

Pathways to Work 2026-2030

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Submission

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Introduction

Acquired Brain Injury (ABI) Ireland welcomes the opportunity to provide input into the forthcoming Pathways to Work 2026-2030 consultation process by the Department of Social Protection.

This submission was written by the ABI Ireland's Step Ahead Plus Vocational Rehabilitation Service staff comprising neuro-specialists in occupational therapy and speech and language therapy.

Acquired Brain Injury (ABI) Ireland

ABI Ireland is the leading provider of community-based neuro-rehabilitation services in the country. With over 25 years' experience, the organisation delivers internationally accredited, person-centred services to empower people with an acquired brain injury to live independently and meaningfully in their communities. Services include brain injury case management, transitional and assisted living, vocational rehabilitation, family supports, and more. www.abiireland.ie

Acquired Brain Injury

Every year in Ireland 19,000 people acquire a brain injury. Brain injury can happen as easily as slip, fall or because of an assault or traffic accident. It could also be the result of an infection, stroke or tumour. People's lives can change suddenly and significantly following an ABI. Having a serious brain injury is totally life altering for both the person and their family due the effects of brain injury. Brain injury can affect how a person feels, thinks, acts and relates to others. Often the impact of brain injury results in invisible or hidden disabilities.

An ABI can cause a wide range of changes that affect:

- Thinking (memory and reasoning)
- Sensation (touch, taste and smell)
- Language (communication, expression and understanding)
- Emotions (personality changes, anxiety, acting out and coping skills).

These have consequences for the individual and their family and they may experience:

- Loss of income and unemployment
- Social and economic isolation
- Changes in relationships and family dynamics.



Step Ahead Plus Vocational Rehabilitation Service

Step Ahead Plus enables brain injury survivors to re-enter education, training or work. Through our in-depth assessments, The Step Ahead Plus clinicians identify the skills, experience and abilities of brain injury survivors. With this knowledge, we guide them back to paid employment, while educating employers about their individual needs for inclusive workplaces. Our service is also dedicated to running groupwork programmes to educate our participants with accessible and brain injury specific vocational guidance. We also are continually forging links with inclusive employers to establish work placement opportunities.

From a policy perspective, vocational rehabilitation is recognised as a key rehabilitation service in the community for people with neurorehabilitation needs in the <u>Neuro-rehabilitation Strategy Implementation Framework 2019-2021</u>

Recommended actions

Based on our experience as clinicians delivering a vocational rehabilitation service to adults with an acquired brain injury, we recommend the following actions for inclusion in the next Pathways to Work Strategy:

1. The need for <u>neuro specialist</u>, <u>clinically led vocational</u> <u>services</u> to meet the needs of adults with an acquired brain injury

Brain injury is a life changing acquired disability. Often it is invisible and can has significant impact on the individual's cognitive, emotional, and psychological well-being. There is a significant level of complexity in responding to the vocational needs of a person with ABI. Clinically led services are vital to help address the multiple issues and ensure the long-term successful outcomes for the individual. Layers of specialisms needed including neuro experience and vocational rehabilitation expertise.

- a. Access to neuro-specialist vocational Occupational Therapists to complete clinical assessment including standardised assessments and skilled vocational interviewing.
- b. Psychological services to support the emotional adjustment to a new working reality post brain injury. To our knowledge, there are currently no dedicated psychological services for vocational rehabilitation post brain injury in Ireland.
- c. On-going clinical rehabilitation supports on a one-to-one basis and groupwork with staff trained in brain injury rehabilitation.
- d. Funding to develop online and technology-based support options (e.g. courses on learning management systems). Creating these resources can help vocational rehabilitation services to have a wider reach and be more accessible to individuals across the country and helping to reduce the impact of the 'postcode lottery' that occurs in service provision. In addition, digital literacy is an important element of employment

skills training. Providing resources and training via online platforms can help to build digital literacy in jobseekers in preparation for future employment. Finally, technology is constantly advancing and becoming a more prevalent part of the employment environment (e.g. artificial intelligence (AI)). It will be important for vocational rehabilitation services to have funding available to upskill in advances in technology so they can provide training and development in this area to support jobseekers to become familiar with technology advancements, such as AI, as a part of their employment skills training. Furthermore, we propose that this dedicated technology funding stream for vocational programmes will have additional benefits as a platform for delivering health promotion resources such as brain health or mental health education. Ensuring that participants have access to foundational strategies to support a sustainable return to the workforce and foster healthy work life balance. Once established, these technological advancements will support the scalability and the long-term sustainability of the programmes beyond time restricted funding streams.

2. Address youth unemployment within the brain injury community

We do not have current data from an Irish context on youth unemployment rates among the brain injury population. However, we know from the general population that the overall unemployment rate in Ireland as of Quarter 1 2025 is 4.3%.

Among young people (aged 15-24), the rate is considerably higher: 9.5% in Q1 2025. Even without ABI, young people generally experience higher unemployment rates. When you add in an acquired brain injury diagnosis, the challenge is greater.

Based on our experience as a national specialist vocational service, there are several potential barriers for young people with brain injuries pursuing employment.

1. Disruption to educational milestones:

- Injury might occur during school or early in adult life, interrupting education or training, leading to gaps in credentials or limited qualifications. This can, in turn, impact employment prospects.
- Cognitive deficits can make returning to or completing education difficult (attention, fatigue, etc.).

2. Lack of tailored support/specialist services:

- Currently, there is a specialist inpatient paediatric service for brain injury in the National Rehabilitation Hospital of Ireland for those aged under 18 years of age
- Step Ahead Plus (Acquired Brain Injury Ireland) offers an online information group to those aged 16+ exploring strategies for managing fatigue, cognitive deficits and solutions in Assistive Technology.
- Outside of these pockets of services, young people may not access the supports they need to succeed in education and subsequent employment.



Solutions to overcome these barriers include:

- Dedicated resources to develop a clinically led vocational specialist service to provide tailored support to the young people, their parents and schools. This could encompass rehabilitation supports such as occupational therapy, speech and language therapy, physiotherapy and psychological supports.
- Tailored career guidance to support the transition from school to next steps.

3. Brain injury education module developed for employers

According to statistics collected by the Central Statistics Office in the 2022 Census, only 49.3% of people with disabilities of working age are at work, compared to 70.8% of people without disabilities in Ireland. This results in Ireland having one of the highest disability employment gaps in Europe out of 27 countries. According to research carried out by Acquired Brain Injury Ireland, 52 brain injuries occur in Ireland every day.

In our role as a specialist national vocational rehabilitation service, we have extensive experience of working with employers across a variety of sectors in Ireland. From our experience of working with employers and persons with disabilities, specifically acquired brain injury, there are several factors contributing to a lack of employment opportunities for people with disabilities in Ireland;

- Lack of awareness regarding hidden acquired disabilities causing stigma and negative assumptions by employers regarding the abilities of people with disabilities in work.
- Fear of inadvertent discrimination and impact on business for the employer, based on lack of education and experience welcoming a person with disability into the workforce.
- Lack of timely supports available for employers to navigate and support a person with a
 disability within the workforce (i.e. significant delays or refusals with Wage Subsidy
 Scheme applications and Work and Access applications).
- Lack of oversight and accountability with inclusive recruitment and retention practices
 within the public and private sector. A lot of social responsibility actions are seen as 'box
 ticking exercises' rather than creating opportunities for people with disabilities in the
 workplace. There is also a lack of evidence on actions and efforts made by private and
 public sector employers and a lack of ramifications for employers who neglect to meet
 current targets.
- Lack of accountability and transparency where employers have declined reasonable accommodations without justification and possibly discriminating against a person with a disability in the workplace.

The reality of the lived experience of individuals we have worked with is that they have likely experienced potential discrimination in the workplace. There are multiple systemic barriers for the individual to tackle discrimination in employment. There are options available (i.e. free legal aid, paid legal services, Workplace Relations Commission complaint, union support) but these options come with challenges eir own (i.e. months-long waiting times, costly legal fees, lengthy and complicated administration procedures, and fear of isolation and further discrimination or

possible termination of employment). Aside from these challenges, the level of time, commitment and resilience required to pursue a complaint or legal actions is a significant undertaking, particularly when an individual is working/looking for employment and actively recovering from a brain injury. In a lot of cases, the individual may choose not to pursue the case further for the sake of their health, welfare and possible financial implications but the reality is that they are not getting to have their voices heard or their rights upheld¹.

We recommend the following actions to address the systemic barriers currently faced by disabled people:

- 1. Funding for specialist employment and vocational rehabilitation services to develop accredited condition specific disability awareness training. The aim of this training would be targeted at increasing understanding and awareness of specific disabilities, particularly hidden disabilities such as acquired brain injuries. This would provide practical guidance and actions for employers on recruiting and retaining a person with specific disabilities within the workforce.
- 2. Requirement for all private and public sector employers and employees to complete disability awareness training on an ongoing basis, not just a once off.
- 3. Reduce the administrative burden and streamline the application processes in Government departments to access supports and financial incentives for employers to enable the recruitment and retention of people with disabilities in an efficient and timely manner.
- 4. Ongoing target monitoring and oversight by the National Disability Authority on mandated and targeted actions (i.e. actions listed above) for private sector employers, similar to arrangement for public sector employers, to increase employment rates for people with disabilities in Ireland. A requirement for all employers (both public and private) to evidence their practical efforts to work on recruiting and retaining people with disabilities within the workforce.
- 5. Investigation by overseeing body (e.g. National Disability Authority, Workplace Relations Commission) on cases of persons with disabilities being declined reasonable accommodations in work or being made redundant. This is to ensure employers have done all that is considered reasonable to accommodate a person with a disability within the workplace (as stated in the Employment Equality Act) and requirement for evidence of attempt to explore and implement accommodations as much as is possible.
- 6. Provide an accessible service by an overseeing body (i.e. NDA, IHREC) that offers information, guidance and mediation for employees and jobseekers to explore possible cases of discrimination and to identify actions and supports needed resolve the issue or act if needed.

 $^{^{}m 1}$ We have examples of cases of possible discrimination within the workplace to illustrate these issues in practice

4. Funding for transport to and from work placement

Work placements are a valuable aspect of building return to work confidence and skills. Work placements tend to be unpaid and of short duration i.e. two hours a day over 2 weeks. In our experience, access to appropriate transport to/from work placement opportunities, is a common barrier for both rural and urban participants. Many brain injury survivors find accessing multiple public transport methods difficult due to fatigue and executive skills such as decision making.

We propose to combat this barrier that a fund should be established within the Work and Access Scheme for people with disabilities to support their work placement transport costs.