

**April 2023**

NDA Submission to the Department of Further and Higher Education Research Innovation and Science Statement of Strategy 2023-2025[[1]](#footnote-1)

# Introduction

The National Disability Authority (NDA) is the independent statutory body with a duty to provide information and evidence-informed advice to Government and officials in the public sector on disability matters, and to promote Universal Design. This submission on the Statement of Strategy 2023 - 2025 addresses issues related to this department’s remit which fall within the NDA’s competencies and expertise.

The NDA recommends that the Department of Further and Higher Education, Research Innovation and Science (DFHERIS) include clear commitments in this Statement of Strategy with regard to how services and supports within its remit will be provided to members of the public with disabilities. A clear statement referencing how the Department will recognise and meet the needs of disabled persons when delivering services is a useful approach. However as this departments remit extends to innovation and research it will be equally important to ensure disability is addressed in these areas. DFHERIS will be required to disability-proof the policies and supports it provides, thereby also ensuring it is playing its part in the delivery of the State’s commitments under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).

With the establishment of DFHERIS significant change has commenced with regard to the access and delivery of further and higher education and the inclusion of learners with disabilities and all marginalised learners. The department’s adoption of universal design (UD) has been instrumental to this change.

In the Disability Act 2005, Universal Design is defined as follows:

“Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people, regardless of their age, size or disability. This includes public places in the built environment such as buildings, streets or spaces that the public have access to; products and services provided in those places; and systems that are available including information and communications technology (ICT).”  
(Disability Act, 2005).

A key feature of the national policy landscape for further and higher education and training is the ambition for all learners to learn in the company of their peers in a fully integrated and inclusive way and within the same educational and training facilities and campuses, underpinned by the provision of graduated supports. This ambition is reflected in policy documents across the educational continuum, for example, SOLAS in its FET strategy (2020-2024) states that the strategic priority “Fostering Inclusion” must be met through:

“Developing and applying good practice guides and toolkits on inclusive practice across the system [and] adopting a universal design for learning (UDL) approach in shaping [the FET sectors] future provision”.[[2]](#footnote-2)

Equally this department through supporting the National Access Plan – ‘A Strategic Action Plan for Equity of Access, Participation and Success in Higher Education 2022-2028’, places equity, diversity and inclusion at the heart of its objectives. It notes

“That the higher education student body entering, participating and completing higher education, at all levels reflects the diversity and social mix of Ireland’s population.” and “That our higher education institutions are inclusive environments which support and foster student success and outcomes, equity and diversity and are responsive to the needs of students and wider communities.” This National Access Plan frames these ambitions in the context of Universal Design by seeking to ensure that “every student has a positive student experience supported by the principles of Universal Design and inclusive approaches to teaching and learning”.

Understanding a Universal Design approach as a process that incorporates the implementation of the Universal Design Principles and Guidelines is key. It focuses on accessibility and usability from the earliest possible time and throughout all stages in the life of products and services, and the interoperability of products and services with assistive technology. The Centre for Excellence in Universal Design has produced specific and detailed guidance to support the implementation on UD in further and higher education, this guidance is accessed through <https://universaldesign.ie/awards/education/>

The NDA and its Centre for Excellence in Universal Design will continue to support PATH 4 and its ongoing roll out. In support of this work please see a policy landscape paper[[3]](#footnote-3) which places education and training in Ireland within a clearly defined UDE approach.

As this department continues to develop a more inclusive and responsive Further Education and Training (FET) and Higher Education (HE) sector the NDA welcomes the newly established National Tertiary Office (NTO) and the commitment of the Director to a Universal Design approach to the work of this office.  The NDA and CEUD are happy to support the work of the NTO.

In addition to the ongoing work to develop a fully inclusive and universally designed tertiary education system, it will be important to have disabled academics and support staff involved in FET and HE fields reach the top of their professions. Therefore, it is important that promotion opportunities within these sectors takes disability into account. As Yerbury described ‘the real-life issue of diversity disclosure within academia. The breadth of disability and discrimination is framed within the context of high demands and competitiveness. While some institutions are supportive, the culture of ableism, stigmatization, and the disabling barriers make disclosure of disability a complex and difficult decision’.[[4]](#footnote-4) It will be useful for the departments next Statement of Strategy to provide leadership in this regard and to include a statement of support.

# United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

During 2023 a UNCRPD Implementation Strategy is to be developed. While the development of the Strategy will be coordinated by the Department of Children, Equality, Disability, Integration and Youth (DCEDIY), there will be obligations and actions for all government departments and across the public sector, in order to ensure the rights of persons with disabilities are recognised and realised. Article 9 of the UNCRPD is particularly relevant to the Department of Further Higher Education Research Innovation and Science.

• Article 24 Education

• Article 27 Employment and Work

The UNCRPD also places an obligation on states to ensure that people with disabilities are included in policy development and decision-making. The NDA published ‘Participation Matters: Guidelines on implementing the obligation to meaningfully engage with disabled people in public decision making’ in 2022 to support public bodies in achieving meaningful engagement with disabled people, especially through their representative DPOs.[[5]](#footnote-5) The NDA also produced an ‘Advice Paper on Disability Language and Terminology’ which is intended as a practical guide for departments and public bodies on the use of language about disability.[[6]](#footnote-6)

While the NDA welcomes the department’s consultation with stakeholders, including Disabled Persons’ Organisations (DPOs), through its Disability Consultative Committee, the NDA wishes to advise that meaningful engagement and participation should feature throughout the lifetime of the next Statement of Strategy, so that policy interventions planned and delivered by the department and associated agencies are disability-proofed from the outset.

# National Strategies

The department are likely aware of delays in getting agreement on the final three year action plan of the Comprehensive Employment Strategy for People with a Disability (2015-2024). The Department of Children, Equality, Disability, Integration and Youth (DCEDIY) have advised that a draft of the plan will be circulated soon to all departments. It will be important that the

DFHEIS work with DCEDIY to support the finalisation of the plan and to agree specific and joint activities. The NDA advise that a concerted effort is required by the department around subsequent implementation of the plan to address the persistent employment gap for persons with disabilities in Ireland. In addition to completing the final phase of the CES, important cross departmental work will take place during 2023 to develop a UNCRPD Implementation Strategy following the conclusion of the National Disability Inclusion Strategy in 2022. This strategy is likely to include both an education and an employment pillar. These pillars are important in light of the department’s role to support and prepare disabled people for employment and societal participation through education, training and the research function that lies within this department.

Ireland has one of the largest disability employment gaps within the EU. Data from 2016 shows that the employment rate of persons aged 20-64 with disabilities in Ireland is about half of the rate (36.5%) for persons without disabilities (72.8%).**[[7]](#footnote-7)** As results for Census 2022 will not be published until later in 2023 and because of changes in the way disability information was collected, it will be difficult to assess progress in increasing employment of people with disabilities at this point, if using census data as the benchmark. However, recent data from EU-SILC shows that there has not been any significant improvement in employment levels and suggests that the disability employment gap for persons with disabilities characterised as ‘severe limitations’ has even widened in recent years.[[8]](#footnote-8)

## National Skills Strategy

The NDA welcome work underway by the OECD to review the Irish National Skills Strategy and see this strategy as a key mechanism to address the disability employment gap. In order to achieve this it will be necessary to have specific statements to ensure that people with disabilities have can access skills attainment pathways, encompassing each area of the skills strategy. The NDA have fed into the OCED Skills review through their involvement with the Dublin Regional Skills Forum and at OECD hosted consultations in 2022.

In tandem with OECD review, the NDA would advise that a series of practical and implementable measures regarding universal design and inclusion of disabled learners is evidenced in the work of the Expert Group on Future Skills Needs[[9]](#footnote-9) thus ensuring that disabled peoples skill requirements are addressed in any future focused developments.

Evidence has shown that routes into employment and out of unemployment for disabled people can be multifaceted. The following measures can be evidenced in the next Statement of Strategy:

* Access to better and more informed **transitions** from school to further and higher education and training,
* **Place and train** models of support in the FET and HE sector

Including improved accessed and participation in **apprenticeships and internships and self-employment options**

* Development and delivery of ‘on going’ **career guidance**, support and information

## Transitions

Establishing the practice of managed and supported transitions along the education journey is an important feature of the support a learner with disabilities requires as they build their skills and gain confidence. Skills attainment is only one feature of the pathway from education to employment. Currently a limited transition process in place, one that is based on accessing a secondary school place for those leaving primary education and for those leaving special education an adult day service place. There is no systematic examination of local mainstream FET or HE options. The Progressing Accessible Supported Transitions to Employment[[10]](#footnote-10) (PASTE) project revealed a supported transition is one that has ‘knowledge and understanding of the range of post-school pathways and options are a fundamental factor in planning for post-school transitions’[[11]](#footnote-11). This project also revealed the importance of developing self-awareness, self-determination, and self-advocacy as key skills for young people leaving school. The learner pathway in the FET [[12]](#footnote-12)sector is a useful model to indicate education options and support the transitions process. However, the learner pathway prior to and post FET requires further work to clearly indicate where and what level of support is available to the individual learner with disabilities, this is a clear function of DFHERIS and its agencies. This function can be supported through understanding that ‘conceptually, transition planning is a longitudinal strategy in which early implementation is vital’ and that ‘the process should begin in the junior cycle of education and continue until the transition to post-school destinations’. A clear learner pathway could also be served by better linkages between post primary and FET and HE. A mechanism that had achieved results in other jurisdictions is to design protocols between the key stakeholders involved in the process.

#### Current pilot projects requiring FET support

A cross-departmental and agency team consisting of Department of Education (DoE), DFHERIS, Education Training Boards Ireland, HEA, HSE, National Council for Special Education (NCSE) and Solas have developed a ‘Transition from School’ pilot project. This project builds on evidence that has shown effective practices—such as family involvement, inclusion in general education, work-based learning, and interagency collaboration is necessary to help young people with disabilities reach their potential[[13]](#footnote-13). This pilot project, aims to provide all school leavers who require specialist supports with access to a transitions programme. The pilot is currently underway in two demonstration sites (North Dublin and Galway) a mapping of FET, Higher Education and other services for young people with disabilities provided in the two pilot locations will serve to provide information on options available. While each project site will have specific learning and new practice to support transitions. DFHERIS can support how this learning will be mainstreamed within the wider education system.

### Learning from the Ability Programme

The Department of Social Protection (DSP) funded the Ability Programme of pilot projects.[[14]](#footnote-14) These 27 pilot projects had the aim of bringing young people with disabilities (YPWD) aged 15 to 29 who are not work-ready closer to the labour market using a range of person-centred supports. These projects addressed the key transition points in the young person’s life. While these projects have been completed, the learning relevant to the FET and HE sectors should be shared and mainstreamed. Some stakeholders have criticised that this sharing of good practice has not yet happened and the learning and approaches developed in these pilot projects will not be continued. Evidence from the final evaluation of these projects[[15]](#footnote-15) contains similar findings to work conducted in other jurisdictions on this age group. These findings centred on a number of practices which increased the likelihood of participants achieving successful outcomes:

* Providing a case management approach increased the likelihood that a participant increased their soft skills or acquired a Quality and Qualifications Ireland (QQI) qualification.
* Providing paid work experience increased the likelihood that a participant progressed into employment
* Developing a formal service plan with goals, actions and dates increased the likelihood that a participant progressed into education
* Supporting a participant to attain a voluntary social role in their community increased the likelihood that a participant would attain a QQI qualification.

## These findings from the Ability programme provide providers of Further Education & Training with practical information on improved delivery. Improvements that will support more learners from the 15 to 29 age group to stay in FET.

## Developing Skills through Place and Train Models

Options such as supported employment, internships and apprenticeships remain underdeveloped entry routes to employment for many people with disabilities. Routes to these options must be clearly outlined and in some instance as early as age 13. These routes are useful as they involve the ‘place and train’ model of support which suits some people with disabilities more than a purely classroom based model. The ‘place and train model’ is at the core of supported employment. Current examples of supported employment in the Irish system include the Individual Placement and Support (IPS) model for people with mental health difficulties, the model used by Specialisterne to support autistic adults and the EmployAbility model. However, the EmployAbility models requires people to be ‘Job Ready’ and able to work over 8 hours per week. These two requirements continue to keep this option out of reach for some people with disabilities including those with high support needs. Until that gap is addressed employment numbers for people with disabilities will remain low. DFHERIS could align a national programme of supported employment with delivery of community based and employer based training. This alignment could utilised funding from the National Training Fund[[16]](#footnote-16) thus ensuring that employers’ needs are being met.

## Guidance including career guidance

The establishment of the National Policy Group on Lifelong Guidance to develop a coherent long term strategic framework is welcomed by the NDA. The National Policy Group which comprises of five government departments: DoE, DFHERIS, DCEDIY, the Department of Social Protection (DSP) and the Department of Enterprise, Trade and Employment (DETE) are the key departments required to address the gaps in the provision of guidance, support and information for all people including people with disabilities. As the work of this group is focussing on ensuring a coherent national long-term policy on guidance through the development of an overarching National Strategic Framework for Guidance, the delivery of ongoing career guidance information and support must underpin this work. Career guidance in FET is currently addressing gaps that exist in the school years as evidenced by the ESRI ‘The provision of career guidance at secondary level in Ireland is inconsistent and the type of guidance pupils receive depends on many things: the school type; the school’s social mix; pupil’s social class, gender and ethnicity; and parental expectations[[17]](#footnote-17) The NDA recently submitted a policy advice paper on effective career guidance for school based students, this paper is supported by a literature review[[18]](#footnote-18). The NDA advise that linking career guidance in post primary and special education with the adult career guidance service available in the FET[[19]](#footnote-19) will require further work. This work should focus on understanding the support needs and career goals of learners with disabilities as they transition into the adult education environment.

## Self-employment and entrepreneurship

Many people with disabilities encounter significant barriers to employment, including lack of availability of accessible transport and discrimination, and many choose self-employment as it provides flexibility and the ability to pace work in accordance with their individual needs. Among people with a disability who are employed in Ireland, 14.8% are self-employed. OECD research shows that the share of part-time self-employment for persons with disabilities in Ireland is twice the observed share for persons without disabilities.[[20]](#footnote-20) The NDA recommends that this Statement of Strategy include a statement of intent regarding the specific measures and interventions within this Department’s remit that can support more disabled persons to access training, skills development supports and services that can make entrepreneurship a viable option. Moreover, this recommendation could be informed by the 2022 OECD workshop examining inclusive entrepreneurship for Ireland, and lead to the production of a high-level roadmap describing steps that can be taken to strengthen entrepreneurship training schemes and supports for target groups.[[21]](#footnote-21)

# Research

## Awarding Research

Within DFHERIS and its research remit, the NDA welcomed the 2022 publication of Impact 2030. Work underway in the NDA to support Irish research includes finalising guidance for all researchers on delivery of collaborative research with disabled people. The NDA advise that Impact 2030 can promote, in a manner similar to Patient and Public Involvement (PPI), initiatives to ensure the inclusion of disabled people as co-researchers. However the NDA also see Impact 2023 as a key mechanism to ensure that more disabled people who are researchers are designing, leading and managing the Impact 2030 research output. The NDA see that ‘building a more inclusive and engaged research and innovation system that is recognised as integral to addressing major societal issues ranging from climate change to health and wellbeing’ can only benefit from this approach.

To ensure innovation in Irish research the NDA also wish to advise that all research grants covered by Science Foundation Ireland (SFI), the Irish Research Council, and all agencies under the aegis of the department with a research role factor Universal Design (UD) into their funding calls and assessment criteria. This funding approach should also ensure that disabled people are considered equitably when awarding funds and grants.

**Statutory Obligations**

The NDA recommends that the DFHERIS describes clear commitments in this new Statement of Strategy with regard to statutory obligations under the following sections. Please note that the NDA has statutory monitoring duties under many of these obligations. The NDA will periodically publish compliance reports with regard to the provisions of the relevant legislation. The NDA will also continue to provide guidance to public bodies on how specific areas can be addressed.

## Procurement Requirements

Central to delivering universally designed services is procurement. If accessibility and universal design are key requirements at the procurement stage, this will remain a central component of design and delivery throughout.

The NDA would like to remind the DFHERIS of accessibility in procurement requirements under [S.I. No. 284/2016 - European Union (Award of Public Authority Contracts) Regulations 2016](https://www.irishstatutebook.ie/eli/2016/si/284/made/en/print) in the case of public service and also in all public works contracts. In addition, EU Directive 2019/882 on the accessibility requirements for procurement of products and services needs to be considered and this is of particular importance to information and communications technology.Accessibility of services provided to public bodies is also a requirement under [Section 27 of the Disability Act](https://www.irishstatutebook.ie/eli/2005/act/14/section/27/enacted/en/html).

The NDA recommends that the Department incorporates procurement requirements into all processes to ensure these obligations are consistently met. The Department should ensure that these requirements are recognised and consistently applied throughout bodies under its remit. Accessibility requirements for transport projects are particularly important when procuring services as their exclusion can create repercussions throughout design and implementation processes and can ultimately lead to inaccessible services.

“Public bodies are required to specify accessibility as a mandatory requirement when procuring communications products and services. They can do this by including accessibility criteria as part of the technical specifications or in the award criteria, or both. Where accessibility standards exist, public bodies are expected to use these as the basis of the accessibility criteria.”

**Compliance with Part 5 of the Disability Act 2005**

Part 5 of the Disability Act 2005 details the obligations public bodies have to promote and support the employment of persons with disabilities.

The NDA is pleased to note, with the exception of one public body that was just below the minimum 3% in 2021, that the rest of the public bodies under your Department  have exceed the minimum  3% target. In 2021, three of your public bodies reported that over 6% of their employees had disabilities. Leargas, Solas and the National College of Art and Design (NCAD) reported respectively that 10%, 8.11% and 6.6% of their employees had disabilities. The NDA advises the public bodies to continue focussing on improving their performances.

The NDA advised and provided public bodies with:

* [Comprehensive guidance](https://nda.ie/monitoring/monitoring-2-2/employment-of-persons-with-disabilities-in-the-public-sector/advice-and-guidance-on-part-5) that the 3% is a minimum target and they should focus on exceeding this target and progressing towards reaching the minimum 6% by 2025, a new target that has been set by the Assisted Decision Making (Capacity) Amendment Act 2022.
* The necessity of documenting the measures they have in place and the progress they are making to meet their obligations under Part 5, in addition to providing statistical information. Our advice and guidance reflects the requirements of the Disability Act 2005, whereby public bodies must demonstrate the measures they have in place to actively promote and support employment of persons with disabilities.
* Using a Universal Design approach helps them to create Equal, Diverse and Inclusive (EDI) work cultures and to improve their performance under Part 5. When public bodies use this type of approach, they are ensuring that all their products, services, communications (digital, written, spoken and signed) and the physical environment are universally designed and therefore easy to access, understand and use for everyone regardless of age size, ability or disability.

## EU Web Accessibility Obligations

The [EU Web Accessibility Directive](https://nda.ie/monitoring/eu-web-accessibility-directive/eu-web-accessibility-directive-monitoring-reports), which came into force in September 2020, requires Member States to ensure that websites and mobile applications of public sector bodies are fully accessible to persons with disabilities and comply with the harmonised standard EN 310 549 (v3.2.1). The Directive further requires public bodies to maintain an [Accessibility Statement](https://nda.ie/monitoring/eu-web-accessibility-directive/accessibility-statements) in a prominent location on all its websites.  This must include a clear feedback mechanism for users to ask for assistance with inaccessible content and features as well as the statutory complaints mechanism through which a person can make a formal complaint about the website’s accessibility in-line with the Disability Act 2005 or the Equal Status Act 2000-2015, whichever so applies. The National Disability Authority is named in Irish Regulations as the National Monitoring Body for the purposes of monitoring compliance with and reporting on the EU Web Accessibility Directive. The NDA has submitted [two monitoring reports](https://nda.ie/publications/monitoring-report-eu-wad-ireland-2021-nda-report) to the European Commission in December 2011 and 2022 in this regard, and issued a Notice of Monitoring to the departments in November 2022.[[22]](#footnote-22)[1]

In 2022, NDA conducted **Simplified (automated) Reviews on 23 Higher Education and 17 Further Education and Training websites.**

The average number of errors on HEI websites was marginally higher than that of all sites reviewed by NDA (225 in total). There was a very large variance in the number of errors across all HEI websites.  The HEI with the least number of errors detected was placed 54th out of 225 in terms of overall rankings of all public sector websites reviewed. This is a relatively low ranking for the highest scoring website from the HEI sector. Overall, HEI websites contain a lot of errors that should be addressed as part of routine and ongoing development and maintenance of their websites.

The average number of errors on FETs websites was higher than the average of all sites reviewed.

In its most recent monitoring scans, NDA detected an average of 44 errors for each of the 10 most frequently accessed departmental PDFs published on GOV.ie, including priority documents for inclusion such as the National Access Plan.

The NDA recommends that the Department articulates its statutory obligation to ensure all its websites, including departmental PDFs published to GOV.ie comply with the EU Web Accessibility Directive, in the Statement of Strategy. The department should encourage HEI and FET institutions to take further steps to improve their compliance with the Directive.

The NDA recommends that this obligation and an action plan to address access issues is referenced in relevant strategic objectives and that the Statement of Strategy itself is published in a fully accessible PDF.

**Compliance with Part 3 of Disability Act 2005**

Part 3 of the Disability Act details obligations public bodies have to ensure that information and services are accessible to persons with disabilities. The Centre for Excellence in Universal Design at the NDA developed a Customer Communications Toolkit for Services to the Public, which provides guidance for public servants on how to communicate with the public using the simplest and clearest language possible and to ensure that all services are accessible, and meet the diverse needs of all customers.[[23]](#footnote-23) This document was updated and relaunched in March 2023[[24]](#footnote-24).

**Requirement for Accessible Public Buildings under Section 25 of the Disability Act 2005**

Section 25 of the Disability Act requires all departments and public bodies to ensure that the parts of their buildings which are accessed by the public, are brought into compliance with Part M of the building regulations, which deals with access and use. This does not apply to heritage sites which have separate requirements under Section 29 of the Act.

The requirement is to upgrade older public buildings so that they comply with Part M, within a ten-year time-frame of any amendment to Part M. Part M 2010 commenced on 1 January 2012 and was subsequently reviewed and replaced again with Part M 2022, which commenced on 1 January 2023. Under Section 25 therefore, public bodies are required to bring their public buildings into compliance with Part M 2010 by 1st January 2022 and Part M 2022 by 1st January 2033. The new requirements under Part M 2022 relate to the provision of changing places toilets.

The NDA advises that each department and agency should develop an action plan including access audits, planned improvements works, timeframes for implementation and earmarked funding, to work towards achieving compliance with these legal obligations. This may involve engaging with other authorities as appropriate, including for example, the OPW. We also advise that compliance with Section 25 should be factored into performance framework agreements with agencies as a governance matter to comply with legal duties. The NDA recommends that the department develops a plan to implement Section 25 recommendations in buildings within its remit, and that this commitment is clearly articulated in the Statement of Strategy.

An Operational Review of the Effectiveness of Section 25 of the Disability Act 2005 was published by the NDA in 2019 providing guidance on how public bodies can comply with Section 25. Under Part 3 of the Disability Act, the NDA is developing a statutory Code of Practice on Accessible Public Buildings at the request of the Minister, informed by the findings of the Operational Review. When completed, the NDA will have a role to monitor compliance with same, and to provide advice to departments on areas requiring further action or focus.

## Irish Sign Language Act

The Irish Sign Language (ISL) Act 2017, which recognises the right of ISL users to use ISL as their native language, and to develop and preserve it, was enacted in December 2020. This Act places a statutory duty on all public bodies to do all that is reasonable to provide ISL users with free ISL interpretation when availing of or seeking to access statutory entitlements and services provided by or under statute.

The NDA is pleased to note that in the recently published report on the operation of the Act, the Department of Further and Higher Education, research, Innovation and Science reported themselves as being aware of the ISL Act and their responsibilities under it, have procedures in place for arranging ISL interpretation and assessed themselves as compliant with the Act. However, the NDA also notes that a number of bodies under the Departments aegis were not aware of their responsibilities under the ISL Act and reported themselves as partially compliant with the Act.[[25]](#footnote-25)

The Department’s commitment to the obligations of the ISL Act described in their survey submission was not reflected within their previous Statement of Strategy 2021-2023, and we hope that their commitment to compliance with the ISL Act is made clear within the next statement of strategy.

We also note that within the ISL Act report[[26]](#footnote-26), there were two recommendations for which the Department was suggested to have responsibility for addressing including:

1. Section 7: Interpreter supply- Review and develop an action plan to increase the supply of interpreters as a priority
2. Section 5(c): Educational placements for ISL training for teachers- Determine the number of placements required in higher education institutions to sufficiently provide for ISL training to teachers of children who are deaf or hard of hearing, and ensure this number of placements are established

We await to receive updates on the progress of these recommendations.

**New European Accessibility Act (EAA)**

Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services requires that, from 28th June 2025, a range of specified products and services are designed, and where necessary manufactured, to ensure that they are accessible to persons with disabilities. The directive is known as the European Accessibility Act (EAA). The directive focuses on private companies selling products or services that:

* Are seen as highly important for persons with disabilities, and
* Have wide ranging accessibility requirements across the member states.
* 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 users.

For instance products and services relevant to FET and HE in this regard could include ‘self-service/payment terminals’ used in colleges and within libraries.

There are a series of harmonised standards that are being developed that will underpin the requirements on the provision of accessible products and services and it will be important for the department to engage in their development as well as in their implication. The role of market surveillance authorities across the EU, including Ireland, will be vital in the implementation of the EAA. The NDA are available to support the department in building competency and capacity within DFHERIS, and relevant agencies under its remit, to advance and implement this transformative new act.

**Conclusion**

The NDA would be happy to engage with officials from the Department of on any of the points raised in this submission. We also look forward to making submissions on forthcoming consultations on various pieces of work which can have a significant impact on the lives of people with disabilities.

1. <https://www.gov.ie/en/consultation/8ca7f-department-statement-of-strategy-for-2023-to-2025/> [↑](#footnote-ref-1)
2. (Solas, 2020) [↑](#footnote-ref-2)
3. <https://universaldesign.ie/web-content-/universal-design-in-education-and-training-policy-landscape-in-ireland-full-document.docx> [↑](#footnote-ref-3)
4. Disabled in Academia https://www.sciencedirect.com/science/article/abs/pii/S016622362100076X [↑](#footnote-ref-4)
5. <https://nda.ie/publications/participation-matters-guidelines-on-implementing-the-obligation-to-meaningfully-engage-with-disabled-people-in-public-decision-making> [↑](#footnote-ref-5)
6. <https://nda.ie/publications/nda-advice-paper-on-disability-language-and-terminology> [↑](#footnote-ref-6)
7. CSO Census 2016: [NDA Factsheet 2: Employment | The National Disability Authority](https://nda.ie/Resources/Factsheets/NDA-Factsheet-2-Employment/NDA-Factsheet-2-Employment.html) The NDA has also analysed data that shows that among 16-24 year olds, the percentage of disabled people who are not in education, employment or training (NEET) is also more than double that of those in this age group who do not have a disability – at 23% vs 10%. [↑](#footnote-ref-7)
8. See: Eurostat (2023) [Disability employment gap by level of activity limitation and sex (source EU-SILC)](https://ec.europa.eu/eurostat/databrowser/view/HLTH_DLM200/default/table?lang=en) [↑](#footnote-ref-8)
9. [Expert Group on Future Skill Group - Skills (egfsn.ie)](https://www.egfsn.ie/) [↑](#footnote-ref-9)
10. https://www.walk.ie/perch/resources/progressing-accessible-supported-transitions-to-employment.pdf [↑](#footnote-ref-10)
11. https://www.walk.ie/perch/resources/paste-final-report-august-2018-pdf-1.pdf [↑](#footnote-ref-11)
12. <https://www.solas.ie/f/70398/x/64d0718c9e/solas_fet_strategy_web.pdf> chapter 7 [↑](#footnote-ref-12)
13. https://www.walk.ie/perch/resources/paste-final-report-august-2018-pdf-1.pdf [↑](#footnote-ref-13)
14. Programme funds local projects that for young people with disabilities between the ages of 15 and 29 closer to the labour market. [↑](#footnote-ref-14)
15. [Ability-Progamme-Evaluation-Report-2018-2021-Final.pdf (pobal.ie)](https://www.pobal.ie/app/uploads/2018/06/Ability-Progamme-Evaluation-Report-2018-2021-Final.pdf) [↑](#footnote-ref-15)
16. https://assets.gov.ie/24754/c42908b6a02a4d9298418f9cdfe129d4.pdf [↑](#footnote-ref-16)
17. (McCoy et al 2006; McCoy et al, 2010; Scanlon and Doyle, 2021). [↑](#footnote-ref-17)
18. https://nda.ie/publications/literature-review-of-career-guidance-for-learners-with-disabilities-in-second-level-education [↑](#footnote-ref-18)
19. https://www.gov.ie/en/publication/0da49-career-guidance-and-information/ [↑](#footnote-ref-19)
20. <https://www.oecd.org/cfe/disability-work-and-inclusion-in-ireland-74b45baa-en.htm> [↑](#footnote-ref-20)
21. OECD workshop for DETE on the results of the OECD-EU Better Entrepreneurship Policy Tool, April 28 2022 [↑](#footnote-ref-21)
22. [1] [Monitoring Report EU WAD Ireland 2021: NDA Report - National Disability Authority](https://nda.ie/publications/monitoring-report-eu-wad-ireland-2021-nda-report) [↑](#footnote-ref-22)
23. [NDA - Universal Design Public Service Toolkit - Foreword](http://publicservice.universaldesign.ie/) [↑](#footnote-ref-23)
24. [Customer Communications Toolkit for Services to the Public - A Universal Design Approach | Centre for Excellence in Universal Design](https://universaldesign.ie/products-services/customer-communications-toolkit-for-services-to-the-public-a-universal-design-approach/) [↑](#footnote-ref-24)
25. See Technical Annex 2 on the Public Body Survey: [Report on the Operation of the Irish Sign Language Act 2017 (December 2021) - National Disability Authority (nda.ie)](https://nda.ie/publications/report-on-the-operation-of-the-irish-sign-language-act-2017-december-2021) [↑](#footnote-ref-25)
26. See Full ISL Act Report: <https://nda.ie/publications/report-on-the-operation-of-the-irish-sign-language-act-2017-december-2021> [↑](#footnote-ref-26)