



Active Ageing & Disability Policy Branch
Department for Communities
Level 7
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BT2 7EG

Submitted via email to: disabilitystrategy.consultation@communities-ni.gov.uk

19th March 2026

Dear Active Ageing & Disability Policy Branch

Re: Consultation on the NI Executive Disability Strategy 2025-2035

Due to pressure of time and workload we are unable to complete a full response to the Northern Ireland Executive Disability Strategy 2025-2035 consultation. We wish to endorse the response to this consultation by the NI Anti-Poverty Network (NIAPN)¹ and Imtac².

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

- We share the concerns raised by Disabled People Against Cuts Northern Ireland (DPAC) who have stated that *“the draft Strategy, largely developed ignoring coproduction, lacks the strategic and resource commitments required to deliver change.”* DPAC has written an open letter to the Executive which we support and which calls for a rethink to their approach as follows:
 - Engage in an urgent dialogue with deaf and disabled people to develop a Disability Strategy with commitments and an action plan containing measurable and time bound targets to address the issues deaf and disabled people face.
 - Specific resources to be devoted to delivering the Strategy.
 - Embed co-production with deaf and disabled people at all stages of development and delivery.
- Like NIAPN we support the overall vision of the Disability Strategy which is *“An inclusive society that respects, protects promotes and fulfils the rights of all Deaf and disabled people to participate fully, free from discrimination”*. We

¹ <https://niapn.org/niapns-response-to-the-draft-disability-strategy/>

² <https://www.imtac.org.uk/comments-imitac-about-public-consultation-draft-ni-executive-disability-strategy-2025-2035>

also share the concerns of NIAPN that the Disability Strategy in its present form will be unable to achieve this vision without an action plan, clear SMART targets and the necessary funding.

- The Women's Regional Consortium supports the points made by Imtac in their response which highlight three major omissions from the draft:
 - No published Action Plan meaning the draft Strategy is incomplete without the significant detail about how and what will be delivered which is contained in the Action Plan.
 - Despite being a key recommendation of the Expert Advisory Panel and the Co-Design Group there is no indication there will be any additional resources made available to help deliver the Strategy. As Imtac have stated: *"A Strategy without resources cannot deliver any meaningful improvements to the lives of Deaf and Disabled people, only offer more of the same."*
 - There is no timeline for the development of an Action Plan and publication of a final Strategy.
- The Women's Regional Consortium shares the concerns of NIAPN that there is not enough focus throughout the Disability Strategy on the disproportionate rates of poverty for deaf and disabled people. Poverty is both a cause and a result of disability and it is clear that disabled people face increased costs.
- A report by the All-Party Parliamentary Group (APPG) on Poverty and Inequality³ found that: *"disabled households face additional barriers and costs, including higher spending on food, heating, transport and medical support, which can amount to additional costs of over £1,000 per month. These costs, combined with inaccessible public services and a punitive social security system, already push many disabled people to the brink."*
- The latest Scope research on the Disability Price Tag 2025⁴ also shows the increased costs experienced by disabled people. *"Disabled households need an extra £1,095 each month on average. This is just to have the same standard of living as non-disabled households. As inflation is expected to rise over the next five years, the extra cost of disability is estimated to reach £1,224 per month by 2029 to 2030 financial year."* This will be further exacerbated by current events where a war in the Middle East is driving up the cost of heating oil which so many households in Northern Ireland rely on. There is no doubt the longer this situation continues it will result in increased energy prices (for both oil and gas) and increased food and commodity prices. This is especially concerning for disabled households who have to spend more on these essentials.
- A report into destitution in the UK by the Joseph Rowntree Foundation⁵ showed that there are strong links between disability and destitution. This research showed that almost two-thirds (62%) of destitute survey respondents stated that their day-to-day activities were limited because of a chronic health problem or disability. The report found inadequate social security is a driver of destitution. The most common source of income for all destitute households was social security benefits (72%).

³ The Disproportionate Impact of Poverty and Inequality on Disabled People, APPG on Poverty and Inequality's response to the Pathways to Work Green Paper, June 2025

<https://appgpovetyinequality.org.uk/home-page/appg-publishes-report-on-the-disproportionate-impact-of-poverty-and-inequality-on-disabled-people/>

⁴ <https://www.scope.org.uk/campaigns/disability-price-tag>

⁵ <https://www.jrf.org.uk/deep-poverty-and-destitution/destitution-in-the-uk-2023>

- Commitment 30 states *“We will align with and complement the implementation of the Executive’s Anti-Poverty Strategy”*. The Women’s Regional Consortium response to the draft Anti-Poverty Strategy for Northern Ireland outlined a range of concerns about the draft Strategy.⁶ We recommended that the draft needed to be completely rewritten using the evidence-based recommendations from the Anti-poverty Strategy Expert Advisory Panel and the Anti-Poverty Strategy Group. Therefore, unless the final Anti-Poverty Strategy is significantly different from the draft then aligning with it will do little to ensure that many deaf and disabled people will be lifted out of poverty. As NIAPN have stated without SMART targets and actions included in Disability Strategy it is unclear what this Commitment means.
- We share the concerns of NIAPN and other children’s disability charities that the draft Strategy did not take a life-cycle approach which would separate policies into children’s disability, transition to adulthood and adult disability. NIAPN’s concerns in relation to child poverty.
- Research shows that households with disabled children tend to experience higher levels of poverty, there is evidence of lower educational qualifications levels among disabled persons in Northern Ireland compared with other regions in the UK and students with additional needs/disability frequently leave school without the work readiness skills that employers expect. Add to this the state of Special Educational Needs provision which has been described as *“under extreme pressure, unable to respond to the scale of need and the complexity of issues that children are presenting.”*⁷ We agree with NIAPN that there must be measurable, targeted actions to address the lower educational qualification levels among disabled people in Northern Ireland.
- Northern Ireland has the largest disability employment gap of any UK region. Northern Ireland’s disability employment rate was 41.3% and the employment rate for people without a disability was 82.2%, suggesting a disability employment gap of 40.9% (April-June 2025).⁸
- The draft Disability Strategy Commitment 42 states: *“We will implement a new Disability and Work Strategy in meaningful partnership with Deaf and disabled people and stakeholders”*. The Women’s Regional Consortium responded to the consultation on the Disability and Work Strategy⁹ and raised a number of concerns about the draft including stressing the need for genuine engagement and co-design with people with lived experience of disability/health conditions as a key and ongoing part of developing and implementing the Strategy. We agree with NIAPN who have stated that it is unclear what actions will be taken within the two Strategies to address the disability employment gap or the disability pay gap. The two Strategies must include robust actions to address these gaps and to ensure progress in these areas. However, the reduction from the original revenue element of the Shared Prosperity Fund which is being replaced by the Local Growth Fund will now see a 74% reduction to revenue projects does not inspire confidence that employment and training support for Deaf and Disabled People and the charities that support them will be adequately invested in.

⁶ <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2025/09/Womens-Regional-Consortium-response-to-draft-Anti-Poverty-Strategy.pdf>

⁷ <https://www.niccy.org/review-of-sen-provision-too-little-too-late/>

⁸ <https://factcheckni.org/articles/employment-in-ni-does-northern-ireland-have-the-largest-disability-employment-gap-in-the-uk/>

⁹ <https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2026/01/Womens-Regional-Consortium-Response-to-Disability-and-Work-Strategy-Consultation-January-2026.pdf>

- We refer the Department to Women’s Regional Consortium research on Women, Skills & Barriers to Work¹⁰ 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.
- In conclusion we support the comments from both NIAPN and Imtac about what needs to happen in relation to the draft Disability Strategy. NIAPN *“urges the Minister to put poverty at the heart of the Disability Strategy. Given the extent to which disabled people face poverty, this is vital if the Disability Strategy is to make a real difference to Deaf and Disabled people.”*
- Imtac is *“calling on the Minister for Communities and the wider Executive to urgently review and revise the current draft Strategy.....Our key recommendation is that Executive Departments re-engage with Deaf, Disabled people and our organisations with a view to addressing widespread concerns about the draft Strategy.”*
- We support Imtac’s further recommendations on what the dialogue with the Minister and Executive should focus on as a priority:
 - Embedding co-production between Government and Deaf and Disabled people as a core commitment of the Disability Strategy.
 - Agreeing a commitment that ensures the Regional Disability Forum provides an effective and constructive body that can challenge Government (with broad agreement on the role, remit and make-up of the Forum).
 - Agreeing a clear, unambiguous commitment to deliver legislative reform as a priority within the first few years of the new Strategy being published.
 - Agreeing a clear, unambiguous commitment to deliver improvements to data collection.
 - Agreeing clear commitment to introduce an ambitious and innovative programme across Government to address attitudinal change and awareness raising such as the commitment to mainstream Disability Equality Training (adopted already by the Department for Infrastructure) across the NICS or embed the Social Model of Disability like the approach adopted by the Welsh Government.
 - Agreeing SMART commitments in the Strategy, aligning with priorities for Deaf and Disabled people and key articles of CRDP (including access to independent living, access to housing, access to an adequate standard of living, access to transport and the build environment, access to education at all levels, access to health services, and access to work and employment).

¹⁰ Women, Skills & Barriers to Work, Women’s Regional Consortium, December 2024
<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2024/12/Women-Skills-Barriersto-Work-1.pdf>

Kind Regards

A handwritten signature in blue ink that reads "Siobhán Harding". The signature is written in a cursive style with a large initial 'S'.

Siobhán Harding

Research & Policy Officer, Women's Regional Consortium