

7th April 2026

National Women's Council Submission

Public Consultation on the Cost of Disability



Introduction

Founded in 1973, NWC is the leading representative organisation working for women's rights and women's equality on the island of Ireland. We represent and derive our mandate from our membership, which includes nearly 200 groups and organisations from a diversity of backgrounds, sectors and locations across Ireland, including organisations representing disabled women. As a membership organisation, is uniquely placed to represent and communicate the concerns of women in Ireland.

The following submission is made in response to the *Public Consultation on the Cost of Disability* run by the Department of Social Protection, ahead of the *Cost of Disability Strategic Focus Network Summit* on 13th May. The following submission touches on all of the questions asked in the Guidance Document accompanying the consultation, although given the overlapping nature of the questions and some of the principles outlined in our submission, it is not strictly formatted in the same way as the Guidance Document.

At the outset, it's important to state that many of the organisations we've consulted with in developing this submission have been concerned at the short timeline for this submission, just 6 weeks with St. Patrick's Day and Easter in the middle of it. This restricted the ability of many people, and many DPOs, to meaningfully consult/survey their members, or for collective sectoral discussion to happen.

The consultation also misses the opportunity for presentation of evidence of analysis of previous submissions and work done by DPOs and other civil society stakeholders in recent years, including but not limited to submissions made under the cancelled Green Paper submission two years ago, submissions last year on the successor strategy to the Roadmap for Social Inclusion and Pathways to Work, and submissions made on the new National Strategy for Women and Girls. With limited or no feedback or thematic analysis of previous consultations, it is a significant missed opportunity and requires each submission and consultation to, to some degree, start from scratch – which is not ideal in developing an inclusive process. Many disabled people and DPOs were extremely frustrated by the process of the development of the Green Paper, and it is important to recognise what lessons have been learned from that.

It's also important to note that although there are different levels of needs and costs faced even among people with the same disability, the broad core issues consistently raised by DPOs and their members are shared and remain the same – and tackling the cost of disability is a key part of that. Central to any effective approach in developing the Cost of Disability Payment is ensuring that there

is real co-creation and co-design undertaken with disabled people and DPOs. We have outlined this further in the below submission.

Summary of NWC recommendations		
General Principles of Reform	Co-creation and co-design with disabled people and DPOs	The development of the Cost of Disability Payment, and the Strategic Focus Network Summit, must be done in a manner that ensures genuine co-creation and co-design of any proposed reform with DPOs and disabled people, with consultative input from civil society more generally
	Embedded in UNCRPD	Any proposals for disability payment reform must be explicitly and demonstrably embedded in Ireland’s obligations under the UNCRPD
	All-of-Government approach	Any development of a cost-of-disability payment should be done as part of a whole-of-government, cross-Departmental approach
	Data collection	Ensure reform is underpinned by robust equality data collection related to disability
Key Principles for Cost of Disability Payment	Principle 1: Cost of Disability Payment must recognise the intersectional gendered nature of inequalities and costs faced by disabled women	
	Principle 2: Cost of Disability Payment should be additional to core supports and services, and those supports should be strengthened and made more accessible and inclusive, including: <ul style="list-style-type: none"> • Social Protection, taxation and employment • Energy • Transport • Housing 	
	Principle 3: Cost of Disability Payment must be based on a social model approach	
	Principle 4: Cost of Disability Payment should be distinct from capacity to work	

Context

1 in 5 people in Ireland have a disability.¹ And although there have been advances in the recognition of efforts to tackle the challenges faced by disabled people in accessing services and engaging in all aspects of society, significant barriers and costs remain. The additional costs faced by disabled people are first and foremost a consequence of the structural barriers they encounter. These barriers, policies and practices that affect disabled people in Ireland today are not gender-neutral. Gender inequalities across our society combine with the barriers facing those with disabilities to create particular forms of exclusion and discrimination for disabled women.

The statistics concerning the inequalities faced by disabled people in terms of poverty, deprivation and employment are quite stark. Only 34% of disabled people are in paid employment,² highlighting significant barriers in the employment market with inadequate supports from public policy and employers. In the most recent Survey on Income and Living Conditions conducted by the CSO, among all groups of Principal Economic Status, the highest deprivation, at risk of poverty and consistent poverty rates occur for those who are unable to work due to long-standing illness.

The Indecon Report on the Cost of Disability in Ireland in 2021 found that that the average annual cost of disability in Ireland ranges from €9,482 to €11,734, based on additional costs associated with living expenses; mobility, transport, and communications; care and assistance services; equipment, aids and appliances; and medicines.³ This study was undertaken before the spike in inflation and costs experienced through 2022 and 2023, and before the Government's programme of once-off expenditures across Budgets in 2022, 2023, and 2024 – which were ended in last year's Budget.

Despite the ratification of the UNCRPD by the state in 2018 and the publication of the National Human Rights Strategy for Disabled People 2025-2030 last year, we have a long way to go to fully vindicate the rights of disabled people in Ireland.

The Programme for Government “recognise[s] that people with a disability face significant additional costs in their daily lives”, and commits to “[i]ntroduce a permanent Annual Cost of Disability Support Payment with a view to incrementally increasing this payment.” This is very welcome, and provides the basis for this public consultation. However, while the commitment is welcome it must be followed by urgent and effective action – and we have outlined the key principles and approach that we believe should underpin this action through this document.

¹ CSO (2023) [Census of Population 2022 Profile 4 - Disability, Health and Carers](#)

² CSO (2023) [Census of Population 2022 Profile 4 - Disability, Health and Carers](#)

³ Indecon (2021) [The Cost of Disability in Ireland](#)

General Principles of Reform

The Cost of Disability Strategic Focus Network Summit will be a significant opportunity to build a real and effective set of principles for the development of a Cost of Disability Support Payment. This section outlines how we believe that process can be most effective in develop effective, inclusive and broadly supported proposals for such a payment.

Co-creation and co-design with disabled people and DPOs

First, the Summit must be part of a process of direct input into the design and development of social protection and employment reform that affect disabled people. In order to make any such proposal effective, and to get community buy-in from those people the proposal seeks to support, any proposal must be co-created and co-designed with disabled people. The co-creation process must be clearly defined, accessible, with a transparent and structured approach to the development of proposals.

Embedded in UNCRPD

Second, the underlying principles for reform must and recognise and be based within the state's obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) – not alone is this vital to vindicate the rights of disabled people, but it is also necessary to ensure Government coherence across different policy areas.

All-of-Government approach

Third, and following from this, the cost-of-disability payment should not be developed in isolation to the broader supports and services needed by disabled people. There is limited benefit, and possibly significant harm, likely to stem from a siloed approach to reform for supports for disabled people. Any development of a cost-of-disability payment should be done as part of a whole-of-government, cross-Departmental approach, that looks at broader social protection reform and also seeks to integrate and develop a range of necessary services and supports in a way that builds a system of support for disabled people. This approach should focus on removing barriers for disabled people across a range of different sectors of society through the provision of services and supports. A cost-of-disability payment is not a solution – though it is an important support – to removing those barriers.

Data collection

While we know there are significant inequalities in the experiences of disabled women, the true picture isn't currently visible due to Ireland's lack of standardised approach to equality data collection. This needs to be addressed, including through embedding the new National Equality Data Strategy in all policy reform, so that policy responses can be targeted and effective for disabled women.

Cost of Disability Payment

In developing a Cost of Disability Payment, we have identified some underlying principles that must be met for any new proposal. We have also highlighted below some of the broader costs, barriers and access to services that must be tackled in conjunction with the development of the payment.

Principle 1: Cost of Disability Payment must recognise the intersectional gendered nature of inequalities and costs faced by disabled women

Women in Ireland are more likely to work part-time, to have interrupted careers due to unpaid care, and to have lower lifetime earnings and pensions. When a woman is disabled, these lower incomes collide with high extra costs, deepening poverty risk once costs of disability are factored in.⁴

Particular groups of disabled women face further barriers. The vast majority of lone parents in Ireland are women,⁵ and in these types of households, therefore, families face both the income-restraints of single earnings alongside the extra costs of being disabled in Ireland – and this is regardless of whether the people with a disability are the parents or the child in the household. Traveller and Roma disabled women, older disabled women, and migrant disabled women, all face a range of further barriers to social inclusion and risks to increased costs, poverty and deprivation.

The ongoing lack of individualisation within the social protection system is an issue which has distinctly gendered effects. Household-level means-tests restrict the financial autonomy and independence of disabled women, which can lead to financial dependency and potentially to financial abuse and domestic violence. There is a need to ensure that any Cost of Disability Payment is individualised to strengthen disabled people's autonomy and independence, and at a broader level this should be extended to other aspects of the social protection system as NWC have consistently called for.

The development of a Cost of Disability Payment must engage with the intersectional gendered nature of inequalities and costs faced by disabled women in Ireland today. A key mechanism for this is genuine co-creation and co-design of any proposed reform with disabled women and their representative organisations.

Principle 2: Cost of Disability Payment should be additional to core supports and services, and those supports should be strengthened and made more accessible and inclusive

It is essential that the development of a Cost of Disability Payment is not done in a manner that sees it as an alternative to or substitution for additional core supports and services. The cost of disability

⁴ IHREC (2025) [Adjusting-Estimates-of-Poverty-for-the-Cost-of-Disability](#)

⁵ CSO (2023) Census 2022

faced by disabled people is *in addition* to the other pressures, including but not limited to increasing inflation, energy and cost-of-living pressures, faced by people in Ireland today, and the development of a Cost of Disability Payment must reflect this. There are many existing income and public service pressures that are faced by disabled and non-disabled people alike – many of which we highlight each year in our Pre-Budget Submissions⁶ – but the Cost of Disability Payment must reflect the additional costs faced by disabled people, and different social protection and public service mechanisms must address the other income and public service pressures shared more broadly.

A cost of disability payment cannot, on its own, resolve the structural barriers that generate disability-related costs in the first place.⁷ Disabled people repeatedly emphasise that many of the highest and most persistent costs they face arise not from their impairments, but from inaccessible, under-resourced, or poorly designed public systems.⁸ Transport, housing, energy, healthcare, communication supports, and personal assistance services all play a decisive role in determining whether disabled people can live independently, participate equally, and avoid poverty.⁹ When these systems fail to meet accessibility standards or remain chronically underfunded, they directly inflate the cost of disability and undermine the impact of any income support.

As it stands, households that include disabled people “require between 41% and 93% extra disposable income to achieve the same standard of living as households with no disabled members.”¹⁰ Therefore, the cost of disability payment must be effectively rooted in an anti-poverty lens with a view to eliminating this gap. Currently, due to inadequate financial supports from government, people with disabilities are regularly faced with having to choose between these necessities and other crucial fundamentals: such as but not limited to food, access to independent shelter and accommodation, and consistent and affordable heating.¹¹ The disability-related costs to be considered here, as stated by various DPOs and identified in the Indecon Report, cover mobility, care, equipment, medication, and household adaptations.¹²

The Summit scheduled for this coming May must be *the beginning* of a co-design process, giving the wider sector and affected community sufficient time and space to explore policy options and create well-considered recommendations to feed into government. It should also engage with a range of

⁶ NWC (2025) [Pre-Budget Submission 2026](#)

⁷ Disability Federation of Ireland (2025) [Cost of Disability](#)

⁸ Cousins, M (2025) [How To Address The Cost of Disability in Ireland](#)

⁹ DFI (2025) [Pre-Budget Submission \(2026\)](#)

¹⁰ DFI (2025) [Cost of Disability](#)

¹¹ Ibid

¹² Cousins, M (2025) [How To Address The Cost of Disability in Ireland](#)

other areas where access to supports for disabled people are needed, and a non-exhaustive list of these are highlighted below.¹³

Social Protection, taxation and employment

Employment, social protection supports and secondary benefits (such as the Free Travel pass) should be linked up in a way that ensures that disabled people are not disincentivised from taking up paid employment as a result of cliff edges and reductions in supports and secondary benefits. Ensuring that thresholds and disregards are indexed and benchmarked is a key part of this, not just for disability-related payments but across the social protection system.

The National Disability Authority states there to be a disability-employment gap in Ireland of 37%, the highest in the EU and much higher than the EU average of 21.4%.¹⁴ the additional costs associated with having a disability must be viewed as distinct and of little relevance to individual labour activation,¹⁵ and additional supports are needed to support disabled people who want to engage in paid employment. Alongside stronger in-work options (such as a right to remote, flexible and blended working; as well as having the option to be in office) and supports, there also needs to be recognition and support for disabled people in terms of getting to and from work, and being supported when working from home in terms of energy and hardware. Training for employers in terms of reasonable accommodation, led by a DPO with disabled experts, is a key part of this. The taxation system should also be examined for mechanisms for reclaiming costs incurred by disabled people as a result of the additional cost of disability, using existing systems within Revenue.

Energy

Energy poverty is disproportionately experienced by disabled people as they often require additional medical equipment, or assistive technologies in the home.¹⁶ Disabled people spend 10% more on energy costs than non-disabled people, and are more likely to be in arrears on utility bills¹⁷; 16.1% of people unable to work due to long-standing health problem were unable to keep their homes warm.¹⁸ For those who use electricity to charge a wheelchair or power other assistive technology, or need consistent warmth to manage pain levels, there is no ability to reduce energy costs or decrease in bills over the summer period.

¹³ Highlighted and expanded further in the submission made by [Independent Living Movement Ireland](#)

¹⁴ National Disability Authority (2024) [Factsheet: Employment and Disability](#)

¹⁵ Cousins, M (2025) [How To Address The Cost of Disability in Ireland](#)

¹⁶ Ibid

¹⁷ Indecon (2021) [The Cost of Disability in Ireland](#)

¹⁸ DFI (2024) [EPAP Consultation Submission](#)

Transport

Access to transport for disabled people carries additional costs. Inaccessible (including the requirement for 24 hours' notice to use public transport) or non-existent public transport infrastructure can mean that disabled people, particularly but not only in rural areas, are more reliant on private travel. Private travel itself isn't always accessible, and additional barriers like for disabled people who own a car or can drive, but require a parent or partner to underwrite a car loan, or who require someone else to drive and therefore must insure them. Additional supports, such as the expansion of the Free Travel Pass, additional investment in accessible and reliable public transport, and a new Transport Support Scheme are needed.

Housing

Inadequate housing supply and inaccessible accommodation options push disabled people into more expensive or unsuitable living arrangements. Where disabled people are seeking to adapt their own home or family home, spousal income should not be part of a means assessment. The Housing Assistance Payment (HAP) Scheme must recognise that there are often higher costs associated with fully accessible accommodation, that net income is not an indicator of disposable income due to the additional cost of disability, and that some single disabled people will need two-bedroom accommodation for overnight supports such as Personal Assistants.

Principle 3: Cost of Disability Payment must be based on a social model approach

It is important to recognise that not all disabled people experience the same costs, nor have the same needs. Through a social model approach, we can acknowledge that we have different support needs. Key to this will be co-creating any new proposals with disabled people and DPOs, potentially resulting in a tiered rather than universal system which recognises different support needs and that some disabled people have higher costs. As outlined below and in other sections, it is vital that this system be reflective of costs faced – and not linked to employment or training in particular. It is also vital that this is done in an integrated manner that reduce costs and increases access to other services and supports, as outlined in the previous section.

Pillar 4: The Cost of Disability Payment should be distinct from capacity to work

Unlike the Green Paper, it is essential that any proposals developed for a Cost of Disability Payment are not linked with training or employment. The additional cost of disability is faced by disabled women regardless of whether they are in paid employment or not.

Further, our social protection system does not adequately engage with or respect other forms of contribution to society which are not necessarily paid – such as the provision of support and care, community and voluntary work, cultural work, political engagement, and social engagement. These forms of work and contribution are highly gendered, and predominantly carried out by women. If the Cost of Disability Payment were tied to paid employment in any way, it would further marginalise and devalue these forms of contribution to society, and the fundamental right of every person to have the support necessary to be a part of society.

This is not to say that significantly more work needs to be done by public policy and by employers to support disabled people's engagement with paid employment; but this must be done by removing barriers to employment as outlined and mentioned above, and not by attaching conditions to necessary supports like the Cost of Disability Payment.