

NCBI Submission to the Joint Oireachtas Committee on Disability Matters

### October 2021

# About NCBI

NCBI (National Council for the Blind of Ireland) is Ireland’s national sight loss agency. Our mission is to transform the lives of people who are blind or vision impaired so they can live confidently and independently. At NCBI, we believe people who are blind or vision impaired should have the same opportunities, rights and choices as others to fully participate in society.

According to 2016 Census figures, there are currently 54,810 people with sight loss in Ireland. This is a figure we know to be on the rise, from the increase in demand we have witnessed for our own services in the past five years. In 2020, we offered support and services to approximately 8,000 people who are blind or vision impaired. Of this figure, 2,000 were new referrals to NCBI.

# Participation in political, cultural, community and public life

The right to independent living is clearly enshrined within the UNCRPD however, in Ireland, many of the core aspects that underpin independence remain lacking for someone living with sight loss. The points outlined below are broader points that impact on the ability of a person who is blind and vision impaired to participate in political, cultural, community and public life.

## Transport

While urban areas are served relatively well, in many rural areas, there is little or no public transport available. For a person who is living with sight loss, their independence is hampered by their inability to drive and the financial costs associated with relying on taxis in the absence of public transport. Therefore opportunities to engage in political, cultural, community and public life will remain limited until there is an accessible, reliable, public transport system to support their involvement. Fully accessible transport not only refers to the routes available but also the accessibility of the vehicles, audio announcements, large print signage etc. Investment in public transport through the National Development Plan and other Government strategies must meet the needs of people who are blind and vision impaired to support their involvement in a wide range of activities.

It is important to note that while urban areas tend to have much better access to public transport, there is a challenge for people who are living with sight loss to be in a position to afford to live in these areas. The housing crisis coupled with the low levels of employment means that often many people who are blind and vision impaired cannot afford to live in urban areas that are better served by public transport.

Additionally, assistance should be available for people who are blind and vision impaired when travelling nationally and internationally at bus and train stations and airports such as, staff to assist passengers navigate to the relevant gate or platform. While NCBI welcomes the passenger assistance that is available in Dublin, Cork and Belfast Airports, NCBI is aware of circumstances where some blind and vision impaired passengers have been unable to travel on their preferred date due to lack of availability of assistance. Assistance should be available at all airports at all times for passengers who require it.

## Personal Mobility

While there are a variety of actions that can be taken to increase participation of people with sight loss in the areas above, they are all secondary to primary needs such as mobility and rehabilitation services. Mobility and other rehabilitation services, such as those offered by NCBI increase the independence, freedom, well-being and dignity of blind and vision impaired people. Unfortunately, there is a significant shortage of trained and qualified orientation and mobility (O&M) workers and practitioners, which has been declining in recent years. If this trend is to continue, increased barriers to opportunity and societal participation will continue to hinder positive outcomes for blind and vision impaired people. The state must play a leading role in ensuring that appropriate funding and skills training and mobility aids (where appropriate) are be made available to enable everyone who is blind and or vision impaired to gain or regain independence - regardless of location, CHO area or age. Building regulations must also be reviewed with input from people living with sight loss to ensure they are reflective of the needs of people and best practice guidelines should be developed, based on international evidence that can support the work of Planning Authorities.

## Audio Descriptions

The availability of audio described television programmes enables people with sight loss to participate in cultural and social life, just as their peers do. People living with sight loss pay the same TV License fee however, they do not have the same access to TV programmes. The current target of audio description in Irish televised broadcasting is 8%, as set out by the Broadcasting Authority of Ireland (BAI). Targets set by the BAI for 2023 are 10% for Irish programming. Many of our current audio described programmes are UK productions which are bought in by our main Irish broadcasters. This allows Irish broadcasters to reach their annual targets quite easily. Irish broadcasters should also be obliged to provide the BAI will a breakdown of targets, which detail how many programmes are home produced with audio description and how many have been bought from other countries with audio description already included. NCBI believes that while advances in availability of audio description on programmes has been noted in recent years, state funded broadcasting should be leading the way in providing accessible programming and where that is not happening, funding allocation from TV License fees should be tied to meeting these targets. Additionally, many Irish programmes that are broadcast with English subtitles present a challenge for people who are blind and vision impaired as the size of the subtitles are too small to see and there is no English voice over option. Nationwide targets for audio description in cinemas, theatres, and sporting events should be set out by relevant government Departments, by the beginning of 2022.

## Accessible cultural and leisure sites

The equal access of people who are blind or vision impaired to cultural life, recreation, leisure, and sport is essential to create a truly inclusive society where participation for people living with sight loss exists at every level. Accessibility refers to the built environment and content of sites where these activities take place, but also includes equal access to participate and contribute to these spaces. Where events are taking place, it is important that the information available is fully accessible such as booklets available in large print, Braille, audio format etc. COVID19 has shown that some cultural and sporting activities could take place online such as online access to theatre performances, virtual dance classes etc. The opportunity to engage in these cultural and leisure activities should remain as public health restrictions are lifted. One of the key barriers to accessing cultural and leisure activities related to transportation and this issue is explained in detail above. Government must ensure that cultural and leisure sites are accessible to people who are blind or vision impaired, including providing access to cultural materials and experiences in accessible formats. Funding should be provided for specialised portable audio-described tours of cultural sites, heritage sites and museums where visual exhibits are present.

NCBI are calling on Government to work with Vision Sport Ireland to support the participation of people living with sight loss in sports, ensuring people who are blind or vision impaired have an opportunity to organize, develop and participate in vision impaired specific sporting activities alongside promoting and supporting the inclusion of those living with sight loss in mainstream sports, where possible. Finally, personal assistance support should be available to individuals living with sight loss to engage in social activities.

## Assistive Technology

As demonstrated through Covid19 pandemic, participation in cultural and community life can also occur online and yet this is a barrier for some who are blind or vision impaired due to costs of devices and poor internet connection. Assistive Technology can support a person who is blind and vision impaired to live independently, access information and to engage in a wide range of activities. However, funding for assistive technology in Ireland is fragmented. Currently, within the Technical Aids Grants scheme funded by the HSE, there is no standardisation of assessment or funding of assistive technology applications across the country. Also, while technological advancements has led to assistive technology now being incorporated into mainstream technology such as smartphones and smart speakers, these devices are not eligible under current criteria. NCBI is calling for the standardisation of the Technical Aids Grant funding and assessment practices across the country, with eligibility extended to those over 65 and the inclusion on smart technology under this funding.

# Accessibility and inclusivity in Ireland’s voting system and ensuring that all citizen’s can access polling stations

The right to vote is one that remains a challenge for many people who are blind and vision impaired. It is one of few disabilities that compromises the ability to vote independently and privately. The Sinnott v Minister for the Environment, Community and Local Government high court ruling highlighted these challenges and while some strides have been made, significant challenges still remain.

The tactile template that is used now to support people who are blind and vision impaired to vote independently has been welcomed but often with so many candidates up for election the length of the ballot paper and the tactile template can be unwieldly. The current voting booths do not have adequate table space to allow for the full ballot paper and tactile template to be placed and used effectively. This presents a challenge for the person using it as they have to keep adjusting both the ballot paper and the tactile template which can cause difficulty when voting.

Another challenge to voting independently is the requirement for people who are blind and vision impaired to remember the list of candidates following a call to the information line or on the relevant local authority website. As mentioned, the volume of candidates running for election can make it difficult to remember all the names and details.

The voter registration process is the first step in using your right, as an active citizen, to vote for your Local, National and European representatives. There is widespread agreement that the current voter registration system is outdated and confusing. NCBI believes an online voter registration system, similar to that available in Dublin, should be available to people across Ireland. The online system should be fully accessible and compliant with the EU Web Accessibility Directive.

The opportunity to cast an individual’s vote via postal ballot is an option that is not commonly known or understood. NCBI believes an awareness campaign should include a focus upon the option to use a postal vote. It must be acknowledged that the timeframe for registering for a postal ballot when an election is called can be quite tight and therefore, a campaign to highlight that people can register for a postal ballot throughout the year would be useful. Finally, if someone living with sight loss registers to cast their vote via a postal ballot, they must also receive the tactile template and the candidate information must be available to them via the helpline and website in advance of the deadline to post their ballot back.

The majority of voters cast their ballots in the polling stations located across the county in each constituency. Many rural polling stations present a challenge for people who are blind and vision impaired as transport to and from these stations can be difficult with many rural areas not having suitable public transport available. Additionally, in urban areas where there are multiple polling stations, it is imperative that people living with sight loss can vote in the closest accessible polling station within that constituency. Where a person who is living with sight loss has no transport to the polling station, a system should be established to allow them to request transport to allow them cast their vote. This could be facilitated by Civil Defence or similar groups within communities. Finally, while training is made available to staff within polling stations, not all staff undertake this training and the Department for Housing, Planning and Local Government do not have the ability to require people to undertake this training. As a result, some staff are unable to appropriately guide a person who is blind or vision impaired or are unable to demonstrate how to use of tactile templates properly.

While tactile templates have been used there are problems with them as outlined. Therefore alternative accessible voting mechanisms such as audio devices or e-voting machines must be investigated. This should be undertaken alongside people with disabilities and organisations that work with people with disabilities. Additional research is required to support the use of technology to assist people with disabilities in the voter registration, identity verification and casting their ballot to simplify and streamline the voting process for people who are blind and vision impaired.

Many people who are blind and vision impaired tend to use technology for writing therefore, a person's handwriting may not always be legible. NCBI is aware of cases where people are concerned their ballots are treated as spoiled ballots as their preferences may not be clearly identified. Where this issue arises, NCBI believes it would be preferable for an individual to be allowed return their ballot where the preferences are not clear to have it destroyed and receive a replacement ballot paper to vote.

Finally, a variety of the points above make reference to the need for additional awareness campaigns. These campaigns should encompass all relevant points in relation to casting a vote from registration to the use of tactile or audio templates.

# Representation of persons with a disability in decision making

There is a well-used phrase in the disability community – nothing about us without us. Unfortunately, people who are blind and vision impaired are often overlooked in the decision-making process. Meaningful engagement with people living with sight loss requires considered and targeted approaches. For engagement to be meaningful, it must be acknowledged that everyone is not on a level playing field and therefore additional supportive measures must be put in place.

Meaningful practices for inclusion should be developed through engaging with people with lived experience, which is further expanded upon below.

NCBI Advocates are involved in various different decision-making structures and processes and have provided clear advice on how to ensure there are meaningful practices for inclusion. It was highlighted by NCBI Service Users that a hybrid approach to meetings should be available as standard as we move out of COVID19 restrictions. Meeting organisers should aim to provide the opportunity for people to attend meetings via online platforms or should provide for alternating between in person and online meetings. If a meeting is taking place in person, the location and time is important to consider in terms of public transport options. Assistance should be available for people who are blind and vision impaired to support them to navigate the venue for the meeting etc. If meetings are taking place online, there are alternative challenges in terms of platforms that are used to store documents and to host the meeting that must be considered.

The documentation relating to the decision must be available in a variety of accessible formats e.g. compatible with screen readers, Braille, large text etc. Presentations that are given at meetings should also be accessible and presenters should be trained appropriately to ensure people who are blind and vision impaired can fully participate. One comment that has been echoed continuously by people who are blind and vision impaired relates to the time given to prepare for meetings and respond to consultations must be extended. Again, recognising that it is not a level playing field, requiring people living with sight loss to respond to a lengthy consultation or read multiple documents to prepare for a meeting with 7/14 days’ notice poses a significant barrier to meaningful engagement. Training should be provided to all those involved in the decision making process to ensure a rights based and inclusive approach is being taken at all times. Such training can highlight the importance of inclusive meeting practices, such as speaker names being given at the start of every contribution, descriptions of people being given at the start of meetings should become standard practice.

All public bodies and state agencies should be required to have at least one Board Member who has a disability so all strategic decisions can be made in an inclusive manner.

In terms of electoral decision making, accessible information is also an issue. Election candidates and parties should be required and supported to produce election material in accessible formats. It is essential that a person who is blind and vision impaired has access to material outlining the candidate and/or party priorities.

Additional supports are required to support people living with sight loss to run for election at a local, national and international level. These supports should be provided by the Election Commission in a fair and non-partisan manner.

Finally, there is a huge difference between equality, equity and justice and while we often hear about diversity, inclusion and equality, the narrative should really be about equity and justice. A level playing field can only be achieved with equity and justice, rather than equality.

# Supporting the participation of Disabled Person’s Organisations in line with Art.33 UNCRPD.

NCBI fully supports the participation of Disabled Person’s Organisations in all decision making and monitoring processes. As highlighted above, it is too often the case that people with lived experiences are not involved in a meaningful way in these processes, and that must be addressed. It is the responsibility of government to ensure that Disabled Person’s Organisations are supported to engage in implementation and monitoring processes.

NCBI will never be a DPO as it is a service provider who can through demonstration of our work advocate for the improvement of national policies, laws and services for people who are blind or vision impaired. NCBI believes it should never be the case that service providers and other organisations are selected or provided priority over a DPO. While NCBI is clear in our commitment to advocating for and working with service users to advocate for themselves on issues affecting them locally, nationally and internationally, that commitment does not take away from the important role that a DPO plays in advocacy. Therefore, NCBI is of the view that a collaborative approach, where possible, would have the greatest impact.