



**Working for People with Sight Loss**

# NCBI Pre-Budget Submission 2024

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## Introduction

NCBI (National Council for the Blind of Ireland) is Ireland’s national sight loss agency. Our mission is to support blind and vision impaired people to overcome the barriers that impede their participation in society. At NCBI, we believe people who are blind or vision impaired should have the same opportunities, rights and choices as others to fully participate in society. NCBI is also home to Vision Sports Ireland, the national governing body for sport for blind and vision impaired people. According to Census figures (2016), there are currently 54,810 people with sight loss in Ireland. This is a figure we know to be on the rise, from the increase in demand we have witnessed for our own services in the past five years.

A society in which blind or vision impaired people can fully access, participate and contribute in economic, cultural and social life, requires a robust, rights-based and holistic approach by government. The UNCRPD sets out clear requirements of the Irish Government to “promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.”<sup>1</sup> In 2022, the number of unique service users who required support and services from NCBI was 7,424 (up 7% on 2021). Of this figure, those aged under 23 were 1,281, 23-65 years were 1,923 and 65 + equalled 4,220.

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<sup>1</sup> [Article 1 – Purpose | United Nations Enable](#)

NCBI's pre-budget submission 2024, outlines key areas of government spending and services which need to be enhanced to support and empower, Ireland's community of people living with sight loss.

## 1 Health

### 1.1 Eye Clinic Liaison Officer Service (ECLO)

**Ask:** €490,000 recurring funding to sustain the current ECLO positions and embed new ECLO staff in the remaining acute hospitals.

NCBI believes that no person should go through a diagnosis alone. A diagnosis of sight loss is life changing for people as it can impact on quality of life, independence and general well-being. Ophthalmology services are currently understaffed and do not have the capacity to provide essential additional emotional and rehabilitation support for patients at the crucial time of diagnosis. The Eye Clinic Liaison Officer (ECLO) service was introduced by NCBI in 2019 and presently operates across five major ophthalmic sites, CHI at Temple Street, CHI at Crumlin, Mater Misericordiae University Hospital, Cork University Hospital and the Royal Victoria Eye & Ear Hospital. The ECLO liaises with clinical staff to address this vital emotional support need while also providing a wraparound service with essential information, ongoing support and signposting to required rehabilitation support in the community.

The ECLO service has supported 3,000 patients and families to date.

Unfortunately, the one off funding provided by the Acute Hospital Division in 2020 is due to run out in Q4 2023 which poses a challenge for the continuity of care and support to ophthalmic patients right across the country.

A recent NCBI evaluation of the ECLO showed that 94% of clinicians reported that ECLO filled a gap in providing essential support. Also 88% of patients reported improved well-being. Where ECLOs are embedded, they have brought point of diagnosis to referral to vision rehabilitation from 3.5 years to 3 weeks.

It is imperative that patients who receive a sight loss diagnosis access equitable treatment and support however, NCBI requires additional and sustainable funding to ensure this is the case. Currently, patients attending the remaining acute ophthalmic hospitals and receive a sight loss diagnosis do not have access to the support provided by the ECLOs. This life changing support should not be dependent on a postcode lottery.

## 1.2 Ophthalmologist Recruitment

**Ask:** Immediately prioritise the recruitment of additional Consultant Ophthalmologists in Budget 2023

As of May 2023, the number of children and adults across the country on waiting lists for outpatient Ophthalmology care was over 33,650<sup>2</sup> people and over 9,858<sup>3</sup> awaiting inpatient/day case Ophthalmology care.

According to the Irish Medical Organisation, the recommended number of Ophthalmologists for the state is 147. However, the current number is far less and this shortfall of Ophthalmologists has negatively impacted timely treatment for people living with sight loss. It has resulted in patients waiting for appointments while experiencing a deterioration in their sight, and some may experience irreparable damage to their vision due to the delay in appointments and specific treatments.

The 2022 Waiting List Action Plan is to allocate €350 million to the HSE and National Treatment Purchase Fund (NTPF)<sup>4</sup> to help reduce waiting lists. The Department of Health, HSE, and NTPF plan is to deliver urgent additional capacity for the treatment of patients, including investing in reforms for sustained reductions in waiting lists in the long term.

In view of this Action Plan and the serious concerns in relation to delayed treatment for those who are vision impaired, NCBI believes the HSE must prioritise the recruitment of Ophthalmologists across the state as a matter of urgency.

## 1.3 Dedicated Treatment Pathways for AMD

**Ask:** Implement recommendations made in the Primary Care Eye Services Report (2017) to move the point of care for appropriate conditions, such as wet AMD out of acute hospitals into primary care in the community.

Age Related Macular Degeneration (AMD) is the most common eye condition in people over the age of 50, affecting approximately 7% of this age group. There are two main types of AMD - dry AMD and wet AMD. Although wet AMD is less common than dry AMD, wet AMD can progress rapidly resulting in

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<sup>2</sup> [OPNational02 \(ntpf.ie\)](https://national02.ntpf.ie/)

<sup>3</sup> [IPDCNational02 \(ntpf.ie\)](https://national02.ntpf.ie/)

<sup>4</sup> [Hospital Waiting Lists – Tuesday, 29 Mar 2022 – Parliamentary Questions \(33rd Dáil\) – Houses of the Oireachtas](#)

significant deterioration of vision. However, if diagnosed early, wet AMD can be treated with the deterioration of vision slowed, maintained and even recovered. To ensure that patients with treatable eye conditions such as wet AMD avoid irreparable damage to their vision, an early diagnostic and subsequent rehabilitation care pathway is urgently required. Increased awareness of early symptoms of AMD will enable patients to refer to their GP to identify and implement diagnostic and specialised AMD eye care quickly.

#### **1.4 North East Region Integrated Eye Care Services (NERIECS)**

**Ask:**

Support the deployment of the Virtual Accountable Care Organisation as a governance structure to manage care across different organisations in our Health Service and

Support the initial funding gap for staffing, equipment and transformation costs (which is €3.9 million for 2023, €2.97 million for 2024 and €2.72 million for 2025 with just index linked cost required after that).

Within the North East (NERIECS) network, there are in excess of 18,850 patients awaiting first outpatient appointments, with 6000 of these patients on the Mater waiting list and a further 6-10,000 on community waiting lists. The North East region comprises North Dublin, Meath, Louth, Cavan, Monaghan, Westmeath and Longford with a combined estimated population of 1.2 million to care for

The demographic demand for eye care is set to increase exponentially in the coming years, with double the number of patients requiring eye care in the next 30 years. This situation has been further compounded following the global pandemic, with a latent demand for services now starting to manifest in the waiting lists in the 6-12 month wait list. Of concern to the NCBI is the support for patients to access care for routine cataract care in other jurisdictions, while other ophthalmic patients wait an unacceptable time, outside of clinically acceptable intervals and are being harmed with resultant irreversible sight loss for conditions such as Glaucoma and Age Related Macular Degeneration.

The vision for better eye care in Ireland has been clearly articulated in the Primary eye care review and The HSE National Model of Eye Care. Slaintecare advocates for the development of a more integrated health service, centred on

a comprehensive community-based care model and provides the framework within which our health services will develop over the coming decade.

While these documents outline the 'what,' they do not support the 'how' and the 'when'. This has been the work that the NERIECS, which NCBI is a member, has been involved in road mapping, sense making and implementing for the last 18 months. **NERIECS** has extensively collaborated with all stakeholders to understand how to fully integrate and deliver eye care locally, to quality standards with optimal outcomes for patients. **NERIECS** has also worked to understand how current hospital centric services need to be redesigned and integrated with community and primary care, how to support this with information and data and how current funding models and mechanisms need to change.

**NERIECS** has achieved a significant amount through the goodwill and willingness of all those working in Eye Care across the region in all different disciplines to work together to tackle the problem in Eye Care delivery.

**To date the transformation has already delivered significant outcomes:**

- ✓ Decrease in both adult and paediatric waiting lists across the region- (71% reduction in adult patients waiting >12months delivered March 2021-2022).
- ✓ Decrease in surgical waiting list of 21% (2021-2022) for >12 months
- ✓ Standardised regional referral for both cataract and Glaucoma
- ✓ Right first time referral improved from 20% to 95%
- ✓ Improved patient and staff satisfaction with cataract pathway experience
- ✓ Conversion rate to surgery for patients referred for cataract now 95% improved from 75% optimising a return to time to care for Consultant surgeons.

3.9 - 2023

2.9 - 2024

2.72 - 2025

**NERIECS** has identified our funding gap for the next three years and if supported we have the mechanism, the structures and most importantly the

buy in of all involved in Eye Care delivery to eliminate our wait lists in the North East in three years. This is a very bold ambition as **NERIECS** looks to

- Reduce the wait list for Outpatients from approximately 14,000 to zero and
- Reduce the wait list for Cataract surgery, from (current level) 3000 to zero

#### 1.5 Standardisation of HSE Technical Aids Grant

**Ask:** Standardise HSE Technical Aids Grant Funding Assessment Model for all CHOs across the country and extend eligibility for Technical Aids Grant to those aged over 65.

People with sight loss have the right to live an independent life and utilise a variety of aids and appliances to support them to do so. The Technical Aids Grant is an essential avenue to support people (aged under 65years) who are blind or vision impaired to purchase equipment that can enhance independence and boost self-esteem. However, the Technical Aids Grant administered by the HSE has no standardised eligibility criteria, assessment processes, or funding allocations for aids and appliances across the country. Consequently, many people with sight loss are unable to afford the cost of these aids and appliances and are either forced to wait for prolonged periods of time or must do without if they are over the age of 65, which undermines their right to living independently. As a result of inconsistent practices across Community Health Organisations (CHOs), there is extraordinarily little information available to guide people who need to apply for the Technical Aids Grant as to what the process entails.

#### 1.5 Mandate offer of electronic payment for the Blind Welfare Allowance

**Ask:** Mandate all CHO areas to offer payment of the HSE Blind Welfare Allowance as an electronic transfer to people who are blind or vision impaired

There is no standardisation of online payment for the HSE Blind Welfare Allowance across the country. Some CHO areas have not set up a direct electronic transfer option for the Blind Welfare Allowance. Many people receiving this Allowance must travel to collect a cheque and then deposit this in their bank account. This method creates additional stress of having to travel unnecessarily for people who are blind or vision impaired as we know that

accessible transport is not readily available for all, particularly those in more rural areas.

### 1.6 Investment in dedicated Mental Health Services

**Ask:** NCBI is seeking dedicated HSE funding of €330,000 per year to guarantee continuation of this essential nationwide service.

There is substantial literature supporting the link between visual impairment and emotional distress and depression. Receiving a sight loss diagnosis at any age is life changing as it affects a person's sense of self and their independence. Adjusting to this can take its toll with many seeking emotional and mental health supports from NCBI who know first-hand the impact of this transition. Children with vision impairment are considered particularly vulnerable to poor outcomes across a range of emotional and social well-being indicators. In reality, the diagnosis of sight loss affects the whole family as they learn to adjust and adapt to the new normal.

NCBI's Counselling, Wellbeing and Emotional Support service offer a suite of services along a spectrum of engagement. This includes specific group peer supports (meeting online or in person), our Connection Network Befriending service and dedicated counselling service (currently all delivered over the phone). This dedicated service was set up in 2022 to meet the need presented and utilise the specialist understanding and knowledge of how living with sight loss affects people,

## 2. Sustainable Service Provision Funding

**Ask:** Publish an Action Plan for the Disability Capacity Review and invest money to resource it.

Multi-annual funding to be put in place for Disability organisations who provide vital services on behalf of the Health Service Executive and the State.

NCBI is seeking a single Service Agreement and 90% funding to service cost target by 2026, starting in 2024 at €7.7M, or 75% of core grant.

NCBI receives state funding to ensure the provision of essential services for people living with sight loss as a Section 39 organisation. This funding is vital to ensure the provision of services for people who are blind or vision impaired such as rehabilitation services and Orientation & Mobility Training through our network of Community Resource Workers.



The funding provided by the state for Section 39 organisations such as NCBI has consistently fallen short of what it costs to run and provide these vital services. As a result, organisations are under constant financial strain and it has knock on implications for the retention and hiring of staff.

The Government estimated €350-€600 million would be needed from Budget 2022 and €450-€800 million by 2027 to address unmet need in disability services<sup>5</sup>. While Budget 2023 saw a €65m funding provision to address inflation in community and voluntary organisations,, the level of funding allocated through Budget 2024 needs to be increased dramatically to meet the needs as demonstrated in the Capacity Review published by Government in 2021. Inflation continues to rise and staffing challenges remain extremely difficult for Section 39 organisations like NCBI.

For NCBI to expand on our service provision and supports for people who are blind or vision impaired, additional sustainable funding is required by Government.

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<sup>5</sup> [8fe32ca7-2154-4fb0-8a41-6931c5f15471.pdf \(www.gov.ie\)](#)

### 3. Housing

#### 3.1 Accessing Social Housing

**Ask:** Ringfence funding to the Disabled Persons Grant Scheme & Improvement Works which are administered by the Local Authorities to meet the bespoke requirements of an applicant who has a disability.

According to research published by the Irish Human Rights and Equality Commission and Economic and Social Research Institute (ESRI) people with disabilities are more than twice as likely to report discrimination relating to housing and over 1.6 times more likely to live in poor conditions, such as living in damp housing, lacking central heating or living in an area with neighbourhood problems<sup>6</sup>.

The same research indicates that people with disabilities are also particularly over-represented in the homeless population as more than one in four homeless people have a disability.

Accessible housing for safe independent living is essential for everyone and not least for people who are blind or vision impaired. Although efforts are made to standardise assessment by some Local Authorities to accommodate and adapt housing to support people with medical needs, there are specific barriers for those living with sight loss. These barriers include location of the house in a poorly lit area and remote access to public transport, inappropriately narrow doorways and passages, poor lighting inside the house, trip hazards such as loose carpets, entrance steps to the house and steps to rooms within the house, lack of contrasting colours on kitchen worktops, poorly identified knobs on cooking hobs etc.

NCBI continues to encourage people who are blind or vision impaired to register their housing needs with their local authorities as this is the only route to access social housing. However, we recognise that many feel reluctant to do so due to the barriers identified above and the inaccessibility of the process to apply online.

NCBI has the capacity, knowledge and expertise to assist Local Authorities in assessing appropriate accommodation required for accessible social housing that fits the need for individuals who are blind or vision impaired. This also extends to include the ability to deliver training to Local Authorities to ensure

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<sup>6</sup> [Discrimination and Inequality in Housing in Ireland \(ihrec.ie\)](https://www.ihrec.ie/publications/discrimination-and-inequality-in-housing-in-ireland/)

they can effectively engage with people living with sight loss in an appropriate manner.

### 3.2 Assistive Technology Budget for Local Authority Housing

Assistive technology plays a significant role in enabling people who are blind or vision impaired in their everyday lives. This support allows people living with sight loss to experience independence and safety in their homes. The evolution of Assistive Technology resulted in the introduction of smart devices such as voice activation of functions that enable people with sight loss to live independently in their own homes. For example, Amazon Alexa devices are voice activation tools so that people can perform tasks including setting alarms and times, texting, making calls, turning on and off lighting and operating household devices and appliances.

### 3.3 Review of Housing Adaptation Grant and Mobility Aids Grant

**Ask:** Review and update the Housing Adaptation Grant and Mobility Aids Grant to recognise the increased cost of building and recognise the additional cost of disability when determining grant payments.

The Housing Adaptation Grant for Older People and People with a Disability is available through local authorities when changes are needed to a home to make it more suitable for a person with a disability.

The Mobility Aids Grant which is also managed by the local authorities is designed to provide grants to address mobility problems in the home. This Grant does not cover more extensive works required but can cover works such as the installation of a level access shower.

Each Grant scheme is covered under the Housing (Adaptation Grants for Older People and People with a Disability) Regulations 2007 and regulations in 2014.

The maximum grant amount available was established in the 2007 regulations and was last updated in the 2014 amendments.

Since 2014, the cost of building has risen sharply which means the cost of completing adaptation projects has continued to rise yet the financial supports available to people through these Schemes has remained stagnant. Therefore, the additional cost is left to the individual to cover which is a barrier for many.

In 2021, the Cost of Disability Report<sup>7</sup> indicated that the highest individual extra living cost that a person who is blind or vision impaired faces but cannot

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<sup>7</sup> [gov.ie - The Cost of Disability in Ireland – Research Report \(www.gov.ie\)](https://www.gov.ie/publications-and-resources/reports/the-cost-of-disability-in-ireland-research-report)

afford is in the area of adequate housing at €755 per annum. In general, this report states that the additional cost of disability for someone who is blind or has a serious vision impairment is between €9,805 – 10,565 per annum. This extra cost should be recognised as an additional burden when determining grant payments.

## 4. Employment

### 4.1.1 Reviewing Employer Supports:

**Asks:** Full implementation of the Comprehensive Employment Scheme and engagement with relevant bodies to ensure successful outcomes for people who are blind or vision impaired.

The supports available to employers through the Department of Enterprise, Trade and Employment and the Department of Social Protection for staff who are blind or vision impaired have had a low utilisation in general. Recent feedback from NCBI service users indicated many issues including the Reasonable Accommodation Fund (RAF) and the Employers Retention Scheme. The lack of awareness among employers of the RAF is well documented, with zero uptake from employers in 12 counties across the country in 2021<sup>8</sup>.

There is also a need for improved take up of the Disability Awareness Support Scheme administered by the Department of Social Protection which provides a maximum of €20,000 funding for private sector employers to pay for disability awareness training for staff who work with a colleague who has a disability. The scheme also informs prospective employers of the supports that are available for their business to support employees with sight loss, or for those retaining employment in the event of a diagnosis of sight loss or blindness.

- Further develop Disability Awareness Support Scheme to inform prospective employers of the supports that are available for their business to support employees with sight loss or for those retaining employment following a diagnosis of sight loss.
- Swiftly publish the results of review of the Reasonable Accommodation Fund and work with stakeholders to identify and implement actions required.
- Review the Employer Retention Scheme urgently, as this support has had sparse uptake over the past six years.

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<sup>8</sup> [Social Welfare Benefits: 4 May 2022: Written answers \(KildareStreet.com\)](https://www.kildarestreet.com/social-welfare-benefits-4-may-2022-written-answers)

#### 4.1.2 Expansion of Supports and Quotas

**Ask:** Introduce a quota for the NGO sector, similar to that in the Public Sector, and expand supports offered to the sector such as the Reasonable Accommodation Fund.

The Comprehensive Employment Strategy for People with Disabilities sets out the Government commitment to increasing public service employment targets for people with disabilities from 3% to 6% by 2024. This is a welcome commitment however, considering the employment rate for people who are blind or vision impaired stands at 24%, there is a need to encourage more employers to recruit and retain staff who are blind or vision impaired to ensure the target is met.

The Non-Government Organisation (NGO) sector is one such sector where this quota could also be introduced once suitable and adequate supports are available to them. NCBI recommended the expansion of the Reasonable Accommodation Fund and other supports available within the private sector to the NGO sectors as many are currently limited to the private sector. This could be one reasonable step forward in supporting greater employment for people who are blind or vision impaired.

#### 4.1.3 Hybrid Working

**Ask:** Development of a hybrid working model with reasonable accommodation supports for remote working.

The ability to undertake hybrid working arrangements can and does benefit many employees and job seekers who are blind or vision impaired. It can open more employment opportunities than ever before however, supports and equipment for people living with sight loss to working remotely should complement the office environment.

### 4.2 Self-Employment

#### 4.2.1 Back to Work Enterprise Allowance

**Ask:** Review the Back to Work Enterprise Allowance to recognise the additional cost of disability and ensure people who are blind or vision impaired have access to an appropriate level of support through this system based on their needs.

The Back to Work Enterprise Allowance (BTWEA) scheme supports people in receipt of certain social welfare payments to become self-employed. If you

take part in the BTWEA scheme you can keep a percentage of your social welfare payment for up to 2 years. However, The BTWEA does not account for the additional challenges that people who are blind or vision impaired may face when pursuing self-employment. The Cost of Disability Report highlights the additional cost for someone who is blind or has a serious vision impairment is between €9,805 – 10,565 per annum.

#### 4.2.2 Short-Term Enterprise Allowance

**Ask:** Extend the entitlement period for the Short-Term Enterprise Allowance for people who are blind or vision impaired.

The Short-Term Enterprise Allowance (STEA) which is paid for a maximum of 9 months gives support to people who have lost their job and want to start their own business. To qualify you must be getting Jobseeker's Benefit or Jobseeker's Benefit Self-Employed. This qualifying criterion denies those on Blind Pension or Disability Allowance the opportunity to avail of such support should they seek to pursue self-employment.

#### 4.2.3 Grant and Project Based funding

**Ask:** Recognition that grant and project-based funding is not income and therefore not considered as means tested income for the purpose of Blind Welfare Pension and other social welfare payments.

The loss of Blind Pension and Disability Allowance upon taking up short term contracts or accessing grant or project funding leaves people living with sight loss financially vulnerable. Grant and project funding provided to those in self-employment to start a company, accept a commission or complete a project should not be considered as means tested income when calculating eligibility for Blind Pension or other similar payments. Funding for this purpose is based on applications that detail the costs associated with the start up or project and do not equate to profits accrued.

## 5. Education

Education is a right and hence should be accessible to all in society. The Department of Education and the Department of Further and Higher Education, Research, Innovation & Science have both outlined a commitment to deliver a high-quality education which includes ensuring equity of opportunity with all students supported to fulfil their potential.

Children and young people who are blind and vision impaired are faced with particular challenges that impact their ability to actively participate in their learning. However, these challenges can be overcome if measures are introduced by both Departments' that can ensure children and young people have an inclusive, accessible and high-quality educational experience.

### 5.1 Primary and Secondary education

**Ask:** NCBI is seeking recognition as a Complimentary Service Provider by the state. This status will give recognition to the additional specialised needs of students with vision impairment and enable NCBI to enhance and expand the supports across this specialised curriculum. NCBI is also seeking the investment of €200,000pa in Orientation and Mobility training across the country in line with what they have funded in one part of the country for many years.

In 2022, the NCBI Children and Young People's Team supported over 1281 children and young people who are blind or vision impaired. The National Council for Special Education (NCSE) recognition that "Measures of social competence and life skills should be included with academic outcomes,"<sup>9</sup> is so vitally important to children who cannot learn many of these skills via the incidental learning processes of other children. Also, while the NCSE concurs with the NCBI position of an inclusive educational experience, however there are obvious gaps in the supports required to ensure this is realised. Equally there is little or no focus on specific compensatory skills such as independent travel skills, communication, and assistive technology. NCBI provide supports across the areas of specialist curriculum needed by students with vision impairment to ensure children and young people who are blind or vision impaired meet their developmental milestones and can become independent. However, NCBI is still not recognised as a Complimentary Service Provider by the state.

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<sup>9</sup> [Supporting Students with Special Educational Needs in Schools \(ncse.ie\)](https://www.ncse.ie/Supporting-Students-with-Special-Educational-Needs-in-Schools)

## 5.2 Transitions supports

**Ask:** Initial funding of €150,000 per annum to expand the delivery of the NCBI Transition Year Programme with schools for students who are blind or vision impaired to assist with transitioning to the Senior Cycle in secondary schools and into tertiary education or into the workforce.

**Ask:** Supported education transition strategy for students who are blind or vision impaired needs to be prioritised by the Minister for Education, Minister of State with responsibility for Special Education and Inclusion and Minister for Further and Higher Education, Innovation, Research and Science.

**Ask:** Data should also be gathered and published detailing the number of students in further education who are living with sight loss.

Learning, Empowerment, Network and Skills (LENS) are the key elements of the NCBI Transition Year Programme. NCBI strongly believes that successful transitions are exponentially linked to a student's access to quality intervention supports in areas such as additional specialist curriculum supports outside of the core academic curriculum, assistive technology and orientation and mobility. Consequently, NCBI introduced the Transition Year Programme in September 2020 with the purpose of providing intensive intervention supports and meaningful work placements to students who are blind or vision impaired. This programme was conducted with the support of 6 schools and in collaboration with Inclusive World Training. There is tremendous opportunity to further develop consistent transition programme protocols for blind and vision impaired students to ensure that they fulfil their potential and are recognised.

While the number of students with disabilities attending third level education increased, the number of students with sight loss decreased in recent years. Recent reports from AHEAD alarmingly show a reduction from 1.8% in 2015/2016 to 1.6% in 2019/2020 of students living with sight loss registered with a disability in Higher Education in Ireland. Furthermore, NCBI believes there is a clear need for school transitioning protocols determining and agreeing content and the delivery of comprehensive transitional plans for children who are blind or vision impaired. These early intervention supports must be timely to support these transitions. Additionally, data is not available for students who are blind or vision impaired in further education which provides a data gap that must be resolved.



### 5.3 Equitable access to support services in Tertiary Education

**Ask:** Provision of ringfenced funding to each education provider to ensure consistency in supports available through Access and Disability offices for all students in all Further and Higher Education providers to ensure equitable supports, irrespective of the college and course attended by the students.

While there are several bodies responsible for the implementation of funds and supports for students with disabilities, support services for students attending Tertiary Education depend on the education provider and the type of course that the student is attending. This sporadic plan significantly impacts on access to learning and personal development and independence for students who are blind or vision impaired.

Students in further and higher education, regardless of their course or institution attended, should receive equitable supports from their institution. This will require ringfenced funding provided to institutions and education providers across further and higher education.

### 5.4 Expansion of the SUSI Grant Scheme to include part-time courses

**Ask:** Expand Student Universal Support Ireland (SUSI) Student Grant Scheme to include part-time students.

The Student Grant Scheme which is available to students across further and higher education once the student is attending an approved course in an approved institution. The Student Grant Scheme is administered by the Student Universal Support Ireland (SUSI). Although SUSI is a considerable support for many students, it is not available for students who are studying part time courses. This significantly hinders opportunities for many students who are blind or vision impaired who wish to pursue third level education but are unable to commit to a full-time course for a variety of reasons.

### 5.5 Assistive Technology

**Ask:** Establishment of dedicated funding through the NCSE and Fund for Students with Disabilities to support access to the Assistive Technology similar to the Disability Federation of Ireland “Life Long Assistive Technology”  
Introduce a scheme for students to assist them with transitioning stages of education and employment.

Assistive Technology is an invaluable support to enable transition for students who are blind, or vision impaired moving within the education sector. The availability of the required assistive technology and having the skills and

supports required to allow students to access and manage their learning materials with ease, efficiency, and as independently as possible is vital. However, delays in accessing appropriate supports such as assistive technology can have a negative impact on education.

The Lifelong Assistive Technology was launched by the Disability Federation of Ireland in 2017. The purpose was to bridge the gap to assist transition from education, employment and indeed life in general. This venture ensured that the assistive technology equipment remained with the person throughout the various stages of transition and at home.

## 5.6 Bookshare Ireland

**Ask:** Sustainable investment of €466,000 per annum for Bookshare Ireland to provide accessible educational course material for students who are blind or vision impaired.

The introduction of Bookshare Ireland has ensured that students who are blind or vision impaired can access their course material at the same time as students who are fully sighted. This digital accessible library has empowered students to learn without the barriers to accessing relevant educational material. Bookshare Ireland is the largest accessible digital library in the country, available to all people with print disabilities. Bookshare makes reading easy with all academic titles available in a format to suit your needs.

## 6. Social Protection

### 6.1 Cost of Disability

**Ask:** Develop a Roadmap to address the rising cost of living and additional cost of disability, informed by the Cost of Disability Report, as a matter of urgency.

The Cost of Disability Report published by the Government in December 2021, clearly demonstrates the additional financial burden experienced by people living with a disability. The overall annual cost of disability for someone who is blind or has a serious vision impairment is between €9,805 – 10,565 per annum. The additional costs incurred for people with sight loss include appliances and aids, medicines and care assistance. In this report the government committed to using this research into the cost of disability to inform the direction of future policy.

According to the European Disability Forum's Human Rights Report 2020, people with disability can be at risk of experiencing poverty and social exclusion, and not least for those who are blind or vision impaired. However, the additional costs of living for a person who is blind or vision impaired is not covered by the social welfare rates.

We know that people with disabilities are more than twice as likely to experience poverty and deprivation than those without disabilities<sup>10</sup> so it is imperative that the Government use the evidence they have gathered through the Cost of Disability Report to ensure people who are blind or vision impaired have sufficient financial support to meet the rising cost of living coupled with the additional cost of disability.

## 6.2 Accessing Social Welfare Support Independently

**Ask:** Ensure access to electronic social protection services through welfare.ie and ensure an online application system is available in line with the EU Web Accessibility Directive across the country.

The Department of Social Protection are the main Department responsible for the provision of entitlements for people who are blind or vision impaired. However, NCBI is aware that many service users find it difficult to complete paper application forms and require the assistance of family or NCBI staff. This reliance on others may prevent people with sight loss from applying for needed supports and can impact on their financial independence when being forced to rely on others. Consequently, NCBI have received ongoing requests that the Department of Social Protection would provide the option to submit applications electronically. It is imperative the option of online applications must comply with the European Web Accessibility Directive so that people who are blind or vision impaired can independently access applications for supports to enhance their independent living and reduce the burden of stress.

## 6.3 Free Travel Scheme

**Ask:** Expansion of the criteria to include all those with a long-term eye condition which renders their level of vision insufficient to meet criteria for a driver's licence in the Free Travel Scheme at a cost of approx. €108,000.

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<sup>10</sup> [SUSTAT107\\_1.pdf \(esri.ie\)](#)

### 6.3 Free Travel Scheme

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**Ask:** Review process for free travel scheme through public services card to ensure those with long-term sight loss do not have to reapply for the free travel scheme unless their condition changes.

The Free Travel Scheme is synonymous with independent living for many people living with sight loss and is an extremely important scheme that NCBI hopes to see continue. However, there are currently 1,071 NCBI service users who are deemed ineligible to access the Free Travel Scheme even though their sight is significantly compromised and they are unable to obtain a driver's licence as a result of their low vision.

We know from the 2016 Census, the most common difficulty (at 43.3%) reported by people with sight loss is related to using transport or participating in leisure activities. This issue could be drastically improved if all those who are declared unable to drive due to their sight loss were eligible for the Free Travel Scheme. The Cost of Disability Report clearly shows the average extra yearly transport costs for people who are blind or have a serious vision impairment is €737. The cost of including 1,071 service users in the eligibility criteria for the Free Travel Scheme is approx. €108,000.

Furthermore, an individual's Free Travel Scheme card must be renewed, despite the medical confirmation of long-term eye conditions. This causes unnecessary inconvenience and stress for people who are blind or vision impaired, especially if they mistakenly missed the expiry date of renewal and must reapply which impacts on their ability to travel independently.

### 6.4 Introduce Travel allowance for community physical activity

**Ask:** Introduce a monthly travel allowance for adults who are blind or vision impaired to allow the use of taxis for community physical activity programmes. In the UK this is offered through the Disability Living Allowance scheme.

From recent research conducted by DCU and Vision Sports Ireland indicated that 54.8% of blind or vision impaired respondents listed transport as a key barrier to participation in sport or physical activity programmes (n = 354

people). The free travel pass supports less than 15% of those with a vision impairment to access community activities. Outside the greater Dublin area and in particular in rural settings, those who are blind or vision impaired rely on family or friends for all transport needs which results in huge levels of isolation and dependency. Individuals with a physical disability are VAT exempt when purchasing a brand-new vehicle and similar supports should be in place for those with a vision impairment to allow them access travel on a needs bases.

## 7. Revenue

### 7.1 VAT exemption for technology and specific sport equipment

**Ask:** Provide VAT exemption for all assistive and mainstream technology devices and home exercise equipment for people who are blind or vision impaired.

Technology has advanced in recent years and is used as a valuable aid to enable people with sight loss to experience more independence in their day to day lives. The Revenue Commissioner provides VAT Reclaim applications for people with a disability including people living with sight loss. However, there is no list of approved devices and the Revenue website only outlines a clear process for people who are blind or vision impaired reclaiming VAT on a radio. Radios are one tool that people who are blind or vision impaired use however, it is extremely outdated to only have specific information on radios considering the advancements in technology over recent decades. The regulations overseeing this process are in place since 1983 and therefore would not have taken into consideration the advancements in technology. The requirement for people living with sight loss to apply for a VAT reclaim when there is very little information available to them causes uncertainty and unease. These technologies are vital in supporting people to live independently and therefore should be exempt from VAT at the point of purchase as is the case in the UK where a 0% tax rating is placed on goods that have been designed solely for disabled people, computer equipment and low vision aids.

People with disabilities often rely on specialist sports and leisure equipment to enable them to obtain a basic level of fitness and well-being. Recent research by DCU and Vision Sports Irelands suggests that 79% of the blind or vision impaired adult population are not meeting the National Physical Activity guidelines (n = 352 people), such inactivity has adverse affects on mental health services. Transport to and from local fitness facilities is a huge barrier to participation and incentives should be in place to encourage people who are blind or vision impaired to be as active as possible. NCBI believes that exercise equipment and devices that can maximise a person's independence and quality of life, should be exempt from VAT with the aim of making them more affordable at the point of purchase.

## 7.2 Expansion of Criteria for Disabled Drivers and Disabled Passenger Scheme

**Ask:** Replace Disabled Drivers and Disabled Passengers (Tax Concessions) Regulations, 1994 with a needs-based grant aided vehicular adaptations scheme.

VRT and VAT relief is available under the Disabled Drivers and Disabled Passengers Scheme for people who are either a disabled driver or passenger. This entire scheme has recently undergone a much needed review in the context of a broader review of mobility supports. In February 2023, the National Disability Inclusion Strategy Transport Working Group published its report proposing replacing the scheme entirely with a needs based, grant aided vehicular adaptations. NCBI welcomes this move and urges the roll out of this approach promptly and for people who are blind or vision impaired to be eligible for inclusion in any new scheme.

## 8. Transport

### 8.1 Access to travel information

**Ask:** Ringfence funds in the Department of Transport for investment in making public transport more accessible to all. Funding should be allocated to ensure that audio announcements and digital screens are in operation, lifts are repaired, and appropriate signage is in place. It is also vital that funding is provided to ensure adequate and frequent training for all staff working in public transport.

Accessible information is a key component of journey planning for people who are blind or vision impaired. NCBI emphasizes that all public transport providers must ensure timely, reliable, audible, and accurate announcements are always in operation on public transport. It is essential that the service includes accessible, large print signage to assist people who are blind or vision impaired, as well as ensuring live travel information screens are present and in operation.

## 9. Digital Equality

**Ask:** The creation of a Digital Accessibility Fund to support Government Departments, State Agencies, schools, hospitals and all other public bodies to comply with the European Web Accessibility Directive legislation.

All public bodies are required to be fully compliant with the EU Web Accessibility Directive legislation in relation to their websites and mobile applications. Compliance has not been universal which has significantly impacted on the ability of people who are blind or vision impaired to access vital services such as education, transport, banking and healthcare.

The recent IA (Inclusion and Accessibility) Labs Digital Accessibility Index shows there were some improvements made by Government Departments in the past year. However, none of the education sector websites passed the IA Labs Accessibility test and only one of the twenty leading public and private hospitals passed the IA Labs Accessibility test.