



Mental Health Reform
Promoting Improved Mental Health Services

**Pre-Budget Submission 2024
to Department of
Employment Affairs and
Social Protection**

16th June 2023



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Summary of Recommendations

1. **Poverty Risk:** Increase all core social welfare payments by a minimum of €25 in line with the impact of the cost-of-living crisis.
2. **Employment:**
 - Reconvene the implementation group of the Comprehensive Employment Strategy for People with Disabilities and progress the strategy as a matter of urgency
 - Incentivise engagement with supported employment programmes (e.g. IPS) through the Reasonable Accommodation Fund
 - Include supports for people with mental health difficulties in the Reasonable Accommodation Fund
 - Publish the review of the Reasonable Accommodation Fund and outline how the €1 million allocation from Budget 2023 will be spent
3. **Flexibility:** Implement a flexible benefits system to facilitate opportunities for people with a mental health difficulty to access work, step out of work, if needed, and re-enter the workforce numerous times, without fear of losing income support
4. **Disability Allowance:**
 - Given the rise in inflation, and the additional costs incurred by individuals with a disability, MHR believes that the Disability Allowance must be increased in Budget 2024
 - Publish the straw-man proposal for the restructuring of long-term disability payments
5. **Cost of Disability:** Introduce the Cost of Disability Payment in Budget 2024 and publish the Action Plan for the Cost of Disability Report 2021
6. **Advocacy Services:** Increase capacity of national advocacy services for people with mental health difficulties in both inpatient and community settings

List of Abbreviations

CES	Comprehensive Employment Strategy for People with Disabilities
CHO	Community Healthcare Organisation
DEASP	Department of Employment Affairs and Social Protection
DFI	Disability Federation of Ireland
EU	European Union
HSE	Health Service Executive
ILMI	Independent Living Movement Ireland



IPS	Individual Placement and Support
MHR	Mental Health Reform
NAS	National Advocacy Service
NDIS	National Disability Inclusion Strategy
ODG	Oireachtas Disability Group
OECD	The Organization for Economic Cooperation and Development
SILC	Survey on Income and Living Conditions
UNCRC	United Nations Committee on the Rights of the Child
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities

Introduction

Mental Health Reform (MHR) is Ireland’s leading national coalition on mental health. Our vision is of an Ireland with accessible, effective and inclusive mental health services and supports. We drive the progressive reform of mental health services and supports, through coordination and policy development, research and innovation, accountability and collective advocacy. Together with our 80 member organisations and thousands of individual supporters, MHR provides a unified voice to the Government, its agencies, the Oireachtas and the general public on mental health issues. MHR is delighted to submit to this public consultation on behalf of our 80 members. MHR would like to thank our members for their continued insight, input and work. Further information on our members can be found on the MHR website.

According to the HSE (2022)¹, one in two people in Ireland have experienced mental health difficulties and a global study on *The Mental State of the World in 2022*² reported that Ireland had one of the highest rates of people experiencing distress. This study also showed that there was little to no recovery in mental wellbeing since the lifting of Covid-19 restrictions. Thus, mental health needs to be a vital area of focus for the whole Government in Budget 2024. This pre-budget submission will focus on the aspects of mental health that are pertinent to the Department of Social Protection for Budget 2024.

In line with Article 28 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)³, the aim of social protection measures is to ensure an adequate standard of living for people with disabilities, including those with mental health difficulties.

Mental Health Reform requests that the pre-budget submission to Budget 2023 ‘[The Cost of Waiting](#)’, MHR’s [submission on the Reasonable Accommodation Fund](#), MHR’s [submission on the Roadmap for Social Inclusion](#) and MHR’s [submission on Department of Social Protection Strategy Statement 2023-2026](#) be consulted alongside this submission.

¹ HSE (2022) [Campaign](#)

² [The Mental State of the World in 2022; A publication of the Mental Health Million Project](#)

³ <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-28-adequate-standard-of-living-and-social-protection.html>



A Note on Language

While our mental health policy, Sharing the Vision⁴, uses the terminology ‘mental health difficulties’, the UNCRPD⁵ refers to ‘psychosocial disabilities’. MHR advocates for the choice of the individual in how they prefer to identify or describe their mental health, but it is important to acknowledge that people with mental health difficulties have rights under the UNCRPD, which Ireland ratified in 2018.

Sharing the Vision and Department of Employment Affairs and Social Protection (DEASP)

MHR would like to highlight Recommendation 66 (p.96) of the Sharing the Vision Implementation Plan⁶:

“Tailored measures should be in place in relevant government departments to ensure that individuals with mental health difficulties can avail, without discrimination, of employment, housing and education opportunities and have an adequate income”

At the time of writing, the most recent update on this recommendation states that:

“A proposed approach to monitoring the implementation of government policy areas, including Housing, Social Protection, Education, Employment, etc., which contained actions of relevance to this recommendation was presented to and approved by the National Implementation and Monitoring Committee.”⁷

Poverty Risk and Mental Health

In May 2023, in the Dáil motion on Food Costs and Rising Grocery Bills, it was acknowledged that inflation on daily costs such as groceries has reached the highest level ever on record and that those with mental health difficulties are at even greater risk of being impacted by this.⁸ The Cost of Disability in Ireland report⁹, now over a year published, clearly outlines the additional costs faced by people with disabilities, with those with mental health difficulties (‘to a great extent’) reporting the highest level of deprivation. The average additional cost of having a mental health difficulty was reported to be €13,251 per year.¹⁰ This means that people with mental health difficulties are at risk of being more adversely affected by the cost of living crisis.

⁴ Department of Health (2020) Sharing the Vision; A Mental Health Policy for Everyone. Dublin: Government of Ireland

⁵ <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/convention-on-the-rights-of-persons-with-disabilities-2.html>

⁶ <https://www.hse.ie/eng/services/publications/mentalhealth/sharing-the-vision-implementation-plan-2022.pdf>

⁷ NIMC [Policy Implementation Status Report Quarter 4, 2022](#), p. 60

⁸ 9th May 2023. Dáil motion on Food Costs and Rising Grocery Bills. [Transcript](#)

⁹ [Indecon \(2021\) The Cost of Disability in Ireland - Research Report](#)

¹⁰ *ibid*, pg. xii



In the report of the Social Inclusion Forum (2023)¹¹ the stark discrepancy between the low welfare rates and the high cost of living, particularly for those with a disability who face additional costs, was highlighted by participants.

Ahead of the National Economic Dialogue, Mental Health Reform, and 27 other social, environmental and voluntary organisation issued a joint call to the government to address energy poverty.¹² Specifically, the call urges the government as a matter of urgency to increase core social welfare payments by a minimum of €25 to reflect the impact of the cost-of-living crisis.

Recommendations:

Increase all core social welfare payments by a minimum of €25 to reflect the impact of the cost-of-living crisis.

Employment and Mental Health

While we are now experiencing a record low unemployment rate in Ireland (3.8% as of May 2023¹³), Ireland has one of the biggest employment gaps between people with and without disabilities in the EU.¹⁴ There are a number of national policies and strategies which commit to rectifying this and improving employment outcomes for people with mental health difficulties, including Sharing the Vision¹⁵, [the Pathways to Work Strategy 2021-2025](#), the [Comprehensive Employment Strategy for People with Disabilities \(CES\)](#) and the [National Disability Inclusion Strategy 2017 - 2021](#) and the [Roadmap for Social Inclusion 2020 - 2025](#). These are underpinned by international commitments under the UNCRPD, the World Health Organisation's Report on Disability¹⁶ and the [European Union \(EU\) Disability Strategy](#).

There have been significant delays in the implementation of the [Comprehensive Employment Strategy for People with Disabilities](#). While there has been improvement in overall rates of employment in Ireland, this has not been the case for people with disabilities.^{14,17} MHR are calling for the implementation group of Comprehensive Employment Strategy for People with Disabilities to be reconvened and progressed as a matter of urgency.

¹¹ Revitalising the Roadmap: Progress and Priorities. CWI/EAPN IRELAND PREPARATORY WORKSHOPS KEY MESSAGES TO THE SOCIAL INCLUSION FORUM 2023

¹² [Friendsoftheearth.ie. Cross section of NGOs urge Government to tackle cold homes and fossil fuels in Budget 2024.](#)

¹³ <https://www.cso.ie/en/releasesandpublications/ep/p-mue/monthlyunemploymentmay2023/>

¹⁴ <https://www.esri.ie/publications/identification-of-skills-gaps-among-persons-with-disabilities-and-their-employment>

¹⁵ Department of Health (2020) Sharing the Vision; A Mental Health Policy for Everyone. Dublin: Government of Ireland

¹⁶ <https://www.who.int/teams/noncommunicable-diseases/sensory-functions-disability-and-rehabilitation/world-report-on-disability>

¹⁷ OECD (2021) [Disability, Work and Inclusion in Ireland; Engaging and Supporting Employers](#)



The most recent Survey on Income and Living Conditions (SILC) data (2022)¹⁸ shows that those most at risk of poverty were those who were unemployed (35.6%), followed by those who were unable to work due to long-standing health problems/disability (35.2%).

Due to the delays with the data from the Central Statistics Office, there is a lack of recent statistics on mental health and employment. However, of the 37 countries within The Organization for Economic Cooperation and Development (OECD), Ireland has one of the lowest rates of employment for people with disabilities.¹⁷ The [OECD \(2021\)](#) has recommended that Ireland should scale up effective supported employment programmes, such as Individual Placement & Support (IPS) for persons with mental health difficulties and ensure that such programmes receive long-term planning and funding. There is also a need to support employers to engage with programmes such as IPS, as was highlighted in our [submission on the Reasonable Accommodation Fund](#).

Programmes providing employment supports for people with mental health difficulties in Ireland have been peripheral and excluded from the mainstream suite of active labour market programmes offered by the Department of Social Protection. The [Reasonable Accommodation Fund](#) (RAF) aims to help employers take appropriate measures to help a person with a disability to access, improve or retain their employment. However, there are no support provisions specifically for people with mental health difficulties included in the RAF. This deficit was highlighted by Mental Health Reform in a submission on the review of the RAF in May 2022 and again in our [Pre-Budget Submission 2023](#).¹⁹ In Budget 2023, an additional €1 million in funding was allocated to expand the provisions made under the Reasonable Accommodation Fund and to support the recommendations from the review.²⁰ This report was due to be published in Quarter 2 of 2023.²¹ However, at the time of writing, the report had not been published and no further supports have been put in place to support reasonable accommodations in the workplace for people with mental health difficulties.

Recommendations:

- Reconvene the implementation group of the [Comprehensive Employment Strategy for People with Disabilities](#) and progress the strategy as a matter of urgency
- Incentivise engagement with supported employment programmes (e.g. IPS) through the Reasonable Accommodation Fund
- Include supports for people with mental health difficulties in the Reasonable Accommodation Fund
- Publish the review of the Reasonable Accommodation Fund and outline how the €1 million allocation from Budget 2023 will be spent

¹⁸ CSO Ireland (2022) Survey on Income and Living Conditions (SILC)

¹⁹ <https://www.mentalhealthreform.ie/wp-content/uploads/2022/06/MentalHealthReformSubmissionRAF.pdf>

²⁰ <https://www.oireachtas.ie/en/debates/question/2023-04-18/1309/>

²¹ <https://www.oireachtas.ie/en/debates/question/2023-03-28/83/>



Flexibility in the Social Welfare System

MHR would like to reiterate the point from our pre-budget submission last year, that the social welfare system requires greater flexibility. Recommendation 73 of our national mental health policy, Sharing the Vision states that:

“In line with the strategic priorities of the Comprehensive Employment Strategy for People with Disabilities, the way people come on/off income supports should be streamlined to maximise entry or re-entry to the workforce with confidence and security. This should happen without threat of loss of benefit and with immediate restoration of benefits where they have an episodic condition or must leave a job because of their mental health difficulty.”
(p. 69)

Strategic goal 3 of the CES is to Make Work Pay and it states that *“Income supports need to be flexible to allow people enter/leave the workforce in times of illness (automatic reverting to relevant benefits if person has to leave labour force)”* (p 70). Certain welfare supports, such as long-term disability payments have been highlighted as areas where reform is needed to *“simplify the system, remove anomalies, recognise the continuum of disabilities, and to support employment.”*²²

Mental health difficulties are often episodic²³ and it can take time for some individuals to adjust and learn how to manage their condition and maintain their recovery. Fear of losing social welfare benefits and the medical card are the most highly reported barriers to taking up work and achieving individual employment goals within the Irish context.²⁴ MHR is of the view that there is a fundamental need to implement a flexible benefits system to facilitate opportunities for people with a mental health difficulty to access work, step out of work, if needed, and re-enter the workforce numerous times, without fear of losing income support.

Recommendation:

Implement a flexible benefits system to facilitate opportunities for people with a mental health difficulty to access work, step out of work, if needed, and re-enter the workforce numerous times, without fear of losing income support

Disability Allowance

The €12 weekly increase to the Disability Allowance in Budget 2023²⁵ was a welcome acknowledgement of the need to adjust this allowance in line with the rising cost of living. However, a €12 increase on €208 is approximately a 5.8% increase, while inflation rose by 7.7% between March 2022 and March 2023.²⁶

²² [NIMC Implementation Report Q3 2022](#), p. 61.

²³ <https://www.heretohelp.bc.ca/q-and-a/whats-the-difference-between-mental-health-and-mental-illness>

²⁴ Department of Justice and Equality (2015) Comprehensive Employment Strategy for People with Disabilities (2015-2024). Dublin: Government of Ireland

²⁵ <https://www.oireachtas.ie/en/debates/question/2022-11-29/130/#:~:text=In%20addition%2C%20from%20January%202023,Blind%20Pension%2C%20and%20invalidity%20Pension>

²⁶ Central Statistics Office. [Consumer Price Index March 2023](#)



Given the additional costs associated with mental health difficulties discussed earlier⁹, and the cost of living crisis in Ireland, the disability allowance needs to be reflective of actual need.

The publication of the straw-man proposal for the restructuring of long-term disability payments, as committed to in the [Roadmap for Social Inclusion 2020 - 2025](#), was promised for Q4 of 2020. The most recently promised publication date was for Mid-May 2023.²⁷ Again, this publication date was not met. As the Department is now 2 and a half years passed its target deadline, MHR urges the Department to publish this proposal and open it for consultation without delay.

Recommendation:

- Given the rise in inflation, and the additional costs incurred by individuals with a disability, MHR believes that the Disability Allowance must be increased in Budget 2024.
- Publish the straw-man proposal for the restructuring of long-term disability payments

Cost of Disability

As far back as 1996 in Ireland, it has been reported that people with disabilities face additional costs not faced by non-disabled people. In that year, the [Commission on the Status of People with Disabilities](#) stated that “...the overall cost of living for people with disabilities is higher than for other people.”²⁸ The Cost of Disability Report⁹ in 2021 was a very welcome publication. The report states that measures to address the additional costs of disability should be based on a multi-faceted approach involving increased cash payments, enhanced access to service provision and specific targeted grant programmes.

In July 2022, a [Private Members Motion](#) was raised about the Cost of Disability where it was highlighted that this report, written before the cost-of-living crisis, outlines the urgent need for measures to address the additional costs faced by people with disabilities. This need is even further amplified by the additional financial strain of the cost-of-living crisis.

In spite of all this, over a year since the publication of the Cost of Disability report, there has been no detailed action plan to address the economic disparity experienced by those with disabilities and there was no cost of disability payment provided in Budget 2023. The Social Inclusion Forum (2023) report stated that “*The additional costs for those with a disability is well known but is all but ignored by the State.*” (p.8)¹¹

Mental Health Reform is a member of the Oireachtas Disability Group (ODG). The ODG is comprised of six national umbrella bodies representing disabled people’s organisations; disability and mental health service providers; and advocacy groups - namely the Disability Federation of Ireland (DFI); Inclusion Ireland; Independent Living Movement Ireland (ILMI); Mental Health Reform (MHR); National Disability Services Association; and the National Federation of Voluntary Service Providers.

²⁷ <https://www.oireachtas.ie/en/debates/question/2023-03-28/82/>

²⁸ A Strategy for Equality; Summary of the Report of the Commission on the Status of People with Disabilities (1996), p. 6



As mentioned in MHR’s pre-budget submission 2023, the ODG has been calling for a €20/week cost of disability payment.²⁹ Similarly, [Social Justice Ireland](#) also called for the introduction of a cost of disability allowance of €20/week ahead of Budget 2023. It is important to recognise how incredibly modest an ask this is given that this only amounts to €1,040/year per person which is far below even the lower end of the average additional costs identified in the report. Thus, this request is only a starting point, pending publication of the Action Plan on the Cost of Disability Report (2021) which should address the economic pressures more thoroughly.

As is previously noted, the highest annual additional cost of disability in this report was recorded by those with mental health difficulties ('to a great extent').¹⁰ One suggested measure in the report to address this is through cash payments.

Figures - Response from DEASP on Parliamentary Question [23016/22](#)

Estimated additional cost to the Exchequer of a weekly cost of disability payment of €20, €30 and €40			
264,960	€20	x 52	€276m
264,960	€30	x 52	€413m
264,960	€40	x 52	€551m

Recommendations:

- The Cost of Disability Payment is introduced in 2024 - at least €20/week
- An Action Plan is published indicating a roadmap, targets and timeframes of how to address the findings of the Cost of Disability Report 2021
- Clearly outline the actions and timeframes to address the additional costs of having a disability in the National Disability Inclusion Strategy (NDIS)

Advocacy Services

MHR has long been a proponent of the need for funded, accessible, independent advocacy services for children and adults with mental health difficulties.³⁰ MHR has called for the right to advocacy to be placed on a statutory footing in the ongoing reform of the Mental Health Act, 2001.³¹ MHR sits on the Sharing the Vision Working Group on Advocacy, relating to Recommendation 65. A gap analysis of the advocacy services in mental health is currently being undertaken and is due to be published this year. In order for these gaps to be addressed adequately, advocacy will need to be sufficiently resourced in Budget 2024.

²⁹ https://www.disability-federation.ie/assets/files/pdf/oireachtas_disability_group_pre_budget_submission_2022.pdf

³⁰ See for example, the Pre-Legislative Scrutiny process on the Assisted-Decision Making (Capacity) Act (2015) – MHR’s report to the Committee [here](#).

³¹ <https://www.mentalhealthreform.ie/campaigns/reform-the-mental-health-act/>



Recommendations 54, 65 and 92 in the implementation roadmap of Sharing the Vision all highlight the importance of advocacy for persons with mental health difficulties.

Existing Advocacy Services

As stated in our pre-budget submission last year, MHR understands that the development of a full independent advocacy service for people with mental health difficulties is the responsibility of the Department of Health as per action no. 60 in the [National Disability Inclusion Strategy 2017-2022](#). However, the National Advocacy Service (NAS)³², established under the Citizens Information Board, and under the aegis of the Department of Social Protection, provides a non- statutory advocacy service to people with disabilities, including individuals with mental health difficulties. In fact around one quarter of the people accessing the support of NAS in 2021 had a mental health difficulty.³³ The 2022 annual report is not yet available at the time of writing.

NAS focuses primarily on individuals who reside in HSE supported accommodation. As a result, in addition to being significantly under-resourced, advocacy supports provided through the Citizen Information Centres are limited in their remit. In their 2021 annual report, NAS reported that they had not received funding for any new permanent staff since 2011 and yet demand for their services has increased by 50% in the last five years.

Peer Advocacy in Mental Health³⁴ offers a peer advocacy service to individuals across the country, prioritising services to individuals in acute inpatient units. The Youth Advocate Programmes Ireland³⁵ also provides advocacy support to young people in inpatient care, and some Community teams in CHO2 West.

It is important that we adequately fund the existing advocacy services available in Ireland and facilitate expansion of their remit to allow access for those in the community, as well as in inpatient services.

Recommendation:

Increase capacity of national advocacy services for people with mental health difficulties in both inpatient and community settings.

Additional Comments

MHR notes the detrimental impact of living in poverty on the mental health of children, families and older people. MHR will be calling for funding for the Youth Mental Health Pathfinder Project which is a cross-departmental project to be funded by the Department of Public Expenditure and Reform. MHR calls on the Department of Social Protection to allocate some administrative resources to addressing the many areas of mental health difficulties across the lifespan of people living in Ireland. Many aspects of the UN Convention on the Rights of Persons with Disabilities (UNCRPD) and the UN Convention on the Rights of Children (UNCRC) will require input and resources from your Department. Supporting the Child Poverty and Wellbeing Unit in the Department of the Taoiseach will also require input

³² <https://advocacy.ie/>

³³ <https://advocacy.ie/app/uploads/2022/06/NAS-and-PAS-Annual-Report-2021-Final-web.pdf>

³⁴ <https://www.peeradvocacyinmentalhealth.com/>

³⁵ <https://yapireland.ie/what-we-do-yap-ireland/our-services-yap-ireland/>



from the DEASP. MHR calls on the DEASP to integrate progressing and improving mental health outcomes across all clients and staff of the Department and for greater, visible collaboration between your Department and other key stakeholders.

Conclusion

MHR welcomes the opportunity to make this submission to the DEASP ahead of Budget 2024. We appeal to your Department to address the cost of living crisis faced by people with disabilities that the State have been aware of for many years, to incorporate provisions for mental health supports into the Reasonable Accommodation Fund and to expand the reach of the National Advocacy Service for people with disabilities.

For more information on any of the above content please contact Suzanna Weedle, Policy and Advocacy Coordinator at sweedle@mentalhealthreform.ie or at 0860245409

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