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Key points from the ILMI consultations with disabled people on the Green Paper on welfare reform.

Immediately after the announcement of the Green Paper, ILMI created authentic consultative spaces for members who were concerned about potential reforms that would have a huge impact on their lives. ILMI produced a concise, but detailed, website article to outline the key issues and themes proposed in the Paper.

Additionally, this article announced the process of bringing disabled people together in two facilitated discussion spaces in October. In both spaces - vibrant discussions with disabled people who brought their analysis to the proposals on a cross-impairment and indeed cross-country basis. ILMI will use these authentic, nationwide consultative spaces as the foundation for our full submission to the Department of Social Protection in December.

We have compiled, as a requested by our disabled collective, key, emerging concerns from the workshops as a short summary for members to consider before Department consultations which are taking place in Dublin, Cork and Athlone. Members requested this be made available so that they could consider some of the main points before making their own submissions before the 15th December deadline on the larger position piece.

Overarching themes:

- Disabled people were extremely unhappy with how the process of how the Green Paper
 was developed or announced. The announcement and media coverage left many
 anxious about potential changes that they were not consulted about. The process lacked
 consultation and was not in the spirit of the CRPD.
- Members felt, while discussions on welfare payments are welcome, DPOs should have been part of the co-creation of the Green Paper.

- Welfare reform to reduce the risk of poverty that many disabled people face is welcome.
 However, it needs to do that in a way that embeds considerations from the Cost of Disability research.
- Disabled people are enormously aware of the low rates of employment of disabled people. However, in the Paper, there is a massive misrepresentation and misunderstanding of the real causes of this low employment rate. Disabled people are denied access to employment through disabling barriers such as lack of accessible transport, accessible built environment, lack of accessible jobs and failure to provide the supports to access employment such as Personal Assistance Services (PAS). It is not based on disabled people not wanting to work.
- Welfare reform should be kept separate from discussions on what supports disabled people need to access employment. Creating a link between welfare reform and employment suggests that disabled people are "not trying hard enough to get work" and plays into fears that these proposals are based on UK welfare reforms which had a huge negative impact on disabled people's lives
- There was a significant amount of information for disabled people to digest in the Green Paper. Many disabled people required spaces, such the ILMI discussion spaces, to have the time to hear about the proposals and also to be given the time to listen to their heir peers and to form their opinions. This was linked to the process of how the Green Paper was developed and how DPOs should have played a role in informing the process. Authentic, structured consultation will equate to better policy formation.

Introduction of a single scheme to replace the Disability Allowance, Blind Pension and Invalidity pension:

- Most disabled people were in favour of this, with the following conditions:
- If, however, this single scheme corrects the imbalances that exist between payments to ensure a single system that is easy to access for disabled people.
- A system of assessment for accessing this social welfare payment needs to be based on the social model of disability.
- The current assessment is completely medicalised. Some of us are born with impairments but have to be reassessed every two years as if we would be "cured"!! It is stressful, and a waste of our time. Additionally, it is outdated and not in the spirit of the UNCRPD.

• Currently the system does not meet our needs. As it stands, 50% of disabled people applying for Disability Allowance are refused yet almost 70% of us win on appeal which shows a very poor understanding of disabled people's needs.

Introduction of a Three-tiered Personal Support Payment

- If disabled people had appropriate supports to engage in meaningful employment, we
 would not need a tiered system. We can work, it is not that we do not want to.
- It is very worrying to place disabled people into categories based on obsolete and inaccurate concepts of "incapacity"
- There are huge concerns on how the assessments would be carried out and that it
 would be very much medicalised. The Bio-Psycho-Social model that is proposed is not
 an appropriate, or indeed fair, system of assessment.
- The proposed changes and linking to accessing INTREO supports show a lack of understanding of the structural inequalities we face in accessing employment and the lack of systemic supports for disabled people trying to find work.
- There is enormous fear and concern that this is the initial step into reducing payments based on disabled people "not trying hard enough to get work".
- Disabled people were strongly opposed to any suggested reform in a social welfare
 payment and obligations to engage with INTREO. Not only were disabled people
 concerned about INTREO's current capacity to understand the barriers we face and how
 we should be supported into employment, it also shows total lack of understanding of the
 barriers we continually face in accessing employment.
- The proposed obligation does not take into account how few accessible jobs there are currently for disabled people, especially in rural areas or the lack of supports many of us would need to take up work. There are real fears that without that understanding it will mean people losing their Disability Allowance.
- Assessment should be based on capacity to earn with appropriate supports. For
 example, disabled people, even with complex support needs, can and are earningbecause there are supports such as PAS in place.
- Many disabled people feel that there will be stigma attached to being allocated to a specific tier. There are also GDPR concerns. Disabled people who collect their DA

locally from their post office fear that the amount they claim would reveal information about their impairment. There are concerns about security of information based on how some disabled people receive information in relation to DA, including issues relating to privacy of date for vision impaired people who still receive information by post.

Introduction of new in-work supports

- The lack of a clear proposal makes this impossible to debate. Disabled people are
 interested in real thresholds that allow disabled people to earn more to offset the costs of
 disability.
- Any threshold for payments need to reflect the cost of disability. Presently, for working disabled people, the costs of disability still are placed on us.
- Thresholds for income disregard currently are at minimum level to survive. They need to reflect the extra costs of disability (such as need for transport to get to a job, physio that might be needed due to work-related impact on our bodies and so on).
- Means testing and thresholds for disabled people should not take into account earnings
 of other people who a disabled person lives with. The cost of disability report shows our
 additional needs, so our income thresholds need to reflect our needs, not household
 needs.
- If we are working, we need income to ensure quality of life outside work and for that
 reason thresholds need to reflect the costs that disabled people face due to disabling
 barriers that we must overcome to get to work.
- In-work supports need to reflect the need for flexible working hours and be responsive to the how employment changes for many disabled people based on the hours they can work each week.

Raising the age of accessing Disability Allowance to 18

- Some disabled people felt this was a worthy proposal as some young disabled people
 do view it as income. Raising the age to 18 should encourage more disabled people to
 continue in mainstream education which will lead to better employment prospects.
- It provides equality in terms of other social welfare supports and age.

- Conversely, some disabled people were not in favour as they felt that younger disabled people were denied part-time or casual work that their non-disabled peers can, and do, access.
- Being a young person can be expensive, and it is even more expensive for disabled people to build their independence to be socially included (accessing transport for example for some disabled people).

The consultative spaces hosted and managed by ILMI again illustrated the importance of disabled people having a voice on decisions that affect our lives. IT is vital that any further consultation is held with DPOs so to give disabled people the opportunity to have their say in policy making.