

AHEAD Submission on the Reasonable Accommodation Fund and Associated Grants

This submission was originally sent to the Department of Social Protection in April 2021 on direct request of department officials, and then resubmitted as part of the open public consultation process closing in May 2022.

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and Employment for People with Disabilities

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About AHEAD

AHEAD is an independent non-profit organisation established in 1988 working to create inclusive environments in education and employment for people with disabilities. The main focus of AHEAD's work is further education and training, higher education and graduate employment.

In 2005, AHEAD established two employment initiatives; GetAHEAD and The WAM (Willing Able Mentoring) Programme, both of which are currently funded by the Department of Social Protection.

- GetAHEAD works directly with students and graduates with disabilities supporting them to develop the necessary skills to secure employment and enhance their ability to negotiate barriers in the recruitment and selection process.
- The WAM Programme is a work placement programme which aims to promote access to the labour market for graduates with disabilities and build the capacity of employers to integrate disability into the mainstream workplace. Participating employers collaborate with WAM to offer mentored, paid, full-time, work placements for graduates with disabilities. To date, over 500 graduates have secured placements with WAM employers, in both with the public and private sector.

Through both of these initiatives, AHEAD has gained invaluable experience and knowledge of the on-the-ground barriers to participation in employment for people with disabilities and how organisational/national policies can facilitate inclusive employment.

Introduction

This submission was developed by AHEAD on request of the Department of Social Protection (DSP) to support the department in reviewing and updating the Reasonable Accommodation Fund and associated employer grants.

The submission is based on:

- Research of the literature of the social context of disability and its links to poverty and unemployment.
- AHEAD's knowledge and understanding of the Fund and our experiences engaging with employers and graduates who have applied for or received the related grants.
- A small survey of graduates with disabilities on AHEAD's graduate database on their knowledge of the fund and their experiences engaging with it.
- Excerpts from research with more than 250 Irish employers on employer attitudes to the recruitment and retention of people with disabilities currently being conducted by Behaviour and Attitudes on behalf of AHEAD.

This submission provides a brief outline of the current funding initiatives of the DSP, puts forward recommendations for the re-development of these funding initiatives along with a proposal to consolidate the funding streams to offer a more holistic funding model that is:

- more streamlined and efficient
- person-led and employer-led
- reflective of the needs of graduates in the modern workplace;
- underpinned by a Human Rights approach
- well-publicised to employer and graduate audiences

About Reasonable Accommodation Fund and Associated Employer Supports

In July 1990, an Employment Support Scheme was introduced to increase employment opportunities for severely disabled people who were deemed to have a productivity level of 50-80% compared to non-disabled people¹. This was done through a subsidy administered by the National Rehabilitation Board, which is now more commonly known as the Wage Subsidy Scheme. In addition to this, the Workplace Equipment Adaptation Grant was also

¹ Whyte, C., 1993. Disability and Poverty: Training and Employment Policy. In: *Disability, Exclusion and Poverty*. Dublin: Combat Poverty Agency, pp.112-129.

established, which still exists today. Over time, more funding and grant opportunities were developed and funded by FÁS and subsequently funded by the Department of Social Protection (DSP).

The DSP are responsible for administering a range of funding provisions for employees or potential employees with disabilities under the following streams;

- **Reasonable Accommodation Fund**
 - Workplace Equipment Adaptation Grant (WEAG)
 - Job Interview Interpreter Grant (JIIG)
 - Personal Reader Grant (PRG)
 - Employee Retention Grant (ERG)
- **Wage Subsidy Scheme (WSS)**
- **Disability Awareness Training Scheme (DATS)**

A summary of the nature and current processes relating to these grants are included in the appendix of this submission.

Rationale for Reform - Societal and Policy Context

In order to combat the risk of systemic poverty and unemployment of people with disabilities, meet its commitments in relation to the implementation of the United Nations Convention on the Rights of People with Disabilities (UN CRPD), and achieve its United Nations Sustainable Development goals, the state must provide equity of access to employment for people with disabilities. Article 27 of the UN CRPD emphasises the state's obligation to recognise the right of persons with disabilities to work, on an equal basis with others. Of particular interest for this submission are the states responsibilities under the convention to safeguard and promote the right to work for people with disabilities by taking appropriate steps, including through legislation, to:

- Promote the employment of persons with disabilities in the private sector through appropriate policies and measures, which may include affirmative action programmes, incentives and other measures (27:h).
- Ensure that reasonable accommodation is provided to persons with disabilities in the workplace (27:i).

People with disabilities in Europe are twice as likely to live in poverty (European Disability Forum's Human Rights Report, 2020) as those with no disability, a statistic replicated here in Ireland (ERSI, 2014). They are also less than half as likely to be in employment as their non-disabled peers (ESRI, 2017).

The most recent CSO SILC data (2019) from Ireland highlights the extent of poverty today:

- The consistent poverty rate for people not at work due to illness or disability is 18.1%. This rate for the general population is just 5.5%, meaning people who rely on state disability payments are more than 3 times as likely to live in consistent poverty as the average person.
- The 'at risk of poverty' rate for this group is 37.5%. By contrast, the 'at risk of poverty' rate for the general population is 12.8%, 3 times lower than that for people with disabilities.

Ireland performs worse than fellow EU countries on related metrics, with one of the highest levels of poverty of people with disabilities in the EU, and the lowest employment rate, at just 32.3% - significantly lower than the EU average of 50.8% (European Disability Forum, 2020).

By supporting employers to recruit, retain and promote people with disabilities, a revamped Reasonable Accommodation Fund and related employer supports offer an important mechanism to help address the double disadvantage caused by the intersection of disability and socio-economic disadvantage, and significantly reduce barriers for access to employment.

Summary of Recommendations in this Submission

In summary, this submission makes the following recommendations which are explored in greater detail later in the document:

Recommendation: Once the fund is reviewed and redeveloped, deliver a national promotion campaign on web, social media and traditional media platforms, targeting employers and people with disabilities. This campaign should seek to raise awareness about the existence and nature of the available grant streams, the ease of the redeveloped application process, and the business benefits of hiring people with disabilities. Ensure the campaign is delivered in an accessible manner and features people with a range of disabilities in its design and delivery. Campaigns should be run on a periodic basis to maintain a high level of awareness about funding streams.

Recommendation: Combine all reasonable accommodations related grants into one holistic, needs-based Workplace Access Fund, with a single, easy to use, online application portal, with employer, employee and approved service provider (e.g. sign language interpreting services) access. Review the application process to identify efficiencies which will radically cut down the processing time (more detail later in the submission).

Recommendation: Provide employer, employee and approved service provider access to the new online application portal so that all parties can review the content of applications and view their application status (more detail later in the submission). Providing access for employees to view the status of applications would provide more agency for people with disabilities in the process and make it more person-led and transparent. Providing service providers with access to and, allowing them to claim costs for approved provision through, the portal (for example the booking of interpreters for job interviews) would give them the confidence to provide services without fear of non-payment.

Recommendation: Ensure that the redeveloped grant rules, eligibility and funding limits are informed by a Human Rights approach and guided by the UNCRPD principle of facilitating 'full and effective participation and inclusion in society', including in employment (more detail later in the submission).

Recommendation: Undertake a thorough review of the department's promotional material, grant rules/eligibility criteria, processes and associated content and evolve the language and approach to promote a more positive, non-deficit model view of disability in line with a person-led, human rights perspective (more detail later in the submission).

Recommendation: Place more emphasis on grant eligibility applying to people with disabilities of all kinds (for example people with Mental Health Difficulties) in line with the broad definition of disability in the Employment Equality Act and ensure promotional

material clearly highlights the broad applicability of the grants to people with all kinds of disabilities.

Recommendation: Ensure funding limits and number of support hours covered are appropriate to the full range of supports that people with disabilities may need to access and participate in employment (more detail later in the submission).

Recommendation: Develop a list of approved organisations, professionals, specialists and job-coaches who have the expertise and resources to assist employers to deliver supports covered under the Reasonable Accommodation Fund and associated grants/subsidies. Criteria for approval of different types of support providers should be established to ensure quality in the process e.g. only qualified interpreters listed on the register of Irish Sign Language Interpreters (RISLI) should be approved for sign language support.

Recommendation: Ensure support for disability awareness training is made available to all employers including those with no as-yet identified employees with disabilities, and widen the scope of eligible training currently funded through the Disability Awareness Support Scheme (more detail later in the submission).

Recommendation: Provide funding for organisations who do not currently have an employee with a disability but who are proactively seeking to make their workplace more disability friendly for future employees (more detail later in the submission).

The rationale for the recommendations above, as well as further detail on the recommendations made are explored below under the following themes:

- Awareness of Grants
- Efficiency and Transparency of the Process
- Gaps in Grant Provision – Holistic, Needs-Based Approach
- Language and Approach
- Grant Rates
- Approved Qualified Providers
- Disability Awareness and Proactive Measures

Awareness of Grants

“Social welfare should inform people with disabilities what grants are available to them in the workplace.”

“I never knew they existed. It would be good if there was more information on it.”

“(They should) try to make it more visible to people with disabilities.”

“The fund is not well advertised”

“When I went for an interview to one very small company and told them that they can apply for job subsidy, they didn’t have any idea about this job subsidy.”

– all quotations are from graduate responses from a small AHEAD survey on awareness of and experiences engaging with the Reasonable Accommodation Fund and related grants.

Despite both the Comprehensive Employment Strategy for People with Disabilities 2015-2024 and National Disability Inclusion Strategy 2017-2021 outlining specific actions for the Department to promote and disseminate information on the Reasonable Accommodations Fund and associated grants to employers, awareness and uptake of these initiatives remains low².

Statistics on the low take-up by employers of some of the grants, despite the valuable support they offer, are notable:

- **Workplace Adaptation Grant (WEAG):** The uptake on the WEAG is low with applications never exceeding 64 per annum from 2012 – October 2018 inclusive.
- **Employee Retention Grant (ERG):** Has the lowest uptake of all of the RAF grants. From 2012 – October 2018, only 17 applications were made to the ERG and no applications were successful under this scheme for a five-year period (2013 - 2017)

² <http://nda.ie/Publications/Employment/Employment-Publications/Reasonable-Accommodations-Obstacles-and-Opportunities-to-the-Employment-of-Persons-with-a-Disability1.pdf>
https://asiam.ie/wp-content/uploads/2021/04/Autism-in-the-Workplace-Report-AsIAM-IrishJobs-April-2021_FINAL-1_compressed.pdf

inclusive). Furthermore, despite the generous funding limits, only €6,220 was paid out in total over this seven-year period.

- **Disability Awareness Support Scheme (DASS):** Only 29 applications were granted under the DASS from 2012 – April 2019 inclusive totalling a spend of €113,168 averaging at just under €4,000 per application.³

AHEAD have commissioned Behaviour and Attitudes (BANDA) to conduct research into employer attitudes on hiring people with disabilities with over 250 Irish Employers, of which the findings are due to be released in June 2021. Analysis of the collected data is still underway, however preliminary findings indicate that only 27% of responding employers were aware of the Reasonable Accommodations Fund offered to employers to support the recruitment and retention of people with disabilities.

This echoes AHEAD's anecdotal experience engaging with both employers and graduates, who also frequently indicate a significant lack of awareness about the existence of supports provided by the Department of Social Protection.

Additionally, in March 2021 AHEAD conducted a small survey of graduates with disabilities on AHEAD's graduate database about their knowledge of available grants and experiences engaging with the Reasonable Accommodation Fund/associated grants. Of the 34 graduates from across the spectrum of disability who responded to the survey, 65% had never availed of any of the related grants or the Wage Subsidy Scheme. The majority of those who did not avail of the fund were not aware that these funding streams existed.

Recommendations

Recommendation: Once the fund is reviewed and redeveloped, deliver a national promotion campaign on web, social media and traditional media platforms, targeting employers and people with disabilities. This campaign should seek to raise awareness about the existence and nature of the available grant streams, the ease of the redeveloped application process, and the business benefits of hiring people with disabilities. Ensure the campaign is delivered in an accessible manner and features people with a range of disabilities in its design and delivery. Campaigns should be run on a periodic basis to maintain a high level of awareness about available funding.

³ Page 75-76 <http://nda.ie/Publications/Employment/Employment-Publications/Reasonable-Accommodations-Obstacles-and-Opportunities-to-the-Employment-of-Persons-with-a-Disability1.pdf>

Efficiency and Transparency of the Process

“Too long, too many forms & complicated to fill in. Managers always take ages to fill in & process takes ages.”

“(The process is) designed to ensure you don’t get the grant”

– all quotations are from graduate responses from a small AHEAD survey on awareness of and experiences engaging with the Reasonable Accommodation Fund and related grants.

The application process for the Reasonable Accommodation Fund and Other associated grants are frequently cited by employers and graduates as barriers to engagement with them. Applications are complex and largely paper-based, with little transparency in the process for employees and often lengthy processing times from application to approval.

In the case of one participant on The WAM Programme for example, it took approximately 12 weeks from the date of submission of the application, to the employer receiving payment under Workplace Equipment Adaptation Grant (WEAG)⁴. In AHEAD’s direct experience accessing the same grant for a staff member of our own, our application was submitted in February 2013. An interview with a Case Officer did not take place until the following May and the grant was not fully approved until August – a total of almost 6 months wait for a modestly priced set of accommodations.

This lengthy process has implications for people with disabilities, especially those working with SMEs or NGOs, who may not be in a position to pay up-front for required equipment or modifications in the hope of getting reimbursed through the grant. A lack of required equipment or modifications can negatively impact on the ability of staff with disabilities to carry out their duties effectively and, as a consequence, may result in an employer having a negative perception of the ability of staff members with disabilities. In some cases, it may even lead to the cessation of employment as in the case of the graduate quote below taken from the aforementioned AHEAD survey:

⁴ <https://www.ahead.ie/journal/AHEAD-WAM-case-study-illustrating-how-arranging-more-complex-employment-supports-for-disabled-graduates-can-be-achieved>

“(I didn’t hear anything till) years after the needs assessment, no follow up or action till I had to leave the job due to difficulties with work facilities.”

In AHEAD’s WAM programme, when a piece of Assistive Technology (AT) or equipment is recommended for a graduate about to commence a work placement in a company, we inform the company of the availability of the WEAG. However, due to the nature of the required procurement and approval processes involved, they often report seeing the process as being too complicated to make it worthwhile and anticipate that it might cause delays in a start date.

For example, the most common type of AT recommended for WAM graduates is TextHelp – Read Write Gold⁵, with an annual license costing approx. €200. For large multi-nationals working with WAM, they have reported to AHEAD staff that this minimal cost is not worth going through the administrative process that the WEAG requires. For much smaller businesses however, this sum, coupled with the length and complex nature of the process to recoup it, may prove a barrier to the employing of an individual.

Additionally, because each of the grants under the Reasonable Accommodations fund have different application forms/processes and different eligibility rules, the complexity of the process is further increased if an individual is eligible for more than one stream. This could be overcome by combining all reasonable accommodations related grants into one holistic, needs based funding stream, with a single online application portal.

“The process should be more transparent, as employers give the impression that it was all a big bother and they were doing you a favour.”

Currently, employees often report being left in the dark about the status of applications to the Reasonable Accommodation Fund. This could be overcome by having employer and employee access points to the application portal which allows both parties to see the status and content of the application request. If professional support services are involved, they too could have online access to view relevant details and recoup payment costs directly where appropriate, resulting in a significantly more efficient process.

Take for example efficiencies which could be gained in administering support currently provided through the Job Interview Interpreter Grant. Generally there is short span of time to plan between an offer of interview and the actual date an interview takes place. This typical practise sometimes renders it impossible for individuals to navigate the current onerous process which involves:

⁵ https://www.ahead.ie/userfiles/files/shop/free/TheWAMProgrammeStatistics2020_spreads.pdf

- seeking approval (where possible) from a DSP Case Officer and sourcing the interpreter/lip speaker
- obtaining physical signatories from both the employer and the interpreter/lip speaker and obtaining additional documentation such as the invoice, an EFT bank mandate and a copy of tax clearance certificate or access number from the provider
- returning documentation to the DSP Case Officer upon which the Case Officer and Assistant Principal will submit for payment

Each party in this process has to repeat this process each time an interview takes place. Instead, a streamlined online process could involve:

- Employer representatives, job seekers each registering only once providing most of the information necessary for the process. Interpreters registering as approved providers with specified rates.
- Jobseekers receiving pre-approval for sign language interpretation support at any time in the job seeking process.
- On receipt of an offer of an interview, the job seeker is permitted to send the interview confirmation request to the employer electronically, and, send the interpreter request to the arranged interpreter who can equally respond to the request electronically.
- On completion of interview, payment is transferred automatically to the interpreter at the pre-agreed rate.

An one-stop online system for registration and application to all streams of reasonable accommodations funding would reduce the burden on individual applicants, speed up the time of approval and reduce the administrative processing required by the Department, ensuring efficiency for all stakeholders.

Recommendations

Recommendation: Combine all reasonable accommodations related grants into one holistic, needs-based Workplace Access Fund, with a single, easy to use, online application portal, which employer, employee and approved service provider (e.g. sign language interpreting services) access. Review the application process to identify efficiencies which will radically cut down the processing time for example:

- Allowing job-seekers to register online and meet an Intreo case worker prior to accessing employment so simple grant requests and interview

accommodations can be pre-approved prior to employment/interview, vastly cutting down future processing time.

- Removing the need to meet with an Intreo Case Officer for small grant requests under a specified limit, offering automatic approval and speedy payment if specific criteria are met.
- Increasing resources for trained, disability-aware Intreo Case Officers so that more complex applications can be reviewed quickly. These case officers should be trained in needs assessment procedures so that they are qualified to make an evidence informed assessment of need for individuals with more complex needs.

Recommendation: Provide employer, employee and approved service provider access to the new online application portal so that all parties can review the contents of applications and view their application status, for example:

- no Application Currently in Process
- application Incomplete (see feedback)
- application in Process – (under review)
- additional Information Requested (see feedback)
- case Officer Assessment Required (book appointment)
- application Approved
- application Denied (see feedback)

Providing access so that job seekers and employees are able to view the status of applications would provide more agency for people with disabilities in the process and make it more person-led and transparent. Providing service providers with access and ability to claim costs for approved provision through the portal (for example for interpreters booked for job interviews) would give them the confidence to provide services without fear of non-payment.

Gaps in Grant Provision - Holistic, Needs-Based Approach

“The process should be more person centred and not just (offer) the barest minimum.”

“We need schemes that are progressive and flexible. Something like the Ability to Work grant in Northern Ireland would be better.”

“I think that there can be a number of things that can be done to make it more effective and person-centred - I think that pulling these supports together to form an Access-to-Work style scheme would be particularly effective, as opposed to providing supports based on a person's perceived functional capacity.”

– all quotations are from graduate responses from a small AHEAD survey on awareness of and experiences engaging with the Reasonable Accommodation Fund and related grants.

Looking holistically across the current grant provision under the Reasonable Accommodations Fund and associated grants and subsidies, a number of significant gaps in provision emerge. The focus on providing several different funding streams focused on a narrow set of specific criteria, rather than focussing on a needs-based approach, means that gaps in the grant provision remain significant for certain cohorts.

The lack of provision in the grant system for personal professional supports in the workplace for example, such as personal assistance or a sign language interpreter, remains a very significant barrier for people with disabilities. The current grant provision is inconsistent and outdated in that it supports some types of professional assistance, but not others, for example:

- The Personal Reader Grant provides support for the provision of a professional reader for blind/visually impaired employees. The need for this type of support, while still vital for a small number of individuals, has decreased significantly due to the huge advances in assistive technologies. However, the same individuals, or

others such as those with a physical disability, may have a greater need for personal assistance in the workplace which is currently not covered under the fund.

- The Job Interview Interpreter Grant currently covers the provision of sign language interpreters for the job interview and for a very limited number of hours of induction (currently set at an unrealistic 3 hours). While the fund currently recognises this need, it does not however support the provision of interpreters at any other time during the course of employment, for example in workplace meetings or presentations, which is a significant barrier for graduates to overcome in an employment setting.

Recommendations

Recommendation: Combine all reasonable accommodations related grants into one holistic, needs-based Workplace Access Fund, with a single, easy to use, online application portal, with employer, employee and approved service provider (e.g. sign language interpreting services) access.

Recommendation: Ensure that the redeveloped grant rules, eligibility and funding limits are informed by a Human Rights approach and guided by the UNCRPD principle of facilitating ‘full and effective participation and inclusion in society’, including in employment. In practice, this means that on top of existing grant cover, the criteria and available funding should be widened to include:

- The cost of sign language interpretation in the workplace by an approved interpreter. Appropriate levels of interpretation required could be decided in tandem between the employer, employee and a trained, Intreo Case Officer who has the skillset to undertake a needs assessment.
- The cost of personal assistance in the workplace, where personal assistance provision is not covered by the HSE. Appropriate levels of assistance required could be decided in tandem between the employer, employee and a trained, Intreo Case Officer who has the skillset to undertake a needs assessment.
- Added travel costs to get to work incurred as a result of disability, for example, if an individual is blind, or has epilepsy, dyspraxia etc, is

therefore unable to drive to the workplace and where insufficient accessible public transport options.

Language and Approach

“(The Wage Subsidy Scheme is) very degrading to take part in and erodes your manager's confidence in your performance. Each month's form strips away your confidence in your ability and what you can achieve. I'd never recommend it to anyone!”

“With respect to the Wage Subsidy Scheme, the fact that it is assessed on capacity can be demeaning to some disabled people, particularly as they're asked to assess how much they're 'less capable' of doing the job.”

– all quotations are from graduate responses from a small AHEAD survey on awareness of and experiences engaging with the Reasonable Accommodation Fund and related grants.

Currently, some of the language and approach taken in the communications and design of the Reasonable Accommodations Fund and the associated grants/subsidies is highly medicalised and promotes a deficit model of disability. The approach now needed is one that is in line with the human rights model of disability which promotes a positive view of disability, locates barriers predominantly in the environment and design of work practices, and emphasises the individual's fundamental right to employment as the central concern. A good example of the approaches built into the current process of the wage subsidy scheme, is the requirement by individuals to return applications/monthly forms confirming their 'loss of productivity' or 'reduced functional capacity'. This process and language can be demeaning and result in reduced self-confidence on the part of the individual, as well as an employer perception of reduced competence in the individual.

In addition,, while the Reasonable Accommodations Fund and associated grants/subsidies are available to all people with disabilities as defined under the Employment Equality Act, sometimes this is not clearly stated and not clearly understood. This can result in people with hidden disabilities, such as mental health conditions, being unaware of their eligibility for grant funding.

Recommendations

Recommendation: Undertake a thorough review of the department's promotional material, grant rules/eligibility criteria, processes and associated content and evolve the language and approach to promote a more positive,

non-deficit model view of disability in line with a person-led, human rights perspective, for example:

- With regard to the Wage Subsidy Scheme, rather than focus on an individual's 'loss of productivity' or 'reduced functional capacity', place focus on percentage of tasks which could not be adapted and needed to be reassigned. This places the focus on the tasks themselves rather than any perceived loss of 'functional capacity', which can send a damaging message to employees with disabilities and their employers.

Recommendation: Place more emphasis on grant eligibility applying to people with disabilities of all kinds (for example people with mental health difficulties) in line with the broad definition of disability in the Employment Equality Act and ensure promotional material clearly highlights the broad applicability of the grants to people with all kinds of disabilities.

Grant Rates

“This rate (for the Workplace Equipment Adaption Grant) hasn't changed in over 10 years.”

“Funding should be higher because the added cost of travel and clothing and other equipment makes it difficult to stay in work.”

– all quotations are from graduate responses from a small AHEAD survey on awareness of and experiences engaging with the Reasonable Accommodation Fund and related grants.

The rates of payment and grant limits for the Workplace Equipment Adaptation Grant have remained the same for the past 15-20 years, despite significant rises in inflation over that period, and a significant change in the nature of grant assistance sought.

In many cases, particularly where purchase of equipment is concerned, the grant limit is sufficient however, limits should be significantly expanded for applications where:

- personal professional supports such as a personal assistant or sign language interpreter are required. It should be recognised that these types of grants need to be provided on an ongoing rather than one-off basis to ensure that employees can demonstrate their ability at work and progress in their career.
- significant capital investment in the accessibility of the physical or digital environment will benefit not just current individual staff, but will future proof organisations for future employment of people with disabilities.

One good real-life example of the latter was outlined in a [case study by WAM](#) where the cost of purchasing technology and adaptations to the coding of an organisational software system significantly exceeded the maximum limit allowed under the WEAG. In this example, the capital investment made to make the general digital infrastructure of the organisation more accessible, benefitted not only the individual graduate, but set the company up to be able to hire many more people with disabilities in the future. However, this was not taken into consideration when assessing the value of the support and therefore the limit of the grant provided.

With regard to the provision of personal professional supports, other jurisdictions have significantly higher limits on financial support provided. The UK for example operates a holistic model of support called [Access to Work](#) where the fund covers a range of measures such as, aids and equipment, technology, adaptations, communication support at interview, travel costs and another practical supports such as a note taker etc. The person with a

disability is responsible for making an application to the fund and subsequently meets with an advisor who carries out an assessment of need if the person with a disability does not yet know what type of supports are appropriate. The funding is awarded based on the needs of the individual and funding can be provided up a maximum of £62,900 a year per individual.

The only ongoing professional personal supports provided currently through the Reasonable Accommodation Fund are via the Personal Reader Grant. The current limit of 640 hours of support allowed for equates to approximately 91 working days or 18 working weeks. For a person who is in full-time work, this means they are only able to avail of a personal reader for one-third of the working calendar year. Having no access to this vital support for large parts of the working week could have potential consequences in a blind or visually impaired employee carrying out their duties or have an impact on their career progression within their organisation.

In respect of the Wage Subsidy Scheme, the rate has not increased in line with increasing wages. In 2008, the subsidy was 61% of the national minimum wage and in 2020, it represented just 52%⁶. This scheme has the largest uptake of all of the supports provided, with 1604 employers and 2,615 employees participating on the scheme in 2020⁷ and approx. €20 million spent on the scheme annually.

Additionally, there is a need for the Department to review rates offered for professional support services to ensure they are aligned with current market rates for qualified providers. For example, a survey conducted with Council of Irish Sign Language Interpreters (CISLI) members highlighted the median rate of pay for employment related interpreting assignments is €130⁸ for a half day rate set at 3 hours. The Department should use objective measures like this where possible as a minimum rate for qualified interpreters and seek similar measures for providers or other professional supports.

Recommendations

Recommendation: Ensure funding limits and support hours covered are appropriate to the full range of supports that people with disabilities may need to access and participate in employment, and the number of hours such support services may be required to participate. In particular, introduce/raise the funding limits offered for:

⁶ https://www.rehab.ie/what-we-do/publications/pre-budget-submission/final_pre_budget2021.pdf

⁷ <https://www.oireachtas.ie/en/debates/question/2020-12-08/402/>

⁸ <https://cisliireland.files.wordpress.com/2019/12/cisli-interpreter-fees-survey-report-december-2019-2.pdf>

- The provision of personal supports while at work including the cost of personal assistance or sign language interpretation.
- Capital investments which benefit all current and future employees with disabilities by making physical or digital environments more accessible across an organisation.

Recommendation: Map the rate of the Wage Subsidy Scheme to the minimum wage to ensure changes in rates provided change accordingly.

Approved Qualified Providers

Where the department is supporting the provision of professional services such as sign language interpreters, personal assistants or specialists/job coaches funded under the Employee Retention Grant, there is a need to ensure that providers are qualified to deliver the relevant professional services.

To take one example of why this is important, let us look at the use of sign language interpretation in interviews/at work. AHEAD recently partnered an Erasmus+ funded project, [DESIGNS](#)⁹, which looked at promoting the inclusion of deaf people in employment and created guidelines based on best practice and research into working with sign language interpreters in job interviews and in the workplace.

It was highlighted in the research that interpreters are not subject matter experts and this should be taken into consideration. For example, the interpreter may not be familiar with the type of abbreviations or technical terms that both the interviewer and the deaf employee are aware of, and this could impact on the quality of interpretation given in a response to a question on the matter. Therefore, it is vital that the deaf jobseeker is provided with an appropriately trained interpreter where available (not a family member or friend) to ensure the integrity and fairness of the interview process.

It must also be noted that Section 7 of the Irish Sign Language Act 2017 states;

“A court or public body, in compliance with its obligations under this Act, shall not engage the services of a person providing Irish Sign Language interpretation unless the person’s qualifications have been verified under an accreditation scheme funded by the Minister for Social Protection.”

As a result of this, The Regulatory Centre for Irish Sign Language Interpreters Ireland CLG was been established for the purpose of maintaining the [Register of Irish Sign Language Interpreters \(RISLI\)](#), a voluntary, national, professional register. RISLI sets and ensures adherence to standards for the provision of ISL by public bodies.

Given that interpreters are currently being paid through the Department of Social Protection (a public body), it would be appropriate that the grant is restricted to those on the RISLI Register ¹⁰.

⁹ <http://designsproject.eu/assets/eu-benchmark-report.pdf>

¹⁰ <https://ahead.ie/journal/A-Milestone-for-Access-for-Deaf-Irish-Sign-Language-users>

An approved list organisations, specialists and job-coaches who have the expertise in other related professional support services should be available on the Department's website. This would make sourcing of appropriate expertise more easily accessible to employers and jobseekers and aforementioned online registration and approval would speed up verification processes significantly.

Recommendations

Recommendation: The Department should develop a list of approved organisations, professionals, specialists and job-coaches who have the expertise and resources to assist employers to deliver supports covered under the Reasonable Accommodation Fund and associated grants/subsidies. Criteria for approval of different types of support providers should be established to ensure quality in the process e.g. only qualified interpreters listed on the register of Irish Sign Language Interpreters (RISLI) should be approved for sign language support.

Disability Awareness and Proactive Measures

The Disability Awareness Support Scheme currently provides a good level of support for organisations seeking to provide inclusive training to staff but uptake is low¹¹.

Potential reasons for low uptake include a lack of awareness of the grant, coupled with the narrow descriptions of training topics allowed, and the fact that organisations must have an identified disabled employee to receive the grant.

In general, many of the measures currently supported under the Reasonable Accommodations Fund to improve accessibility would be more effective if, in particular, employers could apply at any time, regardless of whether they currently employ person with a disability.

Proactive measures to improve accessibility would prevent many employees with disabilities having to navigate inaccessible physical and digital environments while waiting for capital works/adaptations to be completed, and in general, promote more inclusion in the work environs in Ireland.

Recommendations

Recommendation: Ensure support for disability awareness training so that it is made available to all employers, not just employers with as-yet identified employees with disabilities, and widen the eligible training, currently funded through the Disability Awareness Support Scheme, to include training on:

- inclusive recruitment and training practices
- digital accessibility
- disability specific awareness such as autism-friendly workplaces, mental health awareness

¹¹ Page 75-76 <http://nda.ie/Publications/Employment/Employment-Publications/Reasonable-Accommodations-Obstacles-and-Opportunities-to-the-Employment-of-Persons-with-a-Disability1.pdf>

- assistive technologies at work

Recommendation: Provide funding for organisations who do not currently have an as yet employee with a disability but who are seeking to proactively make their workplace more disability friendly for future employees, including covering the costs of:

- digital accessibility audits of websites and systems
- capital technical upgrades to address accessibility issues identified
- physical environment accessibility audits
- capital works to address accessibility issues identified e.g. installation of a wheelchair accessibility toilet, loop system, braille signage etc.

Conclusion

AHEAD believe that redeveloping the Reasonable Accommodations Fund and associated grants/subsidies for people with disabilities in line with the recommendations in this submission will act as a win-win for individuals, the state, and society at large, by facilitating increased access to employment for people with disabilities, increased diversity in Irish workplaces, further recognition from the state of the commitment to employment for all as a public good, and a significant long term economic dividend for the economy.

These measures would:

- Support the development of a more diverse employee base by facilitating an increase in access to employment for people with disabilities. This will in turn strengthen the economic output of the nation and provide qualitative benefits for our society.
- Support the state in meeting its responsibilities under the UN Convention on the Rights of People with Disabilities (UNCRPD) and its goals set out in the Comprehensive Employment Strategy for People with Disabilities.
- Evidence the state's commitment to employment for all as a public good and its commitment to supporting access for people with disabilities to all aspects of employment in line with a Human Rights approach to disability.
- Provide a significant long-term economic dividend for the state for a low-cost investment up front, by supporting more people with disabilities to access employment. These new-earners would return initial investment many times over in the future through increased income tax returns and reduced reliability on state supports over their lifetime.

Appendix – Summary of Current Grant Processes

Workplace Equipment Adaptation Grant

This grant is available for people with disabilities to pay for minor modifications, technology or other items of equipment that may be necessary in order for them to do their job. The grant is only applicable to private employers or those who are self-employed at a minimum of 8 hours per week. The grant is not available for those on sheltered employment or unpaid voluntary work.

Current Process

- An employee, self-employed person or the employer can apply for the grant either in advance of them commencing employment or in employment.
- The individual is required to specify the categories in which the grant application falls under and outline a description and justification as to why it is necessary due to the nature of their disability, accompanied by medical evidence.
- Quotes must be obtained showing VAT separately. The number of quotes required depends on the cost of the equipment required.
- In case of adaptations, work plans and a timescale for the work should be indicated.
- Completed forms are submitted to Intreo, whereby a Case Officer will meet with the applicant face-to-face to review the application. From time to time, external professional advice may be sought to review the application.
- Payment is then made directly to the employer (applicant), upon which they are required to submit a copy of the invoice and receipt of payment to the Department. Occasionally pre-approval may be granted in advance of purchasing the necessary equipment/adaptations.

Rates

The WEAG is a contribution grant of up to €6,350. Applications in excess of this sum will be considered on an individual basis up to a maximum of €9,523 if specialist training for the assistive technology is required.

The grant can also be used to upgrade adaptive equipment which may have been funded previously.

Personal Reader Grant

This grant is available to blind or visually impaired persons employed in the private sector and need to employ a personal reader to assist them with work related reading.

Current Process

- The employee completes an application outlining personal details and personal details of the reader they wish to employ. Justification as to why a personal reader is required is also outlined in the application form. These are returned to their Intreo Centre or a Case Officer.
- A Case Officer will review the application and negotiates with the employee and employer to assess the numbers of hours per week, the hourly rate of pay and the length of time for which the reader will be required. Approval is then sought from the Assistant Principal.
- The applicant (employee) must return a claim form at the end of each month which is signed by both the personal reader and the employer.
- The grant is paid directly by EFT to the employee or the personal reader.

Rates

The rates are set at a maximum of 640 hours per year and paid at the minimum wage which currently stands at €10.15 per hour however the hourly fee may be higher if the personal reader is technically qualified.

Taking the standard rate of pay and maximum hours available under this grant, €6,496 is available under the Personal Reader Grant.

Job Interview Interpreter Grant (JIIG)

This grant is available to cover the costs of an interpreter or a lip-speaker for interview and induction (with prior approval only) where an interviewee or new staff member is unemployed and deaf, hard of hearing or has a speech impediment. The grant will cover up to 3 hours and is applicable to private sector employers only.

Current Process

- The job seeker is responsible for seeking prior approval (where possible) from a DSP Case Officer and sourcing the interpreter which can be a friend/family member or a professionally qualified interpreter.

- The job seeker is responsible for obtaining signatories and from both the employer and the interpreter and obtaining additional documentation such as the invoice, an EFT bank mandate and a copy of tax clearance certificate or access number.
- The job seeker returns all documentation to the DSP Case Officer where the Case Officer and Assistant Principal will submit details of application for payment.

Rates

The rates are set from €95 - €205 depending on the qualifications of the interpreter and the duration of the assignment. Travel is also paid at a rate of €0.25 per km where no public transport is available.

There is no limit as to how many times a jobseeker can apply for this grant.

Employee Retention Grant

This grant is available to private sector employers should an employee acquire a disability during their working life and the employer wishes to retain them within the company. The grant assists by funding employers to identify accommodations and training for the employee, and/or retraining the employee so they can take up a different position within the company.

Current Process

Stage 1 – Development of Retention Strategy

- An individualised retention strategy developed by a specialist outlining what reasonable accommodations and training should be put in place by the employer to enable them to stay in their current role or where the person could be redeployed.
- The application is made in consultation with the employee and line manager either when the employee has been absent for a minimum of 4 weeks or when their disability begins to impact on their employability.
- The specialist should provide references, qualifications and tax clearance alongside the employer's tax clearance and application form
- Prior approval by a DSP Assistant Principal should be sought in advance of any application. Claims for Stage 1 must be received by the Department before advancing to Stage 2.

Stage 2 – Implementation of the Retention Strategy

- This grant assistance goes towards the cost of retraining the employee, hiring a job coach or a specialist at a set number of hours (maximum of 300 hours and 60 hours respectively) to support or manage the strategy for the employee.
- If a single specialist or job coach provides services in excess of €5,000, three independent quotations must be obtained.
- The required hours and cost as well as training costs must be outlined in the application form in addition to invoices/receipt. The specialist or job coach must also provide references, qualifications and tax clearance alongside the employer's tax clearance and the application form.

Rates

The total grant under this scheme should not exceed €15,000 broken down below;

- Stage 1 is a maximum of €2,500 or 90% of the costs per employee.
- Stage 2 is a maximum of €12,500 or 90% of the costs per employee.

Wage Subsidy Scheme

The Wage Subsidy Scheme (WSS) has been in existence in Ireland since 1990 however previously under different names. It is a financial incentive for private sector employers to employ people with disabilities who may have a loss of productivity of 20% or more in comparison with their colleagues despite appropriate supports and reasonable accommodation being put in place.

There are varying strands relating to the WSS whereby the employer receives a top up if there are more than 3 employees with a disability on the WSS scheme ranging from 10% up to 50% depending on the number of employees. In the cases of more than 25 employees on the WSS, a contribution towards the costs of hiring an Employment Assistance Officer is given.

The grant is only available to employees who work for a minimum of 21 hours per week and subsidised up to 39 hours per week and the contract must be for a minimum period of 6 months. The WSS is not available to employers who already receive funding from the Department to pay for salaries of staff, e.g. community employment, Pobal schemes etc.

Current Process

- The employee has to register themselves as a person with a disability with the Department by filling in an application form. If the employee was previously or is in receipt of disability or illness benefits from the Department, a medical assessment is not necessary.

- In the event where the applicant was not in receipt of disability/illness payments, their doctor and/or a specialist should complete the medical assessment report outlining the extent of their disability and agreement on a productivity shortfall in comparison with other employees.
- The employer also completes an application form accompanied by a job description, contract of employment and a productivity level report form.
- The productivity level report form should outline the main tasks that will result in a loss of productivity and the reasons why. The disabled employee has to declare and sign that they agree with their employer's assessment of their productivity shortfall.
- All documentation is sent to Intreo or their Case Officer for consideration.
- The Case Officer may meet with the employer and employee if necessary and make a recommendation to their manager.
- If approved, the employer will become a WSS registered employer and should further employees with a disability be employed under the WSS scheme, the system will automatically calculate whether they are eligible for Strand 2 top up funding.
- For payment processing, every four weeks a wage subsidy request is made to the Department by the employer outlining their hours and leave which is signed off by the employer and employee.
- An annual review is carried out by the Department on the employee's performance over the previous 12-month period to assess whether a productivity shortfall still exists.

Rates

- Strand 1 - the subsidy is €5.30 per hour up to a maximum of €10,748 annually.
- Strand 2 – the rates above are topped up with a range of 10% up to 50% depending on the number of employees with a disability on the WSS within a company.
- Strand 3 – a grant of €30,000 hiring an Employment Assistance Officer.

Disability Awareness Support Scheme

The Disability Awareness Support Scheme provides a maximum of €20,000 funding for private sector employers to arrange and pay for disability awareness training for staff who work with a colleague who has a disability. It can cover fees paid for external disability awareness training programmes or courses, in-house disability awareness training delivered by external providers or for fees for open learning or web based courses.

Current Process

- The employer contacts a Case Officer from their local Intreo.

Rates

Up to €20,000 or 90% of the programme costs in the first calendar year followed by 80% of the costs up to €20,000 in the second and further years.

A grant of €650 is also available for relevant training manuals and resources.