

# **Chime Submission**

**to the public consultation on the**

## **Wage Subsidy Scheme**

**July 2023**

### **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 (D/HH) people. Chime’s services entail a holistic approach, addressing the person’s social, technological and emotional needs.

1.2 Chime welcomes the review of the Wage Subsidy Scheme (WSS) by the Department of Social Protection (DSP). We also welcomed the consultation on the Reasonable Accommodation Fund (RAF) by the DSP in early 2022 – but more than a year later we are still awaiting the publication by the Department of the report on this consultation, and more importantly, any recommendations arising from the review.

1.3 As this submission will outline in greater detail, employers and Deaf employees have relied on the WSS to help make the workplace more accessible for Deaf people, although this is not the core objective of the WSS. This practice has come about because the RAF is currently severely lacking in the provision of in-work supports for Deaf people in the workplace.

## 2.0 Wage Subsidy Scheme and Deaf employees

2.1 The parameters of the WSS are described in detail on the Gov.ie website. The scheme aims to give “financial incentives to private sector employers to employ people with a disability”, on the basis of a report that indicates “why you (the employer) think the employee has or will have a loss of productivity in each of the main tasks they are or will be performing in their role”. Subsequently, the employee and employer must sign forms regularly to make claims under the WSS, certifying that the “above-named employee’s productivity shortfall is/will be as stated in the Productivity Level Report form and that the employee’s terms and conditions of employment are in line with the minimum wage requirements.” It is fair to conclude that the language used to describe the WSS scheme and the associated documentation is strongly ‘ableist’ in tone.

2.2 Chime doesn’t believe that any employee with a disability should have to sign a form using ableist language to state that their productivity is below someone else’s, particularly when the reason for the lower productivity is due to the lack of appropriate accommodations in the workplace. This requirement reinforces the ill-informed view that Deaf people are less able than others, and creates embarrassment and loss of dignity for Deaf employees who have to sign a form to confirm that they are less productive than hearing colleagues.

2.3 It is important that the DSP and other stakeholders understand that deafness or hearing loss is not a barrier to learning or work performance – rather it is the environment and the lack of reasonable accommodations that can impact on a Deaf employee’s work performance and their opportunities to progress their careers in the workplace. In terms of education, the National Council for Special Education (NCSE) recognise that Deaf and Hard of Hearing children should achieve educational outcomes “that are on a par with hearing peers of similar ability”<sup>1</sup>. As such, DSP, employers and others should expect that Deaf employees can perform in the workplace on a par with hearing peers – providing the appropriate communication supports are in place to ensure: (a) that Deaf employees can perform their tasks and duties on a par with hearing peers, and (b) the employer and hearing work colleagues can meet their obligations in terms of dignity, respect, equal opportunities for all employees in the workplace.

2.4 In practice, many employers of Deaf people use the WSS grant to fund the booking of Irish Sign Language (ISL) interpreters in the workplace. Typically this might be for staff meetings, staff training etc. It is important to understand that the role of an ISL interpreter in a meeting is not just to facilitate the Deaf person, but is there to facilitate everyone in the room. For example, if the employer needs to communicate

<sup>1</sup> *The Education of Deaf and Hard of Hearing Children in Ireland*. NCSE (2011).

important workplace information to hearing and Deaf employees at a staff meeting, the ISL interpreter enables him or her to do so in a non-discriminatory and accessible manner for all employees. (The reality is of course that at present this communication support does not happen in many workplaces where there are Deaf employees).

2.5 While Chime understands the reasons that employers use the WSS to fund the booking of ISL interpreters in the workplace – due to the lack of supports available under the RAF (see below) – requiring employers and Deaf employees to ‘sign-off’ that Deaf employees are less productive is erroneous (see section 2.3), undignifying and disrespectful. At a time when the State has adopted the UNCRPD, it is inappropriate that an ableist perspective and language is at the core of the current WSS, while it is well past time that appropriate in-work communication supports are put in place for both employers and employees who are Deaf and hearing.

### **3.0 Reasonable Accommodation Fund and Deaf employees**

3.1 The Reasonable Accommodation Fund (RAF) is managed by the DSP with the aim of supporting employers and employees with a disability to take appropriate measures to help a person with a disability to access, improve or retain their employment. There are a number of grants available: (a) the Workplace Equipment Adaption Grant (WEAG); (b) the Job Interview Interpreter Grant (JIIG); (c) the Personal Reader Grant (PRG); and (d) the Employee Retention Grant (ERG). These grants do not include any ongoing communication support in the workplace.

3.2 The RAF is a bureaucratic minefield and there are typically less than 50 applications annually for the WEAG – in a country with over 600,000 people with disabilities. It can take close to a year to get an application approved, even with great perseverance on the part of the applicant. This is documented in Chime’s submission to the consultation on the RAF conducted by the DSP in early 2022. Although a report was due in Quarter 3 2022, over a year later the report on this consultation has not yet been published.

3.3 The RAF is fundamentally flawed in terms of the lack of accommodations it offers to support Deaf people in the workplace. The JIIG allows a Deaf job applicant to apply for funding for a sign language interpreter for a job interview. However, if the Deaf applicant is successful in securing employment, there is no funding available to them or their employer to support communication in the workplace. This means the employer is faced with paying for an ISL interpreter for essential work meetings or training requirements, such as staff meetings or manual handling training, or, as already outlined, using the WSS as a means to funding such communication support. In reality, booking interpreters for such activities often does not happen, leaving the Deaf

employee essentially excluded from these activities. It is not surprising that research shows that Deaf employees are less likely to achieve promotions in the workplace, and more likely to feel isolated and excluded.

3.4 The situation in Ireland contrasts greatly with that of the UK, where Deaf people have much greater supports under the Access to Work scheme. This is clearly illustrated in the 2019 RTÉ documentary *London Calling*, featuring three Irish Deaf people who emigrated to London seeking work. The programme demonstrated that Deaf employees can work in senior positions with the right communication support in the workplace. The documentary can be viewed on the RTÉ Player, and is recommended viewing for anyone involved in the operation of the WSS and the RAF. (<https://www.rte.ie/player/movie/london-calling/100117032437>).

3.5 The RAF should be expanded and improved to include the provision of in-work communication support to facilitate Deaf and hearing employers and employees in the workplace. For reasons already outlined in this submission, the WSS is not the appropriate scheme to fund the provision of communication support in the workplace.

#### **4.0 Summary**

The WSS is an important scheme in supporting people with disabilities to access employment. Given that Ireland has the lowest rate of employment of people with disabilities in the European Union, the WSS should be improved and expanded in the years ahead. The language and perspective of the scheme should be adapted to align with the philosophy and principles of the UNCRPD.

With respect to most Deaf people, the WSS should not be the relevant scheme to support access in the workplace, as Deaf people are just as productive as hearing people in environments where appropriate communication support is provided. In this respect, the Department of Social Protection must adapt and develop the Reasonable Accommodation Fund to ensure Deaf employees can access employment and can participate on an equal and fully inclusive basis in the workplace.

For any queries related to this submission, please contact:

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