NDA Submission on the draft National SDG Implementation Plan 2022 - 2024

# Introduction

The National Disability Authority (NDA) welcomes the opportunity to share its views on the draft of the second Sustainable Development Goals National Implementation Plan.

The NDA is the independent statutory body with a duty to provide 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 carries out work in several areas relevant to the Sustainable Development Goals (SDGs) and we recognise the importance of putting in place a collaborative approach to their implementation, which will also achieve goals set out in our areas of national policy. For example, our policy work in areas such as education, employment, transport, independent living and access to justice align closely with SDGs 4 (quality education), 8 (decent work and economic growth), 9 (sustainable industry, innovation and infrastructure), 11 (sustainable communities), and 16 (peace, justice and strong institutions). More generally, the work of the NDA to advise on policies and practices that improve the quality of life of persons with disabilities is reflected in the spirit and objective of SDG 10 (reduced inequalities) and the guiding principle of Agenda 2030 to ‘Leave No One Behind’. Our feedback on the draft implementation plan is organised under each of the Strategic Objectives set out within the plan.

# Strategic Objective 1: To embed the SDG framework into the work of Government Departments to achieve greater Policy Coherence for Sustainable Development

## Whole of government approach

The NDA is pleased to note the whole-of-government approach to delivering the SDGs. We welcome the inclusion of high-level representatives from each Government Department on the SDG Senior Officials Group.

We note that a review of the terms of reference for the SDG Inter-departmental working group is due to be carried out. We suggest that consideration is given to how the work of the group could be ‘disability-proofed’ by using the Government’s Disability Impact Assessment[[1]](#footnote-1) process in order to ensure that disability inclusion is central to meeting the strategic goals, delivering communications on the SDGs, and preparing national SDG progress reports. For example, there could be an official with this designated role within the group, or it could be a standing item on the agenda for all meetings. The NDA is happy to support with advice or resources in this regard.

## Capacity-building of public sector

The NDA welcomes plans for capacity-building on the SDGs across national and local Government. The NDA would welcome the opportunity to take part in such an initiative.

## Linking the SDGs with UNCRPD

The NDA welcomes the strategic objective to achieve policy coherence for sustainable development by embedding the SDG Framework into Government Departments. We note that the draft plan includes reference to the National Disability Inclusion Strategy 2017-2022, which comes to an end later this year. We suggest that consideration is given to how to link SDG implementation with implementation of the UN Convention on the Rights of Persons with Disabilities (UNCRPD)[[2]](#footnote-2) as Ireland prepares to develop its first UNCRPD implementation plan (the successor to the NDIS). The NDA advises that the Department of the Environment, Climate and Communications works closely with the focal point of the UNCRPD (Department of Children, Equality, Disability, Integration and Youth) to develop an approach which incorporates both sets of obligations. The NDA would be happy to support this work.

In addition, we would like to highlight that the Office of the UN High Commissioner on Human Rights (OHCHR) has developed a resource package to provide support to policy makers to ensure that actions to implement and monitor the SDGs are disability-inclusive.[[3]](#footnote-3) We suggest that this resource pack may be useful in terms of linking the SDGs with UNCRPD implementation.

## EU Web Accessibility Directive

The NDA would like to highlight the requirements set out within the European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020. This EU Directive was transposed into Irish law on September 25th 2020 and requires public sector bodies to take necessary measures to make their websites and mobile applications accessible by making them perceivable, operable, understandable and robust. The regulation applies to most types of content including; office file formats (Word, Powerpoint and PDF documents), videos, forms, as well as intranets, extranets and their contents.[[4]](#footnote-4) It is important that this requirement underpins all planning regarding stakeholder engagement, the GeoHive, and any other digital elements of the SDG implementation plan including the dissemination of reports and other outputs. The NDA, as the monitoring body for the EU Web Accessibility Directive, is happy to advise in this regard.

## European Accessibility Act (EAA)

Ireland is currently engaged in activities relating to the transposition of the European Accessibility Act (EAA)[[5]](#footnote-5) which is a Directive that aims to improve the functioning of the internal market for accessible products and services, by removing barriers created by divergent rules in Member States. This act comes into force on June 28th 2025 and impacts on both public and private sector organisations.

The European Accessibility Act covers products and services that have been identified as being most important for persons with disabilities while being most likely to have diverging accessibility requirements across EU countries. The Commission consulted stakeholders and experts on accessibility and took into account the obligations deriving from the UNCRPD. These products and services include:

* Computers and operating systems
* ATMs, ticketing and check-in machines
* smartphones
* TV equipment related to digital television services
* Telephony services and related equipment
* Access to audio-visual media services such as television broadcast and related consumer equipment
* Services related to air, bus, rail and waterborne passenger transport
* Banking services
* E-books
* E-commerce

It is important that consideration of the requirements of the European Accessibility Act underpin all planning regarding stakeholder engagement, and other facets of the SDG implementation plan. The NDA is happy to advise in this regard.

# Strategic Objective 2: To integrate the SDGs into Local Authority work to better support the localisation of the SDGs

## A disability-inclusive approach to localising the SDGs

The NDA welcomes plans to strengthen partnerships with local authorities to localise the SDGs. In particular, we note the plans to develop a toolkit to support local authority staff, the emphasis on increased inclusive consultation and participation at the local level, and the consideration of the role of Voluntary Local Reviews to supplement the Voluntary National Review process.

The NDA acknowledges the importance of creating liveable and sustainable neighbourhoods, where everyone can live full and active lives as part of a real community. Universal Design contributes to this by providing for the creation and delivery of the communities that are envisaged in this Plan. When it comes to planning the NDA recommends that efforts to localise the SDGs should encompass Universal Design for all local authority work in relation to planning, developing and building sustainable communities.

The NDA has developed guidance for Government Departments, public bodies and local authorities on how to ensure the meaningful participation of disabled people in participation processes through a universal design approach, which may be a useful resource in this regard. The guidance is due to be formally launched in September 2022, but the NDA is happy to meet with DECC officials to share findings from this work in advance of the launch if that would be useful to inform your planning.

In addition, the NDA highlights the Irish/European Standard “Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users’ is a European process standard about using a Universal Design approach at all levels in organisations to continuously improve and manage the accessibility and usability of the products and services they provide. [[6]](#footnote-6)

# Strategic Objective 3: Greater partnerships for the Goals

## National Stakeholder Forum

The NDA welcomes the recommendation in the draft plan with regard to achieving wider representation, participation and increased awareness of the National Stakeholder Forum. The NDA advises that Disabled Persons’ Organisations (DPOs) should be targeted as a key stakeholder group for inclusion within this Forum in order to meet obligations under UNCRPD Article 4(3).[[7]](#footnote-7)

The UNCRPD recognises DPOs as the “representative organisations” of disabled people. DPOs are a particular type of civil society organisation which are led, directed and governed by disabled people. A clear majority of its membership must be disabled people. The organisation must be rooted in, committed to and fully respect the principles and rights recognised in the UNCRPD. The NDA is happy to provide further information regarding DPOs and how to engage with them. The NDA also highlights that other disability stakeholder organisations and individuals have relevant perspectives which should be sought in addition to DPOs.

Under **Actions 32(a), (b), and (c)** of the draft SDG implementation plan, the NDA would like to emphasise the need to target disabled people and their representative organisations to input into the design of the Forum from the earliest stage possible. The NDA highlights the importance of taking a universal design approach when developing the processes and mechanisms of engagement. It is essential that relevant documents, communications and outputs from the Forum are fully accessible. The Universal Design Customer Communications Toolkit[[8]](#footnote-8) Developed in partnership with DPER and the Centre for Excellence in Universal Design at the National Disability Authority gives practical advise on how to communicate in an accessible and easy to understandable way be it through Voice, Sign language, written or digital forms. The NDA is happy to advise further in this regard.

## SDG Champions

The NDA welcomes the plans to deliver a **“**well-publicised, accessible and inclusive recruitment campaign to attract a diverse range of Champions”.

Under **Action 33(a),** “Establish an SDG Champions Programme sub-group to develop improved Programme format based on Public Consultation feedback”, the NDA advises that people with disabilities are included in these plans from the outset to ensure the new Programme format is disability-inclusive.

Under **Action 33(b)**, “Develop resources to support SDG Champions including a central repository for SDG brand assets, communication strategies and reporting templates to capture Champion activities” the NDA highlights the importance of ensuring these assets and templates are fully accessible. The NDA is happy to provide guidance in this regard.

Under **Action 33 (c),** “Launch open call for applications to the 2023 Champions Programme”, the NDA highlights the need to ensure the applications process is accessible and that efforts are made to target disabled people. It should be noted that for some disabled people, access to internet and technology is limited. Therefore it is advised that in-person, as well as online methods, are used in order to reach a diverse pool of applicants. It is also recommended that the opportunity is circulated among Disabled Persons’ Organisations and other relevant organisations in order to better target disabled people.

## Youth engagement

The NDA welcomes the efforts to ensure that young people are engaged as partners in the delivery of the SDG implementation plan. In particular, we welcome the plan to design a “bespoke youth consultation process as part of the VNR process to seek feedback.” We advise that young people with disabilities should be targeted as a key stakeholder group in the design and delivery of such a consultation, and in any other youth engagement initiatives to deliver the SDGs in Ireland.

The NDA is currently working in collaboration with the Department of Children, Equality, Disability, Integration and Youth to develop guidance for Departments and public bodies in relation to engagement with children and young people with disabilities in policy development and consultation processes. We would be happy to advise further in this regard.

## SDG Geohive

Agenda 2030 outlines that follow-up and review processes will be informed by data which is “disaggregated by income, sex, age, race, ethnicity, migration status, disability and geographic location.”[[9]](#footnote-9) The NDA welcomes the opportunity provided by the SDG Geohive to become a useful source of disability disaggregated data to ensure that the SDGs are being delivered for persons with disabilities on an equal basis with others. The disaggregation of data by disability also fulfils obligations under Article 31 of UNCRPD.

As highlighted above, Government Departments have an obligation under the EU Web Accessibility Directive (WAD) to takes steps towards ensuring their websites and mobile applications are accessible. The NDA therefore welcomes the inclusion of Action 34(a) of the draft plan to “Carry out a full review of all content on the SDG GeoHive to ensure it is informative, accessible, and up to date.” The NDA, as the monitoring body for the WAD, would be happy to advise in terms of the accessibility of this online data hub.

# Strategic Objective 4: To further incorporate the principle of Leave No One Behind into Ireland’s Agenda 2030 implementation and reporting mechanisms

## Meaningful participation to ‘Leave No One Behind’

The NDA welcomes the intention to hold a dialogue to explore the concept of ‘Leave No One Behind’ in an Irish context. The NDA notes that the draft implementation plan considers meaningful and inclusive participation of marginalised groups as key to achieving ‘Leave No One Behind’. We would once again like to highlight our upcoming guidance on how to ensure the meaningful participation of disabled people and their representative organisations in decision making, which may be a useful resource in this regard.

# Strategic Objective 5: Strong reporting mechanisms

## Accessible reporting

The NDA welcomes plans to share periodic progress reports on SDG implementation, as well as the commitment to present Ireland’s next Voluntary National Review at the High Level Political Forum on Sustainable Development (HLPF) in 2023. The NDA would like to emphasise that progress reports must be available in accessible formats so that disabled stakeholders may access this information on an equal basis with others. Accessible progress reports will also support the meaningful participation of disabled people in multi-stakeholder consultations on the VNR.

## Consultation process for the 2023 Voluntary National Review

The NDA advises that the multi-stakeholder review process to inform the Voluntary National Review report must be accessible and must proactively target disabled people and their representative organisations (DPOs) from the earliest stage possible in order to meet obligations under UNCRPD.[[10]](#footnote-10)

The NDA welcomes plans by the Department to engage with the National SDG Stakeholder Forum on how best to reflect the views of stakeholders, and their contributions to achieving the SDGs, in the VNR report. The NDA further emphasises the importance of designing an inclusive and accessible National SDG Stakeholder Forum, with the meaningful participation of disabled people and their representative organisations, so that the views and contributions of disabled people are adequately reflected through this process.

The NDA welcomes the intention of the Department to include stakeholder representatives in the official Irish delegation to the HLPF. The NDA advises that the process for the selection of stakeholders should be transparent, inclusive and accessible. It is advised that the Department outlines the reasonable accommodation and accessibility supports that will be provided to successful candidates, in order to encourage applications by disabled participants.

# Other useful resources

## CEN-CENELEC SDGs and standards mapping

The European Committee for Standardization (CEN) and the European Committee for Electrotechnical Standardization (CENELEC) have started mapping the standards that make the most significant contribution to the **SDGs in the European context.[[11]](#footnote-11)** A variety of stakeholders are involved in CEN and CENELEC work, including business, industry and commerce, service providers, public authorities, regulators, academia and research centres, European trade associations and interest groups representing environmentalists, consumers, trade unions as well as small and medium enterprises, and other public and private institutions. These standards may be worth reviewing in the context of SDG monitoring.

1. <https://www.justice.ie/en/JELR/20120305%20DIA%20Guidelines.pdf/Files/20120305%20DIA%20Guidelines.pdf> [↑](#footnote-ref-1)
2. Ireland ratified the UN Convention on the Rights of Persons with Disabilities (UNCRPD) in March 2018, and submitted its initial State Report on the progressive realisation of the Convention to the Committee on the Rights of Persons with Disabilities (the Committee) in 2021. [↑](#footnote-ref-2)
3. OHCHR (2020) SDG-CRPD resource package. Available at: https://www.ohchr.org/en/disabilities/sdg-crpd-resource-package [↑](#footnote-ref-3)
4. NDA ‘European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020’ http://nda.ie/publications/communications/eu-web-accessibility-directive/ [↑](#footnote-ref-4)
5. [Link to text of European Accessibility Act](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0882) [↑](#footnote-ref-5)
6. <https://universaldesign.ie/products-services/i-s-en-17161-2019-design-for-all-accessibility-following-a-design-for-all-approach-in-products-goods-and-services-extending-the-range-of-users/> [↑](#footnote-ref-6)
7. UNCRPD Article 4(3). Available at: https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-4-general-obligations.html [↑](#footnote-ref-7)
8. <https://universaldesign.ie/products-services/customer-communications-toolkit-for-the-public-service-a-universal-design-approach/> [↑](#footnote-ref-8)
9. Transforming Our World: The 2030 Agenda for Sustainable Development, paragraph 74 (g). https://www.un.org/ga/search/view\_doc.asp?symbol=A/RES/70/1&Lang=E [↑](#footnote-ref-9)
10. See UNCRPD Article 9 ‘Accessibility’ and Article 4(3) ‘General Obligations’. [↑](#footnote-ref-10)
11. https://www.cencenelec.eu/european-standardization/sustainable-development-goals-sdgs/ [↑](#footnote-ref-11)