

**April 2023**

NDA Submission to the Department Social Protection on the Mid-Term Review of Pathways to Work 2021-2025[[1]](#footnote-1)

# Introduction

The National Disability Authority (NDA) is an independent statutory body that provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities and to promote Universal Design. The NDA welcomes the opportunity to make a submission on the Mid-Term Review of Pathways to Work 2021-2025 and address issues related to the Department of Social Protection’s remit which fall within the NDA’s competencies and expertise. We outline our responses to the four questions asked in the review and are available for follow up on any of the issues raised.

# Q1: What progress do you feel has been made in achieving the aims and commitments set out in Pathways to Work 2021-2025?

Research delivered by the OECD in 2021 in partnership with the NDA highlighted a number of ways in which the State could promote the employment of disabled people, both directly with employers, and through the public employment service, Intreo. Many of the recommendations made by the OECD are reflected in the ‘Pathways to Work’ commitments. While we look forward to the implementation of this Strategy over its lifetime[[2]](#footnote-2), we suggest that there are currently key gaps that could be addressed, including a system to support return to work after acquiring disability, fully inclusive supported employment, and a fit for purpose reasonable accommodation fund for employee/employer. A worthwhile and important progression is that at the end of February 2023, approximately 6,500 people have taken up employment and signed off the Disability Allowance since the Make Work Pay report was published in April 2017[[3]](#footnote-3), which is a very positive development.

Commitment 50 sets out to review the long-term disability payment schemes with a view to removing inconsistencies/anomalies and ensure that they recognise the continuum of disabilities and support employment, which is based on research in the ‘Comprehensive Employment Strategy (CES)’ and the ‘Make Work Pay Action Plan’. The NDA understands that a ‘Strawman Proposal’ is currently being designed by the Department of Social Protection and looks forward to a public consultation on the review of long-term disability payments. Our understanding is that this will be followed by a review of the Wage Subsidy Scheme which we also welcome. NDA emphasises the importance of reform of the Reasonable Accommodation Fund (RAF) following the consultation held last year as the fund is a key enabler for many disabled people to access employment. This reconfigured reasonable accommodation fund will require consistency with the new Code of Practice being developed by the Irish Human Rights and Equality Comission. The NDA recommend that DSP promote the new RAF through promotional work of their Employer Engagement Unit, thus ensuring that employers are able to locate this important financial support.

The regular reviews of supports to persons with disability by the Department of Social Protection such as revising the earnings disregard for disability payments at budget time have enabled more disabled people to work part-time while retaining benefits. For example by the end of February 2023, 15,400 DA recipients continued to receive a DA payment while they were in insurable employment or self-employed and avail of the DA income disregard. However, often entitlements are not well communicated and there can be misperceptions among people with disabilities that they would be worse off in employment due to losing their medical card or travel card which may not be the case. In this regard it is necessary for the next phase of Pathways to Work to develop an action regarding clear communication with a consistent effort to support Case Officers within Intreo is this regard.

Commitment 51 sets out to complete the consultation on the **Early Engagement Roadmap for young people with disabilities** and implementation of the approach started in 2021. 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 recommend that the Department continue to embed a culture and process of early engagement in mainstream service design and evaluation, as well as expanding the service to other age groups. Analysis done by the NDA found that among young people aged 16-24 years who are ‘Not in Education, Employment or Training’ (NEETs) over twice as many were young people with a disability (23%) compared to those without a disability (10%).[[4]](#footnote-4) These figures highlight the importance of supporting young people early with information and guidance in relation to careers and further education and training to avoid falling into a poverty trap. However, with specific regard to the early engagement process 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. The process invites people on Disability Allowance aged 18-22 to engage via a call from an Employment Personal Advisor. The young person is then provided with advice and appointments made as desired / appropriate. The NDA advise that because of the low engagement numbers that this systematic process could be enhanced by learning from the Ability[[5]](#footnote-5) funded projects that worked with similar age groups. Key findings from the Ability programme in which it supported a total of 2,195 young people with disabilities – 83% of the programme target (2,662 participants), of which 1,755 young people with disabilities were supported to either find employment (373), enter into education and/or training (778) or become more informed about their employment options (604). Importantly, while on the Ability programme, 861 participants gained a qualification. Finally, as reported by Pobal, a third of participants who were unemployed when they started Ability found employment after they exited, and a further 44% were actively seeking employment. Lessons of what work from these models of support and relevant to the Case Officer role requires explicit implementation in DSPs mainstream Intreo service in the next phase of Pathways to Work.

Commitment 52 in Pathways to Work is to ‘ensure progress on addressing other ‘wrap-around’ issues identified in the Comprehensive Employment Strategy for People with Disabilities is monitored and reported on by the Department of Children, Equality, Disability, Integration and Youth and the National Disability Authority. Understanding the decision making process that enables disabled people to undertake an employment option was addressed by CES action 5.1. The detail of this action was developed through a sub-group, which included Department of Social Protection membership. The decisions relating to available supports, maintaining benefits and understanding the risks at a personal level of taking the employment route, sometimes referred as the ‘wrap-around’ supports were explored under this action. The overall action tasked relevant government departments to work together **to develop a seamless pathway to employment** for disabled people including those with high support needs. One key recommendation from this work was the implementation of a coordinated programme of supported employment. Evidence continues to show that supported employment without the requirement that a person is ‘job ready’ and with no restriction on the number of hours to be worked continues to be effective in supporting more people with disabilities into employment.[[6]](#footnote-6) A key feature of supported employment that is inclusive of all people with disabilities, is the job coach role who often acts as the guide to accessing ‘wrap-around’ supports and services. A positive development during the initial phase of the Pathways to Work Strategy was DSP’s continued support for the peer reviewed model of supported employment in the mental health area called Individual Placement and Support (IPS)[[7]](#footnote-7). This model of supported employment allows the job coach to work alongside the community mental health teams and in doing so the job coach guides both the employee and would be employers along the employment journey. However, the lack of an inclusive supported employment programme remains a key gap in programme of employment supports for some disabled people and this gap should be addressed in the next phase of Pathways to Work to ensure that the maximum number of people who want to work are supported to do so.

# Q2: What are the key challenges facing the Irish labour market that Pathways to Work 2021 – 2025 will need to address over the remaining lifetime of the strategy?

Since Pathways to Work was launched in 2021, the Irish labour market has undergone significant change. The emergency Covid-19 income and employment supports have concluded. However, the full implications of the Covid-19 pandemic on the employment of persons with disabilities is still not fully clear. As outlined in the consultation document, Ireland is entering a period of significant economic uncertainty. Research shows that economic downturns tend to further deteriorate the labour market situation for persons with disabilities. As persons with disabilities in Ireland tend to have lower levels of formal education, are under-represented in full-time employment and over-represented in involuntary part-time employment, they are more vulnerable to job losses during a crisis. Recent OECD research found that workers with disabilities are more exposed than the average worker to the risks from accelerated automation and slightly over-represented in the economic sectors hit hardest by the pandemic, and their jobs are therefore more vulnerable.[[8]](#footnote-8)

Many people with disabilities choose blended or remote working as it allows increased autonomy and flexibility, as well as facilitating breaks to suit their individual needs. An adaptable approach to remote working by employers can support increased labour market participation, including for persons with disabilities. However, there are also a number of reasons for people with disabilities to choose office based work, including social inclusion and community access. Employers must ensure that those who attend the office are not unfairly advantaged over those who work remotely in terms in promotion and allocation of projects. While remote working is not a panacea for people with disabilities, it comes with particular issues that should be carefully considered in the context of supporting employees with disabilities. As remote working becomes an established feature of employment in Ireland, there is a need to ensure accessibility and inclusivity of remote working arrangements are communicated to employers, either through the work of DSP or through communication by the Department of Enterprise Trade and Employment.

Changed economic and geo-political circumstances globally have led to a Cost of Living crisis, which is having a severe impact on all households, including households with persons with disabilities. 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 Indecon Cost of Disability in Ireland Research Report examined the extra spending needs that people with a disability face in their day-to-day lives that others in society do not face. [[9]](#footnote-9) While full implementation of the Indecon Cost of Disability 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. It will also be important that the impact of these additional payments is measured to examine how it relieved cost of living pressures for disabled people.

# Q3. Are there any changes that you would suggest to the current ambitions and commitments in Pathways to Work 2021 – 2025, in light of the changed economic circumstances? This can include suggestions to change the high-level ambitions, strands of action or specific commitments.

As described in previous answers, but necessary in the next phase of the Pathways to Work are the following recommendations:

* Adoption of learning from Ability Programme into the ‘offer’ provided by Intreo Case Officers who are advising young people in the early engagement process
* Provision of better communication regarding changes to the welfare system that allow disabled people on disability allowance and related payments to work and earn money through the earnings disregard. Disabled people also require accurate update and relevant information about maintaining secondary benefits such as their medical card and free travel.
* Coordinated work of the employer engagement unit in DSP, with information on the new reasonable accommodation fund and practical guidance on accessing this fund.
* Liaison between Intreo Case Officers and local adult guidance officers working in Education Training Boards to ensure that people with disabilities have access to information about careers and education options.

The substantial Pathways to Works target is to increase employment rates of people with disabilities from 22% to 33% by 2026, respectively.[[10]](#footnote-10)

In order to ensure coherence of national statistics, and the comparability of official national statistics with those developed across the EU within the European Statistical System (ESS), standardised concepts, definitions, classifications and other types of standards are consistently applied by the Central Statistics Office (CSO), Ireland’s national statistical authority.[[11]](#footnote-11) The definition of the employment rate is often provided by the CSO in the annexes to statistical publications, and is provided below:

“The employment rate is the number of employed aged 15 to 64 expressed as a percentage of the total population aged 15 to 64”[[12]](#footnote-12)

This definition, which calculates the employment rate with reference to the standardised definition of the working age population (15-64), represents an international standardised definition which is used by national statistical agencies across Europe, Eurostat[[13]](#footnote-13), the UN[[14]](#footnote-14), the OECD[[15]](#footnote-15) and the World Bank[[16]](#footnote-16).

The Irish Census of the population 2016 records the total number of persons with disabilities in the 15-64 age range as 359,657. A total of 121,968 of these persons with disabilities described their Principal Economic Status as being at work.[[17]](#footnote-17) This amounts to an employment rate of persons with disabilities of 33.9%, which is substantially higher than the employment rate of persons with disabilities of 22.3% reported in the Roadmap for Social Inclusion (RSI) for the same Census year, on which the Pathway to Work target is based.[[18]](#footnote-18) Moreover, the employment rate of persons with disabilities of 33.9% recorded in Census 2016 actually exceeds the rate of 33% described as the target to be reached by Census 2026 in Pathways to Work.

As outlined in Table 1, the Census 2016 employment rate of persons with disabilities of 22.3% reported in the RSI stems from the inclusion of individuals in the ’65 years and over’ age range category in the calculation of the employment rate.

Table 1: Census 2016 Employment Rate of Persons with a Disability by Working Age Population (15-64) and Persons Aged 15+

|  |  |  |
| --- | --- | --- |
| **15-64** | Total Persons With Disabilities | 359,657 |
| Total Persons With Disabilities at Work | 121,968 |
| Employment Rate of Persons with Disabilities | **33.9%** |
| **15+**  **(incl. 65+)** | Total Persons With Disabilities | 584,045 |
| Total Persons With Disabilities at Work | 130,067 |
| Employment Rate of Persons with Disabilities | **22.3%** |

The significant impact of the inclusion of individuals in the ’65 years and over’ age group on the rate of employment of persons with disability stems from the significantly higher prevalence of disability among individuals aged 65+ (See Figure 1), as well as the very low levels of employment among persons aged 65+ due to retirement. The higher prevalence of disability in older persons means that a far larger share (34.9%) of persons with disabilities were in the 65+ age range during the 2016 Census, while a far smaller share (13.4%) of the total population[[19]](#footnote-19) were aged 65+ (Figure 2).

The capture of a large group of individuals that are of retirement age in the calculation of the employment level of persons with disabilities within the RSI makes the achievement of the long-term targets set therein largely unachievable. If progress in increasing the employment level of persons with disabilities is continually tracked while including individuals that are aged 65 years and over for Census 2022 and Census 2027, it will remain the case that a large share of those persons with disabilities included will be of retirement age. Such an outcome would not be appropriate to the task, since the purpose of the employment rate target should be to establish an ambitious target to increase levels of employment for individuals of working age and measure progress in meeting this target. One means to resolve this issue would be to establish a revised set of targets based upon the employment rate of persons with disabilities of working age as outlined in Table 2.

Table 2: Revised Targets

|  |  |  |  |
| --- | --- | --- | --- |
|  | Census 2016 | Census 2022 | Census 2027 |
| Employment Rate of Persons with Disabilities (15-64) | 33.9% | Data available May 2023 | Set revised target |

Before setting a revised target the NDA advises requesting a headline figure of the employment rate of persons with disabilities aged 15-64 for the 2022 census. Our understanding is that this is not due to be released until late May 2023 but we feel it would be valuable to request this figure sooner in order to set a meaningful revised target. It should be noted however, that the 2022 Census data on disability will constitute a break in the series due to changes to the questions and is unlikely to be comparable to 2016 data.[[20]](#footnote-20) Given that the next Census will be in 2027 it may be worth basing targets on other data such as LFS or SILC data.[[21]](#footnote-21) or carrying the target into the next roadmap. Consideration could also be given to introducing a target around self-employment or at least being able to disaggregate the overall target by whether someone is employed or self-employed.

It should also be noted that there is an employment target associated with the Comprehensive Strategy for Persons with Disabilities (2015-2024) and while this target uses 20-65 years rather than 15-64 years, we would advise that there is consistency between the targets. The NDA are happy to engage further on this issue.

# Q4. Do you have any suggested actions to help improve the employment prospects and outcomes of people under-represented in the labour market? This can include, for example, actions in relation to the Public Employment Services, training and employment supports, the social welfare system, and/or engagement with employers.

A 2021 OECD report ‘Disability, Work and Inclusion in Ireland: Engaging and Supporting Employers’ recommended 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. [[22]](#footnote-22)

There is room for improvement for supporting employment. The supports available to people with disabilities who are or wish to be self-employed or entrepreneurs is underdeveloped and there are some system and process issues that present barriers. For example, people can find it difficult to predict their income when setting up a small business to allow their disability benefits to be adjusted. The systems in place to support people with more severe disabilities to find work is also underdeveloped with very limited access to job coaches who can provide that intensive support required, particularly at the beginning of a placement. People wishing to returning to work after acquiring a disability find they are often unsupported either in determining what reskilling or accommodations they require and in negotiating with their employer. The NDA has previously provided guidance to DSP on developing a vocational rehabilitation system in Ireland.[[23]](#footnote-23)

With regard to the social welfare system and the stigma that can be associated with accessing payments, the NDA suggest that it is timely to reconsider the language and titles used to describe these payments. For example the review of the Wage Subsidy Scheme is an opportunity for the Department of Social Protection to frame such a payment around the concept a social model of disability outlined in the United Nations Convention on the Rights of People with Disabilities (UNCRPD).

As shown in the NDA funded OECD report**[[24]](#footnote-24)**, many employers have misconceptions about employing people with disabilities that can be a barrier to their employment. The OECD report stated that:

Employer engagement and support for employers are critically important for the improvement of the labour market situation for persons with disabilities in Ireland. Effective strategies for employer engagement are critical, to overcome disability-related misperceptions and discrimination and to raise awareness about available support programmes and subsidies. Yet, Ireland has an **underdeveloped employer engagement structure** with respect to information and support for the employment of persons with disabilities.

Therefore, within the next phase of the Pathways to Work, Employer Engagement Teams in DSP have an opportunity to strengthen its employer engagement and awareness activities through the provision of more disability specific support, guidance and information. Within the context of Pathways to Work, DSP can work with the Department of Enterprise, Trade and Employment and the Employers for Change service to address the gap in information and support ‘to enable employers with all the information and advice needed to hire, employ, manage and retain staff with disabilities[[25]](#footnote-25)’. In 2022 Employers for Change worked with 95 employers, including Brown Thomas / Arnotts, Coillte Ireland, Dell, EY and Salesforce, through 185 interactions. The service also published an employer’s toolkit[[26]](#footnote-26).

It is necessary to establish supports to ensure a return to work after the onset of a disability. Over 70% of people with a disability acquire their disability after the age of 16, frequently while they are in employment. It is important that this connection with work can be maintained after acquiring a disability, as being in employment has been documented to be beneficial in the recovery process, as well as being important in avoiding poverty and long-term draw-down of social welfare benefits. Having a work history is an indicator of returning to work, however, Ireland does not currently have a national or consistent approach to provision of vocational rehabilitation. The NDA advises that through the next phase of the Pathways to Work strategy a programme that addresses the following gaps should be developed as a key priority:

* The absence of a joined up pathway or systematic links between medical rehabilitation, the welfare system, guidance and supports to jobseekers, vocational training, disability support organisations and employers, in regard to people who acquire a disability;
* Lack of information available to people with acquired disabilities and long term health conditions on their conditions and supporting 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;
* Recent changes to the welfare system in Ireland may require further measures, in order 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. Ideally, an application for an illness or disability payment would trigger access to tailored employment supports;

Lack of awareness for employers 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;

* Recognition of the lack of capacity in vocational rehabilitation practice, professional development and education.

The establishment of the National Policy Group on Lifelong Guidance to develop a coherent long term strategic framework is welcomed. It will be important to see the inclusion of this group’s output in the next iteration of Pathways to Work. The NDA welcome the cross government approach of five government departments[[27]](#footnote-27) working together as these are the key departments required to address the gaps in the provision of guidance, support and information for all people including people with disabilities when accessing support guidance and critically career guidance. As career guidance in school for all learners with disabilities remains a gap, the role of Intreo and adult guidance services in local Education Training Boards will remain key avenues of information and guidance once young people have left school. It is through the work of this group that the provision of “services intended to assist individuals, of any age and at any point throughout their lives, to make educational, training and occupational choices and to manage their careers[[28]](#footnote-28)” must be made available.

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%).**[[29]](#footnote-29)** One of the key objectives set out in Pathways to Work 2021-2025 is to improve employment rates of people most distant from the labour market, including people with disabilities. As results for census 2022 will not be published until September 2023, 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 recently. The EU-SILC data for recent years suggests that the disability employment gap for persons with disabilities characterised as ‘severe limitations’ has widened in recent years.[[30]](#footnote-30) This gap has been acknowledged by the EU Commission, who is 2022 launched an Employment Package[[31]](#footnote-31) to support Member States to improve labour market outcomes of persons with disabilities. This employment package is one of the seven flagship initiatives announced in the Strategy for the Rights of Persons with Disabilities 2021-2030 (Disability Rights Strategy)[[32]](#footnote-32). This EU initiative saw the introduction of a new practitioner toolkit for Public Employment Services across Europe. This toolkit was designed to combat labour market discrimination against persons with disabilities and to assist in their participation in the labour market[[33]](#footnote-33). The NDA advise that the utilisation of this Toolkit by Intreo, the Irish public employment service, should be examined and actioned during the next phase of the Pathways to Work strategy

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.

# 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. We also look forward to making further submissions on various work items which can have a significant impact on the lives of people with disabilities.

1. <https://www.gov.ie/en/consultation/49f9c-public-consultation-on-the-pathways-to-work-2021-2025-strategy/> [↑](#footnote-ref-1)
2. [Disability, Work and Inclusion in Ireland: Engaging and supporting employers | The National Disability Authority (nda.ie)](https://nda.ie/publications/employment/employment-publications/disability-work-and-inclusion-in-ireland-engaging-and-supporting-employers.html) [↑](#footnote-ref-2)
3. DSP report to the March Disability Consultative Forum meeting [↑](#footnote-ref-3)
4. [NDA Factsheet 3: NEET | The National Disability Authority](https://nda.ie/Resources/Factsheets/NDA-Factsheet-3-NEET/NDA-Factsheet-3-NEET.html) [↑](#footnote-ref-4)
5. https://www.pobal.ie/app/uploads/2018/06/Ability-Progamme-Evaluation-Report-2018-2021-Final.pdf [↑](#footnote-ref-5)
6. https://www.easpd.eu/fileadmin/user\_upload/Publications/s.beyer\_report\_-\_opport\_and\_barriers\_of\_diff\_employment\_models\_final.pdf [↑](#footnote-ref-6)
7. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8914809/ [↑](#footnote-ref-7)
8. OECD Report Disability Work Inclusion in Ireland [↑](#footnote-ref-8)
9. [indecon\_report\_on\_cost\_of\_disability\_in\_ireland.pdf](https://www.indecon.ie/assets/files/pdf/indecon_report_on_cost_of_disability_in_ireland.pdf) [↑](#footnote-ref-9)
10. <https://www.gov.ie/pdf/?file=https://assets.gov.ie/152608/090ec83f-7e86-4419-a63c-d3ee92bbce4a.pdf#page=null>, page7, page 27. [↑](#footnote-ref-10)
11. See: CSO (2021) ‘Handbook of Quality Standards and Guidelines’ <https://www.cso.ie/en/media/csoie/methods/A_Handbook_of_Quality_Standards_and_Guidelines_2021.pdf> [↑](#footnote-ref-11)
12. See: <https://www.cso.ie/en/releasesandpublications/ep/p-tah/tenureandhouseholdsinireland2016-2019/definitionsandnotes/#:~:text=The%20Employment%20Rate%20is%20the,Rate%20as%20of%20Q2%202015>.

    See Also: <https://www.cso.ie/en/methods/surveybackgroundnotes/labourforcesurvey/> [↑](#footnote-ref-12)
13. See: <https://ec.europa.eu/eurostat/databrowser/view/tipslm15/default/table?lang=en>

    <https://ec.europa.eu/eurostat/databrowser/view/lfsa_epgan6/default/table?lang=en> <https://ec.europa.eu/eurostat/statistics-explained/index.php?oldid=411116> [↑](#footnote-ref-13)
14. See: <https://www.un.org/esa/sustdev/natlinfo/indicators/methodology_sheets/demographics/dependency_ratio.pdf> [↑](#footnote-ref-14)
15. See: <https://data.oecd.org/pop/working-age-population.htm> [↑](#footnote-ref-15)
16. See: <https://databank.worldbank.org/metadataglossary/gender-statistics/series/SP.POP.DPND> [↑](#footnote-ref-16)
17. See CSO ‘E9009 - Population Aged 15 Years and Over 2011 to 2016’

    Available: <https://data.cso.ie/table/E9009> [↑](#footnote-ref-17)
18. Roadmap for Social Inclusion figure quoted in Pathways to Work, page 65. NDA made the same point in relation to employment targets in its submission to the Roadmap to Social Inclusion mid-term consultation. [↑](#footnote-ref-18)
19. ‘Total population’ here implies the population as a whole, i.e. inclusive of both persons with disabilities and persons without disabilities. [↑](#footnote-ref-19)
20. Q15 in Census 2022 included response options of ‘yes to some extent’, ‘yes to a great extent’, ‘no’ whereas the 2016 survey had a simple yes/no response option. [↑](#footnote-ref-20)
21. Note that as Census 2027 is to change to an online mode of data collection there may also be some comparability issues. [↑](#footnote-ref-21)
22. [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-22)
23. [Vocational Rehabilitation Policy Paper & Consultation | The National Disability Authority (nda.ie)](https://nda.ie/publications/employment/employment-publications/vocational-rehabilitation-policy-paper-consultation.html) [↑](#footnote-ref-23)
24. [Disability, Work and Inclusion in Ireland: Engaging and supporting employers | The National Disability Authority (nda.ie)](https://nda.ie/publications/employment/employment-publications/disability-work-and-inclusion-in-ireland-engaging-and-supporting-employers.html#:~:text=Disability%2C%20Work%20and%20Inclusion%20in%20Ireland%3A%20Engaging%20and,improving%20labour%20market%20outcomes%20for%20persons%20with%20disabilities.) [↑](#footnote-ref-24)
25. https://employersforchange.ie/ [↑](#footnote-ref-25)
26. [EFCEmployervToolkitFinal.pdf (employersforchange.ie)](https://www.employersforchange.ie/userfiles/files/EFCEmployervToolkitFinal.pdf) [↑](#footnote-ref-26)
27. The Department of Education (DoE), Department of Further and Higher Education, Research, Innovation and Science (DFHERIS), the Department of Children, Equality, Disability, Integration and Youth (DCEDIY), the Department of Social Protection (DSP) and the Department of Enterprise, Trade and Employment (DETE) [↑](#footnote-ref-27)
28. https://www.researchgate.net/publication/225180619\_The\_involvement\_of\_the\_European\_Union\_in\_career\_guidance\_policy\_A\_brief\_history [↑](#footnote-ref-28)
29. 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-29)
30. 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-30)
31. European Commission (COM(2021) 101 final): Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030 [↑](#footnote-ref-31)
32. Appendix One for details [↑](#footnote-ref-32)
33. https://ec.europa.eu/social/main.jsp?langId=en&catId=89&newsId=10387&furtherNews=yes [↑](#footnote-ref-33)