Living conditions and quality of life
Integration of people with disabilities into the open labour market: Irish case study

Disability and labour market integration:
Policy trends and support in EU Member States

Disclaimer: This working paper has not been subject to the full Eurofound evaluation, editorial and publication process.
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## Abbreviations used in the report

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<td>AHEAD</td>
<td>Association for Higher Education Access and Disability</td>
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<td>AT</td>
<td>Assistive Technology</td>
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<td>CES</td>
<td>Comprehensive Employment Strategy</td>
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<td>CSH</td>
<td>Critical Systems Heuristics</td>
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<td>CSO</td>
<td>Central Statistics Office</td>
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<td>DBEI</td>
<td>Department of Business, Enterprise and Innovation</td>
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<td>DEASPD</td>
<td>Department of Employment Affairs and Social Protection</td>
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<td>DES</td>
<td>Department of Education and Skills</td>
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<td>DETE</td>
<td>Department of Enterprise, Trade and Employment</td>
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<td>DFI</td>
<td>Disability Federation Ireland</td>
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<td>DJE</td>
<td>Department of Justice and Equality</td>
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<td>DJEI</td>
<td>Department of Jobs, Enterprise and Innovation</td>
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<td>EDI</td>
<td>Employer Disability Information</td>
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<td>ESF</td>
<td>European Structural Fund</td>
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<td>FJI</td>
<td>Future Jobs Ireland</td>
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<td>HSE</td>
<td>Health Service Executive</td>
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<td>IHREC</td>
<td>Irish Human Rights and Equality Commission</td>
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<td>IIASA</td>
<td>International Institute for Applied Systems Analysis</td>
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<td>ILO</td>
<td>International Labour Office</td>
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<td>Intreo</td>
<td>The public employment service (see also PES)</td>
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<td>IPS</td>
<td>Individual Placement and Support</td>
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<td>MWP</td>
<td>Make Work Pay Report (See also CES)</td>
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<td>NDA</td>
<td>National Disability Authority</td>
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<td>NDIS</td>
<td>National Disability Inclusion Strategy</td>
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<td>NESC</td>
<td>National Economic and Social Development Office</td>
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<td>LES</td>
<td>Local Employment Services</td>
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<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
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<td>PAS</td>
<td>Personal Assistance Service</td>
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<td>PCB</td>
<td>Partial Capacity Benefit</td>
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<td>PEIL</td>
<td>ESF Programme for Employability, Inclusion and Learning</td>
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<td>PES</td>
<td>Public Employment Services (see also Intreo)</td>
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<td>Abbreviation</td>
<td>Full Form</td>
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<td>RAF</td>
<td>Reasonable Accommodation Fund</td>
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<td>SDGs</td>
<td>Sustainable Development Goals</td>
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<td>SILC</td>
<td>Survey on Income and Living Conditions 2019</td>
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<td>SMEs</td>
<td>Small and Medium-sized Enterprises</td>
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<td>UN</td>
<td>United Nations</td>
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<td>UN CRPD</td>
<td>United Nations Convention on the Rights of People with Disabilities</td>
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<td>VSM</td>
<td>Viable Systems Model</td>
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<td>YESS</td>
<td>Youth Employment Support Scheme</td>
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1. Introduction

Ireland has one of the lowest participation rates of people with disabilities in the open labour market in Europe, at the same time as the country is experiencing almost full employment (at time of writing). This case study examines how current policies and practices aimed at jobseekers, workers and employers contribute to achieve greater participation of people with disabilities in work, using Systems Thinking tools in order to determine how viable the current support system is.

Whilst it is acknowledged that there are good practices, good employers and services in existence, the primary focus of this research is to identify policy and implementation gaps and formulate recommendations to inform effective social policy interventions. The case study focuses primarily on services providing direct supports to disabled jobseekers/ workers and employers, whilst acknowledging the importance of education, housing, accessible transport and accessible childcare as part of the larger context of people’s lives. The following sections outline the current policy context, the methodology used to explore the current system, key findings and conclusions. A set of leverage points are crafted to contribute to the development of a viable system that can achieve its purpose to increase the participation rates of people with disabilities in the labour market.

The following sources were used to inform the findings:

Desk research on Irish social policy environment (including data from Eurofound’s collection of measures)

Expert Workshop (using a mixture of open discussion, drawing rich pictures, brainstorming, groups breakout) to discuss different elements of the system adopting VSM to assess the effectiveness of current supports and CSH to guide discussion on power dynamics.

Written submission from members of the Independent Living Movement Ireland on their members views and experience of seeking work and working in Ireland.

This research was conducted between November 2019 and February 2020.

1 Since completion of the fieldwork and writing up of this case study, the rapidly evolving ‘Corona virus (Covid-19)’ situation has already dramatically affected Ireland, as well as most other EU countries. Since the announcement of measures by the Irish Government as of 13 March 2020, early indications suggest that the employment situation in Ireland is dramatically changing for the worse. Whilst it is too early to say what impact these unfolding events will still have on the economic, employment and social situation in Ireland, the authors are acutely aware that the situation is in flux since this research was conducted. This case study therefore describes the situation as it was prior to the mitigation measures introduced to combat the public health threat through the Corona virus.
2. Irish policy context

People with disabilities are a diverse population, who experience a wide range of disability and chronic conditions. Many have individual requirements to support their participation in the open labour market. Measures developed to support disabled workers and jobseekers as well as employers consist of a complex mix of legal instruments, strategies, diverse stakeholders all operating at different levels within the system.

2.1. Disability and employment policies

Disability policy

Overall, Irish disability policy is grounded on the principle of mainstreaming which is enshrined in the Disability Act 2005. This means that mainstream services across government departments and public services should involve people with disabilities in the design and delivery of such services. Other primary legislation promoting inclusion includes the Employment Equality Acts (1998-2015) and the Equal Status Acts (2000-2015).

Irish government policy on disability is driven by the National Disability Inclusion Strategy (NDIS), a cross-departmental approach to improving the lives of people with disabilities, including the sphere of work. The Irish Human Rights and Equality Commission (IHREC) is charged with ensuring all Irish public bodies take measures to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies. This is known as the Public Sector Duty. The National Disability Authority (NDA) is the independent statutory body that provides information and advice to the Government.

In 2018 the Irish Government was the last of all EU Member States to ratify the United Nations Convention on the Rights of People with Disabilities (UN CRPD), but did not sign the Optional Protocol, which allows for citizens to make complaints to the UN on breaches to the Convention.

Overall employment strategy

Ireland’s mainstream employment strategy is driven by Future Jobs Ireland (Department of Business, Enterprise and Innovation), a multi-annual framework to ensure Irish enterprises and workers are resilient and prepared for future challenges and opportunities. The strategy is framed around five pillars:

- embracing innovation and technological change;
- improving SME productivity;
- enhancing skills and developing and attracting talent;
- increasing participation in the labour force;
- transitioning to a low carbon economy.

The employment strategy has the goal to double participation in lifelong learning and increase labour market participation rates for everyone aged 25 to 69 to 78% between 2019 and 2025. It also aims to reach or exceed the EU average for numbers with basic digital skills and match skills workers and employers. The strategy includes additional specific actions around disability that aim to
improve incentives to participate in the labour force, focusing almost exclusively on early engagement for people with disabilities who are new to work or return to work.

Disability and employment

The Comprehensive Employment Strategy (CES) for People with Disabilities (2014-2024) is a cross departmental approach to support people with disabilities into work and forms part of the NDIS. Responsibility is held within the Department of Justice and Equality and the strategy is independently chaired. The CES aims to address the participation of people with disabilities in education, training and employment by:

- building skills, capacity and independence amongst jobseekers
- providing bridges and supports into work for disabled workers and jobseekers
- addressing the costs of going out to work
- promoting job retention and re-entry to work
- providing co-ordinated and seamless support, and
- promoting awareness and engagement amongst employers.

The CES also aims to increase the statutory target of 3 per cent of employees with disabilities in the public sector towards 6 per cent by 2024. There are no quotas imposed on the private sector.

The Irish Government approved the Mid-Term Review of the NDIS in January 2020, agreeing that the focus for 2020 and 2021 will be on the implementation of the UN CRPD. The CES is also moving into its 2nd phase (2019-2021) and focusing on the UN CRPD. It includes some encouraging initiatives in development, such as the pre-apprenticeship programmes supporting people for mainstream apprenticeships, plans to embed employment supports for mental health service users in healthcare regions, as well as the development of an early engagement plan for young people, to support participation in education training and employment.

2.2. Support Services

Public Employment Services (PES) in Ireland are a series of internally managed activation supports collectively known as ‘Intreo’ which provide activation supports and outsourced services to a range of social welfare payment recipients (Lavelle and Callaghan, 2018). Intreo also offers a recruitment (‘matchmaking’) service for employers. In addition to Intreo offices being the first point of contact for jobseekers, additional services include Local Employment Services (LES) which support long term unemployed people who seek work and provide specialist disability services including the Employability and Ability programmes. The Employability programmes provide an employment and recruitment service to assist people with a disability to secure and maintain a job in the open labour market. The ‘Ability programme’, a three-year intervention funded within the ESF Programme for Employability, Inclusion and Learning (PEIL 2014-2020), aims at bringing young people with disabilities who are not job-ready closer to the labour market using person centred supports. Employability programmes are run by independently contracted organisations, while existing organisations such as disability service providers and local partnership companies tender for Ability programmes2. A new Youth Employment Support Scheme (YESS), also under the PEIL programme,

2 The ‘Ability’ programme is co-financed by the Irish Government and the European Social Fund as part of the ESF Programme for Employability, Inclusion and Learning 2014-2020. ([https://www.pobal.ie/programmes/ability-programme/](https://www.pobal.ie/programmes/ability-programme/))
was established in 2018, offering a work placement scheme for young jobseekers aged 18 to 24, where disabled jobseekers are eligible to apply.

Most adults with disabilities are in receipt of Disability Allowance, a means tested payment which also offers an income disregard if people choose to work. Partial Capacity Benefit (PCB) is the primary social welfare payment which allows the person to return to work or self-employment (if they have a reduced capacity to work) and continue to receive a benefit payment, based on the level of disability. This is the main in-work income support payment available and is based on the social insurance contributions previously made by the person with disabilities. Both payments are medically assessed. There are also a number of grants available to support jobseekers, workers and employers collectively known as the Reasonable Accommodation Fund (RAF) (grant scheme being reviewed in 2020).
3. A Systems Thinking approach to understand the effectiveness of employment supports

This section introduces Systems Thinking and explains how it is used in this case study to understand employment supports available in Ireland and the extent to which they are effective in producing greater participation in the workforce amongst people with disabilities.

3.1. Systems Thinking

Systems Thinking is gaining traction as an approach to working with increasing complexity across a wide range of social policy issues. This is the result of a growing recognition that policy making in the 21st century needs to be significantly different in order to cope with a fast-changing landscape, rapidly including climate change, the future of work and technological advancements (OECD, 2017; European Commission, 2018). In February 2020, the OECD and the International Institute for Applied Systems Analysis (IIASA) published further recommendations around the use of systems thinking approaches to public policy including longer term strategies for employment (Hynes et al, 2020).

Systems Thinking supports a greater understanding of complexity in policy and management and takes a different approach to traditional ways of understanding policy which tend to ‘simplify complex problems into what are considered to be their constituent parts and manage them through discrete interventions, layered on top of another’ (OECD, 2010). Systems Thinking focuses on understanding how a system functions in its entirety. A boundary is drawn around a ‘situation of interest’, rather than viewing a system as a fixed entity – for instance the education system or the health system. This makes it easier to determine what is important for the situation so that it can be explored in depth, and what can be considered outside of the scope of research (Reynolds and Holwell, 2010). Systems thinking also acknowledges that the system is not one unified entity in reality; it is comprised of a number of stakeholders who have different roles, priorities and perspectives that can also be conflicting, but who together form the system of interest. These stakeholders’ activities are dynamic and enacted within an ever-changing environment. Systems Thinking also attempts to contextualise information, by identifying interrelationships between issues rather than looking at each variable in isolation.

This case study adopts a Systems Thinking approach to understand the effectiveness of current policies and practices aimed at jobseekers, workers and employers in achieving greater participation of people with disabilities in the workforce, and to determine how viable the current support system is from different perspectives. The focus is on creating opportunity for learning and identifying leverage points for improvement, which are inevitably temporary, given that the external environment and people themselves are in a constant state of flux (Ison, 2017).

3.2. Disability and complexity

The participation of people with disabilities in the open labour market can be understood as a complex issue, requiring a Systems Thinking response:
• **People with disabilities are a heterogenous group:** Disability is complex due to the diverse profile of the population, the variety of disabling conditions and the fact that they are experienced differently by different people.

• **Intersectionality of issues:** Having a disability is indivisible from structural or educational disadvantage and discrimination. For this reason, it can be expected that support measures focusing on aspects different from employment – for instance, access to housing, childcare, accessible public transport, and a Personal Assistance Service (PAS) - also play a key role in influencing people with disabilities’ opportunities to access to the workforce.

• **Different worldviews:** Different stakeholders view the situation differently and orientate their actions according to different goals. For example, a human rights perspective emphasises equality and access to decent work (Sustainable Development Goals (SDGs)), whereas an economic perspective may focus on supplying enough workers for a sustainable economy.

• **Different policy instruments:** In order for each policy area to be effective it must attend to its own metrics and targets. This plurality of goals, instruments and approaches makes it is difficult to assess how policies in different areas affect labour market participation of people with disabilities. At the same time, given the intersectionality mentioned above, policy action in different fields affect each other, without this being fully predictable/controllable in advance.

• **Everchanging environment of work:** The world of work is constantly evolving. Structural shifts are currently reshaping the world of work: technology, demographics, globalisation, new production patterns, the rise of the on-demand economy as well as people’s expectations to have a job and career (WEF, 2016).

### 3.3. Research tools and process

Two Systems Thinking tools were used to assess the effectiveness of the current suite of supports in Ireland.

**Viable Systems Model**

The Viable Systems Model (VSM) was used to understand the different functions of the system of supports and how they interact to create a viable system. A viable system is one which is balanced both in its internal and external functions, but also has the mechanisms and opportunities to grow, learn and evolve as it adapts to its environment and achieve its purpose (Beer, 1972; Hoverstadt, 2010, pp 87-133). VSM works well with complexity as it can be applied to understand a system across different levels of functioning within a system as well as sub-systems. VSM is a tool that asks questions across five areas of function in a system:

- **Level 1: Provision of support services** – this is the operational element of the system where value is delivered to customers.
- **Level 2: Co-ordination of support services** – this is about the degree to which there is effective horizontal coordination across different services within the system.
- **Level 3: Management and monitoring of services** – this level is about balancing the internal management resources for the provision of services with the demands of the external environment, with an eye to monitoring that the overall system is working as expected.
• **Level 4: Interaction between the system and with wider environment** – this function focuses on the extent to which the system is outward focused and can identify opportunities and threats emerging in the wider environment.

• **Level 5: Governance of the overall system** – this is where the vision and strategic thinking for the system is developed to inform strategy.

Analysis of the strength of functioning of each system contributes to an assessment of the viability of the system in question. This case study looks at the Irish system across three interdependent elements of the system: support to jobseekers and workers, employers and policy.

**Critical Systems Heuristics**

A second tool was used to analyse power and boundary issues within a situation of interest. Critical Systems Heuristics (CSH) is a tool that looks at where power resides in the situation and considering where it should be situated (Ulrich and Reynolds, 2010). It is a reflective tool designed to support working with tension that arise due to different perspectives and stakeholder interests.
4. Key issues arising from the analysis

4.1. Current participation rates of people with disabilities in the open labour market

Ireland has one of the lowest employment rates of people with disabilities across the EU and one of the highest gaps between people with and without disabilities (45 percentage points) in employment (EU Semester Report, 2019). 37% of people with disabilities between the ages of 18 and 64 are in work, but they are not participating on par with their non-disabled peers (Central Statistics Office, 2016, 2019). This situation has been a longstanding one which current policy measures have had little success in tackling (OECD, 2010; DFI, 2018).

Research indicates that supportive government policies could help an estimated 35,600 people with a disability into work (Watson et al, 2017). There is also evidence to suggest that many people on Disability Allowance have worked at some point and are interested in work:

- 82% of people with disabilities of working age have worked at some stage in their lives, but 35% have been without work for more than four years (Watson et al., 2017)
- Over a third of disabled people (35%) are interested in full time work, while 8% are interested in part time work (DEASP, 2015)
- 56% of those in receipt of Disability Allowance had worked at some point in the past (DEASP, 2015).

Key reasons for non-participation in the labour force include: the level of disability, fear of losing benefits including the medical card, a lack of appropriate supports to find work and available jobs, and a need for flexible working hours (DEASP, 2015). Two of these issues have since been addressed: the amount people can earn before losing their medical card has been raised and a fast track mechanism to return people to benefits if a job does not work out has been put in place (DEASP 2017).

4.2. Barriers in participating in the open labour market

Educational attainment

Differences in educational attainment contribute to the differences in labour market participation amongst disabled people (Watson et al, 2017). Amongst those aged 15 to 50 years with a disability, 13.7% do not have an education beyond primary level, compared to 4.2% of the general population of working age (CSO Census, 2016).

Young people

The difficulties experienced by young people in accessing the labour market is a recognised issue for all young people including those with disabilities (Watson et al 2015). Getting a foothold in the labour market and sustaining work for this cohort has been the focus of many of the policy supports already in place.
Work retention
Work retention is an issue for many: 70% of disabilities are acquired in later life, when job retention and retraining become an issue (Watson et al, 2015). The risk of experiencing work-related discrimination is almost twice as high for people with disabilities compared to those without disabilities and has more serious effects (Watson 2017). It was the main inequality issue raised by people contacting the Human Rights and Equality Commission.

Risk of poverty
In work poverty is an issue across Europe, with people with disabilities at greater risk than other groups (Eurofound 2017). Figures indicate that 111,000 of the wider workforce in Ireland live in poverty (CSO 2019). Whilst it is difficult to estimate how many of these people have disabilities, people with a chronic illness or disability are more likely to have a lower hourly wage compared to those without a disability (Nolan, 2015). People with disabilities are at a higher risk of poverty than other cohorts of the population and this risk is rising according to figure from the Central Statistics Office (CSO, 2019). The day to day extra costs incurred by disabled people is a recognised issue, currently being tackled with research into the cost of disability in Ireland (DEASP, 2019). This research focuses on those in receipt of primary social welfare payments, which may limit the potential effectiveness of any resulting actions tackling in work poverty effectively.

4.3. Analysis of power within the system
The power analysis carried out to inform this case study included reflection on where power sits within the system and also asked where it should be located. Consideration of this issue resulted in the following points:

- an imbalance between policy makers and beneficiaries of services
- a ‘top-down’, ‘paternalistic’ approach to policy making that lacks transparency
- high level of control in service management, which disincentivises innovation and maintains the status quo
- overriding culture within workplaces that is not welcoming for disabled workers
- competing agendas between different services vying for clients and funding
- lack of inclusion of people with disabilities, as rights holders and their supporting organisations, as partners, in the design and governance of support services.

These points relate to issues that reoccur throughout the case study.
5. Viable Systems Model (VSM) analysis of the current system

This section lays out the findings in relation to the five elements of the VSM model and how they interact in order to assess the viability of the current system.

5.1. Level 1: Provision of services

The value that services provide for jobseekers with disabilities, workers seeking to retain employment and employers raise four significant issues: access to quality support services, equity of access to support services, access to information and access to grants.

Access to quality support services

The Public Employment Service (PES) is organised around Intreo, which became the new one stop shop for people accessing both payments and employment services in 2012. Disability supports have traditionally been delivered separately from mainstream supports leading to the ‘othering’ of disabled jobseekers as a distinct category of jobseeker or staff member from other jobseekers (DFI, 2018; NESC, 2018). Since the Irish economic recession, people with disabilities are increasingly being directed to access services through this new case management system within Intreo. Activation for people with disabilities is voluntary and the PES is regarded as generally supportive of those entering its doors to access services (NESC, 2018).

 Whilst encounters between jobseekers and Intreo Case Managers can be pivotal to progression, there is a lack of trust between jobseekers and Intreo staff who traditionally have not been trained to serve disabled jobseekers (NESC, 2018). This can be accounted for, in part, by the fact that the same service administers social welfare payments, but also relates to lack of experience, training, or time to work with people with disabilities as people have traditionally been sent to specialist services. There is a need for Case Managers in Intreo services to (be able to) give adequate time to listen to the person, demonstrate empathy and build trusting relationships, in order to understand the jobseekers’ interests, skills, circumstances, motivations and the barriers to employment they face (NESC, 2018) Training is being given attention in the second phase of actions under the CES; however, training individuals will not meet with success unless aspects such as culture and protocols (such as time spent with individual clients) are also addressed.

There are inconsistencies in the degree to which disabled jobseekers report a positive and quality service in their experience accessing Employability services in different geographical locations (INDECON, 2016). The Individual Placement and Support (IPS), a specialist pilot service that facilitates people with mental health difficulties to move into mainstream competitive employment, has been regarded as effective in supporting that cohort of jobseekers (NDA, 2019) and is due to be embedded into health services under the CES Action Plan 2019-2021.

Equality of access to services

This case study identifies anomalies in the degree to which different jobseekers and workers with disabilities are supported. There is a greater focus on building the skills, capacity and independence of disabled jobseekers, with a particular emphasis on young jobseekers, and those with intellectual...
disabilities in the CES and less attention on those who acquire disabilities in their working life, despite an identified need for focus on this area (Watson, 2017). Jobseekers with invisible disabilities such as autism or mental health problems do not feel understood or well supported when they approach services for support (NDA, 2019). Those with high support needs are also excluded from accessing the work force as no provision is made for a Personal Assistant Service within the CES.

**Access to information**

Both jobseekers and employers report difficulties in accessing information and being informed about the available services. For employers this includes awareness of their obligations under reasonable accommodation, as well as accessing information on grant schemes (NESC, 2018; NDA, 2019). In some instances, employers have required advocacy from external agencies in order to access grants such as the Association for Higher Education Access and Disability (AHEAD), which supports graduates with disabilities into work. There was consensus amongst those consulted for this research, that jobseekers ‘who shout loud enough’[^3] are more likely to get what they need, and that services are leaving those with less confidence in their approach behind.

**Access to grant supports**

Grants to support both jobseekers and employers fall under the RAF are outmoded and their applicability is patchy at best). This is due to technological advances, the limited scope of supports and a lack of employer awareness of the schemes, among others (Eurofound, 2021). The plan (at time of writing) to review the RAF within the CES Action Plan 2019-2021 is described as an operational review rather than a commitment to reform how these measures might support a more strategic review of reasonable accommodation.

The viability of support services can therefore be considered weak in their contribution to the overall system aimed at increasing participation of people with disabilities in the open labour market. Intreo has also been found to be ineffective in activating non-disabled jobseekers (Kelly et al, 2019) pointing to a less optimistic outlook for disabled jobseekers and employers seeking to adopt a more inclusive approach in their workforce, as the additional supports they require are also ineffective.

### 5.2. Level 2: Coordination of support services

For each support service to play its part towards the overall goal of the system, it must be given enough autonomy to perform its function. Autonomy must be balanced with horizontal coordination mechanisms in order to avoid conflicts, duplication and gaps across the range of support services. The evidence from this case study suggests that a lack of coordinating mechanisms between services leads to difficulties: information deficits between service providers, competition between services for the same customer, and gaps in peer supports for employers.

**Information deficits between service providers**

Despite having a PES described as a one-stop-shop, disabled jobseekers report being sent to different places for different services and often end up spending a lot of time trying to find out whom they need to speak to and providing the same personal information multiple times (NESC,

[^3]: Workshop participant
Jobseekers have also reported being given incorrect information about entitlements once they return to work.

### Competition between services for the same clients

A lack of local coordination leads to duplication in services in some areas resulting in services approaching the same potential employers or drawing on the same pool of disabled people to support. This can happen across a number of services, including supported employment services as well as Ability programmes and service provider programmes. There are some promising developments, that recognise the need for stronger coordination. Transitions between education and work have been a source of difficulty for young people as well as support services who have traditionally worked in silos. The proposed development for an early intervention scheme for young people under the CES Action Plan 2019-2021 has the potential to address this issue.

### Lack of access to peer supports for employers

Lack of coordination also means that employers have little access to peer supports in order to develop positive experiences of employing disabled workers. The Employer Disability Information (EDI) was a specialist service supporting employers with the recruitment, management and retention of employees with disabilities. It held the role of co-ordination between employers, employees and state services. Three years after being set up as a pilot under the CES, it was closed in January 2019. Intreo is now the single point of contact for employers, offering employer supports throughout the recruitment process, but the need for co-ordinated peer supports for employers remains (NDA, 2019).

In the absence of a high-level strategic commitment to coordination, different initiatives are emerging to fill co-ordination gaps. These include the development of Workplace Passport Scheme by the Irish Congress of Trade Unions that supports workers to retain jobs and access training by setting out accommodations required and agreeing an action plan with management. A new industry-led initiative called Open Doors has also been set up to support employers seeking to diversify their workforce to include disabled jobseekers as well as migrant and young workers, indicating willingness on the part of business to diversify its workforce. These initiatives are to be welcomed and illustrate a need for horizontal co-ordination over a top down approach to managing services.

However, the strategic prioritisation of coordination across support services is weak. This can be attributed in part to how reporting arrangements for services are organized, favouring vertically reporting mechanisms (upward reporting to funders and centralised management) rather than horizontal cooperation for mutual effectiveness (local co-ordination across services).

### 5.3. Level 3: Management and monitoring of the system of supports

Managing in the context of VSM is about bringing coherence in the delivery and coordination of services, in order to contribute to the overall aim of the system. The role of the management system is to balance resources and performance that lead to gaps and inconsistencies in support services.

Overall management responsibility for the full suite of services sits within the Department of Justice and Equality and operational responsibilities are devolved to various departments. Many of the support services directly aimed at increasing employment in the open labour market, such as Intreo, Employability and Ability, are either managed operationally or contracted by Department of
Employment and Social Protection (DEASP). Other departments are also involved in supporting
different parts of the system. For example, The Health Service Executive (HSE) and Department of
Education and Skills (DES) also manage early intervention initiatives. From a Systems Thinking
perspective, the management function of a system has a responsibility to step in, when service
delivery is weak and coordination across services on the ground is poor. The NDA (2019)
corroborates this, stressing the need for greater collaboration in how different parts of the system
are collectively managed and calling for greater links between the inter and intra-departmental
mechanisms in its 2018 review of the CES strategy, indicating a lack of cohesion in how different
parts of the system are collectively managed.

The CSH power analysis points to top-down policy development and implementation that does not
always involve those affected by policies in the management of resources and performance. Two
examples where local services have called for reform of resource allocations, that lead to gaps in
service, are: cyclical project funding and geographical inequities in services.

- **Cyclical Project Funding**: Some people with disabilities experience gaps in supports due to
  the cyclical nature of some funding streams, including Ability programme funding. This can
  hinder personal progression for some people with disabilities. It also disrupts services, as the
  knowledge and expertise built up within service providers is lost as a whole new cycle of
  recruitment of staff and service users begins again with a new round of funding. The
  discontinuity in supports can lead to a sense that disabled people’s life trajectories are
  driven by projects and are therefore “projectified” (Ison, 2017), rather than successful
  projects being institutionalised into mainstream services.

- **Geographical inequities in service delivery**: Local communities have expressed
dissatisfaction about both the availability of services in their area as well as inconsistencies
in the quality of service offered through the Employability services and Ability programmes
across different Intreo locations (INDECON, 2016; NESC, 2018).

Within the VSM model, monitoring is about developing a first understanding of what is happening at
operational level within a system. Monitoring mechanisms are therefore placed outside the
management levels within the system. In order to effectively monitor and understand what is going
on at the frontline, monitoring needs to take place sporadically, independently, unannounced and
in-depth, without interference by management layers.

In the Irish context, IHREC fulfils such an independent monitoring role through discharging its
overarching responsibility of monitoring employment arrangements under the UN CRPD. They
actively monitor discrimination in the workplace as well as the extent to which government
departments discharge their public sector duty to ensure services are accessible to disabled service
users. Whilst management within service delivery is poor, the monitoring function held by IHREC
covers all aspects of the system including what is happening on the ground and can be expected to
influence performance within the system over time.

5.4. **Level 4: Development and interaction with the environment**

Viable systems need to maintain a healthy fit with the external landscape, ensuring they are
adequately responding to the changes in the environment and preparing the environment for
changes in the system. Actions include scanning the environment for opportunities and risks and
fostering innovation in the system.
This research found little critical discourse around balancing tensions between the rights-based approach of the UNCRPD and the economic imperative for growth and access to a skilled workforce. There is little interplay with other instruments such as the Sustainable Development Goals: one workshop participant pointed out that the CES works in a ‘ghettoised way, in parallel with other instruments such as Economic Cultural and Social Rights’. Overall, there is little attention given to ensuring that people with disabilities have access to decent work (ILO) that adequately addresses in-work poverty, even though this is a recognised issue for the general workforce (in line with findings of Eurofound, 2017). How people with disabilities will be protected and supported in the event of an economic downturn (increasingly likely at time of writing) is also a concern, in light of how they were excluded from accessing activation programmes during the Irish recession of 2008.

There are concerns about the extent to which the CES, a ten-year strategy, has the agility to keep pace with advances in the wider landscape of work and benefit from opportunities in the emerging landscape. The new CES plan for the next cycle of the strategy is set to address some longstanding dichotomies between mainstream and specialist policies as well as time lags in responding to emerging trends in work. The degree to which it encourages innovation in the system is less clear.

Future Jobs Ireland (FJI) (2019) lays out the challenges facing the workforce of tomorrow including the accelerating pace of technological change. It sets out a deliberate policy shift to increase quality jobs that will allow for better living standards and sustainable jobs which will be less vulnerable to loss. Disabled jobseekers and workers have much to gain from the changing nature of work as availability of accessible and assistive technology grows. There is also an emerging conversation within the FJI framework on remote working which may suit workers with disabilities, if support for appropriate accommodation is ensured. However, disabled workers are not included in the conversation about remote working (DBEI, 2019, p. 56).

The ongoing discourse around the need for Assistive Technology (AT), including recommendations to introduce an AT Passport for work has gained little traction (O’Donnell et al., 2016). State commitment to address access to and affordability of AT by the end of 2018, that were made in the Make Work Pay Report, are running at least two years behind schedule.

Despite these concerns, there are two areas where positive developments have the potential to impact on the participation of disabled people in the open labour market: reasonable accommodation and entrepreneurship:

- **Reasonable accommodation:** A recent high-profile case leading to clarification on employer responsibilities around reasonable accommodation in the Supreme Court (‘Daly v Nano Nagle School’ case) (2019) placed a high emphasis on the human rights and dignity of the person. However, the NDA (2019) points to a negative attitude amongst some employers in relation to reasonable accommodation. Their review of the Workplace Relations Commission and labour Court decisions highlighted a failure on the part of employers to have adequate policies and procedures in place and to provide reasonable accommodation in a timely manner. Reasonable Accommodation is being reviewed by the NDA in the new CES Action Plan, in recognition of the significant levels of workplace discrimination (IHREC, 2019). This will address the need for greater clarity around employers’ responsibilities to provide reasonable accommodations for disabled workers.
• **Entrepreneurship:** The second area of development is addressing the needs and aspirations of disabled people to become entrepreneurs. Self-employment could be a suitable option for some disabled people (European Commission, 2014, p. 28; Cooney and Aird, 2020) and this opportunity has not been adequately capitalised on to date. However, self-employed are far more at risk of in-work poverty than employed people (Eurofound, 2017). The challenge will be to ensure equal social protection rights to the self-employed, as otherwise, there is a risk of a double penalty for disabled people who are self-employed. Generic supports for entrepreneurs are not designed to be accessible for people with disabilities; staff in Local Enterprise Offices are not adequately resourced and there are no specialist supports. Government commitment to tackle this via a dedicated strategy is to be welcomed.

The extent to which the system demonstrates success in preparing the world of work to embrace people with disabilities is also questionable. The level of discrimination experienced by disabled people in the workforce (IHREC, 2019) testifies to a poor relationship between how the employment system engages employers, and sets out clear obligations around reasonable accommodation in the workplace. In recognition of this deficiency, the new Action Plan for the CES places emphasis on actions to promote awareness amongst employers alongside a review of reasonable accommodation.

The overall system demonstrates an increasing capacity to scan the environment to ensure long term viability in some distinct areas. There is room for more strategic consideration of how the changing nature of the workplace impacts on the wellbeing of workers, including in-work poverty and access to decent work as well as how this system interacts with policy instruments in the wider environment.

### 5.5. Level 5: Governance

Vision and strategy are developed in the governance function of a system. Governance is also responsible for ensuring different levels of the system are designed and supported to work well and reforms are made where necessary. Three areas of concern arose in this case study that warrant attention: the vision of the system, the governance arrangements and the reform agenda.

**Vision**

There was broad agreement amongst those consulted for this research that the CES for People with Disabilities is ‘hugely unambitious’ in its vision. Whilst there has been a reported increase in the number of people with disabilities employed in public sector, this increase may reflect the ageing of the public sector workforce rather than the result of inclusive recruitment initiatives and may require further research (Banks et al, 2018). The figures of those in employment testifies to its ineffectiveness to date in tackling the numbers of people with disabilities in work despite huge investment in services.

Fergus Finlay, independent chair of the Strategy stated at the end of the second year in operation: ‘If people with disabilities continue to fail to benefit from a recovering and growing economy, and from a demand among employers for loyal, committed and productive workers, it will be our failure, not theirs.’ The next phase of the strategy focuses attention on many worthy actions but, without attention to governance issues, it is difficult to remedy the fundamental issues raised by this research.
Governance arrangements
Lack of success to date can be attributed to two overarching issues with the CES. Firstly, the governance arrangements ensure that it remains on the sidelines of mainstream policy. Secondly, the focus is largely on changing parts of the system in a piecemeal way rather than driving mainstream inclusion in all employment measures across government, which limits its potential for effectiveness. The Department of Justice and Equality (DJE) manages the governance and monitoring arrangements for the CES, with support from the NDA. This arrangement is questionable as the DJE has no other role in employment and the overarching philosophical framework of the NDIS is one of mainstreaming. In addition to this, The DEASP has responsibility for preparing the workforce for work and the Department of Jobs, Enterprise and Innovation (DJEI) has responsibility for job supply. There is a mismatch between the degree to which people are being supported to be work-ready and the degree to which employers are being compelled and supported to diversify their workforce, but neither of these departments are ultimately responsible for the strategy. This mismatch between supply and demand is one factor contributing to the ineffectiveness of the CES.

It could also be argued that the CES sits to the side of competing agendas both within and across departments. Employment measures have been accused of locating people with disabilities ‘in a vacuum where disability is considered in isolation of all other identities we as humans have’ (DFI, 2018). Different parts of the employment landscape are working to different purposes: there are competing concerns between short term political agendas, the drive for economic growth, and the human rights agenda. There is an absence of a shared agenda in the development of policies that centre on preparing people for the future of work, and specialist support services preparing people with disabilities for work.

System reform agenda
Public Sector Duty is the primary driver of reform within government departments to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users and everyone affected by their policies and plans. Concerns were raised in this research about the extent to which public procurement rules were taking this responsibility into account in order to avoid structural discrimination in how services are designed, including questions about the accessibility of public sector IT systems for employees with visual impairments. There was a strong call for universal design principles to be adopted in all public funded services in this research.

Reforms within support services to jobseekers and employers have largely focused on operational reviews and changing how services are delivered to jobseekers (ESRI, 2019). However, there have been no substantial changes to what employment services are delivered which suggests that operational review is unlikely to produce the level of reform required to create the level of flexibility and adaptability to respond to the changing nature of the workplace. Focusing on access to and performance within institutions, rather than transformation, will likely not result in inclusion of greater number of people with disability in employment (Van Aswegen, 2017).

The framing of the strategy as list of individual actions does not demonstrate an understanding of the complexity of disability in an everchanging environment. Instead it grapples with policy legacy issues, such as the Reasonable Accommodation Fund, in a traditional management way (OECD, 2017). The OECD lists conditions in the wider environment that suggest a system may be ripe for a Systems Thinking approach, all of which are evident in the direction of Irish public policy. Applied to the Irish case these conditions amongst others can be found:
• an innovation agenda has taken hold (Future Jobs Ireland)
• inclusion of citizens has become a priority (UN CRPD, Public Sector Duty)
• citizen orientation is overtaking institutional organisation
• demand from government for experimentation (Public sector innovation)
• problems are no longer solved by traditional means (Public Sector innovation).

The above considerations suggest that the governance frame for supporting people with disabilities into work is out of step with this wider policy agenda. This makes it unlikely that the Irish system can produce the level of transformation required impact on labour market participation of people with disabilities, beyond individual pockets of action.
6. Conclusion

This research explored the viability of the current support system in terms of its capacity to balance functions, grow, learn and evolve in pursuit of its purpose across five systems of functioning, and also with reference to power dynamics and contributions from a workshop with key stakeholders. If the purpose of the system of supports is to increase the participation rates of people with disabilities in the open labour market, the lack of improvement in the numbers in work alone, testifies to a struggling system. There are significant issues contributing to the degree to which the system is struggling to balance its functions, grow and learn: lack of strategic leadership and vision at a governance level, issues around framing of the issue, and capacity to balance tensions between different parts of the system to achieve purpose.

Strategic leadership and governance
The role of governance is to guide the vision and ambition of a system and provide strategic leadership. The system lacks a coherent vision and identity across its different functions. This is due in part to a lack of high-level strategic leadership and ownership. Without clear leadership, it is difficult to create the level of transformation required to ensure that policies and practices embrace people with disabilities in the open labour market. It is also difficult for individual parts of the system to move outside of siloed responsibilities towards a shared purpose. This impacts on the effectiveness of services on the ground, coordination capacity to avoid gaps, engagement with the wider environment as well as capacity to effectively manage resources and assess performance. These factors lead to little learning or meaningful growth within the overall system.

Framing of the issue
The way in which the CES is organised indicates a lack of understanding of the complexity of disability and the context of a fast-changing world. The CES is under-ambitious in the context of the UN CRPD and the Public Sector Duty. It predates the introduction of both instruments and is not ambitious enough in its vision to drive systemic change across the open labour market. The way in which the system behaves could be described as ‘dynamically conservative’ (Schön, 1973) by virtue of its resistance to engaging in transforming institutions, choosing to focus on piecemeal changes to programmes and policies instead, and in the ways that the future is predicted as being a continuation of the present, rather than a new emerging landscape characterized by uncertainty and volatility (OECD, 2017). This leads to the strategy being at risk of doing ‘the wrong thing righter’ (Ackoff, 2001) rather than addressing the systemic causes of discrimination.

Balancing tensions between different parts of the system
The capacity of the current system to grow and learn is limited. Labour market supports for disabled people sit in a silo apart from other social inclusion measures and are set apart from bigger debates such as the future of work, decent work and a fast-changing environment. The system also creates silos internally within its constituent different parts as well as inequities in services. It therefore lacks a sufficient level of variety to balance the complexity it is confronted with in the broad employment landscape.
The current system is composed of diverse groupings of stakeholders and actors with different responsibilities. Whilst most are highly committed to what they do, they are not united by a shared sense of purpose or strategic understanding of all the different roles within the system and how they need to act together to achieve that ambition. The voice of disabled jobseekers and workers is not sufficiently supported in the system and power imbalances, lack of trust, different competency levels amongst staff all contribute to a self-defeating culture within the very services designed to empower an already disadvantaged group.

In conclusion, the system lacks the level of variety it needs to balance the complexity it is facing in the broad employment landscape.
7. Leverage points

The following leverage points are designed to create a more viable system centred ensuring stakeholders work towards increasing the participation of people with disabilities in the open labour market.

It must first be acknowledged that this is a complex issue. The system cannot control the level of variety found in disabling conditions or people’s circumstances, any more than it can control the external environment shaping the world of work. It is therefore important to broaden the variety of responses available. Leverage points are key places in a system where making changes has the greatest potential to create variety, by amplifying what already works well and shifting focus towards creating space for effective action (Meadows, 2009).

The most effective leverage points for intervening to create culturally desirable and systemically feasible improvements across the system that arise from this research are:

1. The way in which the participation of people with disabilities in the labour market in Ireland is understood and how policies are formulated in response could be reframed. By developing a better understanding that this is a complex issue occurring in an uncertain and changing environment, the potential to shift the policy focus from traditional policy making to developing more systemically viable responses becomes possible. This would change the focus of the system from attempting to solve the issue within distinct silos to one where continuous learning from all part of the system can be valued and shared.

2. Developing a shared purpose across the system requires a high level of strategic commitment to embed purpose within all levels of the employment system and across Irish public services. This requires investment in the strategic capacity within the governance of the system that includes effective implementation of the UN CRPD and Public Sector Duty. It also speaks to the need for all public funded services to be designed using the principle of Universal Design, which aims to ensure environments are accessible, understood and used by the greatest number of people, including people with disabilities.

3. The effectiveness of the system needs to be understood as a coherent whole, with many different stakeholders playing different parts, at different levels of functioning. Measuring the performance of one part of the system in isolation does not give a good indication of the likelihood of overall effectiveness. To avoid competition, duplication, or ‘doing the wrong thing righter’, stakeholders need to work together. Each part of the system needs to be able to attest to its efficacy, and efficiency in contributing to achieving overall purpose. This involves changing design and review metrics for grants and services from measuring individual effectiveness of discrete services to serving this shared agenda.

4. Balancing tensions around performance and resource management is an ongoing issue considering the scale of this system, and the variety of functions within it. In order for each part of the system to contribute to an overall viable system, and to avoid perpetuating a top down management approach, each part of the system could be given both the autonomy and responsibility to act in the best interests of the overall system. Shifting the system to one that values initiative and problem solving at the appropriate level as well as creating strong lines of responsibility, including responsibility to flag areas of concern and propose improvements from any part of the system, is more likely to result in better outcomes for
jobseekers, workers and employers. This will strengthen monitoring capacity within the system. It would also go some way towards empowering service providers to serve customers better, fostering greater trust and removing some time lags in how support services are reviewed.

5. In a fast-moving world, relationships between different parts of the system and the environment are key to creating viability and stability. There are many moving parts in the system of supports and in local employment opportunities, which makes horizontal communication between different parts of the system and the environment critical to effectiveness. **Investment in coordination measures between services** in local areas and the wider environment, that values the tacit knowledge amongst different stakeholders, **can promote learning and growth within the system.**

6. The shape and meaning of work is evolving and there is a drive for innovation in public services as well as across industries to ensure economic stability. This offers a new opportunity for innovation in how people with disabilities are included in the world of work. **Effective innovation**, that avoids repetition, **requires collective learning** across disciplines and traditional service boundaries, such as communities of practice. It also requires **spaces for critical discourse**, on issues such as the interplay between poverty and work and issues around decent work.

7. Viable systems listen to their customers in order to learn and adapt. **User involvement in the design of services and in monitoring them is critical to developing an effective system.** Every attempt must be made to address power imbalances between different stakeholders in the system. There is a particular need to strengthen the voice of disabled jobseekers and workers in the review and evaluation of services and in the development of intervention measures in meaningful ways.

8. **People with disabilities must be afforded greater equity of access to work.** There must be greater equity of access to support services, that cuts across geographical location, type of disability, and the need for reasonable accommodations such as Assistive Technology or flexible working times. However, not all supports will fall under the remit of reasonable accommodation but relate to needs for services such as a Personal Assistant Service. When this occurs, the system of supports must work with other departments to ensure that people can have access to work on par with their non-disabled peers.

9. **Investment in evaluations led by a Systems Thinking approach** could assess the effectiveness of interventions aimed at leveraging change at different levels throughout the system.
Box 1 The impact of COVID-19

COVID-19 has changed the employment landscape in Ireland across all sectors of society since this case study was conducted.

Such a disruptive event has impacted mostly on young people in unskilled jobs, but it has also impacted on policy development and implementation. This is in a context where Ireland has been a late adopter of the CRPD and there had already been a shift in the quality of jobs that favoured employers of health and security of employees, to the detriment of mental health and employee wellbeing (EDF 2020).

It also, however, offers an opportunity to disrupt business as usual. The Comprehensive Employment Strategy for People with Disabilities is a 10-year strategy without the agility to adapt at a strategic level to respond to a crisis such as COVID-19. The 2019 review of strategy⁴ points to the need for greater collaboration and greater coordination, but it pitches these recommendations at an implementation and information sharing level only. While some actions within the strategy have stalled, there are some green shoots emerging. These include the development of a programme within Enterprise Ireland for disabled entrepreneurs, and the revitalisation of a lapsed pilot information service for employers, called ‘Employers for Change” to be launched in the first quarter of 2021.

The pandemic offers an opportunity to fast track the promotion of remote working to ameliorate difficulties in reasonable accommodation and accessible transport. However, progress on reviewing the scheme to provide assistive and accessible technologies to workers, has been further delayed. This is a critical development during a period where in other parts of the employment landscape are adapting to external conditions. Examples include the publication of the National Remote Work Strategy (DETE 2021), a recommendation by Ireland’s Labour Market Advisory Council to digitalise the public employment service run by Intreo⁵, and the development of a digital literacy strategy⁶.

These anomalies lend further weight to the conclusion of this case study that the CES does not have the level of flexibility and ‘requisite variety’ within its structures, at a strategic enough level to impact significantly on the numbers of people with disability in employment. This is concerning considering the expected further shock that Brexit poses for the Irish labour market.

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All Eurofound publications are available at [www.eurofound.europa.eu](http://www.eurofound.europa.eu)


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