

Chime Submission
on the
Review of the Reasonable Accommodation Fund
April 2022

1.0 Introduction

- 1.1 Chime is the National Charity for Deafness and Hearing Loss. Chime was founded in 1964 and is dedicated to a society where deafness or hearing loss does not limit individual potential, personal choice or quality of life. Chime works to achieve this through advocating for a more accessible and inclusive society and providing a range of personal support services for Deaf and Hard of Hearing (DHH) people. Chime's services entail a holistic approach, addressing the person's social, technological and emotional needs.
- 1.2 Chime welcomes the opportunity to participate in the review of the Reasonable Accommodation Fund (RAF). We note that this was an action under the Comprehensive Employment Strategy (CES) Implementation Plan 2019-2021, and that this review is well overdue.
- 1.3 This submission is informed by our experiences supporting Deaf and Hard of Hearing (DHH) people to avail of the RAF in the past and also on our own experience internally whereby DHH employees sought to access the RAF.
- 1.4 A significant portion of the population is affected by deafness or hearing loss. Approximately 200 children are diagnosed each year with hearing loss, with the majority diagnosed within a few months of birth. The Deaf community has approximately 5,000 members whose primary language is Irish Sign Language (ISL). Those who have acquired a hearing loss in adulthood are a much larger group. The HSE estimates that 8% of all adults (approximately 300,000 people) have a moderate or greater hearing loss and require audiological support. The prevalence of hearing loss increases greatly in later life, so that by the age of 70 approximately 50% of the population have acquired a significant hearing loss. Using age-based data from census figures, Chime estimates that there are approximately 3,000 people in the Deaf community of working age. Using hearing loss prevalence data of hearing loss by age, Chime estimates there are approximately 80,000 people of working age with a significant hearing loss*.

(* A significant hearing loss in adults is defined by the WHO as a hearing threshold of 35dB or greater in the better ear. In lay terms this would be described as a moderate or greater hearing loss.)

1.5 Disabled people are much more likely to be unemployed, in low level employment and to experience poverty. Those in the labour force are twice as likely to be unemployed compared to those without a disability¹; the media earnings of disabled people is approximately 56% of that of people without a disability¹; while unemployed disabled people are at almost four times the risk of consistent poverty compared to the wider population². This is why the objectives of the Government's Comprehensive Employment Strategy to increase the employment of people with disabilities and effective schemes such as the RAF are critical to addressing these social inequalities.

2.0 Current issues with the RAF

2.1. The RAF does not provide any communication supports to Deaf or Hard of Hearing people in the workplace.

2.1.1 While there is a Job Interview grant to fund an ISL interpreter for an interview involving a Deaf person, if the person is successful in getting the job, there is no communication support available to the DHH person in the workplace (apart from a small no of hours that may be approved for induction). This means that if a DHH person is successful in getting a job, they often feel marginalised in the workplace (e.g. feel left out at staff meetings, discussions with supervisors, company developments, etc) and have very little opportunity to progress in the workplace (there are virtually no Deaf people whose first language is ISL in supervisory/ managerial roles in Ireland).

Chime is aware that DHH employees often feel 'left out' of workplace activities such as staff meetings. For example, many DHH employees have told us that decisions at such meetings are often communicated to them in writing by a supervisor or colleague after the meetings have finished. Many are not in a position to contribute their views to such meetings. This happens in both the private and public sector. For many, it results in feelings of exclusion, disempowerment and marginalisation in the workplace.

2.1.2 In May 2019 RTE broadcast a documentary about three Irish Deaf adults who moved to London to work. The documentary was entitled 'London Calling'. They moved to London to improve their employment prospects. In the UK they could access communication support in the workplace via the Access to Work scheme. All of them had been able to progress their careers due to the support of the scheme. One worked as a fashion designer, one was a supervisor in a retail outlet and one was a senior manager in a local authority planning department. Two of them availed of sign language interpreters in the workplace, while one used a live captioning service. None of these individuals could progress their careers in Ireland in the same way due to the absence of any communication support service in the workplace.

2.1.3 **Recommendation:** The RAF be expanded to include communication support in the workplace for DHH employees to enable them to participate and progress in the workplace on a par with their hearing peers.

2.2 The RAF scheme is bureaucratic.

2.2.1 It appears that there is a high level of administration, confusion, delays and duplication associated with a RAF application. (See Appendix I for further illustration). For example, in some instances the employee should apply, in others the employer should apply. Applications are not processed where the employee works – but rather according to their address. There are regular delays and duplication in the process (e.g. having to resubmit supplier details – in the example in Appendix I, although a DSP supplier set-up form states that it was only to be completed where 'details have not been previously submitted or have been changed', the employer who was already actively set-up as

a supplier with the DSP was requested to submit details on TWO occasions within this application process).

2.2.2 Chime is aware that in some instances employers simply pay for equipment rather than go through the administrative burden associated with applications, seeking quotes, etc etc.

2.2.3 **Recommendation:** The RAF application process be streamlined to make it easier for employees and employers to apply and for applications to be processed more smoothly and quickly. Actions could include centralising the application process, developing a list of approved equipment and prices, and clear response times.

2.3 **Applications to the RAF are very low**

2.3.1 Chime understands that there are an average of approximately 40 applications for the Workplace Equipment Adaptation Grant per annum, while there a similar number of applications for the Personal Reader Grant. Given that there are over 100,000 disabled people in employment, the number of applications seem inordinately low.

2.3.2 Chime believes that there are a number of reasons why applications are so low. Firstly, there is little awareness amongst employees and employers of the scheme. Secondly, as already pointed out, there is a lot of bureaucracy associated with applications to the scheme. Thirdly, many employees have indicated to us that they are reluctant to apply as they feel they will be seen as a burden to their employer. The cumbersome application process does not help in this regard.

2.3.3 **Recommendation:** The operational processes of the RAF are streamlined and the RAF itself is promoted widely to increase awareness of the scheme amongst the wider public, not just employers and employees. The purpose of the scheme should be widely communicated, and it should be understood that the scheme is not just to ‘help a person with a disability to access, improve or retain their employment’, but also, for example, to enable employees to fulfil their duties more effectively and with less stress and fatigue.

Chime believe it is important to increase awareness of the RAF amongst the wider public, not just employers, as the reality is that one in seven of the population has a disability, while anyone may acquire a disability at any point in time.

3.0 **Summary**

The RAF as currently constituted is not fit for purpose. Most importantly, it does not support DHH people who need communication support in the workplace. The result is that DHH people cannot progress their careers in line with their talents and abilities, and many feel excluded and marginalised in the workplace. The RTE documentary London Calling, first broadcast in 2019, illustrates these issues very clearly.

It is important to point out that while the RAF does not apply to the public sector, these issues are also widely experienced by DHH employees in the public sector, where there is no RAF and no tradition of provision of communication support. Chime expects that the long overdue report by the NDA on the Implementation of the ISL Act will, when published, highlight the high levels of marginalisation that DHH people continue to experience – including in the workplace.

In Chime’s opinion, there is an extremely low take up rate of the RAF grants. Lack of awareness of the scheme and an overly bureaucratic process are contributory factors. But so also is the failure to

effectively encourage and support employers to employ disabled people and develop an enhanced culture of Equality Diversity and Inclusion in the workplace and wider society.

The recommendations contained in this submission, if implemented, would enable the RAF to contribute to reducing the inequality and marginalisation experienced by DHH people in terms of accessing employment and enhance their progression and experiences within the workplace itself. However, a wider whole of government approach will be required to create a society where disabled people can participate on a level playing field in terms of accessing employment and realising income levels on a par with people without a disability.

For further information or queries on this submission please contact:

Brendan Lennon
Director of Advocacy
Chime
35 North Frederick Street
Dublin 1
brendan.lennon@chime.ie

References

¹Income, Employment and Welfare Analysis of People with a Disability. CSO. 2019.

²Survey on Income and Living Conditions. CSO. 2017.

Appendix I

Timeline re a Chime employee's application for a Workplace Equipment Adaptation Grant under the Reasonable Accommodation Fund.

| | Date | From | Mode | Communication |
|----|-------------------------------------|-------------|-------------|--|
| 1 | 25 th June 2021 15:40 | Chime | Email | WEAG application submitted to local Intreo office (of workplace) |
| 2 | 29 th June 2021 09:49 | Welfare | Email | Intreo official reverts seeking employee's home address (workplace address given in application) |
| 3 | 29 th June 2021 16:46 | Chime | Email | Employee responds with home address |
| 4 | 2 nd July, 2021 9:07 | Welfare | Email | Intreo official responds and forwards application to office in area of employee's home address |
| 5 | 2 nd July 2021 9.14am | Chime | Email | Employee responds saying he thought the application was based where he worked. |
| 6 | 23 rd July 2021 10:13 | Welfare | Email | Email from Intreo official requesting employer complete bank details form. |
| 7 | 3 rd August 2021 9:30 | Chime | Email | Employee requests finance colleague to complete form. |
| 8 | 3 rd August 2021 17:04 | Chime | Email | Finance colleague contacts Intreo official re form stating: Form states it should only be completed if we have not previously submitted details to the DSP. We currently receive payments from the DSP under the WSS. However, if you do need me to fill in the form, please let me know. |
| 9 | 1 st October 2021 15:29 | Chime | Email | Employee to Intreo official: Can I have an update of the application for equipment under the WEAG. I awaiting a reply since 3 rd of August. Really in need of the equipment for my work. |
| 10 | 1 st October 2021 15:34 | Welfare | Email | Intreo official responds apologising for delay and saying that the WEAG has been approved and will be with forwarded shortly |
| 11 | 1 st October 2021 15:48 | Chime | Email | Employee acknowledges email with thanks. |
| 12 | 1 st October 2021 15:50 | Welfare | Email | Intreo official acknowledges reply and again apologises for delay. |
| 13 | 14 th October 2021 15:58 | Welfare | Email | Intreo official: Accounts section have requested that you complete part 1 of the application again please. The original application didn't have your home address included. Can you ask your employer to complete the Set-up form also. To save time, both can be returned to me by e-mail. Sorry again |

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| 14 | 14 th October 2021 16:14 | Chime | Email | Employee to Finance colleague: Please see below. Can you complete set-up form as requested. |
| 15 | 14 th October 2021 16:32 | Chime | Email | Email from finance colleague to employee outlining previous email to Intreo on 3 rd August. |
| 16 | 14 th October 2021 16:36 | Chime | Email | Employee acknowledges finance colleague's email and says he will forward it to Intreo. |
| 17 | 14 th October 2021 16:38 | Chime | Email | Chime employee forwards Intreo official email from 3 rd August. |
| 18 | 26 th January 2022 16:54 | Chime | Email | Chime employee emails finance colleague to see if WEAG funding has been received. |
| 19 | 26 th January 2022 16:54 | Chime | Email | Finance colleague confirms that funding has not yet been received. |
| 20 | 26 th January 2022 16:5 | Chime | Email | Employee emails finance colleague to say he will follow up with Intreo. |
| 21 | 26 th January 2022 17:04 | Chime | Email | Employee emails Intreo official stating that funding has not yet been received. Also points out that prices of equipment may have changed in the meantime. |
| 22 | 27 th January 2022 10:53 | Welfare | Email | Intreo official: Sorry, when I didn't hear from you I presumed you received the grant. I have contacted my Manager and asked him to get in touch with the Accounts section. I'll get back to you as soon as I hear |
| 23 | 27 th January 2022 11:50 | Chime | Email | Employee to Intreo official: Ok that's fine however the technology has changed; original version has been discontinued and price of new version is different. I will renew the forms with the new details and forward as soon as possible. |
| 24 | 27 th January 2022 11:52 | Welfare | Email | Intreo official: That would be great, thanks |
| 25 | 27 th January 2022 14:16 | Chime | Email | Employee to Finance colleague : See below. I will follow up with new info forward to you for signature and stamping. |
| 26 | 27 th January 2022 14:36 | Chime | Email | Employee to finance colleague: forms in post to company HQ for signing/stamping. |
| 27 | 9 th February 2022 | Chime | Post | Employee receives signed and stamped form from company HQ. |
| 28 | 9 th February 2022 16:13 | Chime | Email | Employee forwards completed forms to Intreo official. |
| 29 | 22 nd February 2022 13:34 | Chime | Email | Employee emails Intreo official: I have not heard from you since sending documents to you on the Feb 9 th last |
| 30 | 2 nd March 2022 12:32 | Welfare | Email | Intreo official to employee: Will you contact your finance department to see if they received payment. |
| 31 | 2 nd March 2022 13:45 | Chime | Email | Employee forwards Intreo email to finance colleague. |

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|----|-----------------------------------|--|-------|--|
| 32 | 2 nd March 2022, 13:53 | Chime | Email | From finance colleague to employee: We do not appear to have received this from the Department as yet. Generally the DEASP will send a remittance to us before payment. |
| 33 | 2 nd March 2022 15:02 | Chime | Email | Employee to Intreo official: See email from finance. |
| 34 | 21 st March 2022 15:13 | Welfare | Email | Intreo official to employee : Accounts Dept seem to be having problem transferring payment to Chime. Can you ask your finance dept to complete the attached set up form and return to me. |
| 35 | 21 st March 2022 15:16 | Chime | Email | Employee to finance colleague: see email from Intreo. |
| 36 | 21 st March 2022 16:41 | Chime | Email | Finance colleague to Intreo: see completed set up form as requested. Please note that the DSP is already using these bank details to make payments to Chime under the WSS. As such the details do not represent new or changed bank details as requested on the form. |
| 37 | 19 th April 2022 13:06 | Chime | Email | Employee to Intreo official : Is there an update on this? |
| | 28 th April 2022 | No response received to above email by COB on April 28 th 2022. | | |