

October 2025

AsIAm Submission to the Department of Social Protection on the Successor Strategy to *Pathways to Work 2021-2025* 

AslAm, Ireland's Autism Charity, welcomes the opportunity to engage with the Department of Social Protection who are developing a new strategy to succeed the *Pathways to Work Strategy 2021-2025*. Building on recent engagements with the Department, this consultation provides a timely opportunity to highlight the barriers faced by Autistic people and Disabled people in securing an adequate income, accessing work and navigating the social protection system and employment supports.

This consultation is particularly significant given the impact of previous Department initiatives, such as the *Cost of Disability Report* and the *Green Paper on Disability Reform:* A *Public Consultation to Reform Disability Payments in Ireland*, both of which have shaped public debate on disability, work and social protection in recent years.

Autistic people and Disabled people, along with other marginalised communities, continue to face pervasive barriers to employment in Ireland, which is particularly pronounced for our community and have a significant impact on their living standards as Disabled people are much more likely to experience poverty and deprivation.

Considering the additional costs of living associated with being Autistic or Disabled, it is essential that the Department adopts a comprehensive approach to addressing employment barriers for our community.

The previous *Pathways to Work* strategy made some progress in tackling barriers to employment faced by Autistic and Disabled people. However, much more needs to be done to ensure the next *Strategy* supports Autistic people in finding roles that reflect

their skills, strengths, and interests. Reflecting these concerns, AslAm's submission will explore the following issues:

- How did the Pathways to Work Strategy support Disabled People into Employment?
- Measuring Ireland's Progress in Tackling Poverty, Social Exclusion and the Disability Employment Gap.
- The Green Paper on Disability Reform.
- Experiences and Barriers to Employment for Autistic People.
- Community Experiences in Dealing with the Department and Employment Services.
- Addressing Employer Attitudes to Autism and Autistic People.
- Autistic Adults Experiences in Dealing with the Department and Employment Services.
- Promoting Autistic People's Wellbeing and Tackling the Effects of Isolation and Social Exclusion as Barriers to Employment.
- Inconsistencies in Disability Assessments and their Impact in Accessing Disability Supports.
- Self-Employment as a Way of Unlocking Opportunity for Autistic People.
- Public Attitudes and the Role of Social Protection as a "Social Safety Net".
- AsIAm Employment & Post-18 Transitions Programme.
- The Roadmap for Autism and Employment.
- Programme for Government Commitments on Disability and Social Protection.
- Commitments under the Autism Innovation Strategy.
- Commitments under the National Human Rights Strategy for Disabled People 2025-2030.
- Recommendations for the next Pathways to Work Strategy.

# About AslAm

AsIAm is Ireland's Autism Charity. Founded in 2014, AsIAm advocates for an inclusive society for Autistic people that is accessible, accepting and affirming. We work to support the Autistic community and our families throughout the lifecycle to fully engage in Irish life and build the capacity of society to facilitate true inclusion. This is achieved through the programmes of support we offer and our advocacy work. AsIAm provides a range of programmes through our national and regional based activities and programmes.

AsIAm is a Disabled Person's Organisation (DPO) as we are Autistic led, informed by the experiences of Autistic people, and more than half of our staff and board are Autistic or have other differences or disabilities. AsIAm's work focuses on advancing the rights of Autistic people across Irish society. We use a rights-based, Neuro-affirmative approach in all our work supporting Autistic people across all supports within the organisation. AsIAm is also a founding member of the DPO Network - an alliance of five national DPOs who collectively advocate for the rights of Disabled people and to advance the full implementation of the UNCRPD in Ireland, across all our laws and policies.

#### **About Autism**

Autism is a lifelong developmental difference or disability which relates to how a person communicates and interacts with others and how they experience the world around them. In keeping with our community's preferences, AslAm uses identity-first language ("i.e. Autistic person") throughout this submission to reflect that their experience of autism is a core part of their identity and central to their experience of living in Irish society. Further details about Autistic people's language preferences can be found in our Language Guide here.

How did the *Pathways to Work Strategy* support Disabled People into Employment?

When the <u>Pathways to Work Strategy 2021–2025</u> launched in 2021, one of its key objectives was to increase the employment rate of Disabled people, in line with the Comprehensive Employment Strategy for People with Disabilities and the Roadmap for Social Inclusion. The stated goal was to raise employment among Disabled people from 22.3% in 2016 to 33% by 2026.<sup>1</sup>

The Strategy introduced several reforms, including:

- Removing the "rehabilitative work" requirement for Disabled people to keep their Disability Allowance.
- Increasing the earnings disregard for accessing the Medical Card.
- Introducing a fast-track reinstatement process for Disabled people returning to work.
- Creating the Ready Reckoner tool to help Disabled people assess whether work would be financially beneficial.
- Expanding funding for projects under the Ability Programme to support young
   Disabled people beginning to look for work.<sup>2</sup>

The Strategy also acknowledged structural barriers to employment Disabled people face, noting that the social protection system often assessed support needs through a narrow focus on "capacity to work":

"As currently structured, the welfare system largely treats people who are disabled in a binary manner – either they are disabled and therefore cannot work (to any significant degree) or they are not disabled." <sup>3</sup>

<sup>&</sup>lt;sup>1</sup> Department of Social Protection, 'Pathways to Work Strategy 2021 - 2025', <u>pathways-to-work-2021-2025.pdf</u> (accessed 25 Sep 2025).

<sup>&</sup>lt;sup>2</sup> Department of Social Protection, 'Pathways to Work Strategy 2021 - 2025', pathways-to-work-2021-2025.pdf (accessed 25 Sep 2025).

<sup>&</sup>lt;sup>3</sup> Department of Social Protection, 'Pathways to Work Strategy 2021 - 2025', <u>pathways-to-work-2021-2025.pdf</u> (accessed 25 Sep 2025).

This binary approach fails to recognise the diversity of disability and the different supports people need to access and remain in employment. The Strategy therefore committed to reviewing and standardising long-term disability payments to better reflect Disabled people's support needs and the additional costs of living faced by Autistic and Disabled people.<sup>4</sup>

Recognising that many Disabled people face barriers within both the welfare system and employment services, the Strategy called for a more proactive, person-centred approach. The Strategy proposed Intreo centres would appoint specially trained Case Officers, expand access to EmployAbility services, increase employer supports, and pilot an "Early Engagement" programme for young Disabled people.<sup>5</sup>

The Strategy identified three challenges it needed to address barriers to employment experienced by Autistic and Disabled people:

- Ensuring the welfare system "works for work" and does not create disincentives for Disabled people to taking up a new job.
- Ensuring Intreo can engage with Disabled people in an effective and disabilityaware manner.
- Ensuring the availability of wraparound supports to enable participation and sustain employment.<sup>6</sup>

The Strategy made three specific commitments to addressing these barriers to work:

- Reviewing the current long-term disability payment schemes with a view to removing inconsistencies/anomalies and ensure that they recognise the continuum of disabilities and support employment.
- Ensuring progress on addressing other 'wrap-around' issues identified in the
   Comprehensive Employment Strategy for People with Disabilities is monitored

<sup>&</sup>lt;sup>4</sup> Department of Social Protection, 'Pathways to Work Strategy 2021 - 2025', pathways-to-work-2021-2025.pdf (accessed 25 Sep 2025).

<sup>&</sup>lt;sup>5</sup> Department of Social Protection, 'Pathways to Work Strategy 2021 - 2025', <u>pathways-to-work-2021-2025.pdf</u> (accessed 25 Sep 2025).

<sup>&</sup>lt;sup>6</sup> Department of Social Protection, 'Pathways to Work Strategy 2021 - 2025', pathways-to-work-2021-2025.pdf (accessed 25 Sep 2025).

<sup>&</sup>lt;sup>7</sup> Department of Social Protection, 'Pathways to Work Strategy 2021 - 2025', <u>pathways-to-work-2021-2025.pdf</u> (accessed 25 Sep 2025).

and reported on by the Department of Children, Equality, Disability, Integration and Youth and the National Disability Authority.8

Whilst *Pathways to Work* made welcome commitments to improving employment opportunities for Disabled and Autistic people, it fell short of meaningfully addressing the deep-rooted structural barriers to employment that both communities face.

A key weakness was its failure to propose structural reform of disability assessments. Community members consistently describe this medicalised system as distressing, framing support around an individual's "capacity to work" rather than adopting a rights-based or neuro-affirmative approach. This system risks pathologising Autistic people, reinforcing stigma, ignoring lived experiences, and creating significant anxiety and distress, and entrenching hardship. This approach also overlooks the physical, mental and emotional toll that work, or being expected to work, can take for many Autistic people without the right supports or accommodations - where Autistic people often feel pressure to mask, face longer periods of Autistic burnout and occupational burnout, or feel pressure to take up roles simply to retain their entitlements, even if they were not ready to work or managing other disabilities or chronic health conditions. These concerns are reflected in our most recent *Same Chance Report*, where we found that 64% of community members did not find the social protection system to be inclusive or accessible to Autistic people.<sup>9</sup>

The Strategy also relied heavily on engagement with Intreo as a pathway into employment. However, many Autistic and Disabled people report negative experiences with Intreo, including being funnelled into jobs or training that do not reflect their skills, interests, or wellbeing. This is particularly problematic for those managing co-occurring conditions, recovering from burnout, or struggling in existing employment. Crucially, *Pathways* did not address the wider spectrum of opportunities that many Autistic people seek, such as entrepreneurship, self-employment, or further and higher

<sup>&</sup>lt;sup>8</sup> Department of Social Protection, 'Pathways to Work Strategy 2021 - 2025', <u>pathways-to-work-2021-2025.pdf</u> (accessed 25 Sep 2025).

<sup>&</sup>lt;sup>9</sup> AslAm, 'Same Chance Report 2025', <a href="https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AslAm%20">https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AslAm%20</a> Same%20Chance%20Report.pdf (accessed 29 Sep 2025).

education. Nor did it adequately tackle flaws in the disability assessment system, which too often forces people to "prove" their disability in intrusive, medicalised ways that ignore lived experience, perpetuate stigma and reinforce hardship and exclusion.

Instead of a narrow focus on labour market activation, AslAm believes the Department should take a holistic, rights-based and neurodiversity-affirming approach that reflects Ireland's obligations under Articles 27 and 28 of the UNCRPD. This means designing policies and supports with Autistic and Disabled people, focusing equally on dignity, autonomy, inclusion, and wellbeing – rather than reducing employment policy to a market-oriented process that just places people into jobs without the necessary supports.

Reflecting this need to develop rights-based, neuro-affirmative approaches to employment, it is crucial that the Department of Social Protection aligns its commitments with more recent national strategies aimed at better supporting Autistic people in the workplace. The *Autism Innovation Strategy* makes specific commitments to improving employment outcomes for Autistic people to access employment, such as incorporating the needs of Autistic employees in disability inclusion policies, making recruitment processes more accessible and improving data collection on Autistic peoples' access needs to inform recruitment policies and workplace practices. *The National Human Rights Strategy for Disabled People* identifies employment as a key pillar and contains priority actions including reviewing and strengthening civil service disability inclusion and reasonable accommodation policies, improving access to entrepreneurship and self-employment, reforming supports such as the Disability Allowance and the Wage Subsidy Scheme, improving recruitment processes and expanding work placements within the public sector.

Embedding the principles of these strategies into the next *Pathways to Work* strategy will be essential to tackling the deep-rooted structural barriers to employment faced by Autistic and Disabled people, and to ensuring that more members of our community can access meaningful work or pursue careers that reflect their skills, interests and aspirations on an equal basis with others.

Measuring Ireland's Progress in Tackling Poverty, Social Exclusion and the Disability Employment Gap

Ireland has clear international obligations in addressing barriers to employment faced by Autistic and Disabled people, following its ratification of the UNCRPD in 2018 and the Optional Protocol in 2024. Article 27 of the UNCRPD states that Ireland has an obligation to ensure that Disabled people have equal right to work, including access to the labour market, recruitment and working conditions, providing equal access to training and advancement, supporting self-employment and entrepreneurship, reasonable accommodations and protection from harassment and discrimination. <sup>10</sup> Under Article 28 of the UNCRPD, Ireland has an obligation to guarantee "an adequate standard of living for themselves and their families, including adequate food, clothing and housing, and to the continuous improvement of living conditions." <sup>11</sup> It also highlights the need for specific supports for Disabled women and girls, older people, families with disability-related expenses, housing supports, and retirement security.

Despite these obligations, Autistic and Disabled people continue to face persistent barriers to employment and social inclusion. Recent analysis from the European Commission, the ESRI (Economic and Social Research Institute), the Central Statistics Office and the OECD (Organisation for Economic Co-operation and Development) highlight the impact of systemic barriers in accessing work, education and to securing an adequate income.

The European Commission's most recent *European Semester Report for Ireland* found that Ireland has one of the highest disability employment gaps in the EU, with 38.2% of Disabled people experiencing unemployment and underemployment.<sup>12</sup> The Commission identified key barriers including limited access to education, lack of access to

<sup>&</sup>lt;sup>10</sup> Article 27, UN Convention on the Rights of Persons with Disabilities, <u>Article 27 - Work and employment | Division for Inclusive Social Development (DISD)</u> (accessed 25 Sep 2025).

<sup>&</sup>lt;sup>11</sup> Article 28, UN Convention on the Rights of Persons with Disabilities, Article 28 – Adequate standard of living and social protection United Nations Enable (accessed 26 Sep 2025)

<sup>&</sup>lt;sup>12</sup> European Commission, 2025 Country Report – Ireland, p. 90, <u>7ec5fe18-b881-4140-b86a-7b22cb7a8580\_en</u> (accessed 20 Sep 2025).

reasonable accommodations, and workplace discrimination.<sup>13</sup> This undermines the *Pathway's* commitment to increasing Disabled people's labour market participation.

A key factor driving this gap is education. Disabled people in Ireland continue to experience disproportionately low levels of educational attainment - 4 in 10 working-age Disabled people have attained only primary or lower secondary education – twice the rate found among the general population. This education gap fuels exclusion from both the workforce and community life, contributing to Ireland having one of the highest rates of Disabled people neither in employment, education nor training (NEETs) in the EU, at 35.1% in 2022. These inequalities in education and training can lead Disabled people leaving school earlier than their non-Disabled peers, not having equal access to the primary and post-primary curriculums, and from. Without equal access to higher education, vocational training and lifelong learning, many Autistic and Disabled people are excluded from employment, financial security, career progression, wellbeing and social inclusion.

The Commission emphasises expressed concern that the social protection system is failing to adequately compensate for the additional costs of disability. Progress in closing the disability employment gap has been slow undermining its commitments under the UNCRPD. The 2024 Survey on Income and Living Conditions (SILC) from the Central Statistics Office revealed that 32.5% of Disabled people who were unable to work were at risk of poverty compared to 5.4% who were employed, and almost 1 in 5 Disabled people of working age (18-66) live in deprivation and consistent poverty. Alarmingly, without the one-off cost of disability measures implemented in recent Budgets, it found that 37.4% of Disabled people would be at risk of poverty.

silc/surveyonincomeandlivingconditionssilc2024/impactofcostoflivingmeasuresonpovertyandincome/ (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>13</sup> European Commission, 2025 Country Report – Ireland, p. 90, <u>7ec5fe18-b881-4140-b86a-7b22cb7a8580\_en</u> (accessed 20 Sep 2025).

<sup>&</sup>lt;sup>14</sup> European Commission, 2025 Country Report – Ireland, p. 91, <u>7ec5fe18-b881-4140-b86a-7b22cb7a8580\_en</u> (accessed 20 Jun 2025).

<sup>&</sup>lt;sup>15</sup> European Commission, 2025 Country Report – Ireland, p. 91, <u>7ec5fe18-b881-4140-b86a-7b22cb7a8580\_en</u> (accessed 20 Sep 2025).

<sup>&</sup>lt;sup>16</sup> European Commission, 2025 Country Report – Ireland, p. 96, <u>7ec5fe18-b881-4140-b86a-7b22cb7a8580\_en</u> (accessed 20 Sep 2025).

<sup>&</sup>lt;sup>17</sup> Central Statistics Office, 2024 Survey on Income and Living Conditions, https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2024/poverty/ (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>18</sup> Central Statistics Office, 2024 Survey on Income and Living Conditions, https://www.cso.ie/en/releasesandpublications/ep/psilc/surveyonincomeandlivingconditionssilc2024/impactofcostoflivingmeasuresonpove

peoples' poverty rates remain 2.5 to 4 times the national average. These findings mirror our most recent *Same Chance Report*, which found that 84% of community members felt that current social protection rates were not enough to meet their needs.<sup>19</sup>

The ESRI (Economic and Social Research Institute) has also highlighted consistently high levels of poverty, social exclusion, and material deprivation in households with Disabled members, stressing that urgent and comprehensive action is required. The ESRI has warned that the presence of a Disabled household member is a contributing factor to families experiencing poverty and deprivation.<sup>20</sup> EUROSTAT has also found that Ireland ranks 17<sup>th</sup> out of 27 countries in the European Union for addressing at risk of poverty and severe material deprivation for Disabled people and their wider communities.<sup>21</sup>

The Organisation for Economic Co-operation and Development's (OECD) report on *Disability, Work and Inclusion in Ireland* <sup>22</sup> similarly identified persistent structural barriers, stating that Ireland has one of the largest disability employment gaps in EU and OECD countries. <sup>23</sup> Disabled people being half as likely to be in employment as their non-Disabled peers, with barriers including:

- lower levels of educational attainment;<sup>24</sup>
- gaps in training opportunities;<sup>25</sup>

<sup>&</sup>lt;sup>19</sup> AslAm, 'Same Chance Report 2025', <a href="https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AslAm%20Same%20Chance%20Report.pdf">https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AslAm%20Same%20Chance%20Report.pdf</a> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>20</sup> Economic and Social Research Institute (ESRI), 'Adjusting Estimates of Poverty for the Cost of Disability', <a href="https://www.ihrec.ie//app/uploads/2025/03/Adjusting-Estimates-of-Poverty-for-the-Cost-of-Disability.pdf">https://www.ihrec.ie//app/uploads/2025/03/Adjusting-Estimates-of-Poverty-for-the-Cost-of-Disability.pdf</a> (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>21</sup> EUROSTAT, <a href="https://ec.europa.eu/eurostat/databrowser/view/hlth\_dpe010/default/bar?lang=en">https://ec.europa.eu/eurostat/databrowser/view/hlth\_dpe010/default/bar?lang=en</a> (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>22</sup> Organisation for Economic Co-operation and Development (OECD), 'Disability, Work and Inclusion in Ireland' (2021), p. 12: <a href="https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf">https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf</a> (accessed 24 Sep 2025).

<sup>&</sup>lt;sup>23</sup> Organisation for Economic Co-operation and Development (OECD), 'Disability, Work and Inclusion in Ireland' (2021): <a href="https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf">https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf</a> (accessed 24 Sep 2025).

<sup>&</sup>lt;sup>24</sup> Organisation for Economic Co-operation and Development (OECD), 'Disability, Work and Inclusion in Ireland' (2021), p. 57: <a href="https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf">https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf</a> (accessed 24 Sep 2025).

<sup>&</sup>lt;sup>25</sup> Organisation for Economic Co-operation and Development (OECD), 'Disability, Work and Inclusion in Ireland' (2021), p. 18: <a href="https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf">https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf</a> (accessed 24 Sep 2025).

- inaccessible recruitment processes (i.e. job interviews and assessments);26
- reasonable accommodations not always being provided by employers;<sup>27</sup>

The OECD has also highlighted that Autistic employees face additional barriers in the labour market. Disabled workers in Ireland are more likely work in low-paid or part-time roles, with limited opportunities for career progression. They also have fewer options for flexible or remote working and reduced access to reasonable accommodations. For Autistic people in particular, flexibility and accommodations are often essential to meeting sensory and access needs at work, yet these remain inconsistently provided and poorly understood by employers. Employer engagement remains a critical weakness; the OECD noted that employers were not aware of supports available weakness; the OECD noted that employers hat stigma and misconceptions about autism remain widespread in Irish workplaces, discouraging Autistic people to be open about being Autistic at work. These structural and attitudinal barriers mean that Autistic people are often excluded from securing employment, career progression, long-term job security, and belonging and acceptance at work.

Taken together, this evidence paints a stark picture: Ireland's progress in addressing poverty, social exclusion and the disability employment gap remains insufficient. Unless the successor *Pathways to Work* strategy delivers systemic reform - particularly in education, training, employment supports and accessing an adequate income - Autistic and Disabled people will remain excluded from the labour market and full participation in society. This would place Ireland in breach of its obligations under Articles 27 and 28 of the UNCRPD.

<sup>&</sup>lt;sup>26</sup> Organisation for Economic Co-operation and Development (OECD), 'Disability, Work and Inclusion in Ireland' (2021), p. 17: <a href="https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf">https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf</a> (accessed 24 Sep 2025).

<sup>&</sup>lt;sup>27</sup> Organisation for Economic Co-operation and Development (OECD), 'Disability, Work and Inclusion in Ireland' (2021), p. 79: https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf (accessed 24 Sep 2025).

<sup>&</sup>lt;sup>28</sup> Organisation for Economic Co-operation and Development (OECD), 'Disability, Work and Inclusion in Ireland' (2021), p. 78: <a href="https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf">https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf</a> (accessed 24 Sep 2025).

<sup>&</sup>lt;sup>29</sup> Organisation for Economic Co-operation and Development (OECD), 'Disability, Work and Inclusion in Ireland' (2021), p. 17: <a href="https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf">https://www.oecd.org/content/dam/oecd/en/publications/reports/2021/09/disability-work-and-inclusion-in-ireland\_c6df4722/74b45baa-en.pdf</a> (accessed 24 Sep 2025).

## The Green Paper on Disability Reform

Since the publication of *Pathways to Work 2021–2025*, one of the Department's key initiatives has been the development of proposals to address disparities in disability social protection payments. One such proposal was a commitment to "develop and consult on a 'strawman' proposal for the restructuring of long-term disability payments to simplify the system and take account of the concerns expressed in the 'Make Work Pay' Report"<sup>30</sup>. In 2023, the Department of Social Protection published proposals to make changes to Disability social protection payments, known as the <u>Green Paper on Disability Reform</u>. The paper included a Strawman proposal to introduce a 3-tier system of disability payments, intended to align supports with levels of assessed need..

The proposals generated considerable debate across Autistic and Disabled communities, disability and anti-poverty organisations, and wider civil society. Discussions focused both on the structure of the proposed system, but also on its potential long-term implications for Autistic and Disabled people and their families.

As part of AslAm's response, we surveyed over 300 community members about the Green Paper proposal and what they would want to change with the social protection system to better support Autistic people and families. We found that:

- 67% of community members did not find that current social protection payments to be appropriate or adequately meet their needs.<sup>31</sup>
- 55% of Autistic people did not feel that the proposed tiers reflected their needs.<sup>32</sup>

<sup>&</sup>lt;sup>30</sup> Department of Social Protection, 'Roadmap for Social Inclusion 2020 - 2025 Ambition, Goals, Commitments', p. 57 <a href="https://assets.gov.ie/static/documents/roadmap-for-social-inclusion-2020-2025-ambition-goals-commitments.pdf">https://assets.gov.ie/static/documents/roadmap-for-social-inclusion-2020-2025-ambition-goals-commitments.pdf</a> (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>31</sup> AslAm Submission to the Department of Social Protection on Disability Income Supports Reform, https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com/6537ebf5bd64fee2cfd5af24/6632576c36769aa351eb2f9e\_AslAm\%20Green\%20Paper\%20Submission.pd}{\text{f (accessed 26 Sep 2025)}}.$ 

<sup>&</sup>lt;sup>32</sup> AslAm Submission to the Department of Social Protection on Disability Income Supports Reform, https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com/6537ebf5bd64fee2cfd5af24/6632576c36769aa351eb2f9e\_AslAm\%20Green\%20Paper\%20Submission.pd}{\underline{f} \text{ (accessed 26 Sep 2025)}}.$ 

 More than 9 in 10 community members did not believe there were sufficient supports in place to help Autistic people who can work and want to work, to access suitable jobs.<sup>33</sup>

Community members also expressed particular concern that support levels were linked primarily to perceived "capacity to work" rather than to actual support needs. This emphasis was seen as particularly problematic given the significant barriers Autistic and Disabled people already face in the labour market. Respondents highlighted structural barriers including inaccessible recruitment processes, workplace harassment and discrimination, as well as the barriers highlighted throughout this submission.

For many, a payment system tied to "capacity to work" risked penalising them for circumstances beyond their control - leaving them without adequate income or supports while still locked out of the labour market.

Our submission also stressed that fears around losing essential supports - such as the Medical Card or secondary benefits – and "poverty traps" remain a major deterrent to seeking employment. The *Pathways to Work Strategy* did not adequately address these concerns, risking further disincentivising work rather than enabling participation.

Finally, we highlighted that the Green Paper proposals failed to take account of the additional costs of disability documented in the *Indecon Cost of Disability Report*, or the urgent need to tackle stigma and discrimination within workplaces and employment services. By focusing narrowly on restructuring payments and assessing "work capacity," had the proposal been implemented, the Green Paper risked reinforcing exclusion from the labour market rather than supporting more Disabled people into employment.

For these reasons, the successor to *Pathways to Work* must avoid repeating the mistakes of the Green Paper. Employment supports for Autistic and Disabled people should not be conditional on narrow assessments of "work capacity" or "functional"

<sup>&</sup>lt;sup>33</sup> AsIAm Submission to the Department of Social Protection on Disability Income Supports Reform, https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com/6537ebf5bd64fee2cfd5af24/6632576c36769aa351eb2f9e\_AslAm\%20Green\%20Paper\%20Submission.pd}{\underline{f} \text{ (accessed 26 Sep 2025)}}.$ 

capacity". Instead, they should focus on addressing structural barriers and be grounded on rights, inclusion, wellbeing and belonging.

The new strategy should build on Ireland's obligations under Articles 27 and 28 of the UNCRPD, emphasising accessible recruitment, retention, training, and reasonable accommodations, while ensuring income supports remain secure and community members receive an adequate income.

A genuine pathway to work cannot be built on the threat of poverty or the withdrawal of essential supports, but must be founded on dignity, choice, and recognition of Autistic and Disabled people's skills, expertise and experiences.

Experiences and Barriers to Employment for Autistic People

AslAm engages regularly with community members on issues relating to employment and social protection. Insights from our most recent *Same Chance Report* paint a mixed picture - some community members are working part-time (11%), full-time (22%), not currently working (17%) or actively looking for work (5%). <sup>34</sup> Concerningly, 70% of people reported receiving no supports or accommodations in the workplace. <sup>35</sup>

Community members highlighted several reasons that explain why they had negative experiences of employment, including:

- Fear of losing key welfare supports such as Free Travel or their Medical Card.
- Managing one or more co-occurring disabilities, conditions, or illnesses.
- Barriers in recruitment processes, such as job applications, interviews, and assessments.
- A lack of jobs that match their skills, interests and qualifications in their community.
- Recovery from illness or burnout, or with mental health difficulties.
- Experiences of workplace discrimination, ill-treatment, or lack of supports.
- Fear of negative consequences following disclosure of being Autistic.
- Limited access to career development and progression opportunities.

These barriers are not just experienced by Autistic people. In the *Roadmap for Social Inclusion*<sup>36</sup>, the Department of Social Protection noted that many Disabled people must navigate a complex web of rules when starting a new job, forcing them to weigh the benefits of employment against the risk of losing vital supports.<sup>37</sup>

<sup>&</sup>lt;sup>34</sup> AsIAm, Same Chance Report 2025, p.44, <a href="https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AsIAm%20">https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AsIAm%20</a>

Same%20Chance%20Report.pdf (accessed 26 Sep 2025).

35 AsIAm Same Chance Report 2025, https://cdn.prod.website-

files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AslAm%20Same%20Chance%20Report.pdf (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>36</sup> Department of Social Protection, 'Roadmap for Social Inclusion 2020 - 2025 Ambition, Goals, Commitments', p. 56 <a href="https://assets.gov.ie/static/documents/roadmap-for-social-inclusion-2020-2025-ambition-goals-commitments.pdf">https://assets.gov.ie/static/documents/roadmap-for-social-inclusion-2020-2025-ambition-goals-commitments.pdf</a> (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>37</sup> Department of Social Protection, 'Roadmap for Social Inclusion 2020 - 2025 Ambition, Goals, Commitments', p. 56 <a href="https://assets.gov.ie/static/documents/roadmap-for-social-inclusion-2020-2025-ambition-goals-commitments.pdf">https://assets.gov.ie/static/documents/roadmap-for-social-inclusion-2020-2025-ambition-goals-commitments.pdf</a> (accessed 26 Sep 2025).

Our Autism in the Workplace Report further highlighted the scale of these barriers:

- 84% of respondents did not feel confident that employers, managers, colleagues and clients knew enough about autism to support them at work<sup>38</sup>.
- We also found that 60% of all Autistic people did not believe or were unsure about whether they have the same chance of career progression as non-autistic employees.<sup>39</sup>

These findings demonstrate the far-reaching consequences of labour market exclusion. Unemployment and underemployment impact not only Autistic people's financial security but also their wellbeing, self-worth, sense of belonging, and ability to live independently. These experiences also reinforce poverty, material deprivation, and poorer mental and physical health outcomes within our community.

In our Submission to the Department of Social Protection on *Disability Income Supports Reform, we* observed:

"barriers in society have created a climate of 'low expectations,' that many Autistic people and Disabled people experience. Many Autistic people and Disabled people experience low confidence and self-esteem because of a lack of opportunities, from experience of a lot of rejection and adversity in life and from not having the same chance to be accepted and included in Irish society, from inaccessible or exclusionary workplaces or working practices." 40

Autistic peoples' experiences in the workplace also deeply affect their wellbeing and identity. When in the right job with the right supports, many Autistic people have positive experiences of employment - providing dignity, identity, financial independence and purpose. However, most describe workplaces where they feel pressured to "mask" or adapt to neurotypical expectations, often without reciprocal flexibility from

<sup>38</sup> AsIAm, Autism in the Workplace, https://cdn.prod.website-

files.com/6537ebfefba7b3c24a18e646/65f201020206226bbd209458\_Autism-in-the-Workplace-Report-New-Logo.pdf (accessed 26 Sep 2025).

<sup>39</sup> AslAm, Autism in the Workplace, https://cdn.prod.website-

files.com/6537ebfefba7b3c24a18e646/65f201020206226bbd209458\_Autism-in-the-Workplace-Report-New-Loqo.pdf (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>40</sup> AslAm, 'AslAm Submission to the Department of Social Protection on Disability Income Supports Reform', p.49, https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com/6537ebf5bd64fee2cfd5af24/6632576c36769aa351eb2f9e\_AslAm\%20Green\%20Paper\%20Submission.pd}{\text{f (accessed 26 Sep 2025)}}.$ 

employers. Many Autistic adults report feeling unsafe to disclose their diagnosis or Autistic identity, fearing discrimination, denial of supports, or being held to unfairly high standards.

Some Autistic adults reported that their requests for reasonable accommodations during job interviews - such as receiving questions in advance - were refused. They were told by prospective employers that they "have to treat everyone equally" or were dismissed because they did not "look" or "seem" Autistic enough to justify the employer putting the support in place.

These experiences show that Autistic adults often deliberate on whether to disclose that they are Autistic at work, and they do not take the decision to disclose or talk about their access needs lightly. Many Autistic people believe that autism continues to be misunderstood by employers who hold medicalised or stigmatising attitudes about autism. This highlights that many Autistic adults feel that employers would not understand what it means to be Autistic, and why accommodations are needed to meet their needs. This further discourages disclosure and access to vital supports or accommodations.

In our most recent 'Autism in the Workplace' Report,

- 96% of Autistic adults felt they would find it more difficult to find the job they want compared with a Neurotypical person.<sup>41</sup>
- 51% of Autistic adults say that they find current supports and reasonable accommodations from their employer are insufficient to meet their needs.<sup>42</sup>
- 20% of Autistic people had requested a reasonable accommodation from an employer.<sup>43</sup>

<sup>&</sup>lt;sup>41</sup> AsIAm, 'Autism in the Workplace', https://cdn.prod.website-

files.com/6537ebfefba7b3c24a18e646/65f201020206226bbd209458\_Autism-in-the-Workplace-Report-New-Logo.pdf (accessed 26 Sep 2025).

<sup>42</sup> AsIAm, 'Autism in the Workplace', https://cdn.prod.website-

files.com/6537ebfefba7b3c24a18e646/65f201020206226bbd209458\_Autism-in-the-Workplace-Report-New-Logo.pdf (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>43</sup> AslAm, 'Autism in the Workplace', https://cdn.prod.website-

files.com/6537ebfefba7b3c24a18e646/65f201020206226bbd209458\_Autism-in-the-Workplace-Report-New-Logo.pdf (accessed 26 Sep 2025).

- 58% of Autistic people believed that requesting reasonable accommodation would hinder their prospects of securing their preferred role.<sup>44</sup>
- With the right supports, 94% of Autistic people believe that they would be an asset to any business or organisation.<sup>45</sup>
- 82% of Autistic adults in employment also said being autistic gives them specific strengths in their current role.<sup>46</sup>

The burden currently falls heavily on Autistic people to research available supports and seek approval from employers, which deters many from requesting accommodations at all.

For these reasons, it is essential that the Department of Social Protection strengthens supports for Autistic and Disabled applicants during recruitment and ensures that the right to reasonable accommodations is enforceable, accessible, and consistently applied.

<sup>44</sup> AsIAm, 'Autism in the Workplace', https://cdn.prod.website-

files.com/6537ebfefba7b3c24a18e646/65f201020206226bbd209458\_Autism-in-the-Workplace-Report-New-Logo.pdf (accessed 26 Sep 2025).

<sup>45</sup> AsIAm, 'Autism in the Workplace', https://cdn.prod.website-

files.com/6537ebfefba7b3c24a18e646/65f201020206226bbd209458\_Autism-in-the-Workplace-Report-New-Logo.pdf (accessed 26 Sep 2025).

<sup>46</sup> AsIAm, 'Autism in the Workplace', https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com}/6537\text{ebfefba7b3c24a18e6}\overline{46/65f201020206226bbd209458\_Autism-in-the-Workplace-Report-New-Logo.pdf}}{\text{Logo.pdf}} (accessed 26 Sep 2025).}$ 

Community Experiences in Dealing with the Department and Employment Services

Autistic people often engage with both the Department of Social Protection and Intreo to access payments such as Jobseeker's Allowance, Illness Benefit, and other supports, as well as to participate in schemes intended to help people move into employment, education, or training. Community members consistently report that their experiences with Intreo play a major role in shaping both their ability to find work and their wider interactions with the social protection system.

Some testimonies from our community include:

"In my experience with Intreo, their career coaches were not understanding of the difficulties Autistic people face when looking for work and the accommodations we might need."<sup>47</sup>

"When it comes to Autistic people, the system needs to take into account the different needs when dealing with the process from start to finish. Face to face meetings, lots of forms and questions to fill out, pressure to fulfil tasks related to the process, these kinds of things are incredibly difficult for Autistic people. It can be the equivalent of asking a wheelchair user to climb steps to enter the social welfare office to have a meeting. This would never happen, yet for Autistic people this is the reality of our social welfare system."<sup>48</sup>

"We cannot work at jobs we are qualified for because of stigma/fear of disclosure. Unfair psychometric tests despite some having 3rd level degrees. Impossible to give a good interview."49

<sup>&</sup>lt;sup>47</sup> AslAm, 'AslAm Submission to the Department of Social Protection on Disability Income Supports Reform', https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com/6537ebf5bd64fee2cfd5af24/6632576c36769aa351eb2f9e\_AslAm\%20Green\%20Paper\%20Submission.pd}{\underline{f} \text{ (accessed 26 Sep 2025)}}.$ 

<sup>&</sup>lt;sup>48</sup> AslAm, 'AslAm Submission to the Department of Social Protection on Disability Income Supports Reform', https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com}/6537\text{ebf5bd64fee2cfd5af24}/6632576\text{c}36769\text{aa}351\text{eb}2\text{f}9\text{e}\_\text{AsIAm}\%20\text{Green}\%20\text{Paper}\%20\text{Submission.pd}}{\text{f}} \ \text{(accessed 26 Sep 2025)}.$ 

<sup>&</sup>lt;sup>49</sup> AsIAm, 'AsIAm Submission to the Department of Social Protection on Disability Income Supports Reform', https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com/6537ebf5bd64fee2cfd5af24/6632576c36769aa351eb2f9e\_AslAm\%20Green\%20Paper\%20Submission.pd}{\text{f (accessed 26 Sep 2025)}}.$ 

"Many workplaces still do not understand Autism or provide reasonable accommodations. I would love to do even a 4-day week in my job, but that's not an option, it's only full time or 50%, with no flexibility."<sup>50</sup>

"If they want more Disabled people to engage in work, then they need to support us to do so with flexible support programs that meet our needs, rather than threatening to withhold our incomes unless we comply. I would love to be working part-time in a position that suits my strengths and weaknesses, but the government's consistent failure to meet my healthcare needs (including mental health care and ADHD care!) has put me in a position where I'm not even able to look after myself, let alone work. They need to recognise the barriers we face and work with us to dismantle them, instead of treating us like an enemy they need to bully into working." <sup>51</sup>

These experiences highlight the urgent need for Universal Design to be embedded in the Department of Social Protection's processes and schemes. Application processes, physical environments, and personal supports must be accessible to everyone, including Autistic people. Autism understanding, disability equality, and inclusive practice must also form a core part of staff training and service delivery, so that interactions with the Department empower rather than exclude Autistic people.

<sup>&</sup>lt;sup>50</sup> AslAm, 'AslAm Submission to the Department of Social Protection on Disability Income Supports Reform', https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com}/6537\text{ebf5bd64fee2cfd5af24}/6632576c36769aa351\text{eb2f9e\_AslAm}\%20Green\%20Paper\%20Submission.pd}{\underline{f} \text{ (accessed 26 Sep 2025)}}.$ 

<sup>&</sup>lt;sup>51</sup> AslAm, 'AslAm Submission to the Department of Social Protection on Disability Income Supports Reform', https://cdn.prod.website-

 $<sup>\</sup>frac{\text{files.com/6537ebf5bd64fee2cfd5af24/6632576c36769aa351eb2f9e\_AslAm\%20Green\%20Paper\%20Submission.pd}{\underline{f} \text{ (accessed 26 Sep 2025)}}.$ 

Promoting Autistic People's Wellbeing and Tackling the Effects of Isolation and Social Exclusion as Barriers to Employment

For many Autistic people, barriers to employment are not only linked to poverty but also to broader barriers of acceptance, participation and wellbeing that shape their experiences of living in society and their community. Gaining employment needs more than just filling a role – it also depends on Autistic people having the right supports in place to feel a sense of belonging, acceptance and encouragement to put themselves forward for opportunities.

Through our engagement with Autistic people and families across Ireland, we see how the barriers to accessible housing, transport, accessible communities, personal supports, and negative past experiences directly restricts people's ability to pursue and sustain work. These barriers cause Autistic people to experience increase feelings of isolation and exclusion, lower self-esteem, lower confidence in meeting their goals and aspirations, and reinforce low expectations for the future.

Reflecting this, AsIAm published a Report exploring Autistic adults' experiences of loneliness, 'We Just Want to be Included', which illustrates how exclusion from the workforce is deeply connected with exclusion from wider society:

- 55% of Autistic adults felt lonely all or most of the time. 52
- 34% felt lonely some of the time. 53
- 40% lived with at home with their parents.<sup>54</sup>
- 69% of Autistic adults felt left out of society.<sup>55</sup>

<sup>&</sup>lt;sup>52</sup> AsIAm, ""We Just Want to be Included": Autistic Adults and Loneliness: A Position Paper', p. 5, https://cdn.prod.website-

files.com/6537ebf5bd64fee2cfd5af24/688c768187834ccea13b9a13\_Ver%204%20We%20Just%20Want%20to%20be%20Included%20-%20%20Autistic%20Adults%20and%20Loneliness%20Booklet.pdf?utm\_campaign=linkinbio&utm\_medium=referral&utm\_source=later-linkinbio (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>53</sup> AslAm, "We Just Want to be Included": Autistic Adults and Loneliness: A Position Paper', p. 5, https://cdn.prod.website-

files.com/6537ebf5bd64fee2cfd5af24/688c768187834ccea13b9a13\_Ver%204%20We%20Just%20Want%20to%20be%20Included%20-%20%20Autistic%20Adults%20and%20Loneliness%20Booklet.pdf?utm\_campaign=linkinbio&utm\_medium=referral&utm\_source=later-linkinbio (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>54</sup> AsIAm, ""We Just Want to be Included": Autistic Adults and Loneliness: A Position Paper', p. 5, https://cdn.prod.website-

 $<sup>\</sup>label{lem:com/6537ebf5bd64fee2cfd5af24/688c768187834ccea13b9a13_Ver%204%20We%20Just%20Want%20to%20be%20Included%20-%20%20Autistic%20Adults%20and%20Loneliness%20Booklet.pdf?utm_campaign=linkinbio&utm_medium=referral&utm_source=later-linkinbio (accessed 29 Sep 2025).}$ 

<sup>&</sup>lt;sup>55</sup> AslAm, "We Just Want to be Included": Autistic Adults and Loneliness: A Position Paper', p. 5, https://cdn.prod.website-

- 63% of respondents said that there were no activities in their area that matched their interests.<sup>56</sup>
- 87% of respondents said that being Autistic is a barrier to forming friendships.<sup>57</sup>
- 95% of respondents believe that being Autistic was a driving force to feeling lonely.<sup>58</sup>

These findings highlight the intrinsic link between barriers to employment and barriers to wellbeing, belonging, and community. For many people, work is not only a source of income but also of identity, social connection and belonging. Many people form friendships and social connections in the workplace and use these connections throughout their lives.<sup>59</sup>

The World Health Organization has identified loneliness as a major public health concern in a recent Report, and warning of its harmful effects both on individuals and with the wider social fabric.<sup>60</sup> The European Commission has highlighted that Ireland ranks as the loneliest country in the EU, with over one in five adults experiencing loneliness and social exclusion.<sup>61</sup>

files.com/6537ebf5bd64fee2cfd5af24/688c768187834ccea13b9a13\_Ver%204%20We%20Just%20Want%20to%20be%20Included%20-%20%20Autistic%20Adults%20and%20Loneliness%20Booklet.pdf?utm\_campaign=linkinbio&utm\_medium=referral&utm\_source=later-linkinbio (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>56</sup> AsIAm, ""We Just Want to be Included": Autistic Adults and Loneliness: A Position Paper', p. 5, https://cdn.prod.website-

files.com/6537ebf5bd64fee2cfd5af24/688c768187834ccea13b9a13\_Ver%204%20We%20Just%20Want%20to%20be%20Included%20-%20%20Autistic%20Adults%20and%20Loneliness%20Booklet.pdf?utm\_campaign=linkinbio&utm\_medium=referral&utm\_source=later-linkinbio (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>57</sup> AsIAm, ""We Just Want to be Included": Autistic Adults and Loneliness: A Position Paper', p. 5, https://cdn.prod.website-

files.com/6537ebf5bd64fee2cfd5af24/688c768187834ccea13b9a13\_Ver%204%20We%20Just%20Want%20to%20be%20Included%20-%20%20Autistic%20Adults%20and%20Loneliness%20Booklet.pdf?utm\_campaign=linkinbio&utm\_medium=referral&utm\_source=later-linkinbio (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>58</sup> AsIAm, ""We Just Want to be Included": Autistic Adults and Loneliness: A Position Paper', p. 5, https://cdn.prod.website-

files.com/6537ebf5bd64fee2cfd5af24/688c768187834ccea13b9a13\_Ver%204%20We%20Just%20Want%20to%20be%20Included%20-%20%20Adults%20Adults%20and%20Loneliness%20Booklet.pdf?utm\_campaign=linkinbio&utm\_medium=referral&utm\_source=later-linkinbio (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>59</sup> AslAm, "We Just Want to be Included": Autistic Adults and Loneliness: A Position Paper', <a href="https://cdn.prod.website-files.com/6537ebf5bd64fee2cfd5af24/688c768187834ccea13b9a13\_ver%204%20We%20Just%20Want%20to%20be%20Included%20-%20%20Autistic%20Adults%20and%20Loneliness%20Booklet.pdf?utm\_campaign=linkinbio&utm\_medium=referral&utm\_source=later-linkinbio (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>60</sup> World Health Organization, 'From Loneliness to Social Connection: Charting a Path to Better Societies', Report of the WHO Commission on Social Connection (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>61</sup> European Commission, 'Loneliness prevalence in the EU', <u>Loneliness prevalence in the EU - European Commission</u> (accessed 26 Sep 2025).

Addressing the disability employment gap, therefore, cannot be achieved through labour market activation measures alone. Policies must also support Autistic people and Disabled people's wellbeing and address the structural barriers they face in education, housing, transport, community participation, independent living, health, mental health supports, and participation in the community. Without these foundations, Autistic people and Disabled people will remain locked out of employment – not because of laziness, lack of motivation or lack of ability to find a job, but because the essential supports and conditions to get a job and thrive in work are not in place.

Inconsistencies in Disability Assessments and their Impact in Accessing Disability Supports

AsIAm finds that the Department of Social Protection's current approach to disability assessments often produces inconsistent outcomes, leading to inequities in determining who qualifies for supports. Eligibility for disability-related social protection payments frequently depends on "functioning labels" assigned to Autistic people, labels that are applied without meaningful input from the individual or a full appreciation of their lived experiences.

Our engagement with the Autistic community reveals that the process of applying for supports is frequently intrusive, distressing, and undignified. Applicants often feel burdened with the responsibility of proving the extent of their disability or neurodivergence, disclosing highly sensitive information, and recounting traumatic experiences simply to establish eligibility.

Community members have shared stories with us of feeling upset, humiliated or distressed throughout the application and appeals process. Many felt that they were not treated with dignity, but with suspicion at every stage. Community members also described how being required to disclose deeply sensitive personal information or recount traumatic experiences to show eligibility was retraumatising, making an already difficult process even more stressful.

Community members' experiences clearly show that applying for disability-related welfare supports causes significant anxiety and hardship. Many Autistic people and families tell us that they feel misunderstood and demonised by a system that should instead support and empower them.

Assessments also rarely account for Autistic people's diverse support needs, such as communication differences, sensory processing differences, or different ways of processing information - which we highlight in our <u>Guide for Newly Diagnosed Autistic Adults</u>. As a result, many Autistic applicants and families struggle to meet the Department's rigid requirements, which are often not adapted to their access needs.

This approach fails to consider evolving attitudes towards Disability and neurodiversity following Ireland's ratification of the UNCRPD. This does not comply with Article 28 of the UNCRPD, and as a result, many Autistic and Disabled people are excluded from support because their access needs fall outside rigid 'functioning labels' which may not reflect their everyday lived experiences.

The European Disability Forum (EDF) underscores these concerns in its Report on social protection across the European Union. The Report is critical of how Disability allowance and other payments barely cover the costs of living as an Autistic or Disabled person, and that losing these supports means that they are still experiencing poverty even if they are working, since their living costs are considerably higher than a non-Disabled person. It also highlights the flawed assumption underpinning many systems – including Ireland's – that once a person earns above a certain threshold, they should bear the additional costs of disability themselves, regardless of the level of support they require.

#### The EDF states:

"The challenges associated with disability assessment are numerous. To begin with, the process can be lengthy and arduous and, in some cases, undignified. The methods used can also be restrictive and fail to consider the true barriers people face in their daily lives as persons with disabilities. An assessment that does not truly consider the societal barriers the person with disabilities faces, combined with what are often restrictive social protection budgets foreseen for persons with disabilities, result in many persons with disabilities not getting the support they need after being assessed as having a disability.

We also see particular difficulties for persons with "hidden" or "invisible" disabilities who can be misdiagnosed on not diagnosed at all, meaning they lose all entitlement to the support and services they require. Women are also more likely than men to have a disability or a condition misdiagnosed or left undiagnosed"<sup>62</sup>

<sup>&</sup>lt;sup>62</sup> European Disability Forum, 'Social Protection and the Welfare State: What the EU can do to Support Persons with Disabilities', 2022, p. 12. <u>Social-Protection-for-Persons-with-Disabilities.pdf</u> (accessed 29 Sep 2025).

The EDF have therefore called on the European Union to establish a <u>Disability</u> <u>Employment and Skills Guarantee</u>. This would offer financial and practical supports to ensure equal access to mainstream education, training, and employment opportunities, including self-employment and entrepreneurship.<sup>63</sup> This Guarantee should:

- Make every training and skills programme fully inclusive and accessible;<sup>64</sup>
- Ensure Disabled people can retain disability payments when accessing work, training, or education;<sup>65</sup>
- Provide funding for reasonable accommodations;<sup>66</sup>
- Remove age restrictions on accessing supports.<sup>67</sup>

These reforms are vital if Ireland is to develop a system that recognises real support needs, dismantles barriers, and meets its obligations under the UNCRPD.

<sup>&</sup>lt;sup>63</sup> European Disability Forum, 'Updated Disability Rights Strategy', <u>Updated EU Disability Rights Strategy - European</u> Disability Forum (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>64</sup> uropean Disability Forum, 'Updated Disability Rights Strategy', <u>Updated EU Disability Rights Strategy - European Disability Forum</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>65</sup> European Disability Forum, 'Updated Disability Rights Strategy', <u>Updated EU Disability Rights Strategy - European</u> Disability Forum (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>66</sup> European Disability Forum, 'Updated Disability Rights Strategy', <u>Updated EU Disability Rights Strategy - European</u> Disability Forum (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>67</sup> European Disability Forum, 'Updated Disability Rights Strategy', <u>Updated EU Disability Rights Strategy - European Disability Forum</u> (accessed 29 Sep 2025).

Self-Employment as a Way of Unlocking Opportunity for Autistic People

For some Autistic people, self-employment offers a more sustainable and fulfilling route into the labour market. It allows Autistic people to work on their own terms, set flexible working hours, and create a workspace and working style that meets their sensory or access needs. Self-employment can also remove barriers often encountered in traditional workplaces - such as navigating workplace politics or negative work environments or cultures - while allowing Autistic people to work in areas aligned with their skills and interests.

Despite this potential, very few supports exist for Disabled entrepreneurs. Local Enterprise Offices (LEOs) rarely provide tailored or consistent supports for disabled entrepreneurs looking to start their own business or social enterprise. The absence of a dedicated national infrastructure leaves many aspiring entrepreneurs without the practical or financial supports they need to succeed with their venture.

This gap is particularly stark in a country that promotes itself as business-friendly and innovation-driven. The lack of inclusive enterprise supports reflects not only underfunding but also limitations in the ability of LEOs to make entrepreneurship genuinely accessible. Disabled and Autistic entrepreneurs also face additional barriers, such as inaccessible or overly complex grant application processes and bureaucratic obstacles in accessing start-up supports.

While the Pathways to Work Strategy set a goal of supporting 4,200 new entrepreneurs by 2025, this commitment did not specifically extend to Disabled entrepreneurs. The successor strategy must address this omission by embedding accessibility and inclusion in all enterprise supports. This should include:

- Dedicated programmes within LEOs to support Disabled and Autistic entrepreneurs.
- Simplified and accessible grant and application processes.
- National funding streams for inclusive entrepreneurship.
- Ongoing mentoring and training tailored to Disabled business owners.

Public Attitudes and the Role of Social Protection as a "Social Safety Net"

A key challenge for the Department in developing the next *Pathways to Work Strategy* is to address the pervasive negative stereotypes about Disabled people receiving social protection payments and shifting wider public attitudes towards social protection as a public service and a vital *'social safety net'*. Social protection is a lifeline and vital source of income for many Autistic people and families and should be valued in the same way as other public services such as health or education.

Many Autistic people who are unable to access employment but are deemed "fit to work" do not qualify for Disability Allowance. Instead, they must rely on Jobseeker's payments, despite facing significant structural barriers to both employment and engagement with employment services. Community members consistently report feeling pressured to accept unsuitable jobs or enrol in training courses simply to retain their payments. Others find the application process itself arduous, complex, and inaccessible. As we highlighted in our submission on the Green Paper, this assessment process is out of step with a rights-based, neuro-affirmative approach consistent with Article 28 of the UNCRPD. Its rigidity denies many Autistic people the supports they need to pursue work on an equal basis with others.

Gaps in autism acceptance and understanding in society continue to pose significant barriers to Autistic people accessing employment. In our *Same Chance Report 2025*<sup>68</sup>, we surveyed a representative sample of the Irish public using anonymised case studies of Autistic people. When presented with the story of "Ben" - a young Autistic man interviewing for a retail position – 2 in 5 members of the public surveyed found essential accommodations (such as communication preferences or flexible hours) as "unreasonable". Furthermore, 39% said they would be unlikely to hire Ben having heard a description of his communication differences during the interview. These findings underscore the urgent need to improve public awareness and acceptance if Autistic people are to thrive in the workplace.

<sup>&</sup>lt;sup>68</sup> AsIAm, 'Annual Same Chance Report and Attitudes to Autism Poll 2025', p. 55-60, <a href="https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AsIAm%20Same%20Chance%20Report.pdf">https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AsIAm%20Same%20Chance%20Report.pdf</a> (accessed 26 Sep 2025).

Stigma and misinformation about autism more broadly remain major barriers to inclusion. Our most recent *Same Chance Report* found that 92% of Autistic adults found that misinformation about autism has increased over the past 12 months. <sup>69</sup> Community members expressed concern that autism is still portrayed through negative stereotypes and that there is little representation of Autistic people across different industries and roles.

For these reasons, the Department of Social Protection should take a neuro-affirmative approach to disability assessment - one which recognises the diversity of Autistic people's needs and ensures equitable access to payments and supports. Such an approach would not only align with Ireland's obligations under the UNCRPD but would also help to challenge harmful stereotypes foster public understanding and reframe social protection as a system that enables dignity, equality, and inclusion.

<sup>&</sup>lt;sup>69</sup> AslAm. 'Same Chance Report 2025, <a href="https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AslAm%20">https://cdn.prod.website-files.com/6537ebfefba7b3c24a18e646/67e572276f39ff1d6d830135\_Version%203%20Digital%20Full%20AslAm%20</a> Same%20Chance%20Report.pdf (accessed 26 Sep 2025).

## AsIAm Employment & Post-18 Transitions Programme

AsIAm's *Employment & Post-18 Transitions* programme provides a concrete example of what inclusive, autism-affirming employment supports look like in practice. The programme empowers Autistic jobseekers while equipping employers to build accessible, supportive workplaces. This programme includes:

- Employment Groups & 1:1 Career Coaching: Small group sessions focused on job searching, CV and application writing, interview skills, and workplace advocacy. These sessions build participants' confidence and strengthen their career skills.
- 1-to-1 Career Clinics: Tailored sessions to support CVs, mock interviews, and applications, ensuring personalised guidance based on each Autistic person's individual strengths and support needs.
- Employer Education & Partnerships: AslAm runs Employment Partnership
   Programmes which help organisations engage with the Autistic experience
   across the full employee lifecycle: recruitment, onboarding, communication,
   reasonable accommodations, and line management support. Employers who
   sign up can also join AslAm's Communities of Practice, which provide ongoing
   learning and improved recruitment and retention practices.
- Job Vacancies with Inclusive Employers: AslAm advertises opportunities from partner companies that have undertaken or are completing AslAm's employer training. This connects Autistic jobseekers with supportive employers who are more likely to understand and meet their needs.

This programme offers a model of best practice that the next Pathways to Work Strategy should build upon. It represents a community-led, neuro-affirmative, personcentred approach - focusing on strengths, supports, and accommodations rather than assessing Autistic people solely on their "capacity to work." Employers involved in the programme report greater awareness and commitment, while partnerships and the Communities of Practice initiative help businesses shift organisational culture and change attitudes to autism.

Nationally extending access would ensure that more Autistic jobseekers receive personalised, strengths-based support, while more employers are equipped to create inclusive workplaces and retain Autistic employees. This would:

- Reduce unemployment and underemployment among Autistic people.
- Increase employer confidence in inclusive recruitment and retention.
- Provide a replicable, community-driven model for supporting marginalised groups into sustainable employment.

The successor to *Pathways to Work* should recognise and resource this and similar models of inclusive, community-driven employment programmes, embedding their principles into national policy and practice.

### The Roadmap for Autism and Employment

In September, AslAm, in partnership with the employers' organisation IBEC, published the *Roadmap for Autism and Employment*, setting out a coordinated vision for addressing structural barriers that Autistic people face in accessing and remaining in employment.<sup>70</sup> The *Roadmap* is "a collaborative initiative outlining practical steps for government and business to help reduce systemic barriers and support greater workforce inclusion for Autistic people."<sup>71</sup>

The Roadmap identifies persistent barriers to employment<sup>72</sup>, including:

- Inaccessible recruitment processes.<sup>73</sup>
- The absence of autism-specific supports, such as job coaching.<sup>74</sup>
- Fears around disclosure and the potential loss of benefits.<sup>75</sup>
- Lack of employer awareness and training.<sup>76</sup>
- The need to reapply for the same supports when changing roles.<sup>77</sup>
- Limited understanding of reasonable accommodations.<sup>78</sup>
- Exclusionary language in job applications.<sup>79</sup>
- Restricted access to in-person supports for navigating workplace relationships.<sup>80</sup>
- Sensory processing barriers (e.g. lighting, noise, smells, or dress codes).81

<sup>&</sup>lt;sup>70</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>71</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>72</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>73</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>74</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>75</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>76</sup> AslAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>77</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>78</sup> AslAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>79</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>80</sup> AsIAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>81</sup> AslAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

Rigid work practices that make many workplaces inaccessible.<sup>82</sup>

To address these barriers, the *Roadmap for Autism and Employment* make several recommendations including:

- Expanding workplace supports for Autistic adults.<sup>83</sup>
- Developing in-work supports and supported employment programmes;<sup>84</sup>
- Increasing employer awareness and understanding of autism, particularly for HR professionals, recruiters and management.<sup>85</sup>
- Developing inclusive recruitment strategies.<sup>86</sup>
- Creating more accessible, neuro-affirmative work environments and workplace cultures.<sup>87</sup>
- Investing in accessible work placement programmes.<sup>88</sup>

Embedding the principles of the *Roadmap for Autism and Employment* into the next *Pathways to Work Strategy* would ensure that Autistic people are not only supported to access employment but also empowered to thrive in their careers. This requires addressing both structural and attitudinal barriers, scaling up Autism-specific supports, and embedding accessible recruitment practices.

Crucially, it also calls for a more holistic approach that recognises the wider social and economic costs of unemployment - ensuring that Autistic people can enter and remain in the workforce and participate fully in community life on an equal basis with others.

<sup>&</sup>lt;sup>82</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>83</sup> AslAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>84</sup> AslAm, 'Roadmap for Autism and Employment', <u>68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>85</sup> AslAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>86</sup> AslAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>87</sup> AslAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>88</sup> AslAm, 'Roadmap for Autism and Employment', 68c12f8b2f424710573a5e44\_Roadmap for Autism and Employment.pdf (accessed 29 Sep 2025).

AsIAm-Insurance Ireland Autism Accessible Employer Charter

In 2025, AslAm partnered with Insurance Ireland, the representative body for the Insurance industry, to launch the <u>Autism Accessible Employer Charter</u> - an industry-wide pledge to remove barriers to the recruitment, retention and promotion of Autistic employees and candidates. Through the Charter commits participating companies to implementing autism-friendly recruitment practices, developing a life course approach to inclusion and participation, and monitoring progress on recruitment and career progression of Autistic people.

Organisations signing up to the Charter receive dedicated support through AslAm's Employment Programme, which helps organisations audit and redesign policies and practices across onboarding, management, and staff retention. To lower financial barriers, the initiative also provides grant funding of up to 90% of training costs for qualifying companies.

This initiative demonstrates how sectors can take a proactive, structured approach to recruiting and supporting Autistic people. Crucially, it provides a model that could be scaled across other industries, government departments, and public bodies, helping them meet recruitment and inclusion targets for Autistic and Disabled people.

Offering support for industries and organisations to develop similar commitments within the next *Pathways to Work Strategy*, would encourage sectoral leadership and accountability, and practical support to employers relevant to their industry. This can also drive inclusive recruitment, ensure effective workplace accommodations, and foster long-term cultural change across government, public bodies, and industry.

Programme for Government Commitments on Disability and Social Protection

The *Programme for Government*, published in January 2025, includes several welcome commitments around social protection, including a pledge to fully abolish the means test for Carers Allowance. This has been a long-standing call of AslAm and other organisations within the disability sector. Family Carers Ireland estimate that carers contribute over €20 billion in value annually to the State.<sup>89</sup> Recognising and meaningfully supporting their vital work through such actions is a significant step forward.

Other key commitments by the Government include:

- Introduce a permanent annual Cost of Disability Payment, with plans to incrementally increase this payment in line with inflation and living costs.<sup>90</sup>
- Reform the Disability Allowance Payment and remove anomalies in the current means test for the payment.<sup>91</sup>
- Progressively increase weekly Disability Payments and the Domiciliary Care
   Allowance to meet rises in inflation and living costs.<sup>92</sup>
- Review the minimum hours requirement under the Wage Subsidy Scheme for people with disabilities and examine an increase to the payment rate.<sup>93</sup>
- Expand and build on successful programmes like WorkAbility, Employability, and the new Work and Access Programme to support Disabled people into employment.<sup>94</sup>

<sup>&</sup>lt;sup>89</sup> Family Carers Ireland, <a href="https://www.familycarers.ie/about-us/family-caring-in-ireland/caring-by-numbers">https://www.familycarers.ie/about-us/family-caring-in-ireland/caring-by-numbers</a> (accessed 26 Sep 2025).

<sup>&</sup>lt;sup>90</sup> 'Programme for Government 2025 - Securing Ireland's Future',

https://assets.gov.ie/static/documents/programme-for-government-securing-irelands-future.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>91</sup> 'Programme for Government 2025 - Securing Ireland's Future', <a href="https://assets.gov.ie/static/documents/programme-for-government-securing-irelands-future.pdf">https://assets.gov.ie/static/documents/programme-for-government-securing-irelands-future.pdf</a> (accessed 29 Sep 2025).

<sup>92 &#</sup>x27;Programme for Government 2025 - Securing Ireland's Future',

https://assets.gov.ie/static/documents/programme-for-government-securing-irelands-future.pdf (accessed 29 Sep 2025)

<sup>93 &#</sup>x27;Programme for Government 2025 - Securing Ireland's Future',

https://assets.gov.ie/static/documents/programme-for-government-securing-irelands-future.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>94</sup> 'Programme for Government 2025 - Securing Ireland's Future',

https://assets.gov.ie/static/documents/programme-for-government-securing-irelands-future.pdf (accessed 29 Sep 2025).

- Examine the 'ability to work' criteria for certain payments and ensure that
  ongoing medical assessments are not carried out in respect of people with
  lifelong conditions that are not going to change.
- Protect the Free Travel Pass and examine extending it to children in receipt of Domiciliary Care Allowance.<sup>95</sup>
- Promote training initiatives to raise awareness and the understanding of disabilities amongst Intreo staff.<sup>96</sup>

<sup>95 &#</sup>x27;Programme for Government 2025 - Securing Ireland's Future',

https://assets.gov.ie/static/documents/programme-for-government-securing-irelands-future.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>96</sup> 'Programme for Government 2025 - Securing Ireland's Future', https://assets.gov.ie/static/documents/programme-for-government-securing-irelands-future.pdf (accessed 29 Sep 2025).

## Commitments under the Autism Innovation Strategy

In 2024, the Government introduced the <u>Autism Innovation Strategy</u> a coordinated framework designed to improve access to services and supports for Autistic people and families. The Strategy spans 18 months and contains 83 actions, with five specific commitments falling under the remit of the Department of Social Protection:

- Accessible MyWelfare Applications: The Department will consult Autistic and other Disabled users to ensure that digitalised applications for disability schemes on MyWelfare are accessible and user-friendly.<sup>97</sup>
- Up-to-Date Information on Services and Supports: The Department will
  ensure that accurate and relevant information for Autistic people is available on
  citizensinformation.ie and in the Guide to Entitlements for People with Disabilities,
  including links to assistive technology and other services hosted on public sector
  sites.<sup>98</sup>
- Review of Disability Awareness Training at Intreo: Disability awareness
  training for Intreo staff will be reviewed to ensure staff are equipped to support
  Autistic and Disabled people in accessing employment opportunities and
  addressing barriers.<sup>99</sup>
- Sensory-Friendly Intreo Environments: By the end of the first quarter of 2025, every Intreo office will have a quiet room available to support Autistic people and those with sensory processing differences.<sup>100</sup>

Other cross-departmental commitments within the *Autism Innovation Strategy* are also highly relevant to employment and social protection, including:

 The National Disability Authority will review existing resources on making workplaces more accessible to Autistic people, identify gaps in available

<sup>&</sup>lt;sup>97</sup> Department of Children, Equality, Disability, Integration and Youth, 'Autism Innovation Strategy', <u>autism-innovation-strategy-august-2024.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>98</sup> Department of Children, Equality, Disability, Integration and Youth, 'Autism Innovation Strategy', <u>autism-innovation-strategy-august-2024.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>99</sup> Department of Children, Equality, Disability, Integration and Youth, 'Autism Innovation Strategy', <u>autism-innovation-strategy-august-2024.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>100</sup> Department of Children, Equality, Disability, Integration and Youth, 'Autism Innovation Strategy', <u>autism-innovation-strategy-august-2024.pdf</u> (accessed 29 Sep 2025).

information, and provide guidance on supporting people with sensory processing differences in open-plan offices.<sup>101</sup>

- The Public Appointments Service will gather equality data to inform recruitment practices and increase applications from Autistic and Disabled candidates, particularly within the public service.<sup>102</sup>
- The Department of Public Expenditure, NDP Delivery and Reform will consider the needs of Autistic staff in its review of disability inclusion policies and procedures and will also collect data on reasonable accommodation requests from Autistic and Disabled candidates.<sup>103</sup>

<sup>&</sup>lt;sup>101</sup> Department of Children, Equality, Disability, Integration and Youth, 'Autism Innovation Strategy', <u>autism-innovation-strategy-august-2024.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>102</sup> Department of Children, Equality, Disability, Integration and Youth, 'Autism Innovation Strategy', <u>autism-innovation-strategy-august-2024.pdf</u> (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>103</sup> Department of Children, Equality, Disability, Integration and Youth, 'Autism Innovation Strategy', <u>autism-innovation-strategy-august-2024.pdf</u> (accessed 29 Sep 2025).

Commitments under the National Human Rights Strategy for Disabled People 2025-2030

In September 2025, the Government, under the Department of Children, Equality and Disability published the *National Human Rights Strategy for Disabled People 2025–2030*. This is the first national disability strategy developed since Ireland ratified the UNCRPD in 2018, and the Optional Protocol in 2024. It represents a paradigm shift in Irish disability policy, not only because of its rights-based framework, but also because it was co-designed with direct input from Disabled people, reflecting values of equality, participation, and choice.<sup>104</sup>

The Strategy also recognises Disabled people as rights holders rather than as objects of welfare or charity. It sets out priority actions for all Government Departments and many State agencies Strategy's five pillars: inclusive education, employment, independent living and community participation, health and wellbeing, and transport and mobility.<sup>105</sup>

Importantly, the Strategy makes explicit commitments to Autistic people, including supporting the Autism Innovation Strategy and placing a future National Autism Strategy on a statutory footing.

Under the *Employment* pillar, the Strategy commits to:

- Maximise opportunities for Disabled people to secure work across the civil and public service.<sup>106</sup>
- Promote the recruitment and career progression of Disabled people in the private sector, supported by targeted awareness campaigns, mentoring, and recruitment practices which support their access and participation.<sup>107</sup>

<sup>&</sup>lt;sup>104</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>105</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>106</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', <a href="https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0">https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0</a>
9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>107</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

- Provide the right supports at the right time, including double the number of
  Disability Employment Advisors in Intreo offices, expand the Wage Subsidy
  Scheme, review anomalies in Disability Allowance and secondary benefits (i.e.
  Free Travel, Medical Card), and make it easier for people to access supports
  again if employment ends.<sup>108</sup>
- Embed accessibility and inclusion in entrepreneurship supports, ensuring Local
   Enterprise Offices make their training and support opportunities more accessible
   in consultation with Disabled Persons' Organisations.<sup>109</sup>

Specifically under the Employment pillar, the Strategy makes commitments to "maximise opportunities and access for disabled people to get meaningful work in the civil and public sector"<sup>110</sup>, to "actively promote the hiring and career advancement of disabled people across the private sector" and "provide the right supports at the right time for disabled people to access work or return to work". <sup>111</sup>

The Strategy acknowledges the strong link between poverty, deprivation, and the barriers Disabled people face in accessing and sustaining employment. It recognises that Disabled people are less likely to be employed than their non-disabled peers, and that many are deterred from taking up work due to employer misconceptions of what Disabled people can do or the risk of losing essential social protection supports such as the Medical Card or secondary benefits.<sup>112</sup>

The *Pathways to Work 2021–2025* strategy identified priority areas for increasing labour market participation, including activation supports, employer engagement, entrepreneurship, and targeted measures for groups most distant from the labour

<sup>&</sup>lt;sup>108</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', <a href="https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0">https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0</a>
<a href="https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0">https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0</a>
<a href="https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0">https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0</a>

<sup>&</sup>lt;sup>110</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>111</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>112</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

market. The *National Human Rights Strategy for Disabled People 2025–2030* builds on this progress by placing obligations on the State that align directly with these priorities and Ireland's commitments under Articles 27 and 28 of the UNCRPD. <sup>113</sup>This includes:

- Review and enhance disability inclusion policies in the civil service.
- Expand work placement opportunities with mentoring support and develop clear pathways to permanent roles within the Civil Service.<sup>115</sup>
- Promote inclusion with the development of innovative recruitment, assessment and assignment practices.<sup>116</sup>
- o Enforce the 6% minimum recruitment public sector target for Disabled people. 117
- Review the minimum hours requirement under the Wage Subsidy Scheme for disabled people and examine an increase to the payment rate.<sup>118</sup>
- Set up a ministerial-led forum, in partnership with disability organisations including Disabled Persons' Organisations, to raise awareness of supports and discuss issues related to the employment of disabled people.<sup>119</sup>
- Promote inclusion and accessibility in entrepreneurship through the Local Enterprise Offices.<sup>120</sup>

<sup>&</sup>lt;sup>13</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>114</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>116</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>117</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>118</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

<sup>&</sup>lt;sup>119</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', <a href="https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0">https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0</a>
9.25.pdf (accessed 29 Sep 2025).

- Reform the Disability Allowance Payment and remove anomalies in the means test.<sup>121</sup>
- Review the retention of secondary benefits where disabled people take up employment and move off a Department of Social Protection payment.<sup>122</sup>

The commitments set out in the *National Human Rights Strategy for Disabled People* 2025–2030 provide a roadmap for addressing barriers to accessing employment that Disabled people experience. It reframes access to employment as more than "getting a job" - it is about ensuring that Disabled people can thrive in work, access career progression, and be valued for their contributions.

The effectiveness of these commitments will depend on adequate resourcing, effective monitoring, and accountability. Initiatives such as the 6% public sector recruitment target, have struggled with inconsistent enforcement, while programmes like the Wage Subsidy Scheme have been underutilised due to restrictive criteria and lack of employer awareness about the Scheme. Without strong political will, ringfenced funding, and ongoing consultation with Disabled Persons' Organisations, there is a real risk that these commitments will remain aspirational.

Integrating the actions from this Strategy into the successor to *Pathways to Work* provides an opportunity not only to meet Ireland's obligations under the UNCRPD, make progress on closing Ireland's disability employment gap, embed a rights-based approach to employment, and ensure that Autistic and Disabled people can access meaningful, sustainable work on an equal basis with others.

<sup>&</sup>lt;sup>121</sup> Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

Department of Children, Equality and Disability, 'National Human Rights Strategy for Disabled People 2025 - 2030', https://assets.gov.ie/static/documents/33a36e70/National\_Human\_Rights\_Strategy\_for\_Disabled\_People\_WEB\_04.0 9.25.pdf (accessed 29 Sep 2025).

# Recommendations for the Next Pathways to Work Strategy

AsIAm proposes the following recommendations for the Department of Social Protection to include in the successor to the *Pathways to Work Strategy* and in the development of future social protection policies:

## Embed a Rights-Based Approach

- Ensure all reforms are underpinned by the UNCRPD, with neuro-affirmative, person-centred assessments, particularly its provisions on employment and social protection.
- Replace the current "capacity to work" model with person-centred, neuroaffirmative assessments that reflect the diversity of Autistic and Disabled experiences.
- Guarantee accessible processes (Plain English, Easy-to-Read, ISL, digital and non-digital formats)
- Involve Autistic and Disabled people through their DPOs in the design, delivery, and monitoring of all reforms.

#### Reform Disability Payments and Supports

- Abolish means testing for key disability welfare payments, including Carers
   Allowance and Disability Allowance.
- Introduce a universal, non-means-tested Cost of Disability Payment that reflects the additional costs of disability.
- Increase core social protection payments (Disability Allowance, DCA, and Carer's Allowance) in line with inflation, cost of living, and wage growth.

#### **Employment Quotas and Targets**

- Review and strengthen the Government's 6% public sector hiring quota for Disabled people, increasing it to reflect the growth of the disability population in Census 2022.
- Gradually extend targets to the private sector, with supports for the Community and Voluntary sector to recruit more Autistic and Disabled people.

## **Expand Personalised Employment Supports**

- Increase the number of Disability Employment Advisors and introduce Access
   Officers in Intreo offices.
- Introduce a Personalised Budget Scheme, in partnership with the HSE, to give Autistic and Disabled people more autonomy and flexibility over any supports they need or access.

## **Evidence and Access to Supports**

- Accept a wider range of evidence when applying for disability supports, recognising that not every Disabled person has equal access to assessments. This should include doctor's letters, psychologist's reports, summaries of reports, or other relevant documentation, including evidence of being in the process of pursuing a diagnosis.
- Ensure Autistic and Disabled people can access accommodations at work regardless of formal diagnosis or support needs.

# **Employer Training and Supports**

 Provide flexible, accessible funding for employers - particularly SMEs - to access disability equality and neurodiversity training from DPOs and disability-led organisations.

## Safeguard Secondary Benefits

 Extend retention periods of key secondary supports, such as the Medical Card and Free Travel, when Disabled people enter employment. This would reduce the fear of loss of entitlements from taking up work.

#### Support for Disabled Entrepreneurs

- Develop coordinated support structures within Local Enterprise Offices and
   Intreo to provide timely, accessible financial support for Disabled entrepreneurs.
- Increase funding for self-employment opportunities and create bespoke funding mechanisms. Ensure all grants follow Universal Design principles and are fully accessible.

### Inclusion of Employed Disabled People

Ensure Autistic and Disabled employees can access the Cost of Disability
Payment. Many face additional financial and opportunity costs related to their
disability or difference, which impact quality of life, and should not be excluded
simply because they are in employment.

## Continuity of Supports

- Establish a cross-education and employment support system that allows
   Disabled and Autistic people to register at any stage of their education or career,
   ensuring continuity of supports during transitions.
- Supports should be:
  - Transferable between roles and workplaces.
  - Adjustable at the point of need.
  - Accessible through multiple application routes.

## Accessible Information for Employers and Employees

 Develop a national portal, modelled on the US Job Accommodation Network, with clear, accessible guidance for employers and employees on workplace accommodations.

## Disability Assessment Reform

- Adopt a holistic, neuro-affirmative approach to disability assessment, based on the Social Model of Disability and the UNCRPD. Assessments should:
  - Consider individual capacity, support needs, and societal barriers.
  - Avoid over-reliance on medicalised or behaviourist approaches.
  - Involve Autistic and Disabled people directly throughout the process.
     Ensure DPOs and disability-led organisations are co-producers of all reforms.

### Flexible and Person-Centred Supports

- Recognise the diversity of Autistic experiences and avoid one-size-fits-all approaches. Reasonable accommodations should be flexible, adaptable, and responsive to individual needs.
- Appoint Access/Liaison Officers to support employees in identifying and maintaining accommodations.

### Accessible Application Processes

- Ensure all application processes are person-centred and respect dignity, capacity, and agency. Forms and grant materials should be designed using Universal Design principles and made available in accessible formats (Plain English, Easy-to-Read).
- Provide forms in multiple formats (Plain English, Easy-to-Read).
- Requirements for documentation should not pressure applicants to disclose unnecessary personal details or justify their disability or its impact on their lives.

#### Reform the Work and Access Scheme

- Reduce minimum required working hours to 10 per week.
- Redirect payments directly to employees rather than employers.
- Actively promote the scheme to encourage hiring of Autistic and Disabled people.
- Provide in-person and application support for applicants navigating schemes.
- Support DPOs and community organisations to assist jobseekers.

#### **Employer Engagement and Accountability**

- Launch a national employer campaign to tackle stigma, highlight workplace adjustments, and showcase good practice.
- Collect and publish disaggregated equality data (including autism-specific data)
   on recruitment, progression, and accommodation requests.
- Commission employer research to identify barriers and enablers in hiring and retaining Disabled workers, feeding directly into policy reform.

 Regularly review and reform schemes like the Wage Subsidy Scheme and EmployAbility based on evidence.

# Transitions and Career Progression

- Expand work placement and mentoring programmes in both the public and private sectors, with clear progression routes into permanent roles.
- Strengthen transition supports for young Disabled people moving from education to employment.
- Promote remote and flexible working as mainstream reasonable accommodations, particularly for Autistic workers.

#### **Cross-Government Collaboration**

- Ensure the Department of Social Protection collaborates with The Department of Education, The Department of Health, The Department of Enterprise, Tourism and Employment, The Department of Children, Equality and Disability and The Department of Public Expenditure NDP Delivery and Reform to address structural barriers. Establish a cross-departmental implementation group, with strong involvement from DPOs, to oversee delivery and evaluation.
- Ensure alignment with the Autism Innovation Strategy and the National Human Rights Strategy for Disabled People 2025–2030, embedding their commitments into Pathways to Work.