

**February 2023**

NDA Submission to the Department of Social Protection on their Statement of Strategy 2023-2026[[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 - 2026 addresses issues related to this department’s remit which fall within the NDA’s competencies and expertise.

The NDA recommends that the Department of Social Protection include clear commitments in this new 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 confirming the Government’s policy of ‘mainstreaming’ and referencing how the Department of Social Protection will recognise and meet the needs of disabled persons when delivering services is a useful approach. This will require the department to disability-proof the policies and supports it provides, thereby also ensuring that the Department of Social Protection 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).

The NDA advise that the department should provide clear commitments in relation to disability policy and Universal Design, with regard to;

1. **Policy Development**: Ensuring that the department articulates its commitment to completing the Comprehensive Employment Strategy and its important collaborative working with other government departments, including the Department of Disability, Children, Equality, Disability, Integration and Youth, in developing a UNCRPD Implementation Strategy. The department should ensure that measures to tackle the cost of disability and address the disability employment gap are clearly articulated in the Statement of Strategy.
2. **Operational Practices**: Continuing to develop its staff, structures and processes in order to provide appropriate provision to persons with disabilities. Specific areas include developing the public employment service (Intreo), staff training, case officers, the referral process for clients with disabilities, the reasonable accommodation fund, and the availability of ISL for services provided by the department. On the employer liaison front, the department should consider its role in funding and supporting an employer information and advice service. Such a programme could assist the EmployAbility service and the department’s Employer Engagement Unit in their roles.
3. **Organisational Delivery:** Ensuring that the department is compliant with the EU Web Accessibility Directive, the Irish Sign Language Act and the Disability Act 2005 in terms of access to buildings, information and services and is advancing work to ensure it meets the revised the disability employment target of 6% in the public service by 2025.

## Policy Commitments

A UNCRPD Implementation Strategy is to be developed during 2023. 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. Articles of the UNCRPD that are particularly relevant to the Department of Social Protection include;

* Article 28 Adequate standard of living and social protection;
* Article 27 on Employment;
* Article 19 Living independently and being included in the community.

## Participation and Engagement

The UNCRPD also places an obligation on states to ensure that people with disabilities are included in policy development and decision-making. The NDA welcomes the department’s consultation with stakeholders, including Disabled Persons’ Organisations (DPOs), through its Disability Consultative Committee and Disability Consultative Forum, and advises 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 are disability-proofed from the outset. 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.[[2]](#footnote-2) 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.[[3]](#footnote-3)

### Crosscutting Strategies and Working

Consideration of some of the key issues set out within the UNCRPD Articles identified above will require input from more than one department, and the NDA looks forward to continued collaborative working across government in the lifetime of this Statement of Strategy. One route to underpinning this approach is to ensure that commitments in relation to disability are articulated in this Statement of Strategy and that annualised business plans of your department are aligned with other crosscutting strategies and national policies, such as Roadmap for Social Inclusion 2020 – 2025, The Comprehensive Employment Strategy 2015 – 2024, Pathways to Work 2020 – 2024, Ireland’s National Skills Strategy 2025, Future Jobs Ireland and National Policy Group for Lifelong Guidance.

The NDA would like to take this opportunity to highlight the following key areas of focus relevant to your department, which we suggest could be incorporated within this new Statement of Strategy and has organised them under the following two headings;

Issues of importance to Social Protection

Statutory Obligations

# Key issues of importance to Social Protection

## Comprehensive Employment Strategy for People with Disabilities 2015 - 2024

The Department of Social Protection played a key role in the implementation of the 10 year Comprehensive Employment Strategy (CES) now in its 9th year. Specific work led by the department included the delivery of the Make Work Pay Report, which in turn led to the removal of the rehabilitative work condition and the introduction of an early engagement process, as well as the maintenance of secondary benefits for five years for those on disability allowance in employment and the introduction of an earnings disregard. These measures allow disabled people to make more informed choices about entering employment and retaining benefits. The department’s own figures illustrate the number of people who are earning more since the publication of Make Work Pay in 2017. Collectively these measures support people out of poverty. However, with less than two years of the CES remaining, it is important that these early successes are built upon and embedded within the system.

The NDA advises that there are a number of areas within the CES with a clear role for the Department of Social Protection, and we suggest that a signal of commitment in this regard be included in the Statement of Strategy. Outstanding areas for focus in the remaining years of the CES relevant to the department include:

* Delivery of a national programme of supported employment that is inclusive of all people with disabilities who wish to work, including those with higher support needs.
* Dissemination of the learning from the department-funded Ability projects, especially with regard to the development of a national programme of pre-activation. This evidence from the 27 Ability projects should also inform the work of the National Policy Group for Lifelong Guidance on which the department has a key role.
* Involvement with the National Policy Group for Lifelong Guidance should ensure that case officers are fully informed and trained to support those:
  + Returning to work after acquiring a disability. This is one element of vocational rehabilitation, which is an identified gap in the Irish system, leaving many people who wish to return to work unemployed.
  + Young people with disabilities who are characterised as not in education, employment or training. This element of post school career guidance is provided in different ways across OECD countries, including as a function of public employment service. [[4]](#footnote-4)
* Further work to ensure the benefits delivered under the Make Work Pay policy are communicated, understood and applied at all levels of the system;
* Collaboration with relevant departments and organisations to effectively engage and support employers to employ disabled people.

## Public Employment Service

Intreo, the public employment service, needs to be appropriately resourced to respond to the need of all presenting clients, regardless of their ability or disability. In the case of disabled persons accessing the public employment service, NDA advice shows that the case officer approach of developing a personal plan, with activation measures and identified steps to access employment, works in providing supports to persons with disabilities who want to explore their employment options. Case officers can refer people with disabilities to a range of interventions, including supported employment options such as EmployAbililty and the Individual Placement and Support Model, however these models of supported employment still remain unavailable to groups of disabled people with higher support needs. While the NDA welcomes the work of the department in relation to the public employment service, we advise further capacity and resourcing should be built into the system.

This is further evidenced by the OECD report on ‘Disability, Work and Inclusion in Ireland: Engaging and Supporting Employers’ in which it outlines recommendations for Intreo.[[5]](#footnote-5) The OECD recommend that Ireland make mainstream services provided by Intreo more accessible for persons with disabilities, including earmarking resources and caseworkers to non-unemployment benefit recipients to ensure consistent outreach and guidance, and the targeted profiling and registration of persons with disabilities on the Live Register. The OECD further recommend that Ireland create a well-embedded employer service as an additional arm of the public employment service that employers can access easily free of charge. This new service should be resourced with specialised caseworkers that could provide comprehensive support for employers seeking to hire persons with disabilities throughout the recruitment process and during employment, to retain and support career progression for disabled persons.

## Intreo and return to work

The NDA advise that Intreo case officers also have a role in the delivery of advice on options regarding employment as part of a return to work after the onset of disability. The gap in employment advice is evident in the NDA policy advice paper on Vocational Rehabilitation Provision in Ireland which calls for a clear vocational rehabilitation pathway and outlines the associated steps.[[6]](#footnote-6) The paper identified a number of gaps including;

* The absence of a joined up pathway for disabled persons between medical rehabilitation, the welfare system, guidance and supports to jobseekers, vocational training, disability support organisations and employers;
* Lack of information available to people with acquired disabilities and long term health conditions to support their return to work, education and or self-employment;
* Key elements of a vocational rehabilitation system are missing or underdeveloped, such as functional assessment, provision of assistive technologies and case management. There is also a lack of capacity in vocational rehabilitation practice, professional development and education;
* Recent changes to the welfare system may require further measures, to link access to illness or disability benefit payments to disability employment supports for those with acquired disability or long term illness who wish to pursue work.
* Employer’s lack of awareness of supports available to assist the return to work of employees, and lack of provision of specific supports such as occupational health expertise and guidance on technologies to support return to work.

The NDA would welcome the careful consideration of the following steps in the department’s Statement of Strategy in order to address these gaps in the system of return to work (vocational rehabilitation).

* Prioritising early intervention with regard to returning to work. Ideally this will require, that when an individual places an initial claim to the welfare system, that application would trigger access to a case officer who will schedule a return to work options discussion and referral to other supports.
* Implementing the case manager approach would allow and support the individual navigate the system, while ensuring that the individual and their particular requirements are at the centre of the return to work strategy (vocational rehabilitation system).

## Early Engagement

The Department of Social Protection has continued to build its public employment provision and the NDA welcomes that designated case officer details are now available on gov.ie and that more officers are being assigned and receiving training. The NDA notes that as of October 2022, 14% of the 3,363 young disabled people who received a call from a case officer have expressed an interest in availing of Intreo supports. Under the NDIS, the department committed to embedding a culture and process of early engagement with people with disabilities in mainstream service design and evaluation, and the NDA recommend a commitment to the early engagement approach be articulated in the Statement of Strategy, while recognising the particular financial challenges that can often apply to households with disabilities.

## Reasonable Accommodation Fund

The NDA welcomes the department’s review of the Reasonable Accommodation Fund that took place in 2022 and looks forward to its publication. The NDA also notes the additional allocation of €1 million for the Reasonable Accommodation Fund in Budget 2023, and would welcome further updates and commitments on how the fund will be allocated going forward. The NDA’s report on ‘Reasonable Accommodations: Obstacles and Opportunities to the Employment of Persons with a Disability’ found that there is low awareness amongst some private sector employers of the financial supports provided by the Department of Social Protection to assist in accommodating the needs of current and prospective employees with disabilities. [[7]](#footnote-7) This is evidenced by the low level of take-up of certain grants within the scheme. The NDA recommends consultation with the Irish Human Rights and Equality Commission (IHREC), who are currently developing a Code of Practice on Reasonable Accommodation, which would help inform changes to the design and delivery of the Reasonable Accommodation Fund.

The NDA advise that the Department of Social Protection offer a seamless reasonable accommodation funding scheme for both the employee and employer. This funding approach should include the following points;

* Fund the individual rather than the employer, where possible, allowing the ‘accommodation’ to travel with the person with a disability in all employment and self-employment situations. This would lessen the administrative need for multiple applications, as well as allowing for disability details to be shared only once by the individual requesting the accommodation.
* By allowing the individual to ‘own’ the accommodation the department’s system could better link in with the joint Ibec/ ICTU initiative on the ‘reasonable accommodation passport’.[[8]](#footnote-8)
* Self-employed disabled are not currently listed as a group that can have access to this scheme, and the NDA advises that this should be given further consideration, particularly as self-employment can be a route to the labour market that is attractive for disabled people.
* Evidence indicates that the process to access grants can often be delayed and it is important this process be streamlined, sped up wherever possible and not be overly burdensome for disabled people. The NDA suggests that a response time of between 3 - 5 days for the grant to be issued would be appropriate to reflect the pace of the Irish labour market.
* The NDA advise that any revised system should incorporate the range of accommodations now available, including the provision of personal assistance, Irish Sign Language and an array of assistive technologies in the workplace. It may be worth considering how a scheme could be configured to be responsive to emerging technologies.

## Review of Long-term Disability Payments

Under the Roadmap for Social Inclusion and Pathways to Work strategies, the department committed to developing and consulting on a ‘Strawman’ proposal for the restructuring of long-term disability payments, with a view to removing inconsistencies and ensuring that the continuum of disabilities is recognised. The NDA welcomes the forthcoming consultation on the Strawman, and looks forward to seeing how the review will take on board the recommendations of the Cost of Disability research undertaken by Indecon Consultants.

We understand that the Department of Social Protection is also to consider the recommendations of the Partial Capacity Benefit Review in the context of Early Engagement implementation and the above Strawman. It will be important that all of these proposals align and simplify the current system of welfare supports. The NDA further advise that there is a move away from the medical model to the social model of disability both in terms of how benefits are allocated, and in the language used in the administration of schemes.

## Wage Subsidy Scheme

The NDA welcomes the intention of the department to engage with disability stakeholders on the review of the Wage Subsidy Scheme, including an accessible media campaign, and the decision to extend the consultation period, following feedback from stakeholders. In its current form the scheme provides incentives to employers to recruit staff with support needs, in the case where a disability can restrict an employee’s productivity compared to other staff, regardless of their ability to do a job. The Department of Social Protection should consider framing a payment around the concept of a supporting accommodation, in keeping with social model of disability outlined in the UNCRPD, rather than providing funding to employers on the basis of the perceived reduced capacity of an employee. However, it should also be acknowledged that the Wage Subsidy Scheme incentivises some employers to employ persons with disabilities, and is supported by some disability employment representative organisations.

## Cost of Disability

The NDA welcomes the work undertaken in the Department of Social Protection to further understand the additional costs of disability in order to consider ways of addressing same. The department plays a lead role in the Programme for Government commitment to use research on the cost of disability to inform the future direction of policy. The Cost of Disability research report by Indecon found that the financial cost of disability can be significant and varies from person to person, depending on the type and severity of disability, meaning that a one-size-fits-all approach is not always appropriate.[[9]](#footnote-9) While full implementation of the report recommendations was a cross departmental undertaking under the NDIS Steering Group, with the end of the NDIS and a successor strategy not yet developed it will be important to ensure that departments continue to implement measures to address the cost of disability in their departments. The 2023 Budget announcement of a one off €500 payment and a weekly increase for those in receipt of disability related allowances, while welcome, must be accompanied by measures that are more targeted to those who face the largest expenses. The NDA recommend that the commitment that Cost of Disability research inform future policy of the department be included in the Statement of Strategy.

## Disability Data

During 2023 it is intended that the Equality Data Strategy will be finalised and implementation will begin. This strategy supports the ‘collect once use often’ approach and will recommend using data linking as much as possible. The NDA has worked with the CSO on data related to income, welfare and analysis of disabled people that included linking Census data to DSP data.[[10]](#footnote-10) Linking of various administrative databases facilitates more in-depth data analysis to inform policy. The Equality Data Strategy will also promote the standardisation of certain indicators. The NDA recently made a submission on the Roadmap for Social Inclusion mid-term review where we advised the employment rate target was calculated using a non-standard approach. The Statement of Strategy may provide an opportunity to make a commitment to expanding data disaggregation, supporting data linking, using more standardised approach in relation to indicators and targets, and identifying and addressing data gaps.

# Statutory Obligations

## 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 the record of the department in relation to the employment of persons with disabilities, achieving 6.5% in 2021. In addition the public bodies under the aegis of the department also exceeded the minimum 3% target with the Citizen’s Information Board and the Pensions Authority achieving 10.3% and 8.3% respectively. It is important to continue maintaining compliance with Part 5 of the Disability Act as a key focus of the department's HR strategy, and articulating a commitment to same in the department’s overall Statement of Strategy can also demonstrate the department’s standing as an employer invested in equality, diversity and inclusion (EDI).[[11]](#footnote-11) Recent legislation relating to the Assisted Decision Making (Capacity) (Amendment) Act 2022 will increase the minimum target from 3% to 6% by 2025.

## 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.[[12]](#footnote-12)

In light of the importance of the services and supports under the Department’s remit to disabled people, the NDA conducted a simplified review on all Employability websites and an in-depth review on the department’s webpages on GOV.ie. In relation to the department’s websites, or websites of services funded by the department, NDA’s monitoring demonstrates that;

* Most Departmental PDFs published on GOV.ie lack accessibility.
* In particular, forms published in PDF are inaccessible and do not comply with the standard set out under the Directive.
* The level of accessibility of the websites of Employability services varies greatly across the sector.

The NDA recently engaged with Departmental officials to arrange In-depth Reviews of MyGovID and mywelfare.ie online services. The NDA also wishes to further engage with the Department to arrange monitoring of and provide guidance on a wider range of the contracted public employment services such as the JobPath, Local Employment Service and Job Club services.

The NDA recommends that the Department of Social Protection articulates its statutory obligation to ensure all its websites, and the websites of employment services the department contracts, comply with the EU Web Accessibility Directive, in the Statement of Strategy. The department should continue to be mindful of the EU Web Accessibility Directive in the development of any future online content, particularly the development of online forms that people with disabilities may be required to complete to access necessary welfare entitlements. 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 service are accessible to persons with disabilities. Where practical and appropriate, public bodies should ensure that services provided to disabled persons and persons without disabilities are integrated. This is of particular importance to frontline staff in Intreo Offices and the Citizen’s Information Board. The Centre for Excellence in Universal Design at the NDA developed a Customer Communications Toolkit for the Public Service, 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. [[13]](#footnote-13)

The NDA recently forwarded the findings of the Part 3 Monitoring Report to the Secretary General of the Department of Social Protection, which contains the results of a desk based exercise, assessing the websites of public bodies as defined by Part 3 of the Disability Act. Initial findings show that four of the seven public bodies (57.1%) under the aegis of the Department of Social Protection, meet all criteria of the standard indicator regarding Section 26(2) – Access Officers, which is above the average (33.9%) for public bodies overall. However, these figures may be subject to change, as the department and its aegis bodies have until 30th March 2023 to revert with additional information or updated websites, before final publication of the report. The NDA look forward to continued work on the recommendations detailed in the report, to ensure best practice is followed, and in assisting public bodies who do not meet this indicator to address gaps.

## 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, apart from heritage sites, are brought into compliance with Part M of the building regulations, which deals with access and use. 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 advise 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, including public buildings such as Intreo offices, 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 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 Social Protection had assessed themselves as compliant with the Act.[[14]](#footnote-14) Public bodes under the aegis of the department self-assessed as either compliant or partially compliant.

The NDA welcomes the recent updates to the Register of Irish Sign Language Interpreters (RISLI) website by your department and the introduction of the new RISLI Manager role. The report on the operation of the ISL Act identified the need for an increase in the number of Irish Sign Language Interpreters. It is important that the RISLI is alert to this issue and ensures its processes maximise the number of interpreters that can join. It will also be important that the Sign Language Interpreting Service (SLIS) continues to highlight gaps in service provision to those requiring ISL due to a lack of interpreters.

In 2021, the department supported the pilot of a scheme under Section 9 of the ISL Act to provide access to events, services and activities through ISL, referred to as the ‘Voucher Scheme’. The NDA understands that the evaluation of this scheme are under consideration by the Minister for Social Protection and the Statement of Strategy may be an opportunity to commit to the introduction of a more permanent model.

# Conclusion

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

## Summary of Key Recommendations to the Department

The NDA advise that the Department of Social Protection include the following clear commitments in the Statement of Strategy 2023 - 2026;

* Continued work on the areas within the Comprehensive Employment Strategy where the Department of Social Protection has a clear role.
* Inclusion of the OECD recommendations that Ireland make mainstream services provided by Intreo more accessible for persons with disabilities, and that Ireland create an employer service as an additional arm of Intreo that employers can access easily free of charge.
* The implementation of the case officer approach and the prioritisation of early intervention, including a mechanism whereby an application would automatically trigger access to a case officer to address gaps in the system of return to work (vocational rehabilitation).
* The implementation of the early engagement approach, while recognising the particular financial challenges that can often apply to households with disabilities.
* The provision of a seamless reasonable accommodation funding scheme for both the employee and employer.
* Articulation of the department’s commitments, made under the Roadmap for Social Inclusion and Pathways to Work strategies, to developing and consulting on a ‘Strawman’ proposal for the restructuring of long-term disability payments.
* A commitment that the findings within the Cost of Disability research report inform future policy of the department.
* Consideration be given to framing the Wage Subsidy Scheme around the concept of a supporting accommodation, in keeping with social model of disability outlined in the UNCRPD, rather than providing funding to employers on the basis of the perceived reduced capacity of an employee.
* Consideration be given to expanding data disaggregation, supporting data linking, using more standardised approach in relation to indicators and targets, and identifying and addressing data gaps.
* Maintaining compliance with Part 5 of the Disability Act as a key focus of the department's HR strategy.
* A reference to the obligations of the department under the EU Web Accessibility Directive and an action plan to address access issues, and that the Statement of Strategy itself is published in a fully accessible PDF.
* Continued work on the implementation of the recommendations of the Part 3 Monitoring Report, in assisting public bodies under the aegis of the department who do not meet their requirements.
* Maintaining compliance under Section 25 of the Disability Act, requiring all public bodies to bring their public buildings into compliance with Part M Part M 2022 by 1st January 2033, including the new requirements under Part M 2022 in relation to the provision of changing places toilets.
* Consideration be given to the introduction of a more permanent model of the ISL ‘Voucher Scheme’ under Section 9 of the ISL Act, following from the pilot same to provide access to events, services and activities through ISL and evaluation of same.

1. <https://www.gov.ie/en/consultation/cd2a6-public-consultation-on-the-development-of-the-departments-statement-of-strategy-2023-2026/> [↑](#footnote-ref-1)
2. <https://nda.ie/publications/participation-matters-guidelines-on-implementing-the-obligation-to-meaningfully-engage-with-disabled-people-in-public-decision-making> [↑](#footnote-ref-2)
3. <https://nda.ie/publications/nda-advice-paper-on-disability-language-and-terminology> [↑](#footnote-ref-3)
4. This includes three overlapping reviews of career guidance policies in 37 countries, including an OECD (2004) review covering 14 countries; World Bank Review (2004) covering 7 countries; a 2004 report of EU member-states and acceding countries review of 29 countries (Watts and Sultana, 2004). [↑](#footnote-ref-4)
5. [Disability, Work and Inclusion in Ireland: Engaging and Supporting Employers | en | OECD](https://www.oecd.org/ireland/disability-work-and-inclusion-in-ireland-74b45baa-en.htm) [↑](#footnote-ref-5)
6. <https://nda.ie/publications/nda-policy-advice-paper-on-vocational-rehabilitation-provision-in-ireland> [↑](#footnote-ref-6)
7. <https://nda.ie/publications/reasonable-accommodations-obstacles-and-opportunities-to-the-employment-of-persons-with-a-disability> [↑](#footnote-ref-7)
8. <https://www.ictu.ie/publications/reasonable-adjustment-disability-passport>; <https://www.ibec.ie/employer-hub/hr-management-guide/employment-equality/implementation-guidelines/employing-people-with-a-disability> [↑](#footnote-ref-8)
9. [gov.ie - The Cost of Disability in Ireland – Research Report (www.gov.ie)](https://www.gov.ie/en/publication/1d84e-the-cost-of-disability-in-ireland-research-report/) [↑](#footnote-ref-9)
10. <https://www.cso.ie/en/releasesandpublications/fp/fp-iewad/incomeemploymentandwelfareanalysisofpeoplewithadisability2019/incomeandemployment/> [↑](#footnote-ref-10)
11. <https://nda.ie/publications/nda-annual-reports-on-compliance-with-part-5-of-the-disability-act> [↑](#footnote-ref-11)
12. [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-12)
13. [NDA - Universal Design Public Service Toolkit - Foreword](http://publicservice.universaldesign.ie/) [↑](#footnote-ref-13)
14. 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-14)