Disability Federation of Ireland
Disability Funding and Budget Proofing the 2020 Budget
10th May 2019
The issue:

A budgetary measure in one Department can have particular and nuanced implications for certain cohorts of people, either within that department, or across other departments. Even if a budgetary measure, on the face of it, looks like a positive initiative.

If the budget is planned with equality in mind, public bodies will find it easier to use the resources provided to them in a way that reflects their duties towards people with disabilities.

Background:

On the 24th April 2018, The Disability Federation of Ireland, along with a number of other disability organisations, presented to this Committee. We called for the extension of Equality Budget Proofing beyond gender to include also disability matters, coined as ‘Disability Budget Proofing’. This submission builds on our submission at that time.¹

The Department of Public Expenditure and Reform, DPER has the responsibility of developing a system of Disability Budget Proofing. In September 2018 it established an Equality Budgeting Expert Advisory Group to advance Equality Budgeting policy.

On Budget day, 9th October 2018, the Government announced that they would be extending Equality Budget Proofing initiatives beyond just gender to also include poverty, socio-economic grounds and disabilities.

DFI has welcomed this commitment in Budget 2019. However, we also understand that:

- Under section 42 of the Irish Human Rights and Equality Act 2014 the State already has a legal obligation to ensure that all public bodies take proactive measures to eliminate discrimination against people with disabilities. It must also promote the equality and protect the human rights of persons with disabilities. This is part of the wider ‘public sector duty’.

- Compliance with the public sector duty is monitored by the Irish Human Rights and Equality Commission. According to the Commission, public sector duty also applies to public bodies in relation to budgeting and procurement. This means that all public bodies, such as government departments and agencies such as the HSE, must plan their budgets with equality and human rights in mind – including in specific to persons with disabilities.

- The Programme for Government commits to developing a “process of budget and policy proofing as a means of advancing equality, reducing poverty and strengthening economic and social rights”. This is referred to as ‘Equality Budget Proofing’. A pilot initiative of ‘gender proofing’ ran from 2017 to 2018. This has been overseen by the Oireachtas Committee on Budgetary Oversight.

- The United National Convention on the rights of Persons with Disabilities, UN CRPD, was ratified by Ireland in March 2018. This means that Ireland has made a legal commitment to implement the UN CRPD. Combined with section 42 of the Irish Human Rights and Equality Act 2014, the State and all public bodies have a duty to implement the UN CRPD, including in the area of budgeting. This also helps to align the national budget with the EU Semester Process and the European Pillar of Social Rights.
Where are we now?:

At this point DFI is of the view that a very limited interpretation of equality proofing has been applied during the last year.

Equality Budget Proofing uses Key High Level Metrics and Context and Impact indicators. Appendix 10 of The 2019 Revised Estimates for Public Services, REV 2019\(^3\) lists all impact indicators relating to equality. These are arranged into nine themes, with disability specific measures falling under theme number two. In failing to apply governments own commitment to mainstreaming, it would appear that the benefits that could be gained by people with disabilities by disability proofing the other 8 themes metrics has been missed to date.

‘2. Ensure People with Disabilities have Equal Opportunities and Supports’.

\(^3\) p. 267 onwards [https://assets.gov.ie/5516/110119140212-1f5f87d995e643cf96a12e5e42b7f25f.pdf](https://assets.gov.ie/5516/110119140212-1f5f87d995e643cf96a12e5e42b7f25f.pdf)
The Disability Federation of Ireland commends the community based focus of these indicators. But we have serious concerns about the effectiveness of these indicators.

**It is not sufficient to take low hanging fruit and measure the easy stuff:**

For example, one indicator refers to the 'Number of personal assistance hours provided to persons with a physical and/or
sensory disability’. But this does not go far enough. Because the issue is how many people are receiving personal assistance hours. How many hours are each person receiving? Is it enough to support them to get out and engage in life and their communities or is it just enough to get out of bed in the morning and back into bed in the evening? How many people need personal assistance but are not in receipt of any due to lack of service provision?

Equality budget proofing, including disability budget proofing, needs to figure out how to respect and measure the soft supports which are more ‘nebulous’ but have important impacts. Impacts that can strengthen communities and resilience within families. This approach is supported by the OECD which wants us to look at impact and find ways of measuring what is important,⁵ not just apparent.

Why are these soft, ‘nebulous’ supports important? Because many of these softer supports can prevent issues from escalating and can help to keep people out of acute care, mental health service. Many of the member organisations of the Disability Federation of Ireland are specialised in providing these softer supports, yet these are not recognised in Service Agreement with HSE. This leads to precarious funding situations for dynamic, person-centred disability service providers, and can lend to perpetuating the status quo of bigger, more systemised forms of supports, contrary to the UN CRPD.

Disability budget proofing cannot be confined to one theme out of nine:

Funding and budgeting must go beyond programmes and silos. Disability matters must be budgeted and incorporated across government departments, local authorities and the full range of public bodies. Policies and budgets need to be interlinked and interdependent, reflecting the lives of people with disabilities.

In this regard, we would particularly flag that currently, the disability indicators are confined to theme two in relation to people with disabilities. In fact, in keeping with the UN CRPD, disability inclusion should be evidently threaded throughout the indicators of all nine themes:

1. Ensure Gender Equality
   1.1 Advance Socio-Economic Equality for Women and Girls and Women in Leadership at all levels
   1.2 Combat Sexual and Gender Based Violence
   1.3 Promote Uptake of Family Assistance measure for Male Workers
2. Ensure People with Disabilities have Equal Opportunities and Supports
3. Promote Integration and Ensure a Fair and Inclusive Society for Minority Groups
4. Accessible Health and Wellbeing Services
5. Equality of Access to Education
6. Equality to Access to Housing
7. Provide early intervention through Children and Youth Services
8. Create a Safer and Equal Society for All
9. Support those in lower Socio-economic groups and Provide Better Access to Opportunities

Examples:

We believe that social welfare adequacy should lift people above the poverty line and should provide people with the
Minimum Essential Standard of Living, (MESL). That is the standard below which nobody should have to live.

Based on rigorous research conducted by the Vincentian Partnership, MESL represents the goods and services households require in order to meet their physical, psychological and social needs and includes a variety of household types, including those in receipt of social welfare. Below we see the gap in 2018 between what a diverse range of households dependent on social welfare live on versus what in reality they require to achieve the Minimum Essential Standard of Living.

Poverty Impact Assessments or ‘poverty proofing’ was introduced in 1998, as a result of a commitment in the original National Action Plan on Social Inclusion, NAPS that “the question of impact on poverty will also be a key consideration when decisions are being made about spending priorities in the context of the national budgetary process and the allocation of the EU structural funds.”

1 in 4 people with a disability are living in consistent poverty, according to CSO SILC 2017. This count of poverty is however based on income. It falls short, however, as it does not measure the real lived experience and the impact of additional costs of living with a disability.

We ask DPER to drive the move to ensure that Equality budgeting takes cognisance of poverty issues across all departments budget making decisions. We need to see that PIAs are applied before budgetary decisions are made.

We expect to see strong measures to strengthen social inclusion in the new National Action Plan on Social Inclusion which is due to be presented at the Social Inclusion on 22 May, 2019.
Equality Budget Proofing, and Disability Budget Proofing specifically, must ensure that people with disabilities regardless of what social welfare payment they may be in receipt of, have full access to all training, education and activation supports designed for jobseekers. There have in the past been issues with people on disability payments accessing the Youth Guarantee and Springboard, as they were not taken into account in the design of these programmes. This is due to a misunderstanding of the nature of disability, the diversity of conditions and variations in peoples' work capabilities.

We need to address the numbers leaving work and ensure that reasonable accommodation in the workplace measures are fit for purpose and give people a level playing field in the workplace. Current Grant systems administered by DEASP are no longer fit for purpose and even though recommendations were made in the Make Work Pay report\(^6\) to address these, nothing has been actioned to date. This includes access to adaptation grants and assistive technology – all necessary to give people access to work on par with non-disabled people.

Minister Doherty has announced measures to benchmark social welfare payments and this is something we feel would go against attempts to equality proof budgets.

In line with this and within the context of benchmarking social welfare, it is important to emphasise that the right to an income which allows us to participate fully in society and live with dignity, is enshrined in the UNCRPD and also within the Global Goals for Sustainable Development, both of which Ireland has signed up to. This right does not differentiate regarding the source of income whether through employment or social welfare. Ireland has also signed up to the European Pillar of Social Rights which states that ‘everyone lacking sufficient resources has the right to adequate minimum income

benefits ensuring a life in dignity at all stages of life’. A lack of income adequacy represents a major obstruction in Ireland’s bid to meet its National Social target for poverty reduction of 2% or less, by 2020.

Income adequacy therefore plays a huge part in equality budgeting, particularly when the cost of disability is also brought into the mix. DEASP needs to benchmark social welfare to a rate that is adequate. By this what is meant is adequacies the amount that will:

- Lift people above the poverty line
- Ensure the Minimum Essential Standard of Living

We question the validity of benchmarking social welfare if it is not linked to adequacy and believe that benchmarking at a point below adequacy ensures the futility of any such exercise. We do not support the notion that social welfare rates should be benchmarked or indexed to the Consumer Price Index (CPI). We note that CPI has little relevance to the lived circumstances of those with disabilities reliant on social welfare. The Central Statistics Office also concurs that the Consumer price index is not a reflection of the cost of living and operates as "purely a price index".

**Learning from experience:**

**The lived experience of disability:** - The Disability Federation of Ireland are not aware of any disability specific representation on the Equality Budgeting Expert Advisory Group. Despite the extension of Equality Budget Proofing to encompass Disability Budget Proofing in October 2018. This is also despite DFI’s submission to this Committee last year, in which we specifically highlighted calls for directly engagement with people with disabilities and disability organisations. This is necessary to build DPER’s understanding of the real life

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8 http://www.socialinclusion.ie/documents/PublishedNPTBriefing_003.pdf  
implications of budgetary measures, so that this could in turn inform the development of the system of disability budget proofing. This needs to happen as a matter of utmost urgency. Not as a final or tokenistic consultation.

DFI would also highlight that in 2012, the Department of Justice published Guidelines for Government Departments on How to Conduct a Disability Impact Assessment.\footnote{http://www.justice.ie/en/JELR/20120305%20DIA%20Guidelines.pdf/Files/20120305%20DIA%20Guidelines.pdf} The question must be considered; to what extent is this working? What more needs to be done or how does it need to be done differently?


- Disability and budget proofing should extend across
  - Expenditure
  - Revenue and income transfers
  - Macro-level budgetary decisions
  - Both formal and informal barriers, including unstated assumptions behind policies\footnote{The Gender and Equality Budgeting pilot in the Revised Estimates for Public Service 2018, Appendix – Overview of Gender and Equality Budgeting theory}

- Data and statistics must be gathered and disaggregated by disability and type of disability supports and services\footnote{Equality Budgeting: Proposed Next Steps in Ireland, p. 20}

- Good quality and realist objectives must be identified. They must be linked to budget resources to track real and measurable results.\footnote{Ibid}
DFI is about making Ireland fairer for people with disabilities.
We work to create an Ireland where everyone can thrive, where everyone is equally valued.

We do this by supporting people with disabilities and strengthening the disability movement.

There are over 120 member organisations in DFI. We also work with a growing number of other organisations that have a significant interest in people with disabilities.

DFI provides:
• Information
• Training and Support
• Networking
• Advocacy and Representation
• Research, Policy Development and Implementation
• Organisation and Management Development

Disability is a societal issue and DFI works with Government, and across all the social and economic strands and interests of society.

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