NDSA Submission to the Public Consultation of the Disability Act 2005

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Introduction

Representing seven[1] of Ireland's largest community-based disability service providers, the National Disability Services Association (NDSA) welcomes the review of the Disability Act 2005 and the opportunity to contribute to this important process. This review presents a significant opportunity to deliver meaningful legislative reform that reflects current understandings of disability, equality, human rights, and the lived experiences of disabled people.

The Disability Act 2005 was enacted before Ireland ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) and is rooted in a policy framework that no longer reflects Ireland's commitments under the Convention. While amendments to specific provisions may be necessary, incremental changes alone will not address the fundamental shortcomings of the Act.

NDSA believes that comprehensive reform is required to ensure the legislation is fully aligned with the UNCRPD and supports a rights-based approach to disability. Reform must strengthen accountability, promote inclusion and participation, and ensure that people with disabilities can access the supports and services they require to live independently and participate fully in their communities. The review should therefore be seen as an opportunity to create a modern legislative framework that delivers on Ireland's commitments to equality, human rights, and person-centred services.

[1] Acquired Brain Injury Ireland, Cheshire Ireland, Chime, Enable Ireland, Irish Wheelchair Association, Rehab Group, Vision Ireland

1. Definition of Disability

A key priority within the review of the Disability Act is the definition of disability itself. While the Act was an important milestone in advancing disability rights, the current definition retains elements of a medical and deficit-focused approach, framing disability primarily in terms of impairment and functional limitation. This does not adequately reflect the lived experience of disabled people, where exclusion often arises not from an individual's impairment but from barriers within society.

The National Disability Services Association (NDSA) believes that the revised Disability Act should adopt a rights-based definition of disability that is firmly grounded in the social model of disability and aligned with the principles of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). Such a definition should recognise that disability arises not solely from an individual's impairment, but from the interaction between that impairment and the attitudinal, environmental, communication, institutional, and other barriers that prevent full and equal participation in society.

Adopting a modern definition of disability that reflects the principles of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) would provide a stronger foundation for legislation, policy development, service planning, and the delivery of supports. It would also ensure that the Act reflects contemporary understandings of disability and Ireland's international human rights obligations.

For NDSA, updating the definition of disability is not simply a matter of modernising language. It is a critical step towards creating a legislative framework that promotes equality, autonomy, participation, inclusion, and independent living. A contemporary rights-based definition would help ensure that disabled people are recognised as rights holders and are supported to participate fully in their communities and in all aspects of social, economic, and civic life.

More broadly, NDSA believes the Disability Act must evolve from a framework primarily concerned with the assessment and provision of services towards a modern rights-based legislative framework that fully reflects the obligations and principles of the UNCRPD. This should include stronger duties on public bodies to remove barriers, promote inclusion and ensure equal participation, supported by robust monitoring, accountability and enforcement mechanisms. Rights are only meaningful when they are enforceable, and the revised Act should include clear structures to measure compliance and hold public bodies accountable for delivering on their obligations.

The review also provides an opportunity to address the inconsistency that currently exists across Irish legislation. Different definitions of disability apply under the Disability Act, the Employment Equality Acts and the Equal Status Acts. This can create confusion and may result in differing interpretations of disability depending on the legislative context. NDSA believes there is a strong case for harmonising disability definitions across key legislative frameworks to ensure greater clarity, consistency and rights protection for disabled people.

NDSA recommends that the revised Act include a definition along the following lines:

"Disability means a long-term physical, sensory, intellectual, cognitive, neurological, psychosocial, mental health, or other impairment which, in interaction with attitudinal, environmental, communication, institutional, technological, or other barriers, may hinder a person's full, effective and equal participation in society on an equal basis with others."

More broadly, the Disability Act must evolve from a framework primarily focused on the assessment and provision of services to a modern, rights-based piece of legislation that fully reflects the principles and obligations contained within the UNCRPD. Reform should place the rights, choices, and lived experiences of disabled people at its centre, while creating clear duties on public bodies to remove barriers, promote inclusion, and ensure

access to the supports and services necessary for equal participation in society.

NDSA recommends that the revised Disability Act:

- Adopt a rights-based definition of disability grounded in the social model of disability and aligned with the UNCRPD.
- Recognise disability as arising from the interaction between impairment and societal barriers rather than impairment alone.
- Harmonise definitions of disability across Irish legislation, including the Disability Act, Equal Status Acts and Employment Equality Acts.
- Ensure the Act reflects contemporary understandings of disability and Ireland's international human rights obligations.
- Strengthen monitoring, enforcement and accountability mechanisms to ensure rights established under the Act are realised in practice.
- Embed equality, participation, inclusion, autonomy and independent living as core principles underpinning all provisions of the Act.

2. Assessment of Need

The Disability Act 2005 is primarily focused on assessment processes and access to services. While important, it does not establish a clear and enforceable right to independent living. As a result, many people with disabilities continue to be denied access to the personal assistance, accessible housing, and community-based supports necessary to live with dignity, autonomy, and full participation in society.

NDSA welcomes the review of the Disability Act 2005 and the opportunity to contribute to this important process. NDSA believes that reform of the Disability Act should focus on improving outcomes for children and families through a more integrated and accessible system. Drawing on its experience as the lead agency for 20 Children's Disability Network Teams (CDNTs) and nearly two decades of involvement in the AON process, Enable Ireland has identified several key areas for reform.

Key priorities should include the development of a Single Point of Access for families, stronger integration between assessment and intervention, improved information and communication, involvement of families and clinicians in shaping future assessment guidelines, and investment in workforce and service capacity.

Any legislative reform of the Disability Act should be considered as part of wider disability service reform to ensure that children and families can access timely assessment, intervention and support.

Whenever change is introduced, it is imperative that our collective focus remains on keeping the best interests of the child and family at the centre of our practice.

i. Stronger Rights to Services and Supports

Currently the Disability Act provides a statutory right to assessment but no right to services. The review of the Disability Act should strengthen the connection between the identification of need and access to appropriate supports and services.

While recognising the challenges associated with workforce and service capacity, the Act should provide greater accountability for the delivery of

services, clearer obligations on public bodies to promote accessibility, inclusion and participation, and more effective mechanisms to ensure that identified needs lead to timely and meaningful responses. Reform should support families and people with disabilities to access the supports they need to participate fully in education, employment, family life and their communities, and should strengthen public bodies' responsibility to remove barriers and advance inclusion for people with disabilities.

ii. Establish a Single Point of Access for Children and Families

There are many complexities faced by families and they often have to navigate multiple referral pathways across disability, primary care and mental health services.

Many families are unclear about what an Assessment Of Need (AON) is, what it can deliver, and what it cannot deliver. Parents may perceive that getting an AON is a way of getting interventions more quickly. This is not the case. Differences between recommendations made in assessment reports and the interventions which can be provided by services may create unrealistic expectations and, at times, lead to frustration between families and services where the expectations cannot be met within the resources available.

Any reform should ensure improved communication at the earliest point of contact to enable families to make informed decisions and access the most appropriate supports sooner.

The Act should establish a single-entry pathway for children and families seeking disability, primary care or mental health supports. A Single Point of Access model would help ensure children are directed to the most appropriate pathway and to reduce duplication and confusion within the system. Reform should ensure that families receive clear, accessible information and guidance throughout the process. This would:

- Allow families to make one application.
- Provide early guidance on the most appropriate service pathway.
- Reduce duplication of referrals and assessments.
- Prevent families from having to navigate multiple systems independently.

iii. Better Integration Between Assessment and Intervention

Children and families benefit most when assessment, intervention and support are integrated as part of a continuous, child-centred process. Assessment should not be viewed as a separate process from intervention and support.

Being child-centred means being truly curious and wanting to understand each individual child or young person; this cannot be captured by one standardised assessment as often occurs under the existing AON system. There is a risk that the statutory timeline becomes the focus rather than the appropriateness of what is right for the child at each point on their journey, therefore not addressing their needs.

Service Statements outline the services a child should receive, however delivering on these can be challenging for services given the current staffing levels and capacity. The agreed timelines in the Service Statement may be subject to legal scrutiny or rise in complaints creating additional pressure on services to deliver commitments made several years in advance despite changes to staffing and model of care making the service statement difficult to follow. In addition, some recommendations made in a service statement could be very specific to individual therapies without considering the CDNT's family centred model.

Reform should ensure that children and families receive support as early as possible, and assessment processes and subsequent service statement should be integrated with service provision rather than operating as standalone activities.

iv. The statutory timelines need to be reconsidered

AON timelines can overshadow clinical needs with assessment becoming process-driven and not child-centred. Families need clinicians to be able to respond at the right time and in the right way.

v. Protect Comprehensive Assessments

We fully recognise and support the families' right to apply for an AON. Any reforms implemented should not diminish the quality or comprehensiveness of assessments. Children should continue to receive assessments that identify the full range of their needs and provide families

with meaningful information to support future planning and access to services. Comprehensive assessments must be provided by experienced clinicians, who have the clinical and professional knowledge to provide a comprehensive differential diagnostic assessment and individualised recommendations.

vi. Address Workforce and Service Capacity

Legislative change alone will not solve the challenges facing the system. Workforce shortages and insufficient service capacity are key barriers to timely assessments and supports. Clinicians and services that have the knowledge and expertise to undertake assessments require both adequate resources, and a legislative framework, to respond at the right time and in the right way. This is in keeping with the Sláintecare principle of 'right care, right place, right time.'

Whether a child comes through an AON process or not, disability services need the staff to meet their needs whether that is for assessment, intervention or any type of support, resourcing needs to be provided from university graduate up.

Any reform of the Disability Act should therefore be accompanied by investment in staffing and service provision if better outcomes for children and families are to be achieved.

The recent pay increases and restructuring secured under the WRC Agreement for health and social care workers, including Section 39 employees, is welcome. However, significant pay gaps remain and continue to grow between the HSE consolidated salary scales and Section 39 salary rates. This ongoing pay disparity is proving a very real obstacle to Section 39s hiring newly graduated clinicians and retaining staff.

vii. Interagency partnership

Reform needs to ensure greater partnership and a clear understanding of the different roles played by multiple agencies working across disability assessment and services. For example, the role of National Educations Psychological Service (NEPS) in providing assessments and school-based supports, and their interaction with CDNTs, Primary Care and CAMH's needs greater clarity and understanding.

3. Access to Buildings, Services and Public Infrastructure

i. Building Accessibility

Access to the public realm, public buildings and services remains a fundamental requirement for participation in society. While Part 3 of the Disability Act represented a significant step forward when introduced, many disabled people continue to experience barriers in accessing public buildings and services in practice. There remains a significant gap between legislative requirements and the lived experience of disabled people.

A key concern is the lack of effective monitoring, enforcement and accountability mechanisms. Many people who encounter inaccessible buildings or services are unclear about where complaints should be made or how issues can be resolved. Existing accessibility standards, particularly those contained within Part M of the Building Regulations, no longer reflect best practice in universal design and should be reviewed in line with the principles of the UN Convention on the Rights of Persons with Disabilities (UNCRPD). [

Feedback from service service users highlights the persistence of basic accessibility barriers. Individuals reported difficulty accessing healthcare appointments because automatic doors did not operate correctly, resulting in missed appointments. Others described public service buildings with heavy doors, steps, high kerbs, narrow doorways and lifts that were frequently out of service. One visually impaired individual described being struck by outward-opening doors in public buildings because of poor design and layout. These examples demonstrate that accessibility remains an ongoing challenge, even within public services that should be accessible by default.

Accessibility standards should also recognise the need for buildings to adapt to changing user needs over time. Accessibility should be a priority in public procurement rules and specifications, and future-proofed and adaptable design principles should be incorporated into all public infrastructure projects to ensure accessibility remains effective throughout the life of a building.

Recommendations:

- Extend the Act to apply minimum accessibility standards beyond buildings to all public spaces, including roads, footpaths, crossings, parks etc.
- Limit or remove the use of the Section 3 qualification 'as far as practicable' to ensure it is not used to avoid making the necessary or reasonable investment in accessibility
- Ensure accessibility requirements are mandatory and proportionately weighted in public procurement specifications and contracts, providing required guidance and training to relevant staff in public bodies.

ii. Accessible Information and Communications

Accessibility extends beyond the built environment. Equal access to information is essential if disabled people are to engage fully with public services and exercise their rights.

Service users reported that government forms are often overly long and complex, with little information available in Easy Read format. Concerns were also raised regarding the lack of information in Braille, inaccessible online/digital communications and channels, inconsistent provision of Irish Sign Language supports, and overreliance on telephone communication despite the needs of people who are deaf or hard of hearing. Despite the passing into law of the European Accessibility Act in 2025, the vast majority of blind or vision impaired people surveyed by Vision Ireland have seen no improvement in digital accessibility. Suggestions included the introduction of accessible information kiosks in public buildings such as libraries and Intreo offices, alongside a greater commitment to providing information in multiple accessible formats.

The revised Disability Act should recognise access to information and communication as a fundamental right and place a statutory obligation on public bodies to ensure that information, communications and services are accessible from the outset.

Recommendations:

- Recognise communication and information accessibility as a statutory right.
- Require all public bodies to make information routinely available in a range of accessible formats.
- Guarantee access to Irish Sign Language interpretation where required.
- Ensure the availability of Easy Read materials and Plain English information.
- Provide information in Braille, large print and other accessible formats.
- Require all digital services and online information to be fully accessible and comply with regulations.
- Ensure access to alternative and augmentative communication supports.
- Reduce reliance on telephone-only communication channels and provide accessible alternatives.
- Introduce accessible information kiosks and information points in public buildings and community settings.
- Establish monitoring and accountability mechanisms to ensure compliance with accessibility standards and enforcement of same.

By embedding communication and information rights within the Act, the State can help ensure that disabled people have equal access to public services, decision-making processes, and the information necessary to live independently and participate fully in society.

iii. Accessible Public Transport

Transport remains one of the most frequently cited barriers to participation. Service users reported inconsistent wheelchair accessibility on public transport, inaccessible bus ramps, bus stops, ticket machines and rail platforms, and a lack of confidence among staff in supporting disabled

passengers. Visually impaired passengers also reported difficulties when stop announcements were unavailable, making independent travel significantly more challenging.

The Disability Act should place stronger obligations on transport providers regarding accessibility standards, maintenance of accessibility equipment, staff training and accountability for service failures.

Recommendations:

- Design and apply minimum accessibility and universal design standards across all public transport providers, ensuring that all upgrades to existing fleet and facilities and new development/purchasing comply. Include disabled people early in the design process and inform approach with lived experience.
- Ensure that preventative and proactive maintenance programmes assign the appropriate level of priority to accessibility facilities and equipment.
- Provide disability awareness training to all staff, empowering them to deliver inclusive services.
- Ensure accessible and responsive complaints management, with appropriate monitoring and assessment.

iv. Access Officers and Enforcement

The experience of many disabled people demonstrates that accessibility standards are only effective where there are clear mechanisms for implementation, monitoring and enforcement. Research undertaken by Disability Federation of Ireland identified the critical role played by Access Officers within local authorities, while also highlighting significant shortcomings in how the role is currently resourced and supported. Many Access Officers undertake the function in addition to existing responsibilities, without dedicated resources, training or clear national guidance.

The review of the Disability Act provides an opportunity to strengthen the role of Access Officers by establishing it as a dedicated, full-time senior

position within every local authority, supported by clear statutory duties, national guidance and adequate resources. A stronger Access Officer network would significantly improve consistency, monitoring and enforcement of accessibility obligations nationwide.

Recommendations

Part 3 of the Disability Act should be strengthened through:

- A comprehensive review of accessibility standards to align with universal design principles and the UNCRPD.
- Mandatory accessibility audits and accessibility action plans for all public bodies.
- Stronger enforcement and complaints mechanisms, with clear accountability where accessibility obligations are not met.
- Improved accessibility standards across public transport, housing, healthcare, education, employment and digital services.
- A requirement that publicly funded services, including those delivered by private contractors, meet the same accessibility standards as public bodies.
- The establishment of fully resourced, full-time Access Officer posts in every local authority, with responsibility for monitoring, implementation and public engagement on accessibility issues.

This would help move accessibility from a compliance exercise to a practical and enforceable right, ensuring that disabled people can access buildings, services, information and transport on an equal basis with others.

4. Employment and Public Service Participation

Employment is a critical pathway to economic security, social inclusion and participation in public life for people with disabilities. However, Ireland continues to have one of the lowest employment rates for disabled people in the EU, and people with disabilities remain significantly more likely to experience poverty, exclusion and social isolation. This highlights that the barriers to employment are not simply structural but are also driven by attitudes, misconceptions and a lack of disability awareness among employers.

While the Disability Act's employment provisions focus primarily on public sector employment targets, a review of the legislation presents an opportunity to adopt a broader and more ambitious approach to disability inclusion across the public service. Public bodies should not only seek to employ more people with disabilities but should also create workplaces that actively support recruitment, retention, progression and leadership opportunities for disabled employees.

Feedback gathered through NDSA consultations suggests that many disabled people do not view the public service as an accessible or realistic employment option. Participants reported that there is little encouragement for disabled people to consider public service careers and insufficient awareness of the opportunities available. As one participant noted: *"No encouragement to look for a job in the public sector. Not enough is known about the opportunities."* Another participant observed that many disabled people do not believe they would be considered for public service positions.

A recurring theme throughout the consultation was the need for greater disability awareness among employers. Participants consistently reported being judged on their disability rather than their skills, experience and potential. As one participant stated, *"Employers need a greater understanding of people with disability, and their ability and capability,"* while another remarked, *"It's the lack of disability awareness that's the problem."* NDSA believes that mandatory disability awareness and inclusion training should be introduced across the public service. Such

training should focus on challenging stereotypes, understanding reasonable accommodation, promoting inclusive recruitment practices and supporting career advancement for employees with disabilities.

The existing public sector disability employment target also requires review. While the target has increased to 6%, implementation and enforcement remain inconsistent across public bodies Consideration should also be given to whether current targets reflect the reality that almost one in five people in Ireland identifies as having a disability and whether this target acts as a ceiling, not a floor. A greater level of ambition, combined with stronger monitoring, reporting and accountability mechanisms, would ensure compliance would be the minimum aim, while exceeding 6% becomes the goal.

The Disability Act should also place greater emphasis on the quality of employment and workplace inclusion. It is notable that the Act focuses largely on recruitment targets, while issues such as reasonable accommodation, retention, progression and workplace culture receive little attention. The revised Act should require public bodies to demonstrate how they are creating inclusive workplaces and supporting disabled employees throughout their careers. This is particularly important given reports of disabled employees encountering barriers to advancement and instances where employees who acquired disabilities felt discouraged from returning to work.

In addition to direct employment measures, the Act should recognise the important role that public procurement can play in advancing disability employment. Article 20 of the EU Public Procurement Directive allows contracting authorities to reserve certain contracts for organisations that employ people with disabilities or other disadvantaged groups. However, this provision remains significantly underutilised in Ireland. The review of the Disability Act should consider requiring Government Departments and public bodies to allocate a proportion of procurement expenditure to social procurement initiatives, including social enterprises where a significant proportion of the workforce are people with disabilities. This would create meaningful employment opportunities while enabling the public sector to leverage its purchasing power to achieve wider social inclusion objectives.

Recommendations

- Introduce mandatory disability awareness and inclusion training across the public service.
- Strengthen monitoring and enforcement of public sector disability employment targets.
- Increase awareness of public service career opportunities among people with disabilities through targeted outreach and recruitment initiatives.
- Expand the focus of the Disability Act beyond employment quotas to include reasonable accommodation, retention, progression and workplace culture.
- Require public bodies to report on disability inclusion measures and employment outcomes.
- Promote the use of Article 20 of the EU Public Procurement Directive and introduce social procurement targets across Government Departments and public agencies to support employment opportunities for people with disabilities.

This approach would position the public service not only as an employer of people with disabilities, but as a leader in disability inclusion and a driver of wider employment opportunities across society.

5. Universal Design

Universal design is a cornerstone of an inclusive society and must play a much stronger role in the revised Disability Act. The work of the Centre for Excellence in Universal Design has made an important contribution to advancing accessibility and inclusion in Ireland. However, while valuable guidance and standards exist, their application is often inconsistent because implementation remains largely advisory rather than mandatory.

The revised Act should require universal design principles to be embedded from the earliest stages of planning, design and development across both physical and digital environments. Designing accessibility into infrastructure from the outset is more effective and cost-efficient than retrofitting buildings, services or technologies at a later stage. Universal design benefits not only disabled people but also older people, parents with young children, people carrying heavy loads and those experiencing temporary illness or injury, creating environments that are easier for everyone to use.

Universal design requirements should also extend to public procurement. While current provisions focus primarily on public-sector infrastructure, many public services are delivered by private organisations on behalf of the State. Any organisation receiving public funding or delivering publicly funded services should be required to meet the same accessibility and universal design standards expected of public bodies. This would help prevent the creation of unnecessary barriers and ensure that public services are accessible regardless of who provides them.

A strengthened legislative framework should also address the current gaps in monitoring, accountability and enforcement. The principles and standards developed by the Centre for Excellence in Universal Design should be underpinned by statutory obligations, with clear mechanisms to monitor compliance and enforce standards across both public and private sectors. Consideration should be given to assigning these powers to the Centre or establishing an alternative independent oversight body.

The accessibility provisions introduced in 2005 were an important foundation but are now outdated and, in some cases, have been overtaken

by more recent standards and regulations. The revised Act should therefore introduce:

- Universal design standards across all public services.
- Mandatory accessibility audits.
- Accessibility action plans for all public bodies.
- Stronger monitoring, compliance and enforcement mechanisms. Particular attention should be given to key areas of daily life including public transport, housing, digital services, healthcare facilities, education settings and employment supports, ensuring that accessibility and inclusion are embedded throughout society rather than addressed as an afterthought.

6. Additional NDSA recommendations

While reform of the core provisions of the Disability Act is essential, the review should also address a number of wider issues that continue to affect the ability of disabled people to participate fully in society and exercise their rights on an equal basis with others. The revised Act should strengthen independent living, improve accountability, address gaps in data and service planning, and ensure that disabled people are actively involved in the development of policies and services that affect them.

i. Right to live independently and to be included in the community

Article 19 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) emphasises the right of persons with disabilities to live independently and to be included in the community.

May 2026 data from the Nursing Home Support Scheme (NHSS) showed that there were 1,137 disabled people under the age of 65 residing in nursing homes. While it is unknown exactly how many people could be better supported outside nursing homes, it can be assumed that a significant proportion could achieve far better outcomes.

The Ombudsman's 2021 report, "Wasted Lives: Time for a better future for younger people in nursing homes", suggests that nursing homes in general are designed for older people and not equipped to provide the rehabilitation that a younger person living with a disability may require, nor do they provide a social model of care focused on enabling the people concerned to return to their communities.

Recommendations:

- Recognise the right of disabled people to live independently and be included in the community.
- Ensure access to community-based supports and services that enable independent living.
- Ensure access to specialist interdisciplinary rehabilitation services.

ii. Put Personal Assistance Services on a Statutory Footing

A person's independence should not depend on where they live or annual budget decisions.

Recommendations

- Define personal assistance in law.
- Establish eligibility criteria.
- Create a legal entitlement based on assessed need.
- Set national standards and waiting time targets.

iii. Accessible Housing

Access to appropriate housing is fundamental to independent living and community inclusion. The Act should support a strategic and coordinated approach to accessible and adaptable housing that responds to both current and future need.

Recommendations:

- Establish national targets for wheelchair-accessible and universally designed housing.
- Improve data collection on accessible housing need.
- Strengthen accessibility requirements in housing policy and planning.
- Ensure housing strategies are disability-inclusive.
- Promote accessibility and adaptability across all housing tenures.

iv. Disability Data and Planning

Effective planning depends on accurate and comprehensive data. Significant gaps remain in the collection and publication of disability-related data, which impacts the State's ability to plan services, housing, transport and community supports. The review should strengthen obligations on public bodies to collect and publish disability data on a consistent basis.

Recommendations:

- Improve collection and publication of disability-related data.
- Gather data on wheelchair users and mobility aid users.
- Improve data on housing accessibility needs.
- Strengthen information on personal assistance requirements and unmet need.
- Address data gaps relating to intellectual disability, neurodivergence and rehabilitation services.
- Require ongoing review of disability data needs in consultation with disabled people and their representative organisations.

v. Participation, Co-Design and Co-Production

The principle of "Nothing About Us Without Us" should be embedded throughout the revised Act. Disabled people must be recognised as experts through lived experience and should play a central role in designing, delivering and evaluating policies and services.

Recommendations:

- Stronger requirements for co-design and co-production in policy and service development.
- Greater involvement of people with lived experience in service planning and evaluation.
- Accessible consultation and feedback mechanisms.
- Recognition of the expertise and contribution of lived experience.
- Representation of disabled people and Disabled Persons Organisations on relevant advisory and decision-making structures.

vi. Monitoring, Accountability and Enforcement

Many of the challenges experienced under the current Act stem not from an absence of policy commitments, but from a lack of effective enforcement and accountability. The review should strengthen oversight arrangements and ensure that rights can be effectively realised in practice.

Recommendations:

- Introduce stronger monitoring and reporting requirements.
- Strengthen independent oversight of disability rights and service provision.
- Establish clear accountability mechanisms where statutory obligations are not met.
- Improve access to complaints, appeals and redress mechanisms.
- Consider the establishment of a dedicated Disability Ombudsman.