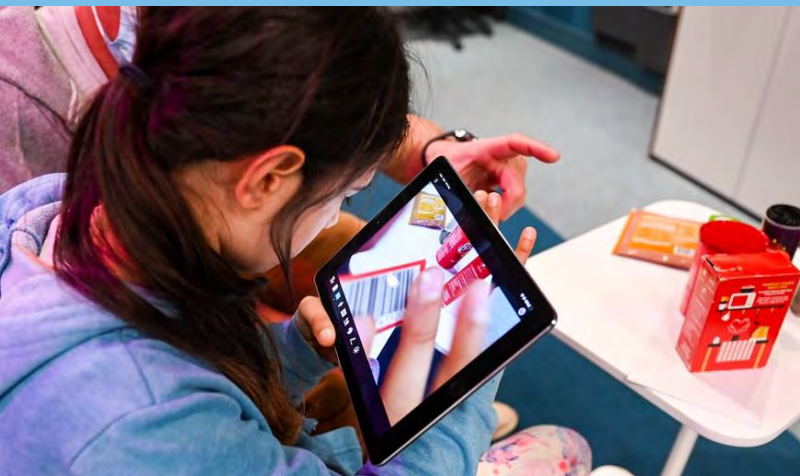




NCBI
Working for People
with Sight Loss



NCBI Pre-Budget 2023 Submission

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Introduction



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 the most recent Census figures (2016), there are currently 54,810 people with sight loss in Ireland. This is a figure we know to be on the rise, from the increase in demand we have witnessed for our own services in the past five years.

A society in which blind or vision impaired people can fully access, participate and contribute in economic, cultural and social life, requires a robust, rights-based and holistic approach by government. The UNCRPD sets out clear requirements of the Irish Government to “promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity.”[1] In 2021 the number of service users who required services from NCBI was 6917. Of this figure, those under 18 equalled 966, 18-65 equalled 2012 and 65 + equalled 3939. The number of new referrals has continued to grow. New referrals comprised of 30% of all referrals into NCBI Adult and Children services. (this figure is up from 25% in 2020).

NCBI’s pre-budget submission 2023, outlines key areas of government spending and services which need to be enhanced to support and empower Ireland’s community of people living with sight loss.

[1] [Article 1 – Purpose | United Nations Enable](#)

1. Health

1.1 ECLO



The diagnosis of sight loss is life changing for people as it can impact on quality of life, independence and general well-being. Ophthalmology services are currently understaffed and do not have the capacity to provide essential additional emotional and rehabilitation support for patients at the crucial time of diagnosis. The Eye Clinic Liaison Officer was introduced by NCBI in 2019 and operates in the Dublin area in the Mater, Temple Street, Crumlin Children's Hospital and the Royal Victoria Eye and Ear Hospitals. The ECLO liaises with clinical staff to address this vital emotional support need while also providing a wraparound service with essential information, ongoing support and signposting to required rehabilitation support in the community.

A recent NCBI evaluation of the ECLO showed that 94% of clinicians reported that ECLO filled a gap in providing essential support. Also 88% of patients reported improved well-being.

NCBI were delighted to receive additional funding to support the further expansion of the ECLO service in 2022 to Cork University Hospital. However, the funding, while welcome, is not sufficient to meet the need nationwide. It is also not reoccurring funding which poses a challenge for sustainable service provision and care for people receiving a diagnosis across the country.

The gross salary for an ECLO averages at €60,000 per annum. NCBI is requesting a full rollout of 7 posts across the state at a cost of €420,000 per year, with an additional €60,000 to cover the cost of a locum ECLO where required to cover leave.

Ask: €480,000 per annum to support the allocation of 7 Eye Clinic Liaison Officers (ECLO) plus 1 Locum across all acute hospital settings. This funding should be ringfenced to sustain the ECLO programme until 2026.

1.2 Ophthalmologist Recruitment

As of April 2022, the number of children and adults across the country on waiting lists for outpatient ophthalmology care was over 43,900^[2] people and over 9,100^[3] people are awaiting inpatient/day case ophthalmology care.

According to the Irish Medical Organisation, the recommended number of ophthalmologists for the state is 147. However, the current number is 41 and this shortfall of ophthalmologists has negatively impacted timely treatment for people living with sight loss. It has resulted in patients waiting for appointments while experiencing a deterioration in their sight, and some may experience irreparable damage to their vision due to the delay in appointments and specific treatments.

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

In view of this plan and the serious concerns in relation to delayed treatment for those who are vision impaired, NCBI believes the HSE must prioritise the recruitment of 50 Ophthalmologists across the state as a matter of urgency for people living with sight loss. The HSE during its workforce planning for 2024 and 2025 should also seek to recruit a further 25 ophthalmology consultants each year to meet the need as recommended by the Irish Medical Organisation.

According to the most recent figures available from the Economic and Social Research Institute, the average gross salary of an ophthalmologist with five years' experience is approximately €207,037. Subsequently, cost of hiring an additional 50 full-time consultants would estimate €10,351,850 per annum.

Ask: Immediately recruit 50 Additional Consultant Ophthalmologists in Budget 2023 across the HSE as a starting point to address the current shortfall.

Ask: Actively plan to recruit a further 25 Ophthalmology Consultants per year as per Budget 2024 and 2025 to fully address the current shortfall.

^[2] OPNational02 (ntpf.ie)

^[3] PDCNational02 (ntpf.ie)

^[4] Hospital Waiting Lists – Tuesday, 29 Mar 2022 – Parliamentary Questions (33rd Dáil) – Houses of the Oireachtas

1.3 Dedicated Treatment Pathways for AMD

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

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

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

1.4 Standardisation of HSE Technical Aids Grant

People with sight loss have the right to live an independent life and utilise a variety of aids and appliances to support them to do so. The Technical Aids Grant is an essential avenue to support people (aged under 65 years) who are blind or vision impaired to purchase equipment that can enhance independence and boost self-esteem.

However, the Technical Aids Grant administered by the HSE has no standardised eligibility criteria, assessment processes, or funding allocations for aids and appliances across the country. Consequently, many people with sight loss are unable to afford the cost of these aids and appliances and are either forced to wait for prolonged periods of time or must do without if they are over the age of 65, which undermines their right to live independently.

As a result of inconsistent practices across Community Health Organisations (CHOs), there is extraordinarily little information available to guide people who need to apply for the Technical Aids Grant as to what the process entails.

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

1.5 Investment in Mental Health Services for Children Living with Sight Loss

There is substantial literature supporting the link between visual impairment and emotional distress and depression. Children with vision impairment are considered particularly vulnerable to poor outcomes across a range of emotional and social well-being indicators. Children in the 12-18 age group can feel overprotected by their families which can impact on their autonomy and social interactions. Sight loss is associated with uncertainty of future prospects and the impacts on daily living which has a significant emotional impact. Children have expressed disappointment and frustration in relation to the stigma of living with a vision impairment which negatively affects confidence and self-esteem. Furthermore, children with sight loss tend to report feelings of loneliness and tend to be more socially isolated.

The diagnosis of sight loss for a child affects the whole family who require dedicated support to create a positive approach from the point of diagnosis and throughout the child's development. Sourcing counsellors who have the learning, qualifications and availability to work with those under 18 is often difficult. The main obstacle to providing a consistent level of service for young people aged 11 and upwards who are living with sight loss centres on the lack of knowledge within the mental health professions regarding the emotional impact of sight loss.

Ask: NCBI is seeking an initial investment of €30,000 per annum to provide an extension of our various support options by making them equipped and accessible for younger people, aged 12-18. This is envisioned as the only such service for visually impaired teenagers in Ireland. This is to be accomplished by the provision of counselling, offered free of charge to an initial amount of young people.

1.6 Review of Long-Term Illness Scheme

The HSE Long-Term Illness (LTI) Scheme provides supports for people with certain diseases and disabilities through the provision of some drugs, medicines and approved appliances for free from pharmacies. The LTI scheme was established under Section 59(3) of the Health Act 1970 with accompanying regulations introduced in 1971, 1973 and 1975. These regulations outlined 16 illnesses covered by the scheme, however, treatments for long-term sight loss conditions are not covered by the current scheme.

Currently, there are several eye diseases that can lead to blindness but have suitable treatment available. Where there are recognised and suitable treatments available through pharmacies, they should be included within the scheme. This could be a key step towards ensuring all patients can avail of medications in the treatment of preventable blindness.

The Minister for Health has acknowledged that the LTI scheme will be included “as part of a review to be carried out under commitments given in the Sláintecare Implementation Strategy”[5] and NCBI would strongly argue that this review should recognise the importance of including long term sight loss conditions to the scheme.

Ask: Treatments for long-term sight loss conditions to be added to Long Term Illness Scheme.

1.7 Data Collection

The current figures for both adults and children who are blind or vision impaired are not representative of the actual cohort within our overall population. There is a clear insufficiency of data and statistics for the sight loss community available in Ireland. Data collection is sporadic in the absence of dedicated data administration specific to the blind and vision impaired community. Furthermore, children and young people living with sight loss are relatively invisible in the data currently available. Therefore, it is imperative that relevant data must be collated and made available for the state to fully ascertain and plan for the rights and needs of people who are blind or vision impaired.

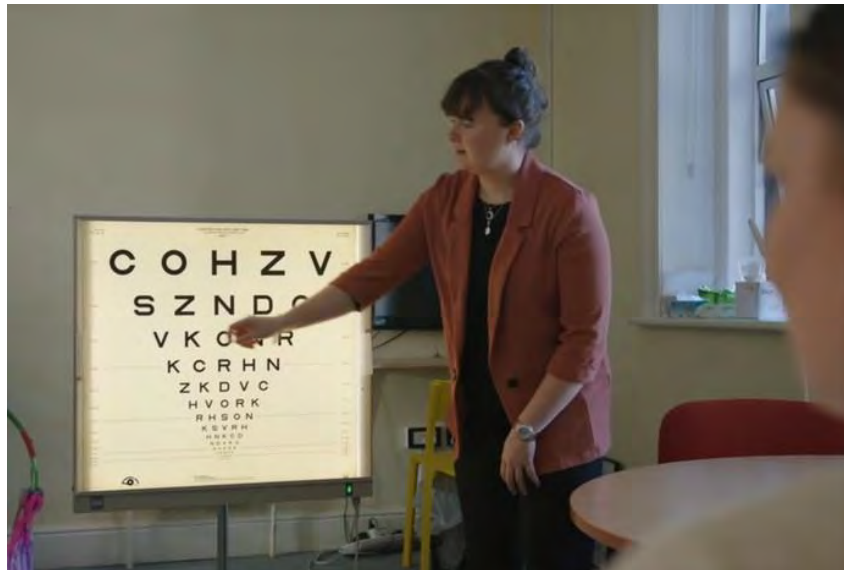
NCBI suggests an additional database administrator post should be introduced to either the HSE or Health Research Board with a specific focus on collating data related to children and adults with a diagnosis of sight loss in Ireland.

This dataset should be available in an interactive form, like that provided by the Central Statistics Office. Data is provided by the Census every five years which is an excellent source, however, it relies on the discretion of those who provide it. Dedicated data administration specific to sight loss, would enable collating crucial information that would be integrated into counties and represent people who are blind and vision impaired including the engagement with service provision and disability services, in counties and/or Community Health Organisations (CHO's) across the country. This valuable information would permit accurate research and proper planning of services and supports required for each CHO based on the needs of the sight loss community.

Ask: One additional post within HSE or Health Research Board at a cost of €45,000 per annum that would focus on collating and providing data on children and adults who are blind or vision impaired within each county across the country.

[5] [Departmental Schemes: 24 May 2022: Written answers \(KildareStreet.com\)](https://www.kildarestreet.com/departmental-schemes-24-may-2022-written-answers)

2. Sustainable Service Provision Funding



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

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

The Government estimated €350-€600 million would be needed from Budget 2022 to address unmet need in disability services[6]. While Budget 2022 led to a minimal increase in funding for disability services, the level of funding allocated through Budget 2023 needs to be increased dramatically to meet the needs as demonstrated in the Capacity Review published by Government in 2021.

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

Ask: Fully fund the Section 39 organisations in line with the Disability Capacity Review to 2032 to ensure ability to meet the full cost of service delivery.

[6] [Disability Capacity Review to 2032 \(www.gov.ie\)](http://www.gov.ie)

3. Housing

3.1 Approved Housing Body Status



According to research published by the Irish Human Rights and Equality Commission and Economic and Social Research Institute (ESRI) people with disabilities are more than twice as likely to report discrimination relating to housing and over 1.6 times more likely to live in poor conditions, such as living in damp housing, lacking central heating or living in an area with neighbourhood problems[7].

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

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

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

[7] [Discrimination and Inequality in Housing in Ireland \(ihrec.ie\)](https://www.ihrec.ie/)

NCBI has the capacity, knowledge and expertise to assist Local Authorities in assessing appropriate accommodation required for accessible social housing that fits the need for individuals who are blind or vision impaired. This also extends to include the ability to deliver training to local authorities to ensure they can effectively engage with people living with sight loss in an appropriate manner.

NCBI is seeking an approved Housing Body Status to provide tailored social housing for people living with sight loss.

Ask: Ensure all local authority websites are fully accessible so individuals who are blind or vision impaired can make their application for social housing online

Ask: Local authorities should engage with NCBI prior to offering accommodation to someone who is blind or vision impaired to ensure it meets the needs of the person.

Ask: NCBI should be authorised as an Approved Housing Body by the Housing Agency.

3.2 Assistive Technology Budget for Local Authority Housing

Assistive technology plays a significant role in enabling people who are blind or vision impaired in their everyday lives. This support allows people living with sight loss to experience independence and safety in their homes.

The evolution of assistive technology resulted in the introduction of smart devices such as voice activation of functions that enable people with sight loss to live independently in their own homes. For example, Amazon Alexa devices are voice activation tools used so that people can perform tasks including setting alarms and times, texting, making calls, turning on and off lighting and other devices, and calling emergency services with the use of their voice.

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

3.3 Review of Housing Adaptation Grant and Mobility Aids Grant

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

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

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

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

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

In 2021, the Cost of Disability Report[8] indicated that the highest individual extra living cost that a person who is blind or vision impaired faces but cannot afford is in the area of adequate housing at €755 per annum. In general, this report states that the additional cost of disability for someone who is blind or has a serious vision impairment is between €9,805 – 10,565 per annum. This extra cost should be recognised as an additional burden when determining grant payments.

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

3.4 Data Collection

The necessary collation of quality, accurate and timely data permits appropriate planning and service for those in our society. NCBI has highlighted this in relation to health services indicated in point 1.7. Data collated within the housing sector is equally important, especially to include people with disabilities and their needs within their homes. NCBI also stressed there is little data available in relation to people who are blind or vision impaired who require housing support in Ireland from the local housing authorities. NCBI suggest an additional post of a database administrator would be introduced in the Housing Agency, to collate specific, important data on people who are blind and vision impaired that need housing supports from the state.

[8] [The Cost of Disability in Ireland – Research Report \(www.gov.ie\)](http://www.gov.ie)

Current data available referring to disability and sensory loss annually from the Housing Agency does not specify those who are living with sight loss. A database administrator would concentrate on collating data on those with sight loss who require housing supports from the local authorities.

The average salary for a database administrator is approximately €45,000 per annum.

Ask: The production of annual figures by a Database Administrator within the housing agency, representing those availing of or requesting housing support, segregated by disability or specialised housing need.

4. Employment

4.1 Reviewing Employer Supports



The supports available to employers through the Department of Enterprise, Trade and Employment and the Department of Social Protection for staff who are blind or vision impaired which have had a low utilisation in general. Recent feedback from NCBI service users indicated many issues with the Reasonable Accommodation Fund (RAF) and the Employers Retention Scheme. The lack of awareness of the RAF among employers is well documented, with zero uptake from employers in 12 counties across the country in 2021[9].

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

Asks:

- ♦ **Full implementation of the Comprehensive Employment Scheme and engagement with relevant bodies to ensure successful outcomes for people who are blind or vision impaired.**
- ♦ **Further develop the Disability Awareness Support Scheme to inform prospective employers of the supports that are available for their business to support employees with sight loss or for those retaining employment following a diagnosis of sight loss.**

- **Swiftly publish the results of the review of the Reasonable Accommodation Fund and work with stakeholders to identify and implement the actions required.**
- **Review the Employer Retention Scheme urgently, as this support has had sparse uptake over the past six years.**

4.1.2 Expansion of Supports and Quotas

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

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

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

4.1.3 Hybrid Working

The Right to Request Remote Working Bill 2021 seeks to recognise the benefits of hybrid working for people and organisations across Ireland.

The inaccessibility of public transport and the built environment can act as a barrier for people who are blind or vision impaired to engage in the workforce. While the inaccessibility of these structures and services is inexcusable and NCBI continues to advocate for change, these barriers can be reduced if the possibility of remote working is made more readily available for people living with sight loss.

The opportunity for this new way of working to be fully inclusive of those who are blind and vision impaired rests, however, on securing supports to successfully work from home. Supports and equipment for people living with sight loss to working remotely should complement the office environment.

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

4.2 Self-Employment

4.2.1 Back to Work Enterprise Allowance

The Back to Work Enterprise Allowance (BTWEA) scheme supports people in receipt of certain social welfare payments to become self-employed. If you take part in the BTWEA scheme you can keep a percentage of your social welfare payment for up to 2 years.

However, The BTWEA does not account for the additional challenges that people who are blind or vision impaired may face when pursuing self-employment. The Cost of Disability Report highlights the additional cost for someone who is blind or has a serious vision impairment is between €9,805 – 10,565 per annum.

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

4.2.2 Short-term Enterprise Allowance

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

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

4.2.3 Grant and Project-Based Funding

The loss of Blind Pension and Disability Allowance upon taking up short term contracts or accessing grant or project funding leaves people living with sight loss financially vulnerable.

Grant and project funding provided to those in self-employment to start a company, accept a commission or complete a project should not be considered as means tested income when calculating eligibility for Blind Pension or other similar payments. Funding for this purpose is based on applications that detail the costs associated with the start up or project and do not equate to profits accrued.

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

4.2.4 Basic Income for Artists Pilot Scheme

The recent announcement of a Basic Income for Artists (BIA) Pilot Scheme by Minister Catherine Martin has been welcomed by many artists as it recognises the precarity of working conditions for artists.

However, serious concerns remain for artists who are blind or vision impaired in relation to how their entitlements from the State will be impacted if they are selected during this pilot. The BIA payment will be treated as self-employed income for the assessment of Disability Allowance and Blind Pension which will lead to a reduction in each of those payments. The impact on secondary entitlements such as medical cards is still unclear.

Again, the Cost of Disability Report demonstrates the additional cost for someone who is blind or has a serious vision impairment is between €9,805 – 10,565 per annum. The BIA scheme does not recognise that additional cost and will lead to disabled artists having to use their BIA to cover their cost of disability as their disability entitlements will be reduced.

Ask: Recognise the BIA as income disregarded for the purpose of means tested payments within the Department of Social Protection.

5. Education



Education is a right and hence should be accessible to all in society. The Department of Education and the Department of Further and Higher Education, Research, Innovation & Science have outlined similar commitments to deliver a high-quality education which includes ensuring equity of opportunity in education and that all students are supported to fulfil their potential. Both strategies also provide leadership and support to deliver the right systems and infrastructure and emphasises the focus on talent and inclusion.

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

5.1 Primary and Secondary Education

In 2021, the NCBI Children and Young People's Team supported over 1,225 children and young people who are blind or vision impaired. The National Council for Special Education (NCSE) recognises that "measures of social competence and life skills should be included with academic outcomes,"^[10] is so vitally important to children who cannot learn many of these skills via the incidental learning processes of other children.

Also, the NCSE concurs with the NCBI position of an inclusive educational experience, however this broad inclusive approach is not visible or present in the NCSE Visiting Teacher approach with little or no focus on social competence and life skills such as Orientation and Mobility.

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

One of the key supports provided through the NCBI is the Expanded Core Curriculum (ECC). The ECC is used to define concepts and develop alternative skills and strategies to ensure children and young people who are blind or vision impaired meet their developmental milestones and can become independent. However, NCBI is still not recognised as a Complimentary Service Provider by the state.

Ask: NCBI is seeking recognition as a Complimentary Service Provider by the state. This status will enable NCBI to enhance and expand the ECC to become more individualised, equipped and responsive to the needs of children who are blind or vision impaired.

5.2 Transitions Supports

Learning, Empowerment, Network and Skills (LENS) are the key elements of the NCBI Transition Year Programme. NCBI strongly believes that successful transitions are exponentially linked to a student's access to quality intervention supports in areas such as additional specialist curriculum supports outside of the core academic curriculum, assistive technology and orientation and mobility.

Consequently, NCBI introduced the Transition Year Programme in September 2020 with the purpose of providing intensive intervention supports and meaningful work placements to students who are blind or vision impaired. This programme was conducted with the support of six schools and in collaboration with Inclusive World Training. There is tremendous opportunity to further develop consistent transition programme protocols for blind and vision impaired students to ensure that they fulfil their potential and are recognised.

While the number of students with disabilities attending third level education increased, the number of students with sight loss decreased in recent years. Recent reports from AHEAD alarmingly show a reduction from 1.8% in 2015/2016 to 1.6% in 2019/2020 of students living with sight loss registered with a disability in higher education in Ireland.

Furthermore, NCBI believes there is a clear need for school transitioning protocols determining and agreeing content and the delivery of comprehensive transitional plans for children who are blind or vision impaired. These early intervention supports must be timely to support these transitions. Additionally, data is not available for students who are blind or vision impaired in further education which provides a data gap that must be resolved.

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

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

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

5.3 Equitable Access to Support Services in Tertiary Education

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

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

Ask: Provision of ringfenced funding to each education provider to ensure consistency in supports available through access and disability offices for all students in all further and higher education providers to ensure equitable supports, irrespective of the college and course attended by the students.

5.4 Expansion of the SUSI Grant Scheme to Include Part-Time Courses

The Student Grant Scheme is available to students across further and higher education once the student is attending an approved course in an approved institution. The Student Grant Scheme is administered by the Student Universal Support Ireland (SUSI).

Although SUSI is a considerable support for many students, it is not available for students who are studying part time courses. This significantly hinders opportunities for many students who are blind or vision impaired who wish to pursue third level education but are unable to commit to a full-time course for a variety of reasons.

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

5.5 Assistive Technology

Assistive Technology is an invaluable support to enable transition for students who are blind, or vision impaired moving within the education sector. The availability of the required assistive technology and the skills and supports required to allow students to access and manage their learning materials with ease, efficiency, and as independently as possible is vital. However, delays in accessing appropriate supports such as assistive technology can have a negative impact on education.

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

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

5.6 Bookshare Ireland

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

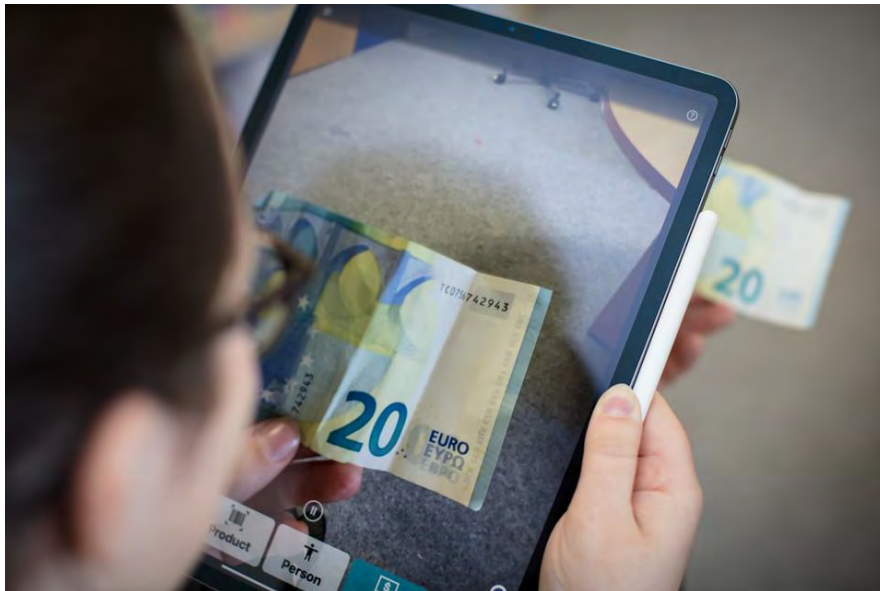
Ask: Sustainable investment of €288,000 per annum for Bookshare Ireland to provide accessible educational course material for students who are blind or vision impaired.

5.6 Accurate Data Analysis of Updated Data in the Education Sector

Acquiring accurate, up-to-date data to reflect the numbers of children and young people who are blind or vision impaired and are active in the education sector is a challenge. This vital information would allow for better quality of data to assess current educational supports services and whether they are meeting the educational needs of each student to ensure they reach their full potential.

Ask: The Department of Education and Department of Further and Higher Education, Research, Innovation & Science invest in prioritising accurate data analysis of the prevalence of blind or vision impaired children and young people to assess if educational support services are ensuring students are reaching their full potential.

6. Social Protection



6.1 Cost of Disability

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

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

We know that people with disabilities are more than twice as likely to experience poverty and deprivation than those without disabilities[11] so it is imperative that the Government use the evidence they have gathered through the Cost of Disability Report to ensure people who are blind or vision impaired have sufficient financial support to meet the rising cost of living coupled with the additional cost of disability.

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

6.2 Accessing Social Welfare Support Independently

The Department of Social Protection is the main Department responsible for the provision of entitlements for people who are blind or vision impaired. However, NCBI is aware that many services users find it difficult to complete paper application forms and require the assistance of family or NCBI staff. This reliance on others may prevent people with sight loss from applying for needed supports and can impact on their independence when being forced to rely on others. Consequently, NCBI have received ongoing requests that the Department of Social Protection would provide the option to submit applications electronically.

It is imperative that the option of online applications must comply with the European Web Accessibility Directive so that people who are blind or vision impaired can independently access applications for supports to enhance their independent living and reduce the burden of stress.

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

6.3 Mandate Offer of Electronic Payment for the Blind Welfare Allowance

There is no standardisation of online payment for the HSE Blind Welfare Allowance across the country. Some CHO areas have not set up a direct electronic transfer option for the Blind Welfare Allowance. Many people receiving this allowance must travel to collect a cheque and then deposit this in their bank account. This method creates additional stress from unnecessary travel for people who are blind or vision impaired as we know that accessible transport is not readily available for all, particularly those in more rural areas.

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

6.4 Free Travel Scheme

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

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

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

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

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

7. Revenue



7.1 VAT exemption for technology and specific sport equipment

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

People with disabilities often rely on specialist sports and leisure equipment to enable them to obtain a basic level of fitness and well-being. While most people who are blind or vision impaired can avail of sports equipment which needs minor adaptations e.g., Braille tabbing, audio guidance using smart wearables etc. there are items of specialised adaptive equipment which can prove more expensive.

NCBI believes devices that can maximise a person's independence and quality of life, should be exempt from VAT with the aim of making them more affordable at the point of purchase.

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

7.2 Expansion of Criteria for Disabled Drivers and Disabled Passenger Scheme

VRT and VAT relief is available under the Disabled Drivers and Disabled Passengers Scheme for people who are either a disabled driver or passenger. NCBI wishes that the Disabled Drivers and Disabled Passengers Scheme must be reformed as a matter of urgency so that people who are blind or vision impaired receive equitable access to the Scheme.

This requires extending the current medical criteria for applying for this scheme to include vision impairment as a category for receiving a Primary Medical Certificate and removing the requirement for specific adaptations on vehicles for passengers who have a disability. Figures from the 2016 Census, demonstrated that 43.3% of people living with sight loss expressed the lack of participating in leisure activities or using transport as a significant barrier to inclusion. Amending the scheme could enormously improve the quality of life of people who are blind or vision impaired.

Ask: Amend section 3 of the Disabled Drivers and Disabled Passengers (Tax Concessions) Regulations, 1994 with a view to including vision impairment as a category for receiving a Primary Medical Cert.

8. Transport - Access to Travel Information



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

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

9. Digital Equality



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

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

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



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