

**IRELAND'S AUTISM CHARITY**

**February 2024**

## **AsIAM Submission to the National Disability Authority on their Strategic Plan**

### **2025-2027**

AsIAM welcomes the opportunity to engage with the National Disability Authority on the Strategic Plan for the organisation. As Ireland's Autism Charity, a key part of our work on advocating for and supporting Autistic people is to work with Government departments, State agencies and other organisations who work around supporting Autistic people and Disabled people. This engagement supports AsIAM to realise its aim of ensuring that every Autistic person has the same chance to belong, feel accepted and to be included in all aspects of Irish society. The National Disability Authority (NDA) plays a significant role in advising and engaging with Government departments, State agencies and disability organisations in disability policy in Ireland, in informing the public around best practices in Universal Design and Accessibility and supporting research around disability. We welcome that the National Disability Authority is engaging with organisations like AsIAM in developing its new Strategic Plan. We hope that by including organisations who are informed by the perspectives and living experiences of communities affected, that this would support the NDA's work in promoting disability policy.

### **What are your views on the NDA's strategic approach and impact to date?**

As an organisation which is Autistic-led and centred around both supporting and advocating on the rights of Ireland's Autism community, we welcome recent moves by the Authority to consult and engage with Disabled people, including Autistic people, in key areas of disability policy related to the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). Article 4(3) of the UNCRPD states that people with disabilities and their representative organisations should be proactively consulted in all issues which impact their lives, and we wish to see this progress on engagement and consultation with communities affected built upon with this new Strategy. We believe that the Strategic Plan can focus on further engagement through an intersectional lens by focusing on particularly underserved or marginalised groups including Autistic and Disabled women and girls, Disabled people who are migrants, LGBTQIA+ Disabled people, and with Disabled people who need additional support to engage with public consultations, such as non-speaking Autistic people.

We are mindful that the NDA's statutory powers dictate that the Authority's role to advise Government and State bodies on best practices in disability policy and inclusion, and so the NDA cannot necessarily be purely an advocacy body or a 'watchdog' which holds Government accountable on matters related to disability.

However, within these parameters, there are opportunities for the NDA to grow its reach and to better support people with disabilities and their representative organisations. We believe that the NDA could support other organisations, including Disabled Persons Organisations, with their engagement and consultation processes with their representative communities. The NDA should also ensure that policies and consultations are available in accessible formats to all members of the public, particularly Disabled people. It is incumbent on the NDA to educate and inform the public around disability rights, to ensure the public know more about the policies that the NDA advises on and holding consultation processes and events in more parts of the country so that more people who face accessibility barriers can take part. It can also support organisations and the public to engage in policy and in advocacy by providing more resources to support engagement, advocacy and participation, and to researchers and organisations to proactively include Disabled people in their consultation processes and represent the disability community across its activities.

**In your opinion, what are the critical challenges and questions the NDA needs to address in its new strategy and programme of work?**

There are many issues for Autistic people and the disabled community at large that the NDA can engage and address with in its next Strategic Plan. A key challenge for the NDA is to ensure that policy advice and guidance it gives to Government more closely connects with the public and relates to the barriers that Disabled people, including Autistic people, experience in their daily lives, including access to education, access to transport, and services. The NDA also needs to ensure that policy advice it gives to Government Departments and State bodies aligns with the UNCRPD and best practice in supporting and including

Autistic and Disabled people, and that these bodies comply with any obligations within the NDA remit. This includes the public sector obligation to employ disabled people within their organisation, and in monitoring organisations to ensure that they are complying with the employment targets set by law (i.e. 6% of employees must be Disabled people by 2025 under Part 5 of the Disability Act 2005), and are encouraged to move beyond these targets to ensure that the number of Disabled people they employ more closely reflects the disability population in Irish society.

Another important challenge for the NDA is to examine ways within its remit that the organisation can support cohorts of the disability community who are looking for more specific changes to policies which could vindicate their rights (i.e. the campaigns to recognise the right to Personal Assistance or to legally recognise Irish Sign Language). From AsIAM's perspective, we have been calling for the Government to introduce a National Autism Strategy and to give the Strategy a legal footing, like similar strategies in other countries such as Scotland and Malta. We have also called for Government to fully implement the [Joint Oireachtas Committee on Autism's Report's Final Recommendations](#). We have also made recommendations on how Government can better support Autistic people and families in Ireland in our [submission on the Autism Innovation Strategy](#).

**What areas of activity, in your view, should the NDA prioritise across the next three to five years?**

From the perspective of our community the most important thing that we would be calling for is the implementation of the 109 recommendations of the [Final Report of the Joint Oireachtas Committee on Autism](#). We believe that that the policy advice the NDA recommends supports the Government to implement these recommendations across all the relevant Departments and State agencies. If Ireland wishes to create a more equitable society for all Autistic people and to ensure the entire Autism community gets the same chance to belong, feel accepted, and be included across all aspects of Irish society, we believe that these recommendations should be more central within Government policy.


All articles within the UNCRPD should be core to all future plans and strategies that are implemented by Government and form part of the NDA's advice to government and public bodies. The NDA has done significant work in aligning policy priorities more closely with the UNCRPD, and the NDA can build on this progress by engaging more disabled people across Ireland, by recruiting more disabled people across the organisation, and ensuring public sector organisations increase disability representation.

As part of this, we hope that the NDA will call on the Government to adopt the UNCRPD Optional Protocol to both expand the rights of disabled people and create a complaint mechanism which will allow individuals to hold the Government to account when appropriate. This should place the onus on the State to introduce laws and policies which are more accessible and inclusive of Autistic people and disabled people, and to proactively include communities affected in all aspects of policy creation and development.

Another idea that the NDA can implement is around doing more outreach to underrepresented communities around how they would like to see themselves represented in terms of the types of policy and advice the NDA gives to government. Many within the autism community perceive that policies which shape how they live in Irish society do not always necessarily reflect their living experiences or what they want to address about living in Irish society. There are opportunities for the NDA to build on this progress by both proactively consulting the community on key policies and to push for greater representation in forums where these decisions are made.

**What other issues or considerations will be particularly relevant to the strategic focus of the NDA across the next three to five years. (max 400 words)**

The NDA's policy advice related to autism needs to more closely reflect that more people in Irish society are both receiving a diagnosis of autism or who are self-identifying as autistic than before. Whereas there have been **1 in 65 people** who have received an autism diagnosis according to a 2016 National Council for Special Education Report, over the past few years this has grown to **1 in 27 people**. This reflects that more Autistic adults, including more women and girls and LGBTQIA+ people, have greater opportunities to access assessments, are now being included within our community. This means that the Autistic community has become more diverse within Irish society, as with the disability community, to include cohorts who would have



experienced barriers to accessing an autism diagnosis but as assessment and diagnostic criteria have now broadened to include [characteristics that they experience](#). The policy guidance the NDA provides to Government and State bodies and engagement with the community will need to reflect these changes and include more diverse voices and perspectives in its advice.

This will involve increasing available supports but also, more importantly, it will mean that the Government will need to ensure that it enacts a National Autism Strategy to better support our community. It will also involve ensuring that future policies around disability and accessibility are more inclusive of our growing community's calls for advancement of their rights. This will present a significant challenge to the NDA, but with appropriate resourcing this change could be met. The new Strategic Plan also presents opportunities for the NDA to deliver policy guidance which help to align Ireland more closely with the UNCRPD. It also presents opportunities to facilitate the delivery of more substantive reforms that help to build a more accessible and inclusive society, for both Autistic people and other disabled people, and for everyone living in Irish society.

The Centre for Excellence in Universal Design has been very effective in terms of promoting Universal Design and in engaging with representative organisations and Government around best practices around making services and environments more accessible to disabled people. One of the ways in which the Centre can promote Universally Designed public services and spaces is to engage with to it that services and supports are fully accessible to Autistic and disabled people, complying with Universal Design Principles. This will mean that people who are sensitive to certain sensory experiences will be able to engage with fully accessible services that meet their needs and can support them to fully participate in society as full and equal citizens.