INCLUSION IRELAND

National Association for People with an Intellectual Disability

Submission to the Department of Social protection 'Make work pay' – September 2016.

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Introduction

Established in 1961, Inclusion Ireland is a national, rights based advocacy organisation that works to promote the rights of people with an intellectual disability. Our membership is drawn from persons with intellectual disability, parents and family members, providers of services to persons with a disability, academics, policy-makers and others.

Inclusion Ireland uses a human rights-based approach to its work. This recognises persons with an intellectual disability as rights holders with entitlements, and corresponding duty bearers and their obligations. Inclusion Ireland seeks to strengthen the capacities of persons with an intellectual disability to make their claims and of duty bearers to meet their obligations.

The vision of Inclusion Ireland is that of people with an intellectual disability living and participating in the community with equal rights as citizens, to live the life of their choice to their fullest potential. Inclusion Ireland works in partnership with other organisations.

Current context

The National Social Target for Poverty Reduction is to reduce poverty to 4% by 2016 and 2% or less by 2020. The consistent poverty rate for people with disabilities is currently at 13%.

People with disabilities have been disproportionately disadvantaged in recent times. Social welfare cuts, failure to enact promised legislation and exclusion from mainstream employment strategies all impact on the standard of living of people with disabilities and act as barriers to inclusion and participation.

The Department of Social Protection (DSP) has the opportunity to drive real reform in the lives of people with disabilities in Ireland. Doing so will entail addressing the root causes of poverty and social exclusion and recognising people with disabilities as citizens with rights.

The Departments current strategy aims to put the person at the centre of services and policies.

There are some practical measures that the Department can implement to ensure people with disabilities can access social protection systems on an equal basis.

Make employment possible for people with disabilities

Having a job helps to combat the institutional and systemic causes of poverty and social exclusion. Data from the Health Research Board indicates that less than 1% of adults registered with the National Intellectual Disability Database are in open employment[1]. Of all persons with a disability about 30% have a job. A recent DSP survey notes that 31% of people with a disability have never worked[2].

It must be noted that people with a disability in many cases want to work. The DSP survey notes that of people with a disability not working 43% expressed a strong interest in working either part-time or full-time.

People with a disability face many barriers in accessing employment. The National Disability Authority notes that 76% of people with a disability do not believe they get equal employment opportunities. Non disabled respondents to the same survey noted that they felt less comfortable

[1] Health Research Board (2015). Annual Report of the National Intellectual Disability Database Committee 2014. Dublin: HRB.
[2] Department of Social Protection Disability Allowance Survey, 2016.

having work colleagues who had an intellectual disability.[3] Employers, service providers and policy makers all have a role to play in reducing the impact of attitudinal barriers and enabling and supporting people with disabilities to access employment.

People in receipt of disability payments are not classified as unemployed and are often restricted from participating in various labour activation programmes. Ensuring that persons in receipt of disability allowance are eligible for all current and future labour activation programmes would help to support people with disabilities to access employment opportunities.

The loss of secondary benefits (e.g. travel pass, medical card) makes the transition from welfare to employment extremely difficult, if not impossible, for people with disabilities. Many persons with disabilities feel that they are caught in a welfare trap. Continued access to secondary benefits is highlighted in the DSP report as supporting people with a disability in achieving their employment goals.

Like many people in society, people with a disability may face childcare costs when taking up employment. Childcare costs are substantial. This, coupled with the fact that many people with a disability obtain lower paying jobs makes it costly to take up employment.

Recommended actions:

- Introduce measures to allow persons in receipt of disability allowance to keep their secondary benefits (medical card, travel pass, etc.) when taking up employment.

[3] A national survey of public attitudes to disability in Ireland, NDA, 2011.

- Introduce measures to ensure that persons in receipt of disability allowance are eligible for all current and future labour activation programmes.

- The DSP should work with employers, service providers and policy makers to remove attitudinal barriers that people with a disability face in accessing employment.

- Childcare costs must be addressed to enable people with a disability to take up employment opportunities.

Accessing welfare payments:

Another barrier to taking up employment for people with a disability is the step into the unknown. What if it does not work out? People are aware of the waiting times to reapply for a Disability Allowance payment. Current figures note that the average time to process a Disability Allowance payment is 14 weeks[4].

Rightly or wrongly, there is a perception that Disability Allowance has become an increasingly difficult payment to qualify for. Disability Allowance is not always granted on first application and accounts for around ¼ of all social welfare appeals. Of these appeals more than 70% are successful[5]. Appeals add on average 15 weeks to the wait time to access a payment. This leaves a potential 29 week application period. This also indicates that people do not fully understand what exact details the DSP are looking for when filling out an application for Disability Allowance.

[4] Written answers, Minister Leo Varadkar TD, 15/09/2016.
[5] Social Welfare Appeal Office Annual Report, 2015.

Recommended actions:

- Allocate additional staff as deciding officers to ensure timely processing of Disability Allowance applications.
- There should be a review of the application procedure for Disability Allowance to address the high level of successful appeals.
- In the event of a person taking up work and ceasing to claim Disability Allowance their 'medical eligibility' for the payment must remain intact. This means that if their employment does not work out they can reactivate their payment.

Introduce measures to address the cost of disability

Economic costs associated with having a disability mean that people with disabilities are more likely to experience poverty and social exclusion compared to others. They are twice as likely to live below the poverty line and also experience higher levels of consistent poverty.

Worrying as these figures are, they are likely to be an underestimation of the real level of economic disadvantage that people with disabilities experience. The Survey of Income and Living Conditions (SILC) looks mainly at income levels in assessing poverty and deprivation, but does not take into account the additional costs of having a disability. Some of these costs are incurred in taking up of employment opportunities.

Data from the UK shows that while 18% of households in general and 23% of disabled households are at risk of poverty when standard income

measures are utilised, this rises to 47% when the additional costs of disability are factored in[6].

There are two elements to cost of disability. Firstly, people with disabilities are less likely to attend further education or be in employment. If they do have a job, they are likely to have lower earnings. Secondly, people with disabilities generally have extra costs associated with having a disability; costs such as home adaptations, higher costs for energy & transport, higher medical costs and disability aids. These extra costs have been estimated to represent around 35% of disposable household income.

Addressing the cost of disability is an equality issue – people with disabilities have lower incomes compared to the population as a whole and have to spend more of their income to achieve the same standard of living as everyone else.

Inclusion Ireland is calling for the establishment of a Cost of Disability Commission to evaluate the additional, essential and recurring costs of having a disability and to make necessary recommendations to address these costs. Among other tasks, the Commission should examine the interaction between social welfare and taxation for people with disabilities.

Having accurate data on the number of people with disabilities experiencing poverty and the level of poverty experienced is key to implementing effective policies. Introducing disability-adjusted poverty

[6] Wood, C. & Grant, E. (2010). Counting the cost. London: Demos

and inequality estimates and equivalence scales would increase the accuracy of this data.

Addressing costs associated with having a disability can have a very real and substantial impact on the standard of living and social inclusion of people with disabilities and should be a key reform for the Department over the next few years.

Recommended actions:

- Establish a Cost of Disability Commission to identify the extra costs of having a disability and to make recommendations around necessary reforms. This would include the extra costs associated with taking up employment.

- Introduce disability adjusted poverty and inequality estimates and equivalence scales to ensure policy making is informed by accurate evidence.