

Chime Submission

on the

Green Paper on Disability Reform -

A Public Consultation to Reform

Disability Payments in Ireland

April 2024

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1.0 Introduction

1.1 Chime is the National Charity for Deaf and Hard of Hearing people. 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 (D/HH) people. Chime's services entail a holistic approach, addressing the person's social, technological and emotional needs.

1.2 Chime welcomes the Department of Social Protection's consultation on the Green Paper on Disability Reform. As the Green Paper states, people with disabilities are at much higher risk of poverty in Ireland. The Cost of Disability report outlines how disabled people face considerable additional costs in their daily lives simply because of their disability, while they also face many barriers in society inhibiting access to equality and inclusion. Ireland has now ratified the UN CRPD and Chime notes the transfer of disability functions from the Department of Health to the Department of Children, Disability, Equality, Integration and Youth (DCEDIY). These developments provide an opportunity for Government to ensure that disabled people are at the centre disability policy and planning, underpinned by core values of equality, fairness and justice.

1.3 This submission focusses primarily on the concerns of D/HH people. There are two main cohorts within the communities of Deaf and Hard of Hearing people. Firstly, there are those people who were born deaf, or acquired their deafness in early childhood, and use Irish Sign Language (ISL) as their primary language. These are the members of the Deaf community and there are approximately 5,000 Deaf people in Ireland whose first language is ISL.

Secondly, there are those who have acquired a hearing loss in adulthood, typically from middle age onwards. These people tend to describe themselves as 'Hard of Hearing', and there are over 300,000 adults in Ireland with a 'significant disabling hearing loss, as defined by the World Health Organisation. It is important to note that individuals within both groups might describe themselves as Deaf and/or Hard of Hearing.

1.4 This submission is limited by the resources and time available within Chime to complete it. The Green Paper itself is broad and wide ranging. Consequently the submission concentrates on key issues at a high level, with a particular focus on the perspective of people who are Deaf or Hard of Hearing.

2.0 Green Paper – context.

2.1 The Green Paper lacks consistency in how it attempts to frame its approach. For example, in the Foreword, the Minister acknowledges that "improving outcomes for people with disabilities is complex" and that they may have varying needs related to

“education, occupational supports, transport, and assistive technologies to name just a few.” In Section 2, the Green Paper further outlines the context by noting that the prevalence of disability is increasing; employment rates for people with disabilities in Ireland is low; they experience higher rates of poverty and deprivation; and they face higher living costs compared to non-disabled people. The Green Paper further states that the Government has “committed to developing and consulting on a proposal that addresses these issues”, and concludes that “this Green Paper does this by suggesting new measures to improve employment outcomes, and by reviewing the structure of disability payments and income supports.” The reality is that the Green Paper addresses only income supports and employment supports, and so is not being considered in the context of a holistic approach to enabling people with disabilities to live independently with equal choice and opportunity.

2.2 Chime believes that a fundamental weakness of the Green Paper is that it is being considered in a policy vacuum. This Green Paper doesn’t address many of the challenges faced by disabled people in going to work, and therefore is asking the public to comment on a ‘package’ related to income supports and employment supports in isolation from other issues that are relevant but not currently being addressed. How can a disabled person who wants to work but may need to get a taxi to and from work, comment on the Green Paper when there is no proposal to address issues such as travelling to work or the need for personal assistance to get ready to go to work? Chime understands that these issues are not the responsibility of the Department of Social Protection – but the absence of a co-ordinated cross Government approach means that this Green Paper is being presented and considered in a vacuum.

Chime recommends that the Government initiate a cross Departmental process to address a range of issues that are barriers to employment and contribute to the costs of disability, in a coordinated and comprehensive manner. Examples of such issues include personal assistance and transport, in addition to disability payments.

3.0 Proposal 1: Disability Payments – a tiered system of payments

3.1 The Green Paper quotes the Cost of Disability Report on Page 15, and appears to use a statement within the report, that “a consideration in designing how to provide additional income supports is the potential impact on incentives to work has been recognised by previous research”, as a justification for proposing a tiered system of payments.

In Chime’s view this statement from the Cost of Disability Report should underline the importance of providing a ‘cost of disability’ payment for all disabled people – those in employment and those unemployed. Disabled people who take up employment should not be penalised for doing so, for example, through additional costs of travelling to work where accessible transport is not available. People with disabilities should expect to benefit financially from work on a par with non-disabled people, and Departmental policy regarding disability payments and supports should be structured on this basis.

3.2 Chime believes that the proposal for a tiered approach to disability payments is fundamentally flawed in that it fails to consider a 'universal' cost of disability payment for all disabled people as a means to address poverty issues and enable people to access work on a more equal footing with non-disabled peers. Furthermore, the proposed approach would tie up valuable resources in a futile assessment process, and would likely lead to much frustration and ultimate failure. This was cogently highlighted by Christopher Prinz, an OECD Senior Policy Analyst, in a presentation at a Green Paper consultation event in Dublin Castle in late 2023.

Chime recommends that the Department of Social Protection abandon the proposed tiered approach in the Green Paper and instead focus on developing a cost of disability payment for all people with disabilities.

4.0 Proposal 2: In-work income supports

4.1 Chime is in favour of simplifying and harmonising the various income supports that disabled people may avail of. However, our support for this measure is within the context of our comments in Section 3 re the proposed tiered model.

5.0 Proposal 3: Proposal on eligibility

5.1 Chime is in favour of raising the age of eligibility for Disability Allowance to 18 years. We have previously supported this proposal on the basis that we don't believe the current model is in the best interests of young people and doesn't encourage them to stay in education. We strongly believe this should not be a cost saving measure and that Domiciliary Care Allowance (DCA) should be increased to reflect the increased living costs for teenagers and young people with disabilities.

An example of the additional costs of disability for young people is the challenge faced by Deaf teenagers to participate in social, cultural and extra-curricular activities in their communities. An important part of teenagers development is increased independence and participation in activities of interest. While adult Deaf people have support to engage in these activities through the new 'Voucher' scheme, this scheme is currently not available to those young Deaf people under 18 years. Chime is aware that teenagers with other disabilities also face increased costs to participate in social and cultural activities, and these costs should be covered through an enhanced Domiciliary Care Allowance payment to families to support their teenage children with disabilities to participate in community life on a par with non-disabled peers.

Chime agrees that the entry age for Disability Allowance is increased to 18 years of age, and that the DCA payment is enhanced and extended for families of teenagers with disabilities up to 18 years of age.

5.0 General approach – some thoughts.

5.1 As pointed out in the introduction, this submission is limited due to available time and resources, and cannot be in itself comprehensive. However, Chime wishes to comment on some of the tone and general approach of the Green Paper.

5.2 Chime does not agree with some of the language used in the Green Paper, which no doubt instilled a level of fear and anger amongst many disabled people and their families and supporters. Phrases such as “will be expected”, “will have to engage....and take up reasonable offers” is not consistent with a caring, person centred and respectful approach to social protection. It is not consistent with the Principles of the UN CRPD, which has been adopted by the Government. And while the Minister helpfully clarified the intended approach sometime after the publication of the Green Paper, the language therein was definitely not helpful in the context of this public consultation.

Chime is in favour of an approach that encourages and facilitates people, rather than threatening them. We believe that such an approach will give more people with disabilities greater confidence to take up employment. In that regard we welcome the long overdue review of the Reasonable Accommodation Fund, and hope that a new approach in this area will enable more people with disabilities, and Deaf people in particular, to access employment.

Chime recommends that the Department adopt an approach to initiatives to support disabled people that is person-centred, positive and encouraging.

5.3 As already mentioned, this Green Paper is only part of the picture in terms of supporting more people with disabilities to access employment and to reduce the level of poverty and deprivation. It is unfortunate that it is being considered in a context where other important elements in the lives of disabled people, such as accessible transport, sign language interpretation or personal assistance, are not being discussed. And the Department and Government need to understand that accessing employment cannot be the only approach to addressing the poverty and deprivation experienced by many disabled people.

The lack of a coordinated Whole of Government approach is an ongoing feature in the area of disability, and the failure to progress many aspects of the Comprehensive Employment Strategy for people with disabilities is a clear example of this. Government needs to find a way to progress objectives to improve the lives of people with disabilities in a way that is holistic and coordinated, rather than piecemeal and inefficient.

Chime recommends that Government moves to improve the lives of people with disabilities across the various domains of daily living through an integrated cross-departmental approach, with programmes and strategies that are funded and delivered in a timely and coordinated fashion.

7 Summary of recommendations

7.1 *Chime recommends that the Government initiate a cross Departmental process to address a range of issues that are barriers to employment and contribute to the costs of disability, in a coordinated and comprehensive manner. Examples of such issues include personal assistance and transport, in addition to disability payments.*

7.2 *Chime recommends that the Department of Social Protection abandon the proposed tiered approach in the Green Paper and instead focus on developing a cost of disability payment for all people with disabilities.*

7.3 *Chime agrees that the entry age for Disability Allowance is increased to 18 years of age, and that the DCA payment is enhanced and extended for families of teenagers with disabilities up to 18 years of age.*

7.4 *Chime recommends that the Department adopt an approach to initiatives to support disabled people that is person-centred, positive and encouraging.*

7.5 *Chime recommends that Government moves to improve the lives of people with disabilities across the various domains of daily living through an integrated cross-departmental approach, with programmes and strategies that are funded and delivered in a timely and coordinated fashion.*

Submitted to Department of Social Protection, April 2024.

For further information on this submission contact:

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