



Disability and Work Strategy Team
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Submitted via email to: disabilityemploymentstrategy@communities-ni.gov.uk

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Dear Disability and Work Strategy Team

Re: Consultation on the Disability and Work Strategy

Due to pressure of time and workload we are unable to complete a full response to the Department's consultation on Disability and Work: A Strategy for Northern Ireland. We wish to endorse Mencap's response to this consultation.

Please accept this letter as our response highlighting the following issues:

- There is no doubt of the need to achieve better employment outcomes for people with disabilities and health conditions given that Northern Ireland has the worst disability employment rate in the UK – 43.4% (2023/24) which is around half of the rate for people without disabilities (83.7%). These figures indicate the scale of the challenge and the need for strong, urgent action to address this longstanding inequality.
- **Scope of the Strategy** - We therefore welcome the draft Strategy but stress that the Strategy **must** be a genuine priority for the whole Executive. It must have the necessary leadership, accountability and transparency and have sufficient investment to effectively deliver on its principles, actions and outcomes.
- **Guiding Principles** – Overall we welcome the guiding principles of the Strategy particularly in terms of being 'person-centric'. People with disabilities and health conditions must be meaningfully included and the principle of co-design should be central to its design and delivery. People with disabilities and health conditions are not a homogenous group and we want to see a more individualised approach which is tailored to specific needs. We believe that effective work in this area will help to ensure that more people with disabilities and health conditions are supported into work, enabled to access good quality work and able to stay in work with appropriate supports. We echo the comments from Mencap who queried with regards to the 'Collaborative

and joined-up' principle: "*whether this was fully implemented in practice during the development of this draft Strategy. The wider disability sector was not involved – or asked to identify disabled people to take part – in 'co-design' of the Strategy.*" In terms of the 'Flexible and responsive' principle we stress the need for this to apply to all involved so that it equally applies to Government Departments as well as to the Community and Voluntary sector.

- **Overarching Outcome** – We welcome the fact that a time-bound measurable target has been outlined in the draft Strategy. Without this progress cannot be effectively tracked and the Strategy will not deliver meaningful change. However, we are disappointed that a disability employment rate increase from the 2023/24 rate of 43.4% to just 50% over ten years is nowhere near ambitious enough.
- **Sub-outcomes** – We broadly welcome the sub-outcomes listed in the draft Strategy however it is difficult to comment further without any detail on the data being used to measure these. There are questions to be asked on how the data will be collated, how often this will happen, who is responsible for collating and reporting on the data and how the data will be made accessible.
- **Key Themes:**
 - **Personalised Support** – the consultation document acknowledges that there is a need to 'build trust' with DfC frontline staff and in an environment of benefit conditionality and sanctions this is very difficult. The benefits system is complex and there is a lot of fear about welfare changes and being financially worse off in making a move into work. There is much work to be done in these regards and a genuine partnership with the Community and Voluntary sector who have trusted relationships in these spaces must be part of this process. The Community and Voluntary sector have many years of experience working in genuine partnership to improve outcomes for disabled people and Government departments need to get better at working this way.
 - **Inclusive Skills, Careers and Educational Transitions** – better planning, good supports, more joined up working and better funding for youth provision is needed both before and after young people leave school.
 - **Supporting and Enabling Employers** – employer engagement should not be the sole remit of statutory bodies and many employers trust Community and Voluntary sector providers who provide genuine support and often achieve better outcomes for people. Northern Ireland is a small business economy and smaller employers can struggle to provide adequate supports particularly in relation to flexible working options. Small businesses need to be better helped and supported by Government so that employees have realistic access to the rights and supports they need in work. We also believe that it is important particularly for small and micro businesses to emphasise the benefits to employers of providing flexible, inclusive and compassionate workplaces. The benefits are well documented and there is no doubt that employees feel more goodwill towards their employer if they are valued and respected within their working environment. This helps to increase loyalty and retention rates. It helps to reduce employee turnover and associated costs, potential reductions in sick leave and helps to boost employee wellbeing and

productivity. It can also help organisations to attract new staff and diverse workforces.

- **Strategic and Structural Enablers** – this theme discusses “*collaboration across the disability and work agenda*”, “*embedding the “Nothing about us without us” principle*”, “*the principle of co-production*” and engaging and listening to “*stakeholders, advocates, and those with lived experience of disability*.” The Women’s Regional Consortium strongly advocates for genuine engagement and co-design with people with lived experience of disability/health conditions and the organisations who work with them as a key and ongoing part of developing and implementing this Strategy.
- **Strategy’s Actions:**
 - **Issue 1 - Personalised Support** – it must be acknowledged that not everyone is able to work full-time and for some people with disabilities/health conditions it is not viable or sustainable. It is important that people are given a genuine choice in relation to work. Providing personalised support in a trusted environment where people with disabilities/health conditions are not scared to discuss their issues and support needs must be carried out in partnership with the Community and Voluntary sector who know their local communities, the needs of their service users and have years of experience in this work. Without this genuine partnership working through intelligent commissioning, investment and true valuing of the Community and Voluntary sector this will not be effective and the outcome of the Strategy will not be delivered. Employers must also be involved and supported in this process.
 - **Issue 2 - Tailoring Support to Meet Individual Needs** – we agree with Mencap that “*disabled people often feel more comfortable going to VCS organisations, who are experienced, approachable and knowledgeable*.” As we have previously stated there is a real need for genuine partnership working in order to be able to achieve this action. This must include sufficient funding to do this work. This is particularly important given the current funding crisis within the Community and Voluntary Sector and the need to provide capacity to be able to provide the right support to disabled people rather than the current situation where the sector is continually being asked to provide more with less.
 - **Issue 3- Navigating Our Disability and Work Ecosystem** – there is a need to take into account that different local areas have different issues particularly for rural communities where there are significant issues around access to services including transport and childcare. In order to achieve this action co-design is key so that Government departments, the Community and Voluntary sector, employers and those with lived experience work together to ensure there is better integration, signposting, and coordination.
 - **Issue 4 - Difficulties Transitioning From Education** – actions are needed to prevent a ‘cliff edge’ for those people with disabilities/health conditions leaving formal education. There is a need to invest in ‘soft skills’ including things like confidence building and managing anxiety/stress which can also be barriers to work. Once again, Community and Voluntary Sector partners including Women’s Centres are important in these areas.

- **Issue 5 - A Need for Specialised Careers Advice and Support** – we support Mencap’s suggestion for a trial or taster to help people explore what education/training/work they might like to do but it is critical to ensure that they do not lose access to benefit entitlements during this process.
- **Issue 6 - Accessing Appropriate Skills Provision** – training and skills provision in the Community and Voluntary sector is often more flexible and adaptable to the needs of people with disabilities/health conditions. We know from our work with Women’s Centres across Northern Ireland that the skills and learning opportunities provided by the Centres are valued by women for their accessibility, flexibility and relevance to their individual needs. For some of the most marginalised women (including ethnic minorities and lone parents) the prospect of increased economic participation can depend on the availability of appropriate integrated childcare and access to education/training opportunities at community level. A lack of appropriate integrated childcare and community education acts as a fundamental barrier to the engagement of socioeconomically disadvantaged women in education and training and in employment. This is the kind of integrated provision that is provided by Women’s Centres and which is so vital to these women. There is also a need to consider issues such as transport and flexibility around learning options (online and classroom options). As we have previously stated the lived experiences of people with disabilities/health conditions are vital in helping to ensure a better understanding of the issues and challenges.
- **Issues 7-9 – Supporting and Enabling Employers** – given that Northern Ireland is a small business economy there is a real need for additional work with small employers to encourage and support them to recruit more disabled people. More work must be done in emphasising the benefits to employers of providing flexible, inclusive and compassionate workplaces. Once again, there is a need to work in partnership between Government, the Community and Voluntary sector, employers and with those with lived experience on the actions arising out of this Theme.
- **Issues 10-12 – Strategic and Structural Enablers** – it is important that clear Terms of Reference are set so that oversight groups are effective and focused. Co-production is vitally important to this Theme but this must be ongoing and genuine in order to be effective and achieve better employment outcomes for disabled people.
- **The Disability and Work Council – Functions** – we support Mencap’s call for a cross-departmental approach with other departments fully engaged in the delivery of the Strategy – this must be clearly incorporated into these structures. We repeat our call for genuine co-design to be integral to the work of the Disability and Work Council.
- **The Disability and Work Council – Partnership Working** – we support the following points made by Mencap which are essential to achieving the Strategy’s goals and objectives:
 - The Strategy must be a genuine priority for the whole Executive and have cross-departmental buy-in.
 - All-party commitment to maintain and continuously develop the Strategy and its structures.

- A genuine and equal partnership with the disability sector, with disabled people and with the wider Community and Voluntary sector throughout.
- Increased and sustained investment in disability employment provision across Northern Ireland.
- **Other Comments** – Any programmes to be delivered through the Strategy must ensure that the Community and Voluntary sector are front and centre of any service delivery given their trusted position, knowledge of the needs of local communities and connectedness to service users and their needs. This must not be a Strategy which leads to services being provided in-house and delivered by Departments. The Women's Regional Consortium are concerned that the specialisms provided by Community and Voluntary Sector providers are not given sufficient importance in the consultation document. The Community and Voluntary sector must be valued as a key delivery partner in this process.

Gendered Issues

Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work, more likely to be providing care either for children or other family members which limits their ability to carry out paid work and are more likely to have to make up for cuts to public services through unpaid work.

Economic inactivity levels are stubbornly high in Northern Ireland and the female rate of economic inactivity is consistently higher than the male rate. The most recent figures show the economic inactivity rate for females is 31% compared to the male rate of 22.5%.¹

It is clear that the high cost of childcare in Northern Ireland affects the ability of parents to work and that childcare costs act as a significant barrier to parents entering and staying in the workforce particularly for women. The availability of accessible, affordable childcare is key to helping tackle economic inactivity, disadvantage and gender inequality. Yet childcare is not mentioned once in the draft Disability Employment Strategy. This is a major oversight and must be rectified in the final Strategy. This further reinforces the need for this Strategy to be cross-departmental and for co-design to be integral to the design and delivery of the Strategy. We support the Childcare for All statement that *“the childcare needs of everyone in the Northern Ireland workforce must be at the forefront of planning to ensure parents and providers are not facing unnecessary risks or barriers to work.”*²

The Women's Centres Childcare Fund (WCCF) provides important childcare for the most disadvantaged children and families enabling the most excluded in disadvantaged communities to access childcare and support. Parents who avail of WCCF supported childcare also access a wide range of programmes available in their communities. Many of the services involve support to parents including: parenting skills, back to work programmes, advice services and health programmes.

¹ Northern Ireland Labour Market Report, NISRA, November 2025

<https://datavis.nisra.gov.uk/economy-and-labour-market/labour-market-report-november-2025.html#>

² Childcare for All Campaign – COVID-19 Statement, May 2020

<https://www.childcareforallni.com/post/childcare-for-all-campaign-covid-19-statement>

For some of the most marginalised women (including ethnic minorities and lone parents) the prospect of increased economic participation can depend on the availability of appropriate integrated childcare and access to education/training opportunities at community level. A lack of appropriate integrated childcare and community education acts as a fundamental barrier to the engagement of socio-economically disadvantaged women in education and training and in employment. This is the kind of integrated provision that is provided by WCCF and which is so vital to these women.

“I am a lone parent, there is a lack of suitable jobs in the area, expensive childcare and I have mental health issues. I would struggle financially if working full-time with childcare costs, rent and regular expenses so it isn’t really a viable option.”

“I can’t afford childcare as I don’t get any support with it. I am lucky I have family to look after my kids. Without them I would need to leave work. My salary is not enough to pay the mortgage and childcare without some help.”

“I have two children under four. The cost of childcare is extortionate. It is our biggest outgoing. Despite help from grandparents we struggle to make these payments.”

“I am a single parent and I have two children. I live in a rural area and I used to have a good job in the city. I had to give up the job as I couldn’t get good quality, affordable childcare outside normal office hours to suit the job and the travel times to and from work. I had to leave home early to get to work and was home later because of the travel time involved. I took a job closer to home so that I could drop the children off and pick them up from school. The job suits my home situation but is about a third of the salary I used to have.”

“I couldn’t afford childcare so I had to come out of work. I can’t afford crèche fees I’m on my own. I’ve no help. It literally sent me into a spiral of depression. It left me feeling so inadequate not being able to work, I’ve worked all my life. I do want to work but I can’t afford to, I can’t.”

“I have to consider childcare, I have three kids and no one to mind them so I have to be able to work weekends/evenings in holiday times. I would have to take a lot into consideration before I could take work. There may not be a benefit in me taking a full time job with the cost of childcare – you are tied. I feel that this is more an issue for women.”

(Quotes taken from Women’s Regional Consortium and Ulster University Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

Finally, we refer the Department to Women's Regional Consortium research on Women, Skills & Barriers to Work³ which presents important evidence on the reasons why women are out of work and the supports they need to get back into education/work. The research showed that 55% of women who took part were out of work due to sickness and disability. In detailing what would help them to move into education or work 50% said better supports for illness and disability. This research made a number of recommendations around support for illness/disability including the need for more Government funded training and education schemes to improve access to education and learning opportunities for people with disabilities, investment in improving access to mental health support services in Northern Ireland and for employers to do more to make it easier for workers to combine work with illness and disability including through the provision of flexible working arrangements.

“It’s the waiting lists for counselling for mental health. I’m on a waiting list and I’ve been waiting for 6 months. Counselling and support groups are underfunded for this work which could really help people to work and move on with their lives.”

“I’m disabled and you’re supposed to have things in jobs to help you but there isn’t anything especially for the mental health side of it. There’s nothing there to help with that.”

“You don’t know how you are from one day to the next. There’s classes I’ve missed because I didn’t know if I was going to be able to get out of bed, that’s the way it is with mental health.”

“The reason I’m out of work is my mental health. I’m trying to get a part-time job but there’s no part-time jobs. I don’t want to sound lazy but because I’ve been out of work so long I couldn’t throw myself into a full-time job.”

(Participants in Women, Skills & Barriers to Work Research, December 2024)

There is a need to work intensively with employers and businesses to ensure they are equipped to provide the flexibility and reasonable adjustments that facilitate more disabled people to enter and stay in the labour market. This is a particular consideration for Northern Ireland which is a small business economy. Therefore, in order to make any significant change in the area of employability small businesses must be supported so that they can properly support those with disabilities and health conditions.

“Businesses don’t want to employ people with mental health issues – if they need mental health days and things like that.”

“It will fall on to employers, they will have to deal with it and they don’t want to.”

³ Women, Skills & Barriers to Work, Women's Regional Consortium, December 2024
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/12/Women-Skills-Barriers-to-Work-1.pdf>

“Where are the jobs? Employers don’t even have the money to make reasonable adjustments. If you go to work with a disability then you’re going to need reasonable adjustments and support. There isn’t the money to support that.”

“People with disabilities shouldn’t be discriminated against when they go to work but they are.”

“Employers are not going to do it unless they’re going to be compensated for it. The business needs to make money. They will not want to take on someone with a disability if they’re going to need more time off. Employers need support to employ people with disabilities.”

“My daughter has serious mental health problems and has pushed herself into college and got herself a job as a trainee hairdresser. Her employer wouldn’t work around her mental health so now doesn’t have a job. She wanted some flexibility in the job for her bad days but the employer wouldn’t have that. She’s just a trainee to them. It’s going to get to the point where if no one is going to take her on and support her she’ll end up on benefits because of this.”

“They need to look at providing support services in schools to help early on, to help children prepare for work and to help them deal with mental health issues.”

“The Government should have employment programs to ease people into work over 6 months so people can see if it is feasible for them mentally and physically. They need programs like this with support and help.”

(Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper)

Kind Regards



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