



NCBI

**Working for People
with Sight Loss**

2019

NCBI
Oireachtas Briefing

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NCBI

National Council for the Blind Ireland

Our Vision

For people who are blind and vision-impaired to have the same opportunities, rights and choices as others to fully participate in society.

Our Mission

To enable people who are blind and vision impaired to overcome the barriers that impede their independence and participation in society.

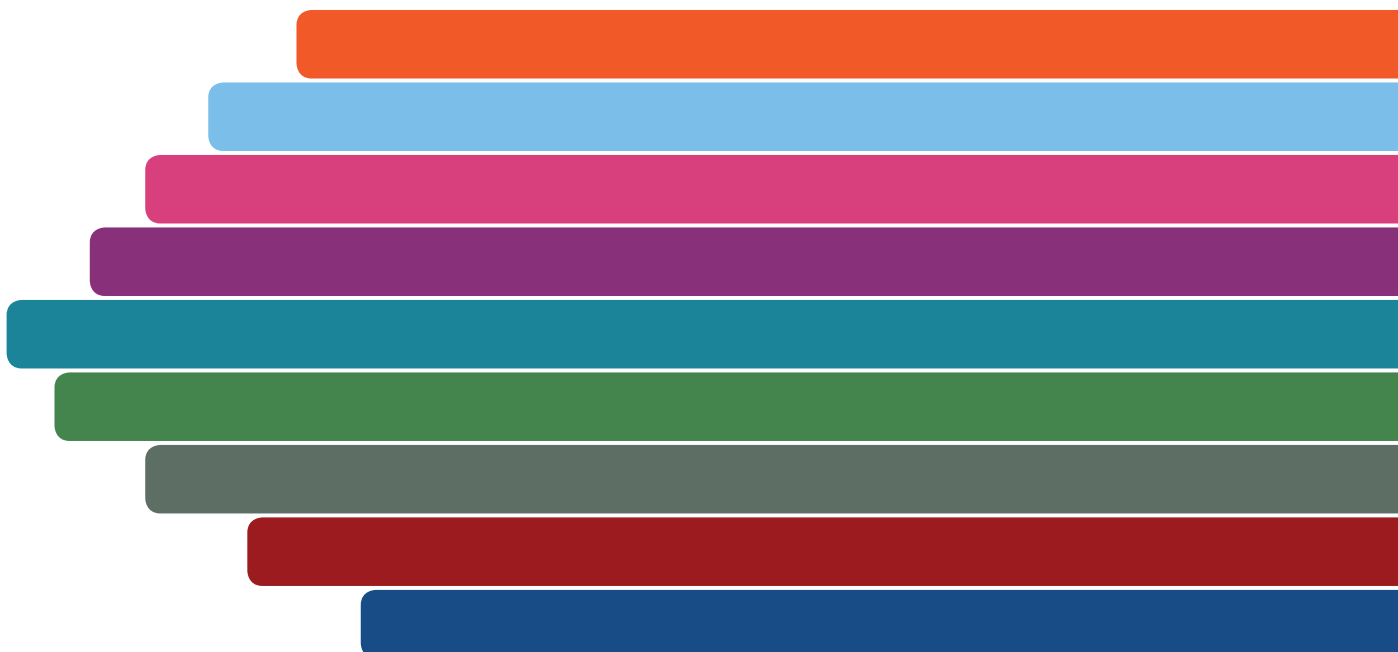
Our Values

NCBI's core values give effect to our vision and permeate our mission and inform all of our actions to ensure that we achieve the highest standards in everything we do.

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About NCBI

NCBI (National Council for the Blind of Ireland) is Ireland's national charity working for the rising number of people affected by sight loss. At NCBI we are working every day with people of all ages, from young babies to those reaching their 100th birthday. The majority of people we work with actually have some remaining vision, while only a small percentage are completely blind. Census 2016 figures show that there are currently 54,810 people with sight loss in Ireland and this number is rising [1]. Last year, we offered support and services to approximately 8,000 people who are blind and vision impaired. Of this figure, 2,000 were new referrals to NCBI. The demands on our services are increasing as the population ages and the incidence of age-related sight loss escalates.

Sight Loss Figures

54,810 people with significant sight loss.
NCBI works with 8,000 each year.





Department of Health

Patient Waiting Lists

At the end of April, National Treatment Purchase Fund (NTPF) outpatient data reported that 43,455 people are currently waiting for outpatient ophthalmic services, the highest number of people recorded to date [2]. Since the beginning of 2019, this figure has grown by 3,012 people. Ophthalmic services are now recognised as the fourth longest waitlist of any specialty. However, this number is not an accurate representation of the extent of the true waitlist. Waitlists for cataract operations are not included in the NTPF figures. Many patients with cataracts are waiting extensive periods of time for access to their treatment, with an increasing number of patients forced to travel to Northern Ireland for surgery.

Our Asks

- The Department needs to ensure more timely access to people awaiting outpatient ophthalmic services.
- The Department needs to introduce a target for eye care patients based on the urgency of the condition, alongside referral to treatment targets to prevent avoidable blindness.

NCBI Eye Clinic Liaison Officers (ECLO)

Following success in the UK by the Royal National Institute for the Blind, NCBI has begun to roll out an Eye Clinic Liaison Service in Ireland. This service acts as an important bridge between health and social services and is central to enhanced support, wellbeing and overall experience of patients in eye clinics. NCBI's ECLOs are available to provide emotional support to patients and their families at what can be a difficult time, alongside appropriate and timely referrals to community-based services.

NCBI is currently piloting two ECLOs across three major hospital eye departments in Dublin; the Mater Hospital, Royal Victoria Eye and Ear Hospital (RVEEH) and Temple Street Children's Hospital. The pilot programme received a one-off grant from the Acute Hospitals Division, however reduced charitable giving limits funding to a part-time ECLO post in Temple Street Children's University Hospital.

Our Ask

The Department needs to work with the NCBI to ensure ECLO's are in the right place at the right time across Ireland's major eye clinics by helping patients maintain independence and well-being whilst reducing burden on ophthalmologists and clinic-based staff.

VAT on Food Supplements

Any VAT increase on food supplements will have a negative impact on people who are blind or vision impaired, many of whom take food supplements that have been recommended by their eye doctors to slow down the deterioration of their sight.

Food supplements are commonly used to suppress the progression of age-related macular degeneration (AMD). In Ireland, AMD is the main cause of sight loss in people over 50 years and with an aging population, the number of people affected by this condition is on the increase.

A VAT increase on food supplements, on these already costly supplements will mean that many people with sight loss will be unable to afford them.

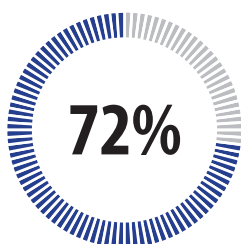
Our Ask

The decision made by the Revenue Commissioners to introduce any VAT increase on food supplements, particularly those which are used by people to slow down the deterioration of their sight, needs to be overturned.

Assistive Technology

Despite the clear significance of assistive technology for people who are blind and vision impaired, funding for assistive technology in Ireland is fragmented and uncoordinated. As a result, many people are unable to afford the upfront costs of essential assistive technology and have to go without [3]. There needs to be fair and equal access to assistive technology for all people who are blind and vision impaired across the country, regardless of where the person lives.

In addition, the Health Service Executive (HSE) does not consider smartphones under the Technical Aids Grant, despite the fact that smartphones are often the most accessible for a person with sight loss and the developments in technology such as the Siri intelligent assistance tool, built in screen reader (Voice Over) and screen magnification are indispensable [3].



of people with impaired vision said that access to assistive technology would enhance their choices and opportunities[3].

Our Asks

- A central agency needs to be mandated with the responsibility of ensuring coordinated delivery of the Technical Aids Grant.
- The Department needs to provide funding to the HSE so that the Technical Aids Grant is adequately resourced.
- The Department should provide funding towards the Technical Aids Grant so that it can be extended to include smartphones.

Aids and Appliances: Eyewear

People with sight loss are spending €5.74 per week on specialist prescription glasses / lenses and high spec sun filter glasses, without which many people affected by glare cannot leave the house [3]. High spec, sometimes prescription, sunglasses are an essential item for an individual with vision impairment as daylight can affect a person's eye condition and often causes pain and incapacity to see anything.



Our Asks

- The Department needs to include high spec sunglasses / filters and specialist spectacle lenses for those with vision impairment within the definition of HSE aids and appliances.
- For every set of high spec lenses and sunglasses received, a second, back-up pair, should be provided to mitigate against the high risk of accidental damage and to reduce the cost of reassessment for the State.
- The Department should enable those with an ophthalmic diagnosis to change their low vision aid if their eye specialist or optometrist has identified that their sight has deteriorated further.

Low-Tech Magnification Aids

Each HSE region employs different criteria for the awarding of magnification or low vision aids. This creates unnecessary stress for those who require the aids for fundamental tasks such as reading and writing. It is vital that any useful vision a person has is optimised to maximise their quality of life and independence.

Our Ask

Each HSE region should adopt standardised criteria for approving low-tech magnification aids, as an entitlement under the General Medical Service.



A New Transport Support Payment Scheme

In May 2018, the Minister for Health and Minister for State for People with Disabilities brought a Memorandum to Government on proposals for a new Transport Support Payment Scheme. Following consideration of the matter, it was decided to withdraw the Memorandum from the Cabinet agenda at the time. The Minister for State for People with Disabilities intended to revert to Government in due course with revised proposals to reflect the discussions at that Cabinet meeting and further discussions on the best way to progress the scheme.

Our Asks

- This scheme not only needs to provide transport to health-related appointments but should also be available to those who need transport to and from work where they are unable to drive a car. This would remove one of the biggest barriers for people with sight loss in relation to taking up or remaining in employment.
- NCBI needs to be involved in the consultation process when proposals are put forward in relation to the development of a new Transport Support Payment Scheme in order to ensure that the needs of people who are blind and vision impaired are fully considered.



Funding of Canes for People who are Blind and Vision Impaired

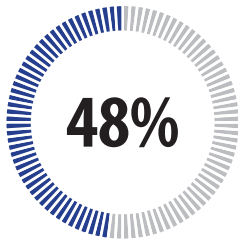
NCBI are disappointed that the State will not cover the cost of a long cane, which are essential for people with little or no vision to move around safely and independently, and symbol canes to indicate vision impairment to others. Currently, NCBI provides long canes to people who are blind and vision impaired using fundraised money.

Our Ask

The Department should fund one cane per year to each person who is blind or vision impaired who needs to use one.

Personal Assistants and Support Services

The personal assistant service plays a key role in the lives of many people with disabilities in Ireland. People who are blind and vision impaired are losing out due to unavailability of the personal assistant service to them. The National Physical and Sensory Disability Database notes that only 91 people with vision impairment have a personal assistant compared with 900 people with a physical disability [4].



of people with impaired vision said that access to funding for a personal assistant to enhance capacity to do the things you want / need to do and access to a call-up service (to help people to get out to do the things that are important to them) would enhance life choices and opportunities [3].

Our Asks

- NCBI calls on the Department of Health to support the HSE in extending the current personal assistant service to include people who are blind and vision impaired.
- The Department needs to fund personal assistant services for people who are blind and vision impaired regardless of where they live.

Funding NCBI Services

As the primary funder of NCBI's frontline services, through the HSE, the Department of Health should ensure that NCBI, the national sight loss agency, is fully resourced to address the needs of people who are blind and vision impaired through one single national budget.

Our Asks

- The Department needs to restore funding allocation to NCBI by at least 16%, which reflects funding reduction since 2008. This would enable NCBI to respond to current and future growth in numbers of people experiencing sight loss in line with the increasing population of older people.
- There needs to be one single national budget for NCBI to facilitate equal access to services across the country.

Restore funding allocation to NCBI by at least



Department of Employment Affairs and Social Protection

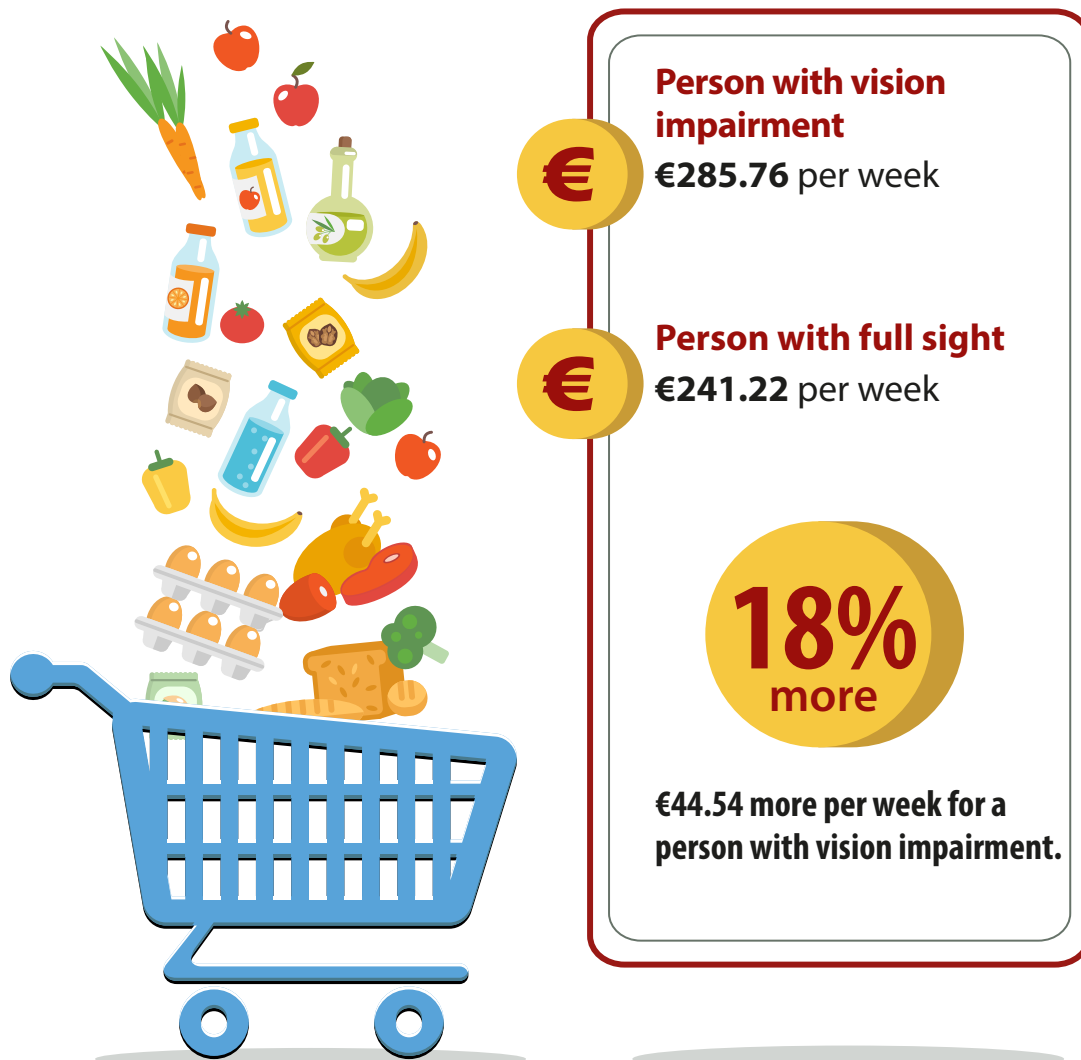
Inadequacy of the Basic Social Welfare Rate

Research carried out by NCBI and the Vincentian Partnership for Social Justice found that the Minimum Essential Standard of Living (MESL) for a single adult with vision impairment costs €44.54 (18%) more on a weekly basis than for a single adult in the main MESL budgets for the general population. The basic social welfare rate does not take into account the additional costs of living with sight loss [5].

Our Ask

The Department needs to increase the basic social welfare rate for the Blind Pension and Disability Allowance by at least €20 per week.

Minimum Essential Standard of Living (MESL)



Research on the Additional Cost of Living with a Disability

The Department has committed to carrying out a piece of research in 2019 on the additional costs of living with a disability. NCBI is delighted to see that the research is underway.

Our Ask

As research will provide quantitative estimates of the cost of disability using a number of approaches including data based on the direct experience of people with disabilities, NCBI and people who are blind and vision impaired should be consulted as part of the research process.

The Free Travel Scheme

The free travel scheme is something that is valued by those who can avail of it and needs to be retained. However, not all people with sight loss are eligible for the free travel scheme. Many people with sight loss are not able to obtain a driver's license, but also do not qualify for the free travel scheme.

There are an alarming 700 people using our services who have no other option but to pay for each journey on public transport to school, college, work and leisure activities as they do not have sufficient vision to drive a car but are not eligible for the free travel scheme. Access to free travel is not a luxury for this specific cohort of people.

Our Ask

Eligibility criteria for access to the free travel scheme should be changed to include those with a long-term eye condition, which renders their level of vision insufficient to meet criteria for a driver's licence.

Loss of Secondary Benefits

If a person with sight loss has an income above the threshold that allows entitlement to the Blind Pension, this also means that person loses out on their entitlement to Fuel Allowance, Living Alone Allowance and Household Benefits Package. This combined loss of entitlement creates an income trough. This income trough acts as a disincentive to earn between €450 and €500 per week [6].

Our Ask

When a blind or vision impaired person's income exceeds eligibility for the minimum Blind Pension rate, the Department needs to address the income trough caused from this due to the loss of their Fuel Allowance, Living Alone Allowance and Household Benefits Package.

Tapering of Supports

The Blind Welfare Allowance has a 100% taper rate. This means that for every additional euro earned by a person who is blind or vision impaired, the Blind Welfare Allowance is reduced by a euro. This creates an income plateau meaning that any earnings between €230 and €450 per week result in the same overall household income. These two issues mean that to improve household income, a salary of €500+ is required to see any improvement in the level of household income when earning €230 per week (or above) [6].

Our Ask

A 100% taper rate is too steep as it creates an income plateau for some people.

Inconsistencies between Payments

The Blind Welfare Allowance is not treated as an assessable income for the Blind Pension means test, but is counted as income for the Disability Allowance means test.

Our Ask

The Department should make change so that Blind Welfare Allowance is not counted when assessing means for Disability Allowance.

Employment Rate



24% Ireland

The statistics indicate that the level of labour force participation amongst people who are blind and vision impaired in Ireland is only 24.4% [1]. This figure states that less than 1 in 4 people with impaired vision are currently actively participating in the labour force. People with impaired vision have a 60% less chance of being in employment than the general population.

Our Asks

- The Workplace Adaptation Grant should be administered consistently across the country. At present, staff in the Department have different interpretations of its administration.
- The Department needs to fund a national awareness campaign that proactively promotes the Employee Retention Grant Scheme and Workplace Adaptation Grant to employers.
- The Department needs to digitalise its records so that it can easily retrieve statistics on the number of people who are blind and vision impaired who have received its supports.
- The Department needs to officially recognise NCBI as a complementary service provider to support and strengthen the structures already in place through the Intreo service. NCBI has expert knowledge of the technological and practical solutions in employment for people who are blind and vision impaired and we need to partner with Intreo, so that each person is getting individualised and responsive supports.
- The Department also needs to engage with NCBI in relation to barriers in accessing Intreo services for people who are blind and vision impaired, which include accessibility of Intreo buildings, the service itself and information available.

Rehabilitative Work

In the report “Make Work Pay for People with Disabilities”, NCBI was delighted to see a recommendation to remove ‘rehabilitative work’ requirements for Disability Allowance.

Our Ask

The Department must also ensure that the requirement that work is of a “rehabilitative nature” is also removed from the Blind Pension.

A New Transport Support Payment Scheme

In May 2018, the Minister for Health and Minister for State for People with Disabilities brought a Memorandum to Government on proposals for a new Transport Support Payment Scheme. Following consideration of the matter, it was decided to withdraw the Memorandum from the Cabinet agenda at the time. The Minister for State for People with Disabilities intended to revert to Government in due course with revised proposals to reflect the discussions at that Cabinet meeting and further discussions on the best way to progress the scheme.



Our Asks

- This scheme not only needs to provide transport to health-related appointments but should also be available to those who need transport to and from work where they are unable to drive a car. This would remove one of the biggest barriers for people with sight loss in relation to taking up or remaining in employment.
- NCBI needs to be involved in the consultation process when proposals are put forward in relation to the development of a new Transport Support Payment Scheme in order to ensure that the needs of people who are blind and vision impaired are fully considered.

Community Employment Scheme

The level of labour force participation amongst people who are blind and vision impaired in Ireland is only 24.4% [1] and therefore, Community Employment Schemes represent an excellent intermediate labour market continuum for many people who are blind and vision impaired.

Our Asks

- People who are blind and vision impaired should be allowed to apply for a second Community Employment role, so that they can get work experience with another employer.
- The Department should extend the Workplace Adaptation Grant to those on Community Employment Schemes.



Department of Transport, Tourism and Sport

Proposed Transport Infrastructure and Service Changes

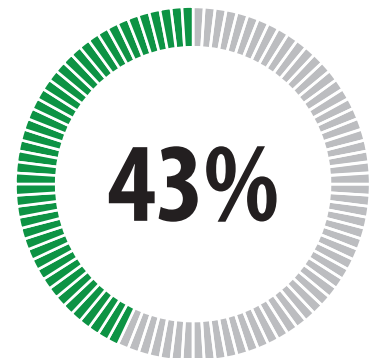
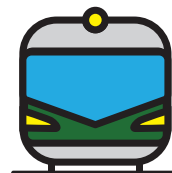
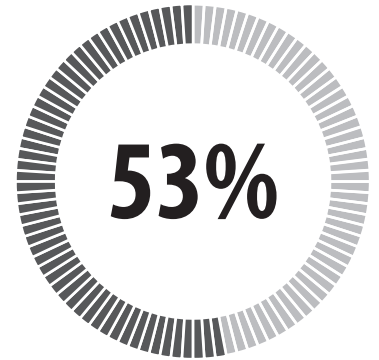
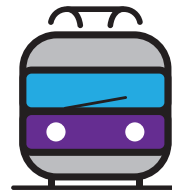
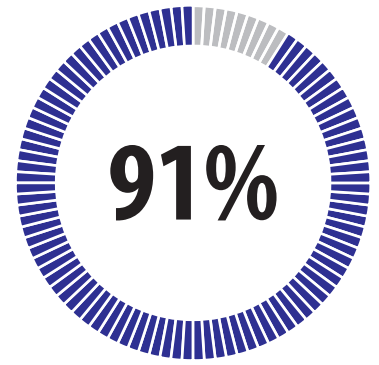
In the coming years, it is proposed by the Government to embark on a number of large-scale transport infrastructure projects and transport service changes across the country. In particular the proposed redesign of the Dublin Bus network under Bus Connects and the Metro need careful attention and the impact on people who are blind and vision impaired must be taken into account before any changes are introduced. It is imperative that NCBI and people who are blind and vision impaired are consulted at every stage of these developments given their dependence on public transport. Any plan needs to be disability proofed at every stage from concept right through to delivery. NCBI firmly believes that many of the issues currently being experienced by people who are blind or vision impaired across public transport would not exist if projects were disability proofed from day one.

Our Asks

- People who are blind and vision impaired should be consulted at each stage in any project or any large-scale service change. This process should be fully accessible to allow someone who is blind or vision impaired to take part independently.
- An equality impact study should be included in any large-scale transport infrastructure project or service change to assess the impact on people with disabilities.



74% of people who are blind or vision impaired use public transport.



The most common forms of transport used by people who are blind and vision impaired are: Bus (91%), train (70%), taxi (53%) and tram (43%) [3].

Audible Announcements

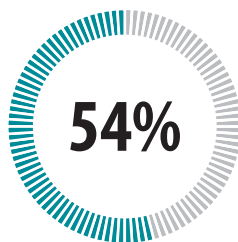
Audible announcements at stations / bus stops and on public transport are essential for independent and safe travel for people who are blind or vision impaired. They provide vital information that is not otherwise available to the person who cannot see enough to read signs independently. The lack of audible announcements is an ongoing problem that people who are blind and vision impaired are faced without the availability of a member of staff to offer assistance. There are many cases where, even when audible announcements exist, they are not working or the driver is unaware of their importance.

Our Asks

- The Department should provide resources to ensure that all public transport services operate audible announcements on all public transport throughout the country and at platforms / stops to enable those with insufficient vision to have access to the same basic information as the sighted population i.e. destination of the train, tram or bus and location of next stop / station.



Audible Announcements



54%

of people who are blind and vision impaired feel that audible announcements in all stations, airports and ferry terminals would make a difference to them.



53%

of people who are blind and vision impaired feel that audible announcements on public transport would make a difference to them [3].

Taxi Subsidies

The availability of the free travel scheme from the Department of Employment Affairs and Social Protection is of great benefit to people who are blind or vision impaired. However, it is important to note that taxis also play a vital role in the mobility and independence of people who are blind and vision impaired, they are not an optional extra. In rural areas, there may be no public transport option, or if there is, it is a taxi journey away. Those who live in urban areas may not have the confidence or the mobility training to use public transport or may be travelling to an unfamiliar place, making taxis their only realistic option.

In many other countries, taxi subsidies are available to people who are blind and vision impaired because it is recognised that people can't drive and, therefore, their need to use taxis is legitimate.

A subsidised taxi transport scheme should be introduced in Ireland for people with vision impairments and other disabilities. Some examples include:

- London's 'Taxicard' system,
- Chicago's Taxi Access Program and
- Australia's Multi-Purpose Taxi Program.

Our Ask

The Department should provide the financial resources to introduce a subsidised taxi transport scheme for people with sight loss. NCBI would be happy to work with the Department on researching a possible scheme.



Taxi Users



of people with impaired vision feel that discounted taxi fares would make a difference to them.



of people with impaired vision said that not being able to drive significantly impacts them [3].

Websites and Apps Accessibility

Websites and apps are an integral part of our daily lives and that is no different for someone who is blind or vision impaired. Travel information, ticket booking and timetables are all available online and on mobile apps. A person who is blind or vision impaired will use either screen magnification or screen reading software but the website and app must be designed in such a way to make it compatible with these accessibility features.

Our Ask

The Department should ensure that all public transport operators must prepare for the implementation of EU Web Accessibility Directive, which will ensure that all websites and apps are accessible.

Station / Bus Stop Accessibility

All stations and bus stops must be fully accessible to people who are blind and vision impaired, and adhere to EU standards and the United Nations Convention on the Rights of Persons with Disabilities. This includes ticket purchasing, accessible signage, use of tactile paving, use of colour contrast and audible announcements of the destination and platform of all trains and buses in advance of and as they enter the station or stop.

Our Ask

Accessibility standards must be embedded into the design of all new stations and bus stops and any significant refurbishment of current stations and bus stops requires a financial commitment from the Department to ensure that accessibility standards can be met.

Disability Awareness Training

Disability awareness training for all staff of public transport operators will ensure an organisation-wide standard for customers who are blind and vision impaired.

Our Asks

The Department needs to provide funding to all public transport providers in order to provide mandatory, standardised disability awareness training.

Department of Communications, Climate Action and Environment

Warmer Homes Scheme

Jobseekers Allowance is a qualifying payment for the Warmer Homes Scheme but Blind Pension and Disability Allowance are not. In fact, if the only income into the household for an applicant is a spouse's earnings from employment, the means test for Jobseekers Allowance and Disability Allowance are the exact same, with the applicant receiving the exact same payment from the Department of Employment Affairs and Social Protection. The only difference is the person on Disability Allowance has a disability and the person on Jobseekers' Allowance does not.

Our Asks

- Blind Pension and Disability Allowance should be included as qualifying payments for entitlement to the Warmer Homes Scheme in the same way as Jobseekers Allowance.
- The Department needs to provide adequate funding to enable this to happen as a matter of urgency, as it is also questionable whether or not the Department could be challenged on this matter on grounds of equality.

Implementation of the EU Web Accessibility Directive

The EU Web Accessibility Directive will significantly improve the accessibility of online public services, websites and mobile applications for people who are blind and vision impaired but the Department has failed to appoint a body to implement it.

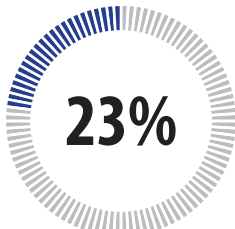
Our Asks

- The Department should ensure that all public bodies prepare for the implementation of EU Web Accessibility Directive.
- A progress report on the implementation of the Directive should also be made available.



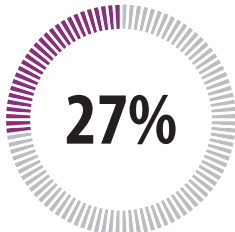
Technology

80% of people who impaired vision use technology [3].



23%

of people who are blind and vision impaired use mobile apps.



27%

of people who are blind and vision impaired use screen reading technology on a mobile device.



28%

of people who are blind and vision impaired use screen reading technology on a computer [3].



Public service priorities

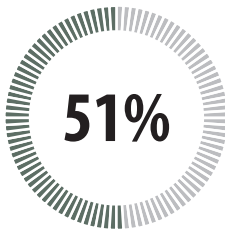
51% of people who are blind and vision impaired said that a public service priority should be for websites to be user friendly and accessible [3].



Audio description



Audio Description



of people who are blind and vision impaired said that availability of more audio described television programmes was a priority in terms of improving their ability to participate in cultural and social life [3].

NCBI is very disappointed with the dreadfully low targets set for audio description in the Broadcasting Authority of Ireland (BAI) revised Access Rules. This year, Irish viewers who are blind and vision impaired can only view 5% of programmes on RTÉ 1 & 2 with audio description. Only 6% of programmes on RTÉ Jnr will be available to children who are blind and vision impaired. Targets set for 2023 are a meagre 10% for both of those channels.

In the UK, there is already a statutory requirement on broadcasters to provide 10% of their programming with audio description, with many broadcasters actually providing 20% [7].

We do however welcome Virgin Media 1's initiative to start broadcasting



its programmes with audio described but the target has only been set at 2%. This should have been at least 1% in 2019 and 2.5% in 2020.

Our Asks

- It is vital that home produced programmes are broadcast with audio description. At the moment, many of the audio described programmes that are being broadcast, such as Eastenders, Emmerdale and Coronation Street, are UK productions which are bought in by our main Irish broadcasters. This allows Irish broadcasters to reach their annual targets quite easily. The BAI needs to set homegrown production targets as a matter of urgency. Irish broadcasters should also be obliged to provide the BAI will a breakdown of targets, which detail how many programmes are home produced with audio description and how many have been bought from other countries with audio description already included.
- NCBI also believes that a proportion of the TV licence fee should be spent on the production of audio description for home produced programmes.

Electric Vehicles

While electric vehicles are welcomed from an environmental and health perspective, we must remember that they pose a serious safety risk to people who are blind and vision impaired. Electric vehicles are

virtually silent, which makes it impossible for someone who is blind or vision impaired to detect them approaching. Electric vehicles are also a problem to children, cyclists and older people. Failure to tackle this issue will inevitably result in serious injury and even death.

Although EU regulation 540/2014 mandates all manufacturers to equip their new electric and hybrid vehicles with an Alert Vehicular Acoustic System (AVAS) by 1 July 2021, there are already hundreds of electric vehicles on Irish roads. Only a tiny minority of these will be equipped with an AVAS.

Our Asks

- The Department needs to provide funding to retrofit existing private electric vehicles that do not have an AVAS.
- The Department needs to provide funding to retrofit public transport that does not have an AVAS and which have been purchased with public funds.

Department of Housing, Planning and Local Government

Social Housing

Local authorities must take into consideration the specific needs of persons who are blind or vision impaired when allocating accommodation. People who are blind and vision impaired need their home to be on a public transport route as they will not be able to drive. They also need to be in short walking distance to services and facilities and a garden / enclosed area should be provided if the person has a guide dog.

Our Asks

The Department should ensure that every local authority reviews its policy in relation to allocation of housing to ensure that the policy recognises the needs of people who are blind and vision impaired. The policy should include the following commitments:

- Access assessments should be completed by a person who is blind or vision impaired with the Disability Housing Officer in advance of housing allocation and be an integral part of the planning process.
- A person who is blind or vision impaired should have the right to refuse a housing allocation more than three times if access issues are not taken into consideration.

- A house should not be allocated, fitted or decorated until NCBI has had an opportunity to carry out an assessment of the requirements of the person, based on their needs which are submitted alongside their application for housing. When a new or transfer application is made by a person who is blind and vision impaired, the local authority must be obliged, by the Department, to consult with NCBI about that person's specific housing needs.

Shared Space

NCBI is in favour of universal design but does not recommend the use of shared space. It is essential to provide footpaths with kerbs, for the safety of pedestrians with impaired vision, and / or with other disabilities, older people, and parents walking with young children who are instructed to "stay on the path". Even very young children understand that they are safe from cars if they don't step off the kerb.

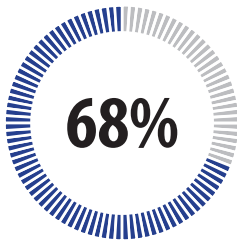
The Lord Holmes UK Report in 2015 entitled "Accidents by Design: The Holmes Report on "shared space" in the United Kingdom" [8] found that people's experiences of shared space schemes are overwhelmingly negative and that "overzealous councils are risking public safety with fashionable 'simplified' street design". A wealth of qualitative data in the report identified over 100 shared space schemes that became public areas which people were terrified to use. Local Authorities in the UK are u-turning and re-installing pedestrian crossings and kerbs. The report recommended that the Department for Transport in the UK must inform local authorities of the many risks of shared space schemes including reinforcing local authorities' responsibilities under equality legislation.

Our Ask

Based on the recommendations in the Holmes report, the Department must inform local authorities of the risk associated with shared space and ask them to implement their responsibilities under equality legislation.

Obstacles on the Footpath

People who are blind or vision impaired often cannot see a parked car, cyclist, overhanging branches, wheelie bins, advertising boards, café furniture on the footpath and may collide with them. Sometimes there is not enough space for the person to get past and this forces them to step off the footpath and onto the road.



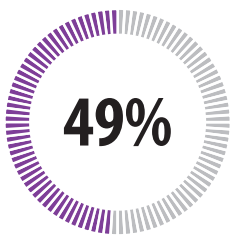
of people who are blind and vision impaired said that smooth easy to use footpaths with kerb edges and no obstacles would make it easier for them to use public spaces.



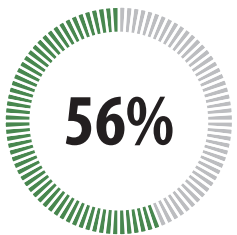
of people who are blind and vision impaired believe that footpaths free of parked cars would help them to use the footpath.



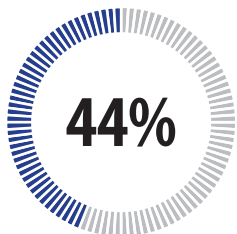
of people who are blind and vision impaired believe that footpaths free of bicycles would make a difference for them.



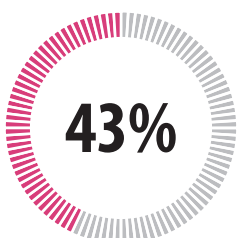
of people who are blind and vision impaired feel that enforcement of regulations on cutting hedges and overhanging branches adjacent to pathways would help them to navigate public spaces more easily.



of people who are blind and vision impaired believe that footpaths free of refuse bags / bins would make a difference for them.



of people who are blind and vision impaired believe that enforced regulations on the height of overhead signage and posters on public pathways would make a difference.



of people who are blind and vision impaired said that solid, clear barriers around on street café furniture would make our streets easier to use [3].

Our Asks

- The Department should see NCBI as a key stakeholder and should involve NCBI in the consultation process in relation to any new design projects or redesign to ensure that the needs of people who are blind and vision impaired are taken into account.
- The Department needs to resource local authorities so that they can subsequently ensure that the accessibility needs of people who are blind and vision impaired can be implemented.
- Access features including those listed above must comply with legislation and directives and must be resourced by the Department. The Department needs to monitor progress on an ongoing basis.
- The Department needs to ensure that each local authority puts an Access Officer in place in line with the Disability Act, 2005 and provide the necessary resources and training.

Making Voting Accessible

Some people who are blind and vision impaired were unable to vote independently in the local and European election in May, despite the availability of tactile ballot paper templates.

While we recognised the strides undertaken by the Department to introduce tactile templates following the April 2017 High Court ruling, the reality is, given there were multiple polls it meant that voters who are blind and vision impaired had to use three tactile templates, something which was likely to prove confusing for many.

Also, the final list of candidates was not known until three weeks in advance of polling, making it virtually impossible to have the free phone numbers and online resources available in a timely fashion to allow voters to familiarise themselves with the candidates running in their locality.

The Department did engage with NCBI and a number of other disability groups in a sincere and collaborative fashion to make the tactile ballot paper templates as accessible as possible. However, it is essential that the Department now gives serious consideration to alternative means of voting for people who are blind and vision impaired.

NCBI looks forward to engaging constructively with the Department as part of the existing Working Group on Accessible Voting to make this a reality in the years ahead.



Our Ask

NCBI believes the only truly independent means for a person with impaired vision to cast their ballot is either by telephone or electronically. Negative experiences with electronic voting in the past cannot be allowed to prevent the almost 55,000 people living with sight loss from exercising their right to a secret ballot.

Business Rates

NCBI has over 110 charity shops around the country. The monies raised by our charity shops fund the vital services that we provide to people who are blind and vision impaired. Each local authority can, at its discretion, exempt NCBI from paying business rates on our charity shop premises.

Our Asks

The Department should encourage local authorities to use their discretion and remove business rates from the premises in which our shops operate.



Department of Education and Skills

Bookshare

The NCBI Library and Media Centre is a specialised service that provides timely access to written material for people with a print disability in Ireland. During 2018, the Library and Media Centre supported over 4,100 members with more than 22,600 titles issued.

NCBI Library and Media Centre continues to develop its services in a bid to meet the evolving needs of its members. In 2018, the Library focused on increasing access for students in higher and further education. On 9 October, NCBI also celebrated the ratification of the Marrakesh Treaty, which allows NCBI Library to reproduce books in accessible formats for all who require them. Additionally, working in tandem with the Dyslexia Association of Ireland, NCBI's Library and Media Centre are now in a position to support all people with print disability across the country – approximately 1 in 10 people nationally.

NCBI are now seeking to build Ireland's largest accessible library, utilising Benetech's 'Bookshare' technology. Availability of this new platform will provide people with a print disability with instant access and downloads of over 470,000 homegrown and international titles in the format of their choosing.



Our Ask

The Department must ring-fence adequate funding to facilitate the NCBI Access Library infrastructure development and its associated costs in continuing to better support the evolving access needs of students with print disability in further and higher education.

Working in Partnership with the Department

Census figures show that since 2011, there has been a 20% increase in the number of children with impaired vision [1]. This steep increase equates to 4,701 children of school age (5-18 years) and highlights the need for a more structured and equipped educational system, which is well positioned to support children and young adults to fulfil their potential across our educational systems.

Estimates suggest that only 1 in 12 students with impaired vision in primary education, and 1 in 8 students with impaired vision in second level education, are currently supported by the National Council for Special Education. Inadequate or intermittent support, combined with increasing prevalence of vision impairment is of major concern.

In addition, there are extremely low levels of registration of students with vision impairment in higher education nationwide. Data from AHEAD shows that in 2017 / 2018, only 1.8% of students registering with a disability at third level (undergraduate and post graduate) had a vision impairment [9]. Since 2013, this proportion has dropped, whilst the number of students registering with disabilities overall has



increased. At 1.8%, students with impaired vision represent the second smallest category of students with a disability in third level education.

All too frequently we see children transitioning to and within education without the pre-requisite foundation independence skills to enable them to progress and maximise the benefits of participation in education alongside their peers.

Our Asks

- Although NCBI are currently working alongside the Department, we seek to be officially recognised and supported as a complementary service provider to support and strengthen the structures to become more individualised, equipped, and responsive to the needs of children with impaired vision.
- NCBI Children's Team delivers interventions based on the Expanded Core Curriculum for children who are blind and vision impaired, which accepts that education is not just academic or school based but also perceives it as being focused on the development of core skills such as sensory efficiency, orientation and mobility, independent living, career education, self-determination, social interaction, recreation and leisure and assistive technology. Our Children's Teams should also be inputting into the establishment and delivery of Individual Education Plans and interventions with children and their families. Our input will only serve to focus attention on the rights and needs of the child.

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- [9] AHEAD (2018) Numbers of Students with Disabilities Studying in Higher Education in Ireland 2017-2018. Available at www.ahead.ie

NCBI Head Office

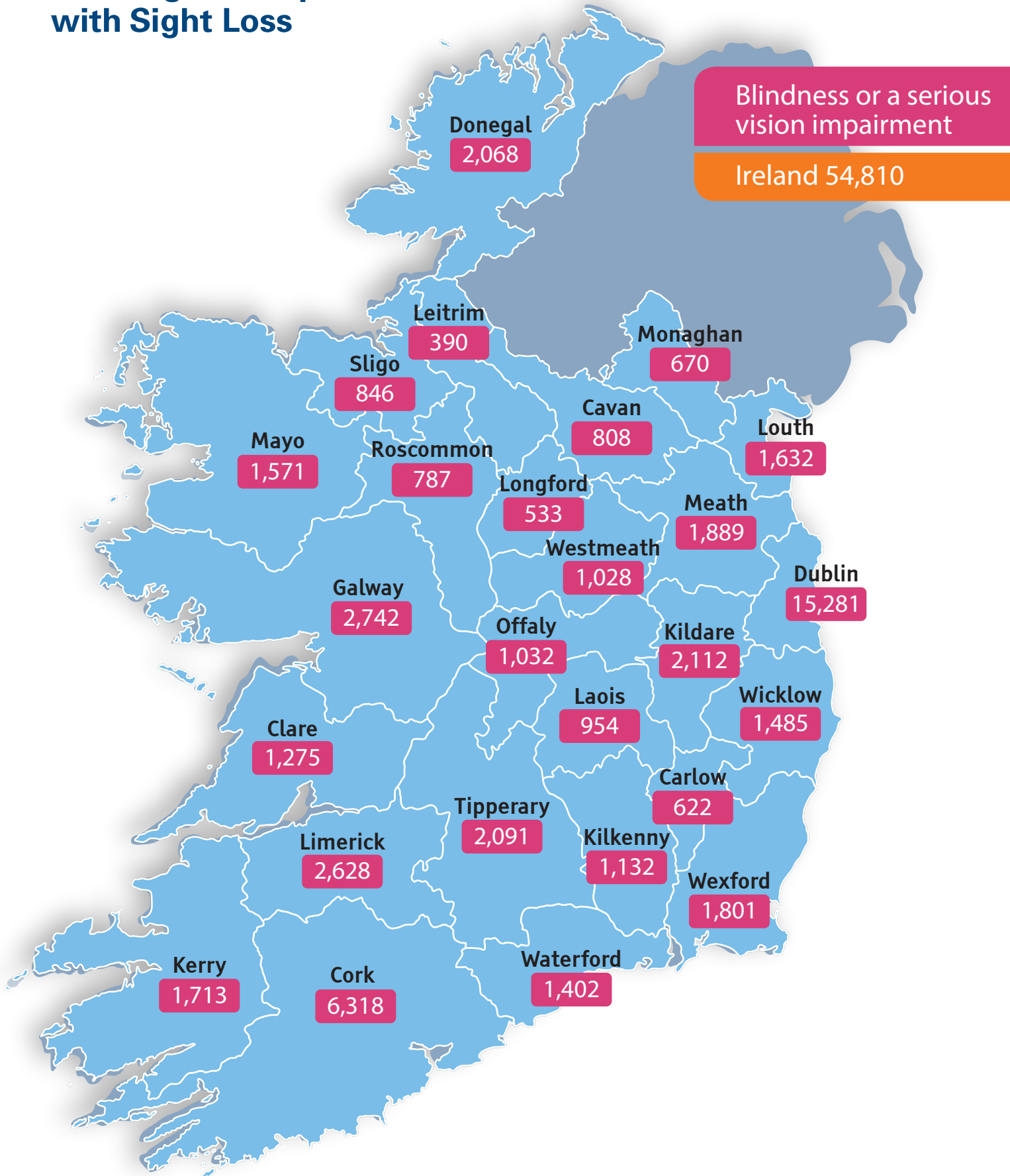
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NCBI

**Working for People
with Sight Loss**









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