conducted in 2022 were published. The main survey findings are set out in a report published in January 2023 '[How's it Going? National Wellbeing and Social Inclusion Survey](#)'. The report presents survey findings across a wide range of measures and highlights consistently poorer outcomes for respondents with a disability compared to those with no disability. In line with the approach adopted in Census 2022 the findings separate those that report a disability between those with a disability to a great extent and those with a disability to some extent. The survey findings indicate that those that report a disability to a great extent experience lower levels of wellbeing and social inclusion than those that have a disability to some but not a great extent.

The survey data enabled a limited exploration of the intersection of disability and other identities linked to social exclusion. The report finds that respondents that identified as being both disabled and a member of the LGBTQI+ community reported poorer levels of belonging and integration in their community and lower levels of mental wellbeing.

As the survey was primarily an opt-in online survey the findings are not representative of the population as a whole. However, the report adds to the existing knowledge base about the experience of living with a disability in Ireland and indicates a need for comprehensive change to improve outcomes for people with disabilities.

In January 2023 the launch event for this survey was followed by an in-person and online consultation event to gather the views of DPOs and individuals with disabilities regarding strategies to improve the wellbeing and social inclusion of people with disabilities.



*Attendees at the How's It Going event*

In December 2023 the NDA also published a second report, [“I don’t know where to start”: Survey respondents’ views about barriers to participation in social and leisure activities](#). This report was based on narrative responses to an open survey question that was directed to respondents who indicated they encounter barriers to participation in social and leisure activities. The question asked these respondents to identify the main things that make it difficult for them to take part in social and leisure activities. Over 1,000 respondents, of whom four in five were people with disabilities, told us about the barriers they face. Many respondents identified more than one barrier. The title of this report, ‘I don’t know where to start’, comes from one of the responses provided.

The responses to this open question provide an invaluable insight into the everyday challenges faced by disabled people and greatly add to our understanding of why people with disabilities report significantly lower levels of wellbeing and social inclusion than those who are not disabled.

The responses indicate that people who are not disabled are more likely than their disabled peers to consider both time, and childcare and family responsibilities, as barriers to participation in social and recreational activities. Conversely, the inaccessibility of the built environment and personal attributes were largely but not exclusively identified by respondents with disabilities. Personal attributes include character traits (such as low self-motivation or confidence) and physical, mental and sensory characteristics. The survey data indicate that disabled people are not able to participate in social and leisure activities on an equal footing with their non-disabled peers.

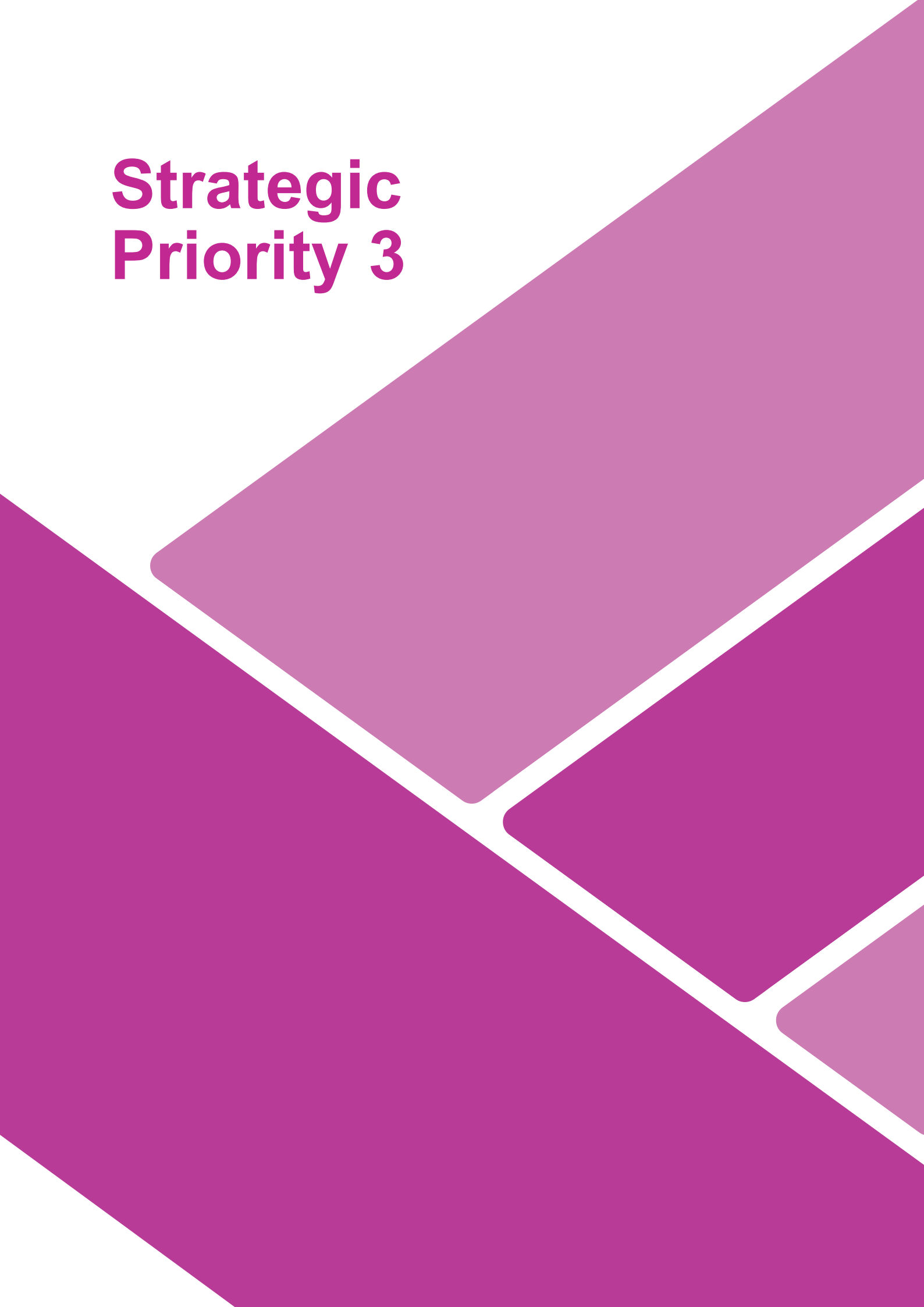
The findings from these two reports will feed into the development of the new National Disability Strategy.



*Tara Smith from the Department of Children, Equality, Disability, Integration & Youth speaking at the How's It Going event.*



# Strategic Priority 3



## Strategic Priority 3

**“Advance activities to promote awareness and wider take-up of Universal Design across Ireland”**

**Encourage take up and compliance with Universal Design principles to foster implementation of best practice**

### Universal Design Guidelines for Changing Places Toilets

The NDA commenced development of Universal Design Guidelines for Changing Places Toilets in early 2023. These guidelines are intended to support implementation of the new Irish Building Regulations and Technical Guidance Document for the provision of Changing Places Toilets (Part M), a document which sets out minimum requirements. The guidelines will reference and recognise compliance with building regulations but will also include guidance on good practice that goes beyond the minimum requirements. In addition, the scope of the guidelines will include management and maintenance issues, which are not within the scope of the building regulations.



*CEUD Senior Built Environment Advisor Ruth O'Reilly at the consultation workshop on draft Universal Design Guidelines for Changing Places Toilets*

A Technical Advisory Group was set up to inform the development of the guidelines, including representatives from Changing Places Ireland and Independent Living Movement of Ireland. Following a competitive tender process, O'Herlihy Access Consultants (OHAC) was appointed to develop Universal Design Guidelines for Changing Places Toilets.

In June 2023, CEUD held a face-to-face consultation workshop on draft Universal Design Guidelines for Changing Places Toilets. The consultation was held at County Hall in Tallaght (which has a Changing Places Toilet), with the assistance of Selina Bonnie, from South Dublin County Council. The workshop was well attended, with approximately 20 people, including DPO's, disabled people who use Changing Places Toilets, parents of users, local authority staff, architects, and equipment suppliers. The feedback from the workshop was used to revise and improve the draft guidelines and were part of the document used for public on-line consultation in November 2023. As a result of the workshop, a number of revisions will be incorporated into the revised guidelines, aimed to be published in the first half of 2024.

### **NDA Meeting with Changing Places Ireland**

In May 2023, the NDA Director and CEUD staff met with representatives from Changing Places Ireland. Changing Places Ireland have concerns regarding the need for a map with information on the location of Changing Places Toilets in Ireland, as the new building regulations requiring Changing Places Toilets in certain buildings commences on 1 January 2024. At present, Changing Places Ireland maintain a website and map, but this is provided without any dedicated funding, and it was stated at the meeting that this is not sustainable into the future. The NDA and Changing Places Ireland discussed possible organisations that might be suitable to take on this important task. It was agreed that Changing Places Ireland might seek further advice and support from the NDA on this matter.

At the meeting, Changing Places Ireland also highlighted that a number of local authorities are proceeding to install so called 'step-down facilities' before the new building regulations commence at the start of 2024. 'Step-down facilities' are generally smaller than the minimum size required in the new regulations. Following the meeting, NDA wrote to all local authorities reminding them of their obligations under the Disability Act, including Section 25 of the Disability Act. Given this obligation, NDA advised public bodies that the installation now of 'step-down facilities' is likely to lead to a need for retrofit in future. It would be preferable to provide Changing Places Toilets in full compliance with the regulations from the outset to ensure that they meet the needs of the intended users, and that public bodies fulfil their statutory obligations under the Disability Act 2005.

### **Meeting with Age Friendly Ireland Housing Technical Advisors**

CEUD engaged with the Age Friendly Housing Technical Advisors network in February and April 2023. It was noted that a number of local authority development plans are now including specific requirements for a percentage of dwellings in new housing developments to be universal design and/or age-friendly units. There is a lack of clarity on how these can be assessed at planning stage by local authorities. CEUD has developed a draft planning stage checklist for the internal layout of dwellings, based on the Universal Design Guidelines for Homes in Ireland. This has been tested with Dublin City Council and the Land Development Agency, and is included in the Home Performance Index.

In April 2023, CEUD presented the checklist summarises key universal design features that should be included at planning stage, related to the internal layout of a dwelling. The aim would be that this would be adopted by local authorities, in particular those that have a target for Age-Friendly/Universal Design Homes in their development plans, to ensure consistency in approach across local authorities. The proposal was well-received and the advisors were asked to send on feedback on the draft checklist. Age Friendly Ireland and CEUD have agreed in principle to co-publish the checklist in early 2024.

### **Update to Customer Communication Toolkit**

The [Customer Communications Toolkit for the Public Service — A Universal Design Approach](#) (Communications Toolkit) offers multiple examples of best practice design

for Written, Spoken & Signed and Digital Communications. It was first published in 2017 based on a series of multiple toolkits prepared to complement related National Standards.

The Communications Toolkit was updated in 2019 and that update focused on Irish Sign Language. In 2020 a supplement was developed for accessible online meetings. CEUD worked on a further update to the toolkit to ensure it is in line with current legislation, policy, use of terminology and best practice. CEUD collaborated with the Department of Public Expenditure and Reform (DPER), [Quality Customer Services Network](#) (QCSN), [National Adult Literacy Agency](#) (NALA) and external stakeholders such as Disabled Persons Organisations (DPOs).

A significant update to the Communications Toolkit was to change the title from 'Customer Communications Toolkit for the Public Service' to 'Customer Communications Toolkit for Services to the Public'. This change was made to acknowledge that the Communications Toolkit is a resource for both public services and private sector organisations who provide services to or on behalf of the public.

The updated Communications Toolkit was launched in March 2023 at the Spring Quality Customer Services Network (QCSN) event. The event was chaired by Brian Boyle (Assistant Secretary - Accountant General's & Strategic Planning Division – Revenue, and Chair of the QCSN). Dr. Aideen Hartney (Director, NDA) co-launched the Communications Toolkit and James Hubbard (Senior Design Advisor, CEUD) introduced the main updates to the Communications Toolkit.

The YouTube video with Irish Sign Language (ISL) of the launch event that was recorded by the Department and [a link to this video](#) is now available on the CEUD website along with the Communications Toolkit which is hosted in HTML format and as an accessible PDF.

The Summer 2023 issue of the [Local Authority Times](#) included an article on the recent update of the [Customer Communications Toolkit for Services to the Public — A Universal Design Approach](#).

The article emphasised the need for public services to provide the best possible customer experience and highlighted how providing information in alternative formats helps to achieve this. The article included details of the [launch](#) of the updated Toolkit and provided details of some of the updates that had been made. A PDF copy of the issues and article are available at: [Local Authority Times Summer 2023 Issue](#).

## **Designing Our Public Services – Design Principles**

The Department of Public Expenditure and Reform (DPER) is leading an initiative to support public service organisations in delivering user-centric services which are accessible, effective, and efficient, in line with Actions 12, 13 and 14 of the Civil Service Renewal Action Plan 2024.

In October 2022, NDA made a submission to DPER advising that these Design Principles needed to have inclusive consultation with persons with disabilities from

the start and that Universal Design needed to be an essential element of all aspects of this process in the future.

In January and February 2023, the NDA attended consultations to the development of an Action Plan to embed Universal Design in public service organisations. At these consultations, NDA reiterated its advice regarding embedding inclusive consultation with persons with disabilities from the start, and that Universal Design was needed in each of the Design Principles and every action in the Design Action Plan. The NDA also advised that:

- Public bodies should enter a process of strategic internal engagement to build their employees' capacity and skills to undertake inclusive and continuous consultation with a diverse external stakeholder group. By focusing on developing their internal structures and services and creating an Equitable Diverse and Inclusive (EDI) work culture using a Universal Design approach, public bodies could meet their statutory obligations under Public Sector Duty, OPS 2020, UNCRPD etc.
- Materials for consultation and information were produced in accessible formats.
- Including an action to evaluate and monitor was of huge importance. Tasks measured are more easily completed, and gaps in design and delivery can be identified and addressed.

### **Participation 2023 OECD AI WIPS Conference - Can AI improve access to the labour market for people with disabilities?**

In March 2023, the NDA were pleased to participate in a virtual panel discussion on the role of Artificial Intelligence (AI) in employment for persons with disabilities. Given the ubiquitous nature of AI across the labour market, it poses both opportunities and barriers. This discussion examined all aspects of artificial intelligence from the recruitment process, through to the part played by AI-based tools in various jobs. CEUD are in the process of writing a briefing paper on the subject of AI to be published in early 2024 in which we will highlight the importance of ensuring that development and roll-out of AI is managed with full consideration of the needs of 'extreme users', including disabled persons, in order to mitigate against potential bias and negative outcomes.

### **Participation 11th BEREC Stakeholder Forum**

The Body of European Regulators for Electronic Communications (BEREC) contributes to the development and better functioning of the internal market for electronic communications networks and services. It does so by aiming to ensure a consistent application of the European Union (EU) regulatory framework and by aiming to promote an effective internal market in the telecoms sector to bring even greater benefits to consumers and businesses alike. The NDA/CEUD were delighted to participate in the eleventh BEREC Stakeholder Forum held in Brussels in March. A Representative of CEUD participated in a panel which discussed the future of communications from the perspective of persons with disabilities. In conjunction with the European Disability Forum and the European Telecommunications Network

Operators Association, a wide-ranging conversation took place covering the importance of telecommunications for people with disabilities, as well as the impact of the forthcoming European Accessibility Act on both operators and consumers.

### **Workshop with Arts Disability Ireland**

In April, CEUD was delighted to participate in an online workshop in collaboration with Arts and Disability Ireland. This workshop, aimed at attendees from various bodies and groups involved with the Arts, focussed on all aspects of inclusion and accessibility. The Centre gave two presentations: The first outlined the core principles of Universal Design as they apply to all aspects of the Arts. The second examined attendance at, or participation in, various types of events and described all aspects of the customer journey including discovering what events were taking place at a venue, booking tickets, and attending the event. Feedback has been extremely positive, and CEUD hopes for further collaborations in this space.

### **Presentation to Paediatric Occupational Therapists (OT)**

CEUD gave a presentation to the OT paediatric occupational Therapy working group in April 2023. The focus was on giving an overview to the committee and OT members of the work in the areas of built environment and communications based on our publications in these areas. There were over 50 participants in the seminar. Some important feedback received included the inaccessibility of classrooms for students with diverse needs. CEUD Staff advised participants to contact the Building Unit of the Department of Education and that the TGD's (Technical Guidance Documents) from the Department needed to be revised and updated. This was one of the actions under the NDIS that had not progressed. CEUD met the key staff in the Building Unit at another meeting in May 2023, who are very open to review the TGDs in question.

### **Development Plan Objectives on Universal Design Homes**

The new Dublin City Development Plan 2022-2028 includes a specific objective on Universal Design in new apartment developments:

“To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019.”

The Design Standards for New Apartments require that ‘The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1-, 2- or 3-bedroom unit types, by a minimum of 10%.’ Under the Dublin City Development Plan objective, half of these - or 25% overall - are required to be designed in according with the Universal Design Guidelines for Homes in Ireland. This is a positive development.



In practice, UD Home type dwellings can be achieved within the ‘10% over’ apartments. However, UD Home+ (wheelchair liveable) cannot, as greater floor area is required. NDA has advised that residential developments incorporating Universal Design Homes should include homes designed to both the UD Home and UD Home+ (wheelchair liveable) levels.

The draft Fingal County development plan 2023-2029 contains an objective on accessible housing which states:

“Final County Council recognises the importance of social inclusion and aims to make 30% of social housing should (sic) be fully accessible and built with a universal design approach which mean that the property will be flexible and changed as needed over the course of the occupant’s lifetime.”

### **Meetings with Land Development Agency (LDA)**

The Land Development Agency is a commercial, state-sponsored body that has been created to coordinate land within public control to provide affordable and social homes and build communities across the nation. The Urban Design and Sustainability Manager at the LDA contacted CEUD’s Built Environment Design Advisor in relation to design principles and apartment typologies being developed by the LDA to inform their design teams. In response to this request, CEUD issued LDA with a draft checklist for Universal Design (UD) Homes that is in development. In addition, two meetings have been held between LDA and CEUD on UD Home type apartment designs to be included in LDA project briefing documents. A further meeting is planned in January 2024, to advise on UD Home+ apartment designs. This engagement with the LDA has the potential to have impact, given the scale of housing development that LDA will be procuring over the next number of years.

### **Solas Fostering Inclusion Strategic Work**

The NDA, through its representation on the Solas committee on fostering inclusion, met with the Solas Director of College of the Future and her team. This meeting focused on the new Capital spend which will see allocation of €430 million to be directed to further education and training, including the expansion of skills centres and apprenticeship programmes across the country and the establishment of Further Education and Training Colleges of the Future. This is the first capital spend in the FET sector in over 20 years and has dictated that all buildings should follow a Universal Design approach. The NDA team from the policy and research unit and the CEUD operating officer detailed examples of practice that can assist to ensure UD is embedded in this schedule of work. The Solas team have requested further assistance from the NDA.



### **Programme for Access to Higher Education (PATH)**

The Higher Education Authority (HEA) issued a call for proposals to higher education institutions under the Programme for Access to Higher Education (PATH) Fund Strand 4 Phase 2. The NDA/CEUD team assisted the HEA over the course of PATH 4, including:

- Phase 1 (2022) – Universal Design Fund - Supporting inclusive universally designed higher education environments for all (once-off fund based on allocation/approved project plan basis to PATH-funded HEIs)
- Phase 2 (2023-2025) – Proposals for course provision for Students with Intellectual Disabilities (competitive call for proposals)

Following engagement with the HEA, there was a significant shift in HEA's approach in funding just covering Universal Design for Learning (UDL) to the wider view of Universal Design in Education (UDE) that covers key elements such as the Built Environment, ICT infrastructure, UD curricula including Universal Design for Learning (UDL) and finally services and supports such as access to the Library etc. The NDA/CEUD was pleased to support the Higher Education Authority in reviewing each of the 19 submissions received from third-level institutions across Ireland. Both strands of the PATH funds are to support the embedding of Universal Design (UD) approaches and inclusive practices in HEIs which will benefit all students and in particular autistic students and enable the building of capacity in HEIs for greater participation by students with intellectual disabilities in higher education. Phase 2, which the NDA was involved in over the course of 2022 and 2023, involved a three-year pathfinding pilot to support an enhancement of course provision for students with intellectual disabilities and to inform future policy considerations for students with intellectual disabilities.

Proposals (based on application designed with NDA input) were received from twelve higher education institutions. The NDA and CEUD, with HEA staff and 2 experts from USA and SA, independently reviewed and assessed the proposals received. We assessed according to the criteria and marking scheme included in the call documentation.

The PATH 4 Phase 2 is viewed within the HEA as a ground-breaking initiative, that has the potential to bring about transformative effects within HEIs. The NDA emphasised the critical importance of supporting HEIs to effectively implement their proposals. Providing support to these institutions would not only advance their programmes but also contribute to fostering inclusive educational environments and facilitate a more comprehensive learning experience for students with intellectual disabilities. Such support may include not only financial resources but also guidance, collaboration opportunities, and the dissemination of best practices among participating institutions. The NDA believe that the PATH 4 Phase 2 initiative is pivotal in initiating positive changes and fostering educational inclusivity.

**Provide policy advice through the development of guidelines and contributing to standards in order to support the implementation of best practices in design of services and products for all citizens**

### **Case Studies on impact of Universal Design Homes on Site Density**

Following a competitive procurement process, Seán Harrington Architects was appointed by the NDA to develop case studies on the density impact of Universal Design Homes. These case studies will inform the cost assessment of Universal Design Homes. This work will form an important part of the overall cost assessment on UD dwellings. The report is to be finalised by early 2024.

### **NDA submission on proposed new Planning Guidelines for Sustainable and Compact Settlements**

NDA made a submission to the Department of Housing, Local Government and Heritage in response to a consultation paper on proposed new Planning Guidelines for Sustainable and Compact Settlements. This is linked to proposed new changes in housing standards for low-rise medium density housing developments. While welcoming some aspects of the proposals, NDA's submission notes stated there was no analysis in the consultation paper on any potential impact on Universal Design Homes. The submission also highlighted two key aspects of the proposed new guidelines that could impact negatively on the provision of accessible and usable housing.

**Guide and advise on curricula to build capacity including the integration of Universal Design for Learning**

### **UDG4ELCS Implementation Project**

The [Universal Design Guidelines for Early Learning and Care Settings](#) (UDG4ELCS) implementation project is to promote understanding and adoption of the UDG4ELCS by Early Learning and Care (ELC) and School-Age Childcare (SAC) educators/practitioners, as well as by built environment professionals involved in the design, planning and construction of ELC and SAC settings.

CEUD and DCEDIY have formed a Project Team to work on a two-year project to promote understanding and adoption of the guidelines by Early Learning and Care providers and practitioners.

In June 2022, CEUD published a Request for Tender (RfT) to eTenders seeking to engage the services of suitably qualified supplier(s) to develop and deliver on the requirements and specifications for:

- A Communications Strategy – that informs the UDG4ELCS Implementation Project.
- A Website and content – that raises awareness of the UDG4ELCS.
- Two e-learning modules – that assists with UDG4ELCS capacity building.

CEUD organised and managed the RfT selection and evaluation stages of the tender, and a suitable contractor was chosen. Contracted work began in April 2023 with the plan to complete this work by Q4 2024.

### **Early Childhood Ireland's National Conference**

[Early Childhood Ireland](#) held their annual conference in the Ashling Hotel in March 2023. The focus of this conference was on [Valuing Outdoor Play](#). The conference examined the many benefits that Outdoor Play can have for children, and it looked at how this area is being developed in other countries such as Norway and Sweden. Attendees and panellists at the conference also discussed risky play, and the need for children to participate in this to develop their own skills to assess risky or unsafe situations.

CEUD attended this conference as they are currently working with DCEDIY on a project to promote understanding and adoption of the [Universal Design Guidelines for Early Learning and Care Settings](#) (UDG4ELCS). As members of the project team for the UDG4ELCS Project it is important for CEUD to have an awareness and knowledge of developments in Early Childhood care and how the UDG4ELCS may be influenced by or may impact on these developments.

### **Universal Design in Primary Level**

CEUD has continued its partnership with Junior Achievement Ireland (JAI) to deliver the Power of Design (POD) programme that includes Universal Design content in 2022-23 school terms. The project deliverables included:

- 50 POD workshops in primary classrooms.
- Refining the blended POD programme.
- A Toolkit for the professional volunteers to use to in-service their colleagues after they present the programme in the schools.
- Trialling a cross-referral coordination between the POD programme and NDA Someone Like Me primary art competition.

The project presented a final report in Q3 2023 that showed a very positive uptake by both teachers and students, and most of the volunteers were keen to continue to participate in future workshops.

### **Universal Design in the IDI BIG IDEA**

CEUD has an ongoing partnership since 2012 with the Institute of Designers in Ireland (IDI) to promote Universal Design among the design community. The IDI is affiliated with The BIG IDEA education programme that introduces a creative design ethos based on social themes for Transition Year (TY) students. The purpose of The BIG IDEA is to empower students through inquiry-based learning and to develop critical thinking through socially conscious, human-centred projects that will connect them with their peers, industry, their community and their world.

The NDA/CEUD project in 2020 explored the feasibility for use of the NDA UD curriculum during the development of the initial BIG IDEA trial that ran in spring of 2021, involving 500 students and 100 mentors. The BIG IDEA programme in 2022 grew to involving 2000 students and 400 participating mentors across all counties in Ireland. Impact review and feedback on the successful BIG IDEA programme has identified an opportunity to further embed Universal Design into the programme through collaboration on the development of additional creative process ideation phase materials for use in the programme.

The project partners developed a BIG IDEA Ideation Tool as a set of curriculum materials to support learning and step-by-step practice for design methods. The BIG IDEA Ideation Tool (now called the Creativity Card Kit) was integrated into The Big Idea 2023 programme for delivery to 4000-5000 students involving approximately 800 professionals as programme student project mentors.

### **SFI Public Service Fellowship**

The SFI Public Service Fellowship aims to link public-sector bodies with academic experts with a view to progressing projects of mutual benefit/interest. This year, NDA/CEUD were pleased to submit two suggested project ideas for this funding call. The first was in the area of Assistive Technology, the second dealt with the acoustics in electric vehicles. We received one submission for each of the proposals. Following an internal review, it was deemed that the proposal received on EV Acoustics was awarded, and the Fellow will commence work in conjunction with the NDA in early 2024.

### **Development of a Post Graduate Diploma in UD and the Built Environment**

To advance knowledge in Universal Design amongst engineers, architects, and other members of the design team, CEUD is working closely with Trinity College Dublin to develop a new Post Graduate Diploma in the Universal Design of the Built Environment. Currently, this is at proposal stage, however, the plans to date have been positively received by the Teaching and Learning Team at the University. It is envisioned that this course will commence in 2025. CEUD has been establishing international collaborations with Universal Design experts to develop course content and build a lecture team for the delivery of this course. This third level education course will develop knowledge and competency within planning, design and construction professionals to create buildings and public realms that are accessible to all. It will also build competency to appraise (access audit) the accessibility of buildings and provide solutions to improve accessibility. This programme will be the first of its kind in Europe and projected to see high national and international demand and interest. Engagement and work on development will continue throughout 2024.

### **Universal Design and Irish University Association (IUA)**

Over the years, CEUD has advised the Irish University Association (IUA) team during their projects on overall communications improvement, their DARE, HEAR and Campus Engage Programmes. Recently CEUD staff gave presentations for UCC that prompted IUA to request a presentation for a meeting of Heads of Communications for Higher Education Institutions (HEIs).

In June 2023 CEUD presented to a IUA meeting with HEIs about the Centre for Universal Design - what we do and how we feed into standards, the European Commission and other bodies. CEUD also spoke on our education programmes, our recent work with HEA and Engineers Ireland, what the statutory requirements are for Accessibility from Universal Design as it relates generally to organisations and more specifically to Higher Education, and resources that are available to the University Communications Teams – revised Toolkit and new publications on Universal Design for Education, etc. The meeting was attended by Heads of Communications across the 7 IUAs. During the Q&A, the HEIs expressed interest on how to seek additional information from CEUD to inform how they can implement accessibility in their organisation.

### **Guest lecture at TU Dublin, Interior**

CEUD staff presented to third year Interior Architecture students at TU Dublin as part of their Universal Design module. Part of the design brief for the students on this module is to enter their design projects into the UDGC built environment category.

### **Guest lecture at TU Dublin, School of Computer Science**

CEUD staff presented to second year Computer Science students at TU Dublin as part of their Universal Design module. Whilst this cohort is not eligible to enter the Universal Design Grand Challenge at this time, the lecture focussed on the applicability of Universal Design Principles in the development of websites.

### **Promote awareness through partnerships with professional awards programmes**

### **Presentation to Dun Laoghaire Rathdown County Council on Public Realm and Housing: Taking a Universal Design Approach**

CEUD's Senior Built Environment Design Advisor was invited by Dun Laoghaire Rathdown County Council to present a webinar to Council elected officials and staff in May, in relation to taking a Universal Design to the public realm and in housing. The presentation included a reminder of the obligations of public bodies in relation to the design of the built environment, under the Disability Act 2005. There were 112 participants at the webinar. Feedback was positive and another webinar was requested later in 2023.

### **Presentation to RIAI Housing Committee on Low-Rise Medium Density Housing**

In April 2023, CEUD's Senior Built Environment Design Advisor was invited along with other members of the RIAI Universal Design Taskforce to present to the RIAI Housing Committee on potential impacts of low-rise medium density housing developments on the provision of Universal Design homes. The presentation was well-received and generated extensive discussion at the Committee.

### **Presentation to GEM Housing Programme Students**

CEUD's Senior Built Environment Design Advisor presented to students of the GEM Housing Programme (A Global Initiative in promoting good design of housing <https://thegemprogramme.com/>) at a workshop in September. The title of the presentation was 'Universal Design Homes: What is working, not working and possible solutions'.

### **Panel Discussion on the Future of Inclusive and Special Education at the ETBI Conference**

CEUD's Senior Built Environment Design Advisor participated in a panel discussion at the ETBI conference in Cork on September, on the Future of Inclusive and Special Education. Other panellists were Joanne O 'Riordan, Dara Ryder (AHEAD), Martina Mannion (Department of Education) and Deidre Madden (UCC). The panel was chaired by Dr Johanna Fitzgerald (National Inclusion, Special Education and Research Coordinator at ETBI).

### **Guest Lecture to Interior Architecture Students at Griffith College**

CEUD's Senior Built Environment Design Advisor was pleased to be invited to present a guest lecture on Universal Design in the Built Environment to Interior Architecture students at Griffith College in October. The students were working on a project to design housing and a community space in an existing building, incorporating Universal Design. As well as attending the guest lecture, part of the student brief was to complete CEUD's eLearning module Buildings for Everyone: Central Bank of Ireland.

### **IDI Graduation Design Awards 2023**

CEUD has a partnership with the [Institute of Designers in Ireland](#) (IDI) to promote Universal Design among the design community. CEUD awards a 'Universal Design Award' to a student designer in the IDI Graduate Design Awards each year. This year, the [IDI Graduate Design Awards](#) took place in October 2023 in Belfast School of Art.

CEUD judges reviewed a total of 93 design entries to the Universal Design category. These entries were divided between Built Environment, ICT and Product and Services. A shortlist of possible winners from each category was then drafted. The judging panel then met to review the shortlist of entries and pick a winner.



This year the judges choose Artafact - Elevating Paper Creativity as their winning design. Artafact is a digital drawing board for paper-based creative work. It was designed by Lisa Moran a student from Southeast Technological University. The judges chose this as a winner because it was evident that user research had a significant impact on the design, including consideration of neurodiverse users. The entry also demonstrated clearly how its design meets the Universal Design principles, through its core styling as well as detail design features.



### NSAI Standards Forum and Awards Ceremony

In October 2023 [National Standards Authority Ireland](#) (NSAI) held their annual [Standards Forum and Awards](#) Ceremony. NSAI hosts this event to recognise the collaborative efforts of thousands of experts worldwide who volunteer their time to develop the technical agreements that are published as Irish and International Standards.

At this year's event the NDA and CEUD were recognised for their contribution to European Standardisation and Dr. Aideen Hartney and Dr. Gerald Craddock were present at the event to receive the award.



*The NSAI's Geraldine Larkin and James Kennedy present Dr Aideen Hartney and Dr Ger Craddock with the NSAI award which recognises the NDA's contribution to European Standardisation.*



## Universal Design Grand Challenge (UDGC)

This is the ninth time this event has been run. The UDGC is a competition for 3rd level students across the Republic of Ireland, in their final two years of study, to showcase Universal Design in action. Students have the opportunity to submit entries across 3 categories, which are:

- Built Environment
- Products and Services
- Technology

There is also a dedicated award sponsored by Enterprise Ireland which provides the winning entry with €15,000 in funding to expedite a feasibility study with a view to further commercialisation of their product. Lastly, audience members in attendance can vote in the People's Choice Award.

This competition was launched in April 2023, with a closing date for entries in June 2023. Following this, a panel of international experts judged each entry, after which CEUD created a shortlist of three entries in each category. For the first time since 2019, the awards night was an in-person event, which was co-located with the NDA Annual Conference for the first time in October 2023, at the Aviva Stadium.

The in-person event had an inspiring keynote address delivered by Dr Larry McNutt. The winners in the various categories are provided below, along with links to their entries.

- Built environment winner: [The Steam Mill, Wellness Centre, Skibbereen](#).
- Products and Services winner: [TremTrack](#)
- Technology winner: [Leva App & Buddy](#)
- Enterprise Ireland Commercialisation winner: [TremTrack](#)
- People's Choice winner: [TremTrack](#)



*The category winners at the 2023 Universal Design Grand Challenge*



*The judging panel at the 2023 Universal Design Grand Challenge*



*Attendees at the 2023 Universal Design Grand Challenge*



### **Presentation to Heads of Computer Science Departments**

In September 2023, CEUD was pleased to be invited to present to the heads of computer science departments from across the Higher-Education sector in Ireland. With the increasing presence of AI, and the imminent arrival of the European Accessibility Act, this represented an excellent opportunity to outline the work of CEUD, and the importance of ensuring that Universal Design plays a prominent role in the design of teaching and learning activities, as well as the infrastructure which underpin their delivery. CEUD very much looks forward to further engagement with colleagues across this sector.

### **Attendance at AAATE Conference 2023**

CEUD was pleased to participate at the 17th conference of the AAATE (Association for the Advancement of Assistive Technology in Europe) which took place in Paris in Q3 2023. Team members contributed to a workshop hosted by the Accessible Hub which brought key stakeholders in the education sector together to discuss how better inclusion might be achieved, and how the European Accessibility Act might facilitate this.

There were over 250 attendees online, and in excess of 100 in person at the event. Members of CEUD presented work on promotion of Universal Design across the Higher Education sector, and also presented work undertaken as part of the BIG IDEA project at second level.

CEUD also chaired, and presented in, two other sessions on Universal Design in Education as part of the main conference event. Our paper, detailing Universal Design across the educational continuum was very well received, with several enquiries for possible collaborations ensuing from it.

During the course of the conference a number of links were also made on advancing our work on advice and training that will be required on implementing the EAA such as the Mobile & Wireless Forum (MWF, [www.mwfai.org](http://www.mwfai.org)) an international association of companies with an interest in mobile and wireless communications including the evolution to 5G and the Internet of Things (IoT).

### **RIAI Universal Design Award 2023**

CEUD has been supporting the RIAI to run a Universal Design category in its annual award scheme since 2013. This year, in a step towards mainstreaming the award, all submissions in every category in the awards scheme were required to include a short statement on 'how good practice in accessibility, inclusion and Universal Design has been achieved and how the project can be used easily, safely, with dignity and enjoyed by all.' In addition, the Universal Design Taskforce was requested to nominate one member to sit on the main jury for the awards. This is an important step in the RIAI acknowledging that Universal Design is an integral part of quality architecture. CEUD's Senior Built Environment Design Advisor was nominated to sit on the RIAI main award jury for 2023. This work included short-listing buildings, visiting buildings, and inputting into the decisions on awards in all categories.

CEUD invited architect Nicola Ryan to chair the Universal Design Award subgroup. CEUD's Senior Built Environment Design Advisor sat on the Universal Design Award Subgroup, which included visiting short-listed buildings and inputting into the subgroup decision on the Universal Design category award.

### **Webinar with Nicola Ryan on Designing with Empathy: Universal Design Homes to benefit everyone**

In June 2023, CEUD organised a webinar aimed at RIAI members, as part of its support to the RIAI on the annual RIAI Universal Design Award. The webinar was provided by Nicola Ryan of Studio Red Architects. She presented four case studies of her work on inclusive housing solutions, including a House at Chapelizod, which was highly commended in the Universal Design category of the RIAI Architecture Awards 2022. There were 88 participants at the webinar. Feedback was very positive, including a request for more webinars of that nature. The webinar is available on the CEUD's Youtube channel.

### **Introduction to Universal Design Lecture**

CEUD returned to deliver an online 'Introduction to Universal Design' guest lecture to the [Master of Science in Design and Innovation | ATU - Atlantic Technological University](#). The course won an [Irish Education Award](#) in 2022.

Most of the students are currently employed in the MedTech sector, mainly in technical or engineering roles. One of the students has a background in sociology, one student has a security alarm system business and two are lecturing staff. The class had recently begun doing research for a team based, design challenge in the area of helping people living with Alzheimer's and their carers.

The lecture was comprised of an overview of the Universal Design Principles, its definition, background, associated drivers and examples of applications. A tour of the CEUD website identified a range of resources useful to the students in their course projects and their careers onward. The students were invited to engage with the CEUD awards and standards development activities.

### **Presentation to Indian Institute of Technology**

In April 2023, CEUD presented to Prof. Gaurav Raheja and his PhD student Divyang Purkayastha from the Indian Institute of Technology. Divyang is doing his doctorate on Inclusive Public Sanitation. Gaurav was interested in visiting CEUD as he is currently supporting the development of Laboratory of Inclusive Design in his department at Indian Institute of Technology.

Both Gaurav and Divyang were interested in learning more about the Universal Design Guidance that has been developed by CEUD.

## Guide and advise on Universal Design of technological solutions to foster inclusive and sustainable communities

### CEUD Meetings with Google UK and PEARL UCL

CEUD Staff travelled to London to meet with Christopher Patnoe (Google- Head of Accessibility and Disability Inclusion, EMEA) and Prof. Nick Tyler (UCL- Director of PEARL and Transport Studies)

First, CEUD met with Christopher in Google at the Accessibility Discovery Centre (ADC). The ADC in Google UK is a space where Google engineers, researchers (internal and external), product teams and Google's external partners (such as TfL, Dyson, the NHS) can build new kinds of accessible technologies to remove more of the barriers faced by persons with disabilities. The ADC was developed by Google with local partnerships like the Royal National Institute of Blind People, the Royal National Institute for Deaf People and Everyone Can, and Google's internal Disability Alliance employee resource group. The Centre is open to the public and weekly tours are provided. CEUD staff were there to learn more about what the centre does, their experiences of setting up this centre and to discuss the possibility of a similar centre being established in Google's offices in Dublin.

CEUD also met with Prof. Nick Tyler in UCL PEARL (Person-Environment-Activity Research Laboratory), a unique facility to explore the ways in which people interact with their environment. PEARL is a new centre; built around 2 years ago. Funding for the project of 50 million Sterling came from UCL and UK Government. PEARL is in a large space in Dagenham – 4,000m<sup>2</sup> and 10m high – in which Nick and his team can create life-sized environments – a railway station, high street, town square – under controlled conditions, so that they can examine how people interact with the environment and other people in these types of places.. CEUD staff were there to learn about the lab space, the experiments currently being done and examine potentials for future collaborative projects.

# Strategic Priority 4

The background of the slide features a series of overlapping, semi-transparent geometric shapes in various shades of purple and magenta. These shapes, which include rectangles and trapezoids, are arranged in a way that creates a sense of depth and movement, with some shapes appearing to float above others. The overall composition is modern and minimalist.

## Strategic Priority 4:

**“Foster strong and open processes for engaging and consulting with persons with disabilities and the wider disability community”.**

**Enhance internal processes for consultation and engagement with persons with disabilities across the NDA’s work programme, including increased use of alternative approaches such as applying a universal design approach and inclusion of persons with disabilities as co-researchers.**

### Review of attitudes to disability

The NDA conducted National Surveys on Public Attitudes to Disability in Ireland in 2001, 2006, 2011 and 2017. While there have been some variations in attitudes over time, the NDA surveys found them to be relatively stable with the more negative attitudes towards people with mental health difficulties and the more positive attitudes towards people with physical disabilities persisting. In 2022, as the next attitudes survey was due, the NDA decided to review whether a public attitudes survey to disability was the optimum approach to take in terms of measuring attitudes. The findings of the review were shared with the Authority in 2023 and the recommendations approved.

The findings of a [literature review on methods used to measure attitudes towards disability](#) along with a literature review on attitudes published in 2022 found that attitudes generally tend to vary little over time. As the survey series on public attitudes to disability has been running since 2001, it is arguable that the potential for additional research insights that can be derived from the series may have reached a point of diminishing returns. A general consensus found through the methods review is that approaching the measurement of attitudes in a direct manner may be overly simplistic and does not provide a full picture of attitudes. The ESRI work on attitudes found that indirectly measuring attitudes to disability shows that there is some bias, likely social desirability bias, shaping responses in the direct face-to-face questions that the NDA has historically asked in its attitudes survey series. This finding suggests that the substantive results of this attitudes survey series may not fully reflect societal attitudes to disability.

Based on the findings from the review the NDA decided to discontinue the five yearly attitudes surveys but to continue to conduct some research in this area as, in line with the UNCRPD, all legitimate approaches to removing barriers – including attitudinal ones - to inclusion and participation must be used.



**Provide guidance and information to public sector bodies to progress a culture of meaningful engagement with persons with disabilities.**

## **Launch of new guidance for conducting collaborative research with disabled people**

The NDA published [Collaborative Research with Disabled People: Guidance for Researchers](#) in October 2023 at an online launch event.

This guidance is a practical resource to support researchers to meaningfully involve disabled people throughout the research process. The guidance was informed by a [Literature Review](#) and a series of consultations with representatives of Disabled Persons Organisations (DPOs), disabled individuals, researchers and other stakeholders.

Although aimed at researchers, the guidance is also a useful resource for disabled people who are interested in getting involved in research and for organisations who wish to support their members to get involved in research. An Easy-to Read version and an Irish Sign Language summary of the report are also available on the [NDA website](#).

## **Evaluation of the Disability Participation and Consultation Network**

In 2020 the Department of Justice and Equality set up a Disability Participation and Consultation Network (DPCN) to facilitate participation by persons with disabilities in the policy development process. In November 2022, the Department of Children, Equality, Disability, Integration and Youth requested that the National Disability Authority carry out an independent evaluation of the DPCN. To conduct the evaluation the NDA interviewed stakeholders, reviewed relevant international examples, policy and legal frameworks (including the UNCRPD and UNCRPD Committee's General Comment Number 7) and administrative information.

The report concludes that the design of the DPCN, which consisted of Disabled Persons Organisations (DPOs) other non-DPO organisations and individuals was not aligned with the requirements of the UNCRPD and that it created practical challenges for the operation of the DPCN, particularly in the area of consultation. The report recommends that:

- a mechanism consisting of Disabled Persons Organisations (DPOs) only is established through a process of co-creation with DPOs
- DPOs are supported to develop their capacity to input into policy design and monitoring processes
- Departments and state agencies need to improve their understanding of their obligations under the UNCRPD to consult with people disabilities and the role of different stakeholder groups in consultation processes

- consideration will need to be given to how the voices of seldom heard people with disabilities (children and young people, people with intellectual disabilities people with dementia for example) can be included in policy discussions.

The [final evaluation report](#) was published in December 2023.

**Hold annual, thematic events to hear directly from persons with disabilities and their representative bodies, while continuing to carry out focused consultation on specific projects to inform NDA outputs**

### Consultation on a new National Disability Strategy

The Department of Children, Equality, Disability, Integration and Youth (DCEDIY) requested that the NDA support them in managing the consultation on a successor strategy to the National Disability Inclusion Strategy. The consultation was run between November 2023 and February of 2024. It consisted of a number of strands, including a survey for disabled people, a survey for carers, thematic focus groups, focus groups for seldom heard groups, bespoke consultation with hard-to-reach individuals (people with intellectual disability and autism) and with children and town hall events. In addition, video or written submissions were invited. Multiple formats were made available for the survey. Disabled Persons Organisations (DPOs) were particularly targeted in the consultation with DCEDIY holding regular meetings with DPOs and strong DPO engagement in the other consultation strands. A consultation report will be published along with the strategy in mid-2024 and the process to develop the content for the Strategy will be informed by this consultation process.

### NDA Listening Session

On 24 May 2023, the NDA hosted an online listening session to hear directly from disabled people and their representative organisations on the theme of 'Awareness Raising'. The theme of this session was based on Article 8 of the UNCRPD. Twenty-seven participants attended, the majority of whom had a disability. The first part of the listening session featured keynote speakers with lived experience of disability and representing DPOs who addressed issues around awareness raising. A small discussion group (eight participants) then followed where people shared their lived experience of awareness raising and made suggestions on how to make communities and society more aware of the issues facing disabled people. In summary, participants addressed the importance of a range of issues including the following:

- The need for a full and complete understanding of Article 4.3 of the UNCRPD and General Comment 7
- Increased and direct funding for DPOs to deliver training
- Moving beyond disability awareness training to disability equality training
- The need for a better understanding of what a DPO is, and what they do
- The need for better representation of disabled people in the media
- The need for more funding opportunities for disabled writers

The learning from the event has been shared with the Minister of State for Disabilities, department officials and will be used to feed into the new National Disability Strategy. Given the lower-than-expected numbers participating the NDA are considering different ways of running the 2024 event.

### NDA Annual Conference

The National Disability Authority Annual Conference 2023 took place on Thursday, 26 October 2023. It was a hybrid event with the in-person element held in the Aviva Stadium. The theme was: Guaranteeing the equal participation of disabled people in political and public life in Ireland (UNCRPD Article 29). The Conference was opened by the Minister of State with responsibility for Disability, Ms Anne Rabbitte TD, who highlighted the right to democracy and the right to participate during her speech.

The 2023 Conference focused on issues in relation to accessible voting and the public and political representation of disabled people in Ireland. The event brought together disabled people, public officials (including officials from the newly established Electoral Commission) and elected representatives to discuss barriers faced by disabled people and proposed solutions. It examined international practices relevant to this theme and presented learning from other countries which could inform potential solutions to address the challenges and barriers faced. It was a very full programme, featured a huge range of presentations and received a very positive reaction from the audience in the room and online. [Recordings of all the conference sessions](#) are available on the NDA website.



*Siobhán McKenna, Head of Equality, Diversity & Inclusion at the Public Appointments Service, Sinéad Friel, Chairperson, National Advisory Council of Down Syndrome Ireland and Suzy Byrne, Regional Manager, National Advocacy Service for People with Disabilities at a panel discussion at the Conference*





*The Minister of State with responsibility for Disability, Ms Anne Rabbitte TD, the NDA Chairperson, Ms Kathryn O'Donoghue and the NDA Director, Dr Aideen Hartney, at the Conference*



*Nellika Valder, Deputy Head of the State Electoral Office of Estonia, speaking at the Conference*

## Someone Like Me Art Competition

“Someone Like Me” is an annual primary schools’ art competition, now in its eighth year, organised by the NDA as a way of developing children’s awareness and understanding of disabilities.

### Competition Review

The NDA conducted a review of the Someone Like Me Competition to examine how this project has performed both in terms of value for money, the reach of the competition and how effective it has been in raising awareness about disability. The review was finalised in 2023.

The review was conducted in two phases. Phase one took place in 2021. The NDA contracted a third party to evaluate the competition to gauge its success in terms reach and effectiveness in raising awareness about disability. The review took a mixed methods approach including stakeholder interviews and surveys with both participating and non-participating schools. Schools that entered were positive about the competition, indicating it promotes diversity and a better understanding of disability as well as providing a forum to discuss disability issues. Schools that did not participate cited time constraints and not remembering receiving the competition details as reasons for non-participation. A brief review of other school-based initiatives was conducted but because of different approaches a direct comparison was not possible. Phase one recommended continuing the competition but with some improvements to increase the reach of the competition.

As Phase One did not capture the voice of children or Disabled Persons Organisations (DPOs), this was included in Phase Two. It also looked further at other school-based initiatives and associated literature, included another survey of teachers and looked at potential collaborations with other NDA school-based activities.

In general, DPOs were in favour of continuing the competition and provided some recommendations. Children also provided positive feedback and explained how they took inspiration from people they knew with disabilities for their competition entry. We also analysed a sample of class worksheets noting that the concept of accessibility only stretched as far as the physical environment. There was also a persistent message coming through the worksheets that disabled people are fragile and sensitive. While there were good intentions behind this it can send the wrong message that disabled people are sensitive and should be treated differently. The teachers’ questionnaire found that knowledge of disabilities increased and most noted a difference in their pupils’ attitudes. The Yellow Flag Programme and ‘Ability Week’ were explored and both were found to be very positive programmes. Potential parallels with the NDA’s Power of Design primary school programme were identified.

The main recommendation from the review was to continue the competition with some modifications for at least another five years. In that time we aim to grow the competition by 0.5-1% per year in terms of the number of schools participating. This proposal was approved by the Authority.



### 2022/2023 Competition

Real Nation was successful in a tender to run the competition for 2022-2023. The competition was launched in September by the Minister of State for Disability, Anne Rabbitte, TD. By the closing date of 10 November 2022, over 2,000 entries had been received, from 208 schools. This was a 21% increase on the previous highest number of schools entered and a 54% increase on the number of schools entered in 2021-2022. There was also a 44% increase in PR coverage. In January an in-person prize giving event, following two years of virtual events due to COVID-19, took place in the Rotunda of Dublin's City Hall. A national highly commended award went to First Class in Our Lady Immaculate Junior National School from Darndale, Dublin 17 and the overall national prize went to Jake Hoen Galvin from 4th class in Lisnagry National School, Limerick. The event was covered in national and local media.



*Jake Hoen Galvin with his winning entry at the award ceremony*

### BT Young Scientist – NDA sponsored award

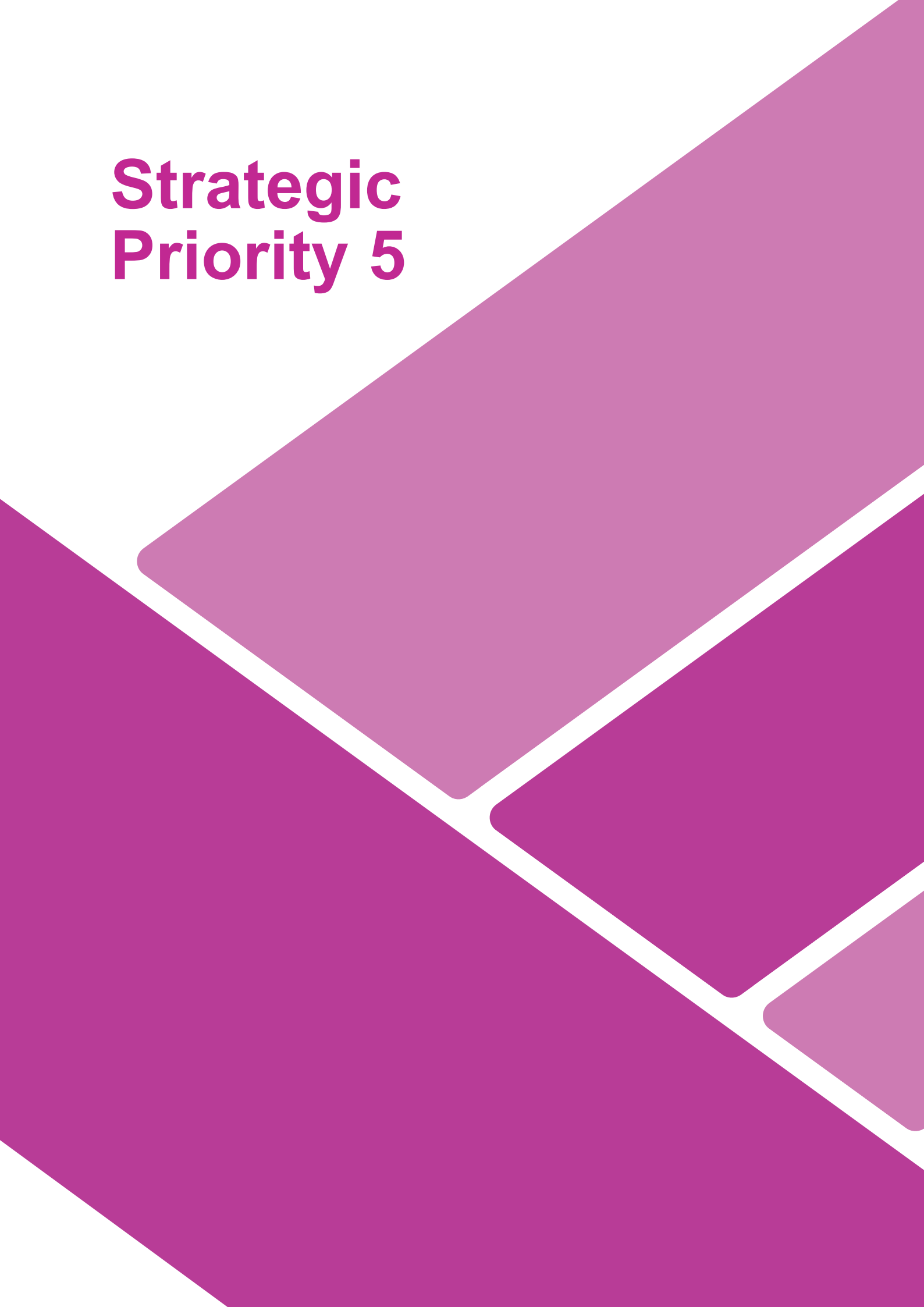
The 59th BT Young Scientist competition took place between 12th and 14th January 2023 and the NDA sponsored an award category with the intent of recognizing projects with relevant to disability and/or Universal Design. The winning project was 'the Effect of Ageing on Balance' which was an investigation into the effects of ageing on balance and a comparison between the balance of different age groups using a series of different tests. The award was made by the NDA's Director to April Conroy, Jessica Fergus and Kathleen Campbell who were all students in St Vincent's Secondary School in Co. Louth. The NDA committed to sponsoring an award in the 2024 competition and plans on also having an exhibition stand.



*Dr Ger Craddock with BTYSTE 2024 National Disability Authority Award winner Luke Blackwell from CBS Thurles.*



# Strategic Priority 5



## Strategic priority 5:

“Maintain and enhance organisational effectiveness”.

### NDA Website

During 2023 work on re-developing the [universaldesign.ie](https://universaldesign.ie) website progressed, and a new website was launched on December 7th. The new website is more visually appealing, easier to search and has a more logical positioning of information. The revised [nda.ie](https://nda.ie) website launched in 2022, was the best performing website among public body websites assessed as part of the Web Accessibility Monitoring in 2023.

### Staff Resources

In accordance with section 27 of the National Disability Authority Act 1999, the NDA is the employer of its staff. The Executive, led by the Director, implements the strategy, annual work plan and policies of the National Disability Authority on a day-to-day basis.

As of 31 December 2023, the National Disability Authority had 42 staff. The NDA's payroll, pension and travel and subsistence processing is provided by the Payroll Shared Service Centre of the Department of Public Expenditure and Reform. The NDA facilitates communication on key issues between management and a recognised trade union that represents NDA staff interests.

The Executive consists of three sections:

- Policy, Research and Public Affairs;
- Centre for Excellence in Universal Design and Standards & Monitoring;
- Corporate Services

The Heads of these three sections, reporting to the Director, comprise the senior management group.

#### Senior Management at 31 December 2023

Director	Dr Aideen Hartney
Head of Policy, Research and Public Affairs	Dr Rosalyn Tamming
Chief Officer, Centre for Excellence in Universal Design and Standards & Monitoring	Dr Ger Craddock
Head of Corporate Services	Suzanne Lambe

## Training and Development

The NDA continued to roll out a training and development plan for staff informed by the Performance Development Management System (PMDS) and individual needs, which included attendance at seminars, conferences, webinars, training sessions and workshops. A number of training courses and workshops were scheduled internally for staff including:

- Optional Coaching Sessions for Grade3/4/CO/EO Staff following completion of Development Programme
- Nvivo Training
- One Drive
- MS Intro & BI
- Interviewing Vulnerable People
- NDA Website Admin Training
- Health and Awareness Education

The following is an example of some of the external training and development opportunities availed of in 2023:

- Smart Mobility Conference
- Data Analytics and Visualisation
- Housing Ireland Conference
- Accessibility and Universal Design
- Design for Sustainability and Circular Economy
- Employment Law
- Pension Training
- Business Writing Skills
- Drafting & Reading Contracts
- Effective Public Speaking
- Data Sharing and Governance
- Minute Taking
- Core Skills for Clerical Officers
- Cybersecurity and Risk Management
- Microsoft 365
- Policy Development, Legislative Drafting and Delivery
- Accounting
- Enforcement for Public Bodies
- Interview Preparation Training

All new staff carried out the following training:

- NDA Disability Equality eLearning
- Protecting Data When Home Working eLearning
- Return to Work Safety Protocol
- Protected Disclosure (Whistle Blowing) Training

Health & Safety Training consisted of:

- Display Screen Equipment (DSE) Assessment
- Ergonomic Assessment
- First Aid Responder

### **Governance and Financial Reporting**

The National Disability Authority is committed to attaining the highest standard of corporate governance within the organisation. The overall governance and control framework within the National Disability Authority is guided by compliance with the NDA Act 1999 and the provisions of the Code of Practice for the Governance of State Bodies (2016).

During 2023, given the ongoing implementation of the NDA's Blended Working policy, particular emphasis continued on monitoring the control environment operating in the NDA, focussing on financial and data management.

An Oversight and Performance Framework Agreement was established between the National Disability Authority and the Department of Children, Equality, Disability, Integration & Youth. The 2023 Performance Delivery Agreement detailed the high-level goals and objectives, as well as the key programme of activity that the NDA committed to for 2023.

Internally produced financial reports showing details of expenditure against the agreed budget were reviewed by the Finance Committee and the Authority on six occasions throughout the year (through management accounts and budget updates). The management accounts were also shared with the Audit & Risk Committee throughout the year. In accordance with the National Disability Authority Act 1999 and the Code of Governance for State Bodies 2016, the NDA prepared and submitted draft financial accounts for 2023 to our parent department and the Comptroller and Auditor General. The Financial Statements of the NDA for the year ended 31 December 2023 have been prepared under FRS102, the Financial Reporting Standard applicable to the UK and Ireland issued by the Financial Reporting Council (FRC). The NDA will submit the approved financial accounts for 2023 to the Minister.

## Risk Management

The effective management of organisational risk requires robust control processes to support the Authority and the Executive in achieving the NDA's objectives. Risk and control functions are established in the role of Audit & Risk Committee appointed by the Authority, who review performance, risk matters including policy and practice.

The risk environment for the NDA is monitored and considered by the Senior Management Group at regular intervals and is a standing item on the agenda for each Authority meeting. The NDA has an established Risk Register which is reviewed and approved at regular intervals by the Audit & Risk Committee and Authority, as appropriate. The Authority has a designated Chief Risk Officer and has developed and approved the organisation's Risk Appetite Statement.

In line with the requirement under the Code of Practice for the Governance of State Bodies to publish top risks, and reflecting on key priorities of the organisation, the following were identified as the potential risks that could negatively impact the NDA during 2023:

1. Risk of insufficient capacity to respond to increased demands in the delivery of Statutory and operational functions of NDA especially in a challenging employment market.
2. Risk of incapacity to deliver on new functions such as European Accessibility Act (EAA) transposition, without additional resources.
3. Risk of disruption due to Cyber-attack.

## Authority 2023

The Authority of the NDA consists of a Chairperson and 12 ordinary members. The Authority met 6 times during 2023. A schedule of 2023 attendance, fees and expenses is set out in the Governance Statement. The Authority conducted a self-evaluation of its performance in 2023 in line with the Code of Practice for the Governance of State Bodies (2016). Recommendations from the previous evaluation process (2022) were progressed throughout the year.



*Minister for Children, Equality, Disability, Integration and Youth Roderic O'Gorman and Minister of State with responsibility for Disability, Ms Anne Rabbitte with the NDA Authority at their September 2023 meeting*

### Internal Audit

Following their appointment through a tendering process in 2021, Crowleys DFK continued in 2023 to provide the NDA with a suite of Internal Audit services agreed with the Audit & Risk Committee and approved by the NDA Authority in 2022.

### Oireachtas members' enquiries

In accordance with DPER Circular 24/2016, the National Disability Authority provided a dedicated enquiries email address [OireachtasReps@nda.ie](mailto:OireachtasReps@nda.ie) for members of the Oireachtas seeking information on matters pertaining to the work of the NDA.

### Public Sector Duty

The Irish Human Rights and Equality Commission Act (2014) requires that the NDA conduct an assessment of the human rights and equality issues it believes to be relevant to the functions and purpose of the NDA; set out the policies, plans and actions in place or proposed to be put in place to address those issues; and report on developments and achievements regarding the Public Sector Duty in its annual report. The NDA has developed a work-plan on the Public Sector Duty and during 2022 we reviewed our progress against the workplan. Of the sixteen actions nine were complete and seven were partially completed. During 2023 we worked on a revised action plan by amending some actions to better reflect our current operations and adding new actions. A key aim is to have a smaller number of more focused actions. Key highlights in 2023 were securing funding to advance works to improve the safety and accessibility of the NDA building and launching our guidance on the inclusion of people with disability in research as co-researchers rather than just as research participants.

### Health and Safety

The NDA is committed to ensuring the well-being of its employees by maintaining a safe place of work and ensuring compliance with the requirements pursuant to the Safety, Health and Welfare at Work Act 2005 (as amended). The NDA's Health and Safety Committee continued to support monitoring and guidance on Health and Safety matters during 2023. A Health & Safety Advisory Audit was conducted by the NDA's internal auditors in Q3 2023. The final report is due in early 2024, following which any recommendations will be enacted.

### Disability Act 2005

Under Part 5 of the Disability Act 2005, public sector bodies are required to report on their level of employment of persons with disabilities. As per the last staff census, the percentage of NDA employees with a disability, under the definition in the Disability Act 2005, was 23% for 2022.

The NDA has taken all reasonable measures to promote and support the employment by it of persons with disabilities, for example: providing an accessible work environment, including Work Station Assessments, with further remote work station and ergonomic assessments conducted in 2023.



### **Library and Information Resource**

During 2023 a review of the library was undertaken, and a decision made to reduce the holdings in our physical library. Much of the material in the library is available electronically and considerable information is out of date. The process of reducing the physical stocks is ongoing. Books and documents of historical importance and particularly those from the National Rehabilitation Board and the NDA are being retained. As the NDA no longer has a librarian, we have a contract with Trinity College Dublin who provide articles to us electronically on request and also provide supports in relation to literature searches. This process is working well and there have been no disruptions to research activities as a result of this change.

### **Accommodation and Facilities**

The NDA's Corporate Services Department is responsible for maintaining a safe and efficient premises. During 2023 Accent Solutions (now trading as Neylons Facility Management) entered its third contracted year in providing an integrated facility management service. Over the course of the year a programme of preventative maintenance continued as well as commissioned works to ensure the effective maintenance and use of its accommodation.

Electrical works began in November 2021, as part of a building works program which consists of electrical, accessibility and refurbishment work, were completed in summer 2022. Following this, the NDA appointed an Architectural firm to conduct a feasibility study for access and refurbishment works. Following a planning application submitted to Dublin City Council being granted in May 2023, a design team were appointed to progress the building improvement works. The team's consultative process, which included meeting with a working group comprised of staff from across the NDA, will result in final designs being presented in early 2024. A Request for Tender for construction services will issue shortly after. Due to the cost of the works, it will be necessary to progress on a phased basis over a number of years.

Since 1 July 2015 the NDA has had a lease agreement in place with tenants for a number of offices, from which the income is accrued as Appropriations in Aid to the Department of Children, Equality, Disability, Integration and Youth. Income was transferred to the Department as appropriate in 2023. This lease expired in 2023 and the offices are currently vacant. The NDA envisages using the offices in 2024 during periods of construction so as to minimise staff disruption.

### **Energy**

The NDA Corporate Services Department registers and maintains records for the National Disability Authority with the Sustainable Energy Authority of Ireland.

The National Disability Authority has a total floor area of 2,633 m<sup>2</sup> which comprises a two-storey over garden level Victorian Building (×2), a link building completed in 2006 and an adjoining three-storey plus attic building completed in the early 1980s.

The main energy users are:

Electrical Energy: Lighting, ICT & Offices

Thermal Energy (Natural Gas): Space Heating (LTHW radiator circuits and under floor heating) and Hot Water (HWS).

For the purposes of making a statutory return for 2023, xx% of electrical energy use in the buildings was attributable to the National Disability Authority. In relation to thermal energy, xx% of the natural gas used was attributable to the NDA.

In 2023, the National Disability Authority consumed xx kWh of energy, consisting of:

- xx kWh of electricity;
- xx kWh of fossil fuels;
- 0 kWh of renewable fuels.

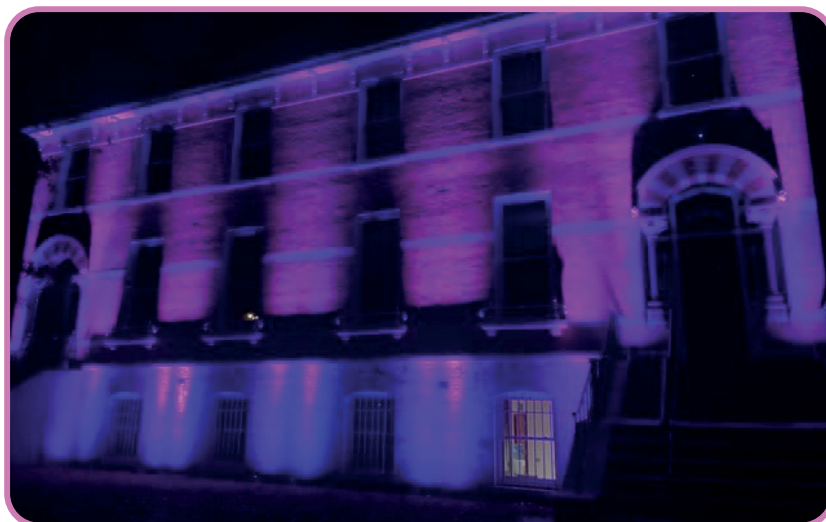
The NDA can report a:

- xx% cost savings since baseline;
- xx% lower consumption since baseline.

### **Actions undertaken in 2023**

In 2023, the NDA undertook planning and implementation of a range of initiatives to improve our energy performance, including:

- Continued Energy Awareness - SEAI Annual Public Sector Energy Conference 2022
- Implemented recommendations from 2021 Energy Audit Review



*The NDA lit up its offices in purple as part of the International Day of Persons with Disabilities on December 3rd 2023*

### **Access Officer**

The NDA's Access Officer, appointed in line with the Disability Act 2005 continued to be available to guide on any assistance required for persons with disabilities who accessed the NDA's facilities, events and website in 2023. The Officer's contact details are on the home page of the NDA's website.

### **Code of Conduct, Ethics in Public Office, Additional Disclosures by Authority Members and Protected Disclosures**

For the year ended 31 December 2023, the NDA can confirm that a Code of Conduct for the Authority and staff members was in place and adhered to. Furthermore, all Authority members and relevant staff members complied with their statutory responsibilities under the Ethics in Public Office legislation.

As a public body, the NDA is required under section 22 of the Protected Disclosures Act 2014, to publish an annual report in relation to the number of protected disclosures made to it in the preceding year, and the action taken in response to any such protected disclosures.

No protected disclosures were made to the NDA in the period 1 January to 31 December 2023.

### **Data Protection/Freedom of Information**

The NDA received five Freedom of Information (FOI) requests in 2023 of which two were part-granted with some redactions and three were refused as not meeting the criteria to be a valid FOI request. All were dealt with within the statutory timeframe.

During 2023, the NDA continued a programme of work to ensure its compliance with the General Data Protection Regulation (2018) and its related risks mitigated. This included updating and developing key policies and procedures as appropriate as well as having a Data Protection refresher seminar for all staff. An Advisory Audit on GDPR policies and procedures was conducted in 2022 with the resulting recommendations being actioned in 2023.

# Appendices

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# Appendix 1: Authority and other committees in 2023

Name:	Role:	Appointment Date:
Kathryn O'Donoghue	Chairperson	August 2018*
Jack Kavanagh	Member	August 2018*
Cathal Morgan	Member	August 2018*
Rebecca Gageby	Member	November 2022
Deirdre Sheehan	Member	November 2022
Bernadette Egan	Member	November 2022
Adrian Carroll	Member	November 2022
Eltin Ryle	Member	November 2022
Thomas Maguire	Member	November 2022
Lorraine Lally	Member	November 2022
Jane Ann Duffy	Member	November 2022
Vivian Rath	Member	November 2022
Niamh Fawl	Member	January 2021
Roderick Bond	Member	December 2023

\*Authority members currently serving a second term.

Bernadette Egan, appointed to the Authority in November 2022, resigned her position in October 2023. The Minister for State with Special Responsibility for Disability Anne Rabbitte appointed Roderick Bond as her replacement in late 2023, as per the table above.

## Audit and Risk Committee

Name:	Role:	Appointment Date:
John Fitzgerald	Chairperson	March 2017*
Tony Fitzpatrick	Member	June 2017*
Tim Maverley	Member	August 2018*
John Maher	Member	August 2018*
Rebecca Gageby	Member	December 2022
Thomas Maguire	Member	December 2022
Adrian Carroll	Member	December 2022

\*Audit & Risk Committee members currently serving a second term.

### Finance Committee

Name:	Role:	Appointment Date:
Rebecca Gageby	Chairperson	December 2022
Thomas Maguire	Member	December 2022
Deirdre Sheehan	Member	December 2022
Lorraine Lally	Member	December 2022
Gary Watters	Member	December 2022
Niall Scanlon	Member	February 2023

### Director Performance Committee

Name:	Role:	Appointment Date:
Kathryn O'Donoghue	Chairperson	November 2022
Jack Kavanagh	Authority Member	August 2018*
Cathal Morgan	Authority Member	November 2022
Bernadette Egan	Authority Member	November 2022

\*Director Performance Committee member currently serving a second term.

Bernadette Egan was a member of the Director Performance Committee, up until her resignation from the Authority, in October 2023.



## Appendix 2: Representation on external bodies in 2023

### Department of Housing, Local Government, and Heritage and associated agencies

- National Housing Strategy for Disabled People 2022-27 National Implementation Steering Group (DHLGH)
- Working Group on Accessible Voting (did not meet in 2023)
- Irish Water Stakeholder Forum
- Working Group on the provision of a Changing Places Facility

### Department of Children, Equality, Disability, Integration and Youth and associated agencies

- AIM Project Team
- AIM Cross-Sectoral Implementation Group
- TÚSLA – Early Years Inspectorate Forum
- Employer's for change Strategy Group
- Comprehensive Employment Strategy Implementation Group (didn't meet in 2023)
- Participation Unit's Disabilities Working Group
- Equality Data Strategy Group (led jointly by DCEDIY and CSO)
- HSE Disability Services National Quality Improvement Governance Review
- HSE Digital and Assistive Technology Committee
- HSE Person-Centred Planning Framework Implementation Subgroup
- HSE New Directions National Implementation Group
- Personalised Budgets Implementation Oversight Group
- Health Research Board (HRB) National Ability Supports System (NASS) Committee
- DCEDIY Disability Services Stakeholder Advisory Group
- Interim DCEDIY Research Ethics Committee

### Department of Education and associated agencies

- National Council for Special Education Consultative Forum
- NCSE Research Sub-committee
- EPSEN Act Advisory Group
- NCSE expert advisory group on modelling of future special class capacity

### **Department of Further and Higher Educational Research, Innovation and Science and associated agencies**

- Sainghrúpa athbhreithnithe oiliúna SOLAS
- An Grúpa Comhairleach 'Foghlaim a Bhunathrú chun Feabhais, Cuimsiú a Chothú' de chuid SOLAS um Thodhchaí an Bhreisoideachais agus na hOiliúna

### **Department of Social Protection Social Inclusion Division Technical Advisory Group on Data and Statistics**

- Disability Stakeholders Forum

### **Department of Health and associated agencies**

- HIQA Advisory Group developing Overarching Standards for the Care and Support for children using Health and Social Care Services
- HSE Disability Services National Quality Improvement Governance Review Committee on the Review of Part B Fire Safety
- Department of Health's Protection of Liberty Expert Advisory Group

### **Other**

- Dublin Regional Skills Forum
- IDS TILDA (Intellectual Disability Supplement of the Longitudinal Study on Ageing) Steering Committee;
- An Garda Síochána – Strategic Human Rights Advisory Committee
- National Standards Authority of Ireland (NSAI) Universal Design Standards Consultative Committee (NSAI TC023) and its subcommittee and working groups
- The European Committee for Standardization (CEN) Technical Committees (TCs): CEN TC452 (and its workings groups (WGs)), CEN TC320, CEN TC228 WG14, CEN TC 293 WG12, CEN-CENELEC Standardisation Request Ad-hoc Group-Accessibility (SRAHG-ACC) for M/587
- Council of Institute of Designers in Ireland • UCD AHEAD Steering Group on the development of a Digital Badge in Universal Design for Student/Learner Support & Engagement
- UCC ID+ project to support access to HE for learners with Intellectual Disabilities
- EU funded Erasmus + project " Neurodiversity at Work (NEW)"
- Senior Official's Group on Transport

## Appendix 3: Publications in 2023

- [Review of UNCRPD Article 29 on participation in political and public life.](#)
- [Independent Evaluation of the Disability Participation and Consultation Network](#)
- [How's it going? Wellbeing and Social Inclusion Survey Report](#)
- [I don't know where to start": Survey respondents' views about barriers to participation in social and leisure activities](#)
- [Monitoring Report on Section 26 Disability Act - Access Officers](#)
- [Collaborative research with disabled people: Guidance for Researchers](#)
- [NDA Independent advice on the provision of Career Guidance in schools for learners with disabilities in Ireland](#)
- [Literature Review of Career Guidance for Learners with Disabilities in Second Level Education](#)
- [A literature review of methods used to measure attitudes towards disability](#)
- [Report on The Care of Older Adults with Intellectual Disabilities and Complex Age-Related Conditions](#)
- [Report on the Operation of the Irish Sign Language Act \(December 2021\)](#)
- [Report on Compliance with Part 5 of the Disability Act 2005 for 2022](#)
- [A user-centred exploration of the assistive potential of Digital Voice Assistants and Internet of Things technology for People with Disabilities in Ireland](#)
- [Assistive Technology for Supplementary Reading Instruction for Children with Disabilities: Current Status & Potential for Application in Practice](#)
- [Monitoring Report EU WAD Ireland 2023](#)
- [Experimental Tests of Public Support for Disability Policy](#) (ESRI publication)

## Appendix 4: Policy advice papers and submissions in 2023

- Government Department Statements of Strategy
- Department of Rural and Community Development
- Department of Housing, Local Government and Heritage
- Department of Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
- Department of Social Protection
- Department of Further Higher Education Research Science and Innovation
- Department of Agriculture, Food and the Marine
- Department of Enterprise, Trade and Employment
- Office of the Revenue Commissioners
- Department of Children, Equality, Disability, Integration and Youth
- Department of Justice
- Oireachtas Joint Committee submissions and appearances
- Oireachtas Joint Committee on Tourism, Culture, Arts, Sport and Media – Arts and Disability (submission)
- Oireachtas Joint Committee on Tourism, Culture, Arts, Sport and Media - The development of local and community arts (arts and disability, health, and older people) (Submission, opening statement and appearance)
- Oireachtas Joint Committee on Assisted Dying – Assisted dying (Submission, opening statement and appearance)
- Oireachtas Joint Committee on Disability Matters – National Disability Inclusion Strategy and the development of a UNCRPD Implementation Strategy (Opening statement and appearance)
- Oireachtas Joint Committee on Disability Matters – The importance of a rights based approach to disability matters, in line with UNCRPD (Opening statement and appearance)
- Oireachtas Joint Committee on Enterprise, Trade and Employment - Employment Strategy and how persons with a disability in the work place are impacted (Opening statement and appearance)
- Oireachtas Joint Committee on Autism – Accessibility of the public realm for people with autism – (Opening statement and appearance)
- Oireachtas Joint Committee on Autism – Services and supports provided by the state for autistic people – (Opening statement and appearance)

## Other submissions

- An Garda Síochána – Strategic Plan 2025-2027
- Central Bank - Consumer Protection Code Review
- Central Statistics Office – Census 2027 consultation
  - Autism
  - Communal Establishments
  - Irish Sign Language
  - Mobility Aids
- Coimisiún na Meán - Draft Gender Equality, Diversity, and Inclusion Strategy
- Department of Children, Equality, Disability, Integration and Youth -Opportunities for Youth: An Action Plan for Youth Services
- Department of Children, Equality, Disability, Integration and Youth - Policy Framework for the Participation of Children and Young People in Decision Making
- Department of Education – EPSEN Act review
- Department of Education – Strategic Group considering Lifelong Guidance
- Department of Enterprise, Trade and Employment - Right to Request Remote Working
- Department of Enterprise, Trade and Employment – Companies Act
- Department of Health - Patient Voice Partner Policy for the Irish Public Health System
- Department of Health - Regulations for Providers of Home Support Service
- Department of Housing, Local Government and Heritage - Draft Sustainable and Compact Settlements Guidelines for Planning Authorities
- Department of Justice - Civil Legal Aid review
- Department of Public Expenditure and Reform - Designing Our Public Services – Design Principles
- Department of Social Protection - Pay-related Jobseekers Allowance
- Department of Social Protection - New Social Welfare Appeals Regulations
- Department of Social Protection – Wage Subsidy Scheme
- Department of Social Protection – Pathways to Work Mid-term review
- Dublin City Council - Sports Plan 2023-28
- Dublin City Council – Active Travel Network – interim cycling infrastructure
- European Commission, Directorate General for Employment, Social Affairs and Inclusion - Catalogue of positive actions aimed at hiring of persons with disabilities and combating stereotypes
- Higher Education Authority - Corporate Strategic Plan 2023 -2026
- Housing Commission - Long-term housing policy post 2030
- Human Dignity Foundation – Sexual exploitation and abuse of children
- National Standards Authority of Ireland - Standard on gender and empowerment

- National Transport Authority - Potential changes to the license conditions for public bus passenger services with regard to accessibility
- National Transport Authority - Galway Metropolitan Area Transport Strategy
- OECD - Review of the Irish National Skills Strategy
- Solas – High-level Mid-Term Review of Future FET: Transforming Learning, The National Further Education and Training Strategy 2020-2024
- Task Force on Safe Participation in Political Life



## Notes

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

## Notes

This image shows a full page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page, providing a template for writing. There are no margins, text, or other markings on the page.

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This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.





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**National Disability Authority is the independent state body providing evidence informed advice on disability policy and practice to the Minister, and promoting Universal Design in Ireland.**