



Pre-Budget Submission 2023 - Summary

- Our Pre-Budget Submission sets out three key pillars; **Rights, Resourcing** and **Staffing**.
- National Federation member organisations support **approximately 26,000 people with intellectual disabilities and their families**.
- People with **intellectual disabilities need essential, frontline supports to access their rights** set out in the United Nations Convention on the Rights of Persons with Disabilities – including the right to live and take part in the community with appropriate supports.
- **Existing investment in disability services is substantial and welcome**; and has included increased funding in recent budgets. However, the number of people in need of **residential and other vital supports** continues to increase, as investment has not kept pace with demographic, age-related, and longer-term needs.
- There are still **very critical unmet needs that require investment in Budget 2023**.
- There is a **pressing need for a collaborative plan to address the staffing challenges** presenting in disability services.

In Budget 2023, we are calling for:

- 1) **Significant investment to meet the urgent needs of people with intellectual disabilities and their families, as set out in the Disability Capacity Review**
- 2) **The establishment of a Disability Workforce Planning Group and action on staffing**
- 3) **€20million to allow S39 intellectual disability services to bridge the pay gap which is causing immediate risk to service provision***

Why does the existing level of funding need to be improved?

1. People with intellectual disabilities are fortunately living significantly longer due to medical advances. The population of people with intellectual disabilities is increasing (*up 15% between 2011-2016*).
2. A growing proportion of people who access services have significant and complex needs.
3. Many people currently receiving supports came into day, respite, and residential services several decades ago with funding totally inadequate to current regulatory and person-centred standards.
4. Support costs have increased as Ireland implements regulation and develops rights-based services. *Regulatory compliance requirements increased while funding decreased over the 10 years of the recession.*
5. Investment is needed in children's services to address current waiting lists and provide appropriate support.
6. 2,400 people with disabilities are still living in inappropriate congregated settings (*HIQA, 2022*).
7. During the recession, investment only addressed crisis admissions, causing significant unmet need.
8. This has resulted in unsustainably high numbers of primary carers in their 70's and 80's. *Our August 2022 figures show there are now over 1500 people with ID living with primary carers who themselves are over 70 years of age, approximately 485 of whom are over 80. (Up from 1250 reported in 2019).*
9. For the majority of people with intellectual disability, the current avenue into residential support is in an emergency when a parent passes away or becomes a recipient of full-time care due to ill health.
10. Services delivered as the result of a crisis/emergency situations result in poorer outcomes for the person and higher costs for the state than planned provision of support.
11. People with intellectual disabilities experience a higher proportion of conditions associated with premature ageing, often resulting in changing and higher support needs.

The Disability Capacity Review to 2032 (July 2021) set out the scale of the resources needed to bridge the gap between the supports currently provided, and those needed to address these factors. Investment to drive implementation of this plan is required in Budget 2023 to meet the urgent and critical needs of citizens with Intellectual Disability and their families.



RIGHTS

- Ireland ratified the **UN Convention on the Rights of Persons with Disabilities (UNCRPD)** in 2018.
- Article 19 of the UNCRPD confirms the **right of all persons with a disability to live in the community, with appropriate supports** where required. Access to appropriate supports is essential to enable people with intellectual disability to access their right to live and take part in the community as **equal citizens**.
- Many of the **unmet needs** currently experienced by people with ID are **pressing and fundamental**.
- These include the **needs of children** to access early intervention services; the **need for respite/short breaks** to support individuals and families in crisis; and **residential support** to provide planning for individuals living in highly inappropriate circumstances, such as those who rely on very elderly carers and those living in unsuitable congregated settings.



RESOURCES

- To **access their right to live and be included in the community, people with intellectual disabilities require supports, which in turn require resourcing**.
- However, due to a range of demographic, historic and systemic factors, there **continues to be a significant shortfall causing distress and hardship for people who are without access to critical supports**, and their families.
- To support planning for Budget 2023, **this Pre-Budget Submission sets out some of the reasons that the resources currently provided regrettably still fall short** of meeting the urgent; and in many cases, crisis, needs of people awaiting services.
- One of the key questions that parents ask when their child is born with an intellectual disability is **'who will care for my son or daughter when I pass away?'**. Sadly, many elderly families are still without an answer to this question, as the majority of people with intellectual disability are only currently receiving residential support when their primary carer passes away or is no longer able to provide support. **Resources should be structured to support people to begin living their lives independent of their family of origin if they wish to do so, and to enable family members to retire from their caring role at a time when they can be assured of their loved one's future.**



STAFFING

- In common with the wider health and social care sector, intellectual disability services are currently experiencing a **crisis in relation to attracting and retaining sufficient staff** to provide necessary services and supports.
- We are calling for the **urgent establishment of a workforce planning group for disability services**, in line with that which has been established for Home Support Carers and Nursing Home Health Care Assistants.
- The **crisis in recruitment and retention is affecting the services provided by both Section 38 and Section 39 service providers**.
- There is a particular; and **exacerbated challenge for citizens supported by Section 39 providers**. The services provided by these organisations are now under significant risk due to the unequal pay of workers in these services compared with those providing precisely the same service in Section 38 or HSE-run services. **Funding to allow Section 39 providers to bridge this gap is urgently required.**

***€20million is the current gap that needs to be bridged to address risk to Section 39 services before agreement on current Public Sector Pay talks**

Detailed Pre-Budget Submission 2023

Our Pre-Budget Submission sets out three key pillars; rights, resourcing and staffing.

The services that many people with intellectual disability are still waiting to access are essential, frontline supports required to realise the rights set out in the UNCRPD. Significant existing investment is very welcome, however a range of factors set out in this submission mean that there are still very urgent unmet needs that require resourcing.

There is also a critical need to address the recruitment challenges presenting in disability services.

We are calling for:

- 1) A significant investment programme in Budget 2023 to meet the urgent needs of people with intellectual disabilities and their families, as set out in the Disability Capacity Review
- 2) The establishment of a Workforce Planning group and action on staffing
- 3) €20million to allow S39 intellectual disability services to bridge the pay gap which is causing immediate risk to service provision*

Below, we set out the detail and evidence supporting the three pillars of this pre-budget submission.

1. How are the rights of people with intellectual disabilities affected in Budget 2023?

The National Federation believes that we have a shared responsibility together with State agencies and Departments, to reflect on disability services, listen closely to the views of people with lived experience, and progressively work together to ensure the rights of individuals enshrined in the UNCRPD are realised and protected. Therefore, the person and their rights are at the heart of this pre-budget submission.

- 1.1 **An accessible budget announcement is needed, so that individuals with disabilities and their supporters can understand how many *existing and new* residential supports, day services and respite supports are provided for in Budget 2023, and how the investment provided relates to the needs outlined in the Capacity Review.**
- 1.2 To ensure the progressive realisation of the UNCRPD, people with disabilities need to have choice and control over decisions affecting them, particularly concerning where they live, with whom they live, and how they are supported during their daily lives. To achieve this requires adequate resourcing and staffing levels.

1.3 The UNCRPD, ratified by Ireland in 2018, confirms the equal right of all persons with disabilities to live in the community, with choices equal to others (Article 19). The Disability Capacity Review highlighted the lack of a planned pathway to access residential supports when an adult with intellectual disability no longer wishes to live with their family, or when family carers can no longer provide support.

Yet, over a year after publication of the Capacity Review, this submission has identified, through data gathered in a survey of NFVSP member organisations in August 2022, that there are now approximately 1,550 family carers over the age of 70 providing primary care for their loved ones, approximately 485 of whom are over the age of 80. This has increased from 1250 individuals reported by our members as living with a family member over the age of 70 in our 2019 survey.¹ Parents and families are struggling; and individuals cannot realise their right to have choice in where they live and maximise the opportunity to develop independent living skills due to the lack of available planned supports.

1.4 According to HIQA's Disability Overview Report 2021, there are **2,419 people with disabilities who remain living in congregated settings**. This report highlights that *'residents living in congregated settings were more likely to experience a poorer quality of life with notable inequalities in the overall quality and safety of the services being provided to residents, when compared to their peers living in small community-based settings'*. (p34).

'.. the findings from the 2021 programme of regulation have consistently found that people living in smaller, community-based homes experience a better quality of life, live in safer services and are more likely to experience better personal outcomes. It remains imperative that Ireland continues its drive to fully decongregate large institutional buildings and campuses, so that all people with disabilities are provided with equal opportunities to live ordinary lives, in ordinary places.'

HIQA's Disability Overview Report 2021 p77

1.5 The lack of access to residential supports, combined with historic underfunding of the day supports accessed many people who began using services many years ago, severely limits life's opportunities for people with intellectual disabilities and prevents families from planning for the future. **The publication and implementation of the Action Plan for the Disability Capacity Review is of central importance. Whilst awaiting publication of the Action Plan, it is imperative that Budget 2023 takes account of the requirements set out in the Disability Capacity Review.**

1.6 We warmly welcome the publication of the National Housing Strategy for Disabled People 2022 - 2027 and the commitment that its implementation will be monitored through the lens of the UNCRPD. **The Housing Strategy Implementation Plan should inform Budget 2023;** to ensure equal access to housing for people with disabilities.

1.7 Equal access to accessible affordable housing is an urgent requirement for people with intellectual disabilities, but for many this can only become a reality if accompanied by integrated support services as outlined in the *National Housing Strategy for Disabled People 2022 - 2027*. **There is therefore a need for coordination of housing provision and associated supports in order to meet Ireland's obligations under Article 19** of the UNCRPD. This will require significant coordination between the relevant government Departments and a **joint approach to the budgetary allocations in relation to both housing and relevant supports**. Currently, opportunities for individuals to access housing are lost when the required supports are not funded/available in a coordinated approach.

¹ National Federation Survey of Member Organisations 2022; National Federation Survey of Member Organisations 2019

- 1.8 There is a need for the Assisted Decision-Making Legislation to be commenced quickly and with due regard to key concerns raised in Pre-Legislative Scrutiny. Seven years on from the enactment of the Assisted Decision-Making Act 2015, Wards of Court and people who require formal decision-making supports are urgently awaiting the full commencement of this legislation. **Budget 2023 should ensure that adequate resources are available to ensure that additional decision-making supports required by people with intellectual disabilities are provided, and this will require an impact assessment for disability services.**
- 1.9 In relation to the implementation of the **Assisted Decision-Making Act 2015, a national awareness campaign and further training is needed**, and dedicated funding and resources will be required in disability services for this campaign. It should be noted that the Disability Capacity Review highlighted in relation to training needs for disability staff working in the new legal framework; that *'it has not factored in any additional costs that might arise in that regard.'*²
- 1.10 Article 7 of the UNCRPD notes that *States Parties shall take all necessary measures to ensure the full enjoyment by children with disabilities of all human rights and fundamental freedoms on an equal basis with other children.* In order for children with disabilities to have equal opportunities to participate in the life of the community, there are key supports and services that they need to access. **Budget 2023 should include a focus on delivering on the needed services and supports to children with disabilities** in order to both support children in their lives now; and to facilitate the early intervention that enables them to reach their full potential which has lifelong effect.
- 1.11 Article 9 of the UNCRPD places a responsibility on States; *To enable persons with disabilities to live independently and participate fully in all aspects of life. States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public.* There has been a very welcome increased investment in day supports for school leavers over the past decade to support the realisation of these rights. However, there are **inequalities that are still affecting people with intellectual disabilities who began using supports many years ago** and who have not seen the same uplift in investment. A specific focus in Budget 2023 is required to ensure that these longer-established services are enabled to provide the individualised and rights-based approach that provides equal access to community life for people supported; and provides for the will and preference of those who are ageing and wish to retire from accessing tradition day service locations.

2. What are the key factors driving shortfalls in resources?

The Disability Capacity Review has shown that whilst the budget allocated to disability is substantial it does not address the built-up unmet need; historic underfunding; and requirements associated with demographic change. There are a range of factors that are affecting this funding shortfall:

- 2.1 People with intellectual disabilities are **living significantly longer**, thanks to medical advances over the past 30 years³. Census 2016 data shows that the number of people with intellectual disability in Ireland had since the previous census in 2011 increased by 15%. Preliminary results from Census 2022 continue to show growth in the general population, which we can expect to further increase the number of citizens with intellectual disabilities.

² Disability Capacity Review to 2032 A Review of Disability Social Care Demand and Capacity Requirements up to 2032, p 35. Prepared by the Department of Health, <https://www.gov.ie/pdf/?file=https://assets.gov.ie/154163/8fe32ca7-2154-4fb0-8a41-6931c5f15471.pdf#page=1>

³ E. Dolan, J. Lane, G. Hillis, N. Delanty Changing Trends in Life Expectancy in Intellectual Disability over Time Irish Medical Journal; Vol 112; No. 9; P1006 [Changin-Trends-in-Life-Expectancy-in-Intellectual-Disability-Over-Time.pdf](https://www.imj.ie/Changin-Trends-in-Life-Expectancy-in-Intellectual-Disability-Over-Time.pdf) (imj.ie)

2.2 As acknowledged in the Disability Capacity Review, there is a changing profile and an **increase in the numbers of people with significant and complex needs** who require support. 'Increasing complexity of need' was noted in the Disability Capacity Review as one of the factors which added uncertainty to estimating future costs.⁴

2.3 The Disability Capacity Review highlighted significant **shortfalls in children's therapy provision** in 2018. Waiting lists have continued to lengthen and increase and significant investment and solutions to the recruitment crisis are required. The Capacity Review estimated that intellectual disability therapy service needed to increase by around 64% in 2022, and by 71% by 2032. Many families have reported that their Children's Disability Network Teams (CDNTs) do not have the full range of required staff and that there is a high turnover of staff⁵.

2.4 Costs for providing services have been rising over recent years. **Regulation of residential disability services has brought with it a significant increase in costs.** This has resulted in the cost of providing supports being higher than when many people began receiving services – key areas of increased cost are:

- a) capital investment in the home environment;
- b) revenue costs for increased levels of support; and
- c) administrative costs associated with regulation of service provision.

From 2009-2019, regulatory compliance requirements increased while funding decreased.⁶ Service providers have reported that the implementation of regulation and provision of improved person-centred services means that in many typical residential settings the average number of people living together in a house has halved and therefore the staffing requirement effectively doubled, over recent years.

2.5 Historically, over many decades, hundreds of people who are currently receiving services **entered full-time residential supports and day services with close to no resources** – during times when even dormitory accommodation and highly congregated day services were deemed acceptable. Standards have improved more recently, however, this has resulted in legacy funding shortfalls for many people receiving supports with outdated resourcing.

2.6 New challenges face service providers in terms of rising costs as they deal with **acute inflationary pressures.** Service providers are now reporting significant cost pressures in relation to energy costs, transport and food and this will require focused resourcing in the context of Budget 2023.

2.7 As costs for people already accessing services increases, the number of people left entirely without a residential support and reliant on family carers continues to grow. This often results in people requiring **higher levels of support when they eventually access a service** due to the lack of transition planning and the missed opportunity to develop early, proactive supports to build independence.

2.8 During the recession there was **a decade when no investment was made in new residential supports** except for crisis admissions. This has resulted in significant numbers of elderly carers in their 70's, 80's and beyond unsustainably remaining as primary carers. These family members are in many cases now unable to continue; but have no pathway currently to access supports for their loved one, other than as an emergency admission when the parent passes away or is themselves a recipient of full-time care.

⁴ Disability Capacity Review to 2032: A Review of Disability Social Care Demand and Capacity Requirements up to 2032, p 35. Prepared by the Department of Health, <https://www.gov.ie/pdf/?file=https://assets.gov.ie/154163/8fe32ca7-2154-4fb0-8a41-6931c5f15471.pdf#page=1>

⁵ Inclusion Ireland, Progressing Disability Services for Children and Young People Parent Experience Survey Report February 2022

⁶ National Disability Authority (2018). Transforming Lives (Working Group 1) Report on Future Needs for Disability Services 2018. Dublin: National Disability Authority.

Research undertaken by the National Federation in August 2022, through a survey of our member organisations, has reported that there are **now over 1500 people with intellectual disability living with primary carers who themselves are over 70 years of age, approximately 485 of whom are over 80.**

- 2.9 Meeting the residential support of a person with intellectual disability as a crisis intervention (due to a family carer passing away or becoming incapacitated) **is the most expensive way to meet the needs of the person and often results in poorer outcomes**, as the person is losing their familiar source of care, their place of home and their parent at one time and as a result is accessing services at a very traumatic time, which can lead to the person needing additional behavioural and psychological supports.
- 2.10 A wider consequence of meeting residential supports in a crisis, is that it frequently results in a (sometimes protracted) period of time when a **respite place is being fully occupied by the person in crisis** – leaving it unavailable to meet wider needs. This is occurring at a time when the shortfall in places means that there is an acute need to deliver short breaks to many people in order to benefit the individual and their family.
- 2.11 A high proportion of people with intellectual disabilities experience **conditions associated with ageing at an earlier age, which cause changing needs**. For instance, people with Down syndrome develop dementia approximately 20 years younger than the general population⁷, and research indicates that more than 80% may experience dementia by age 65 years⁸.

There is currently no budget line provided to resource changing needs, which can often require support at a cost higher than the original support costs than when the person began accessing the service. The lack of funding for changing needs particularly effects those who historically entered services with little or no funding and now have complex needs due to ageing.

Whilst very welcome, recent increases in investment in residential support have not kept pace with the growing and ageing demographic of people with intellectual disabilities outlined above.

The Disability Capacity Review published in July 2021 set out the scale of the resources needed to bridge the gap between the supports currently provided, and those needed to address a range of factors driving unmet need - including those set out above.

- 2.12 There is concern amongst intellectual disability service providers about the delay in publication of the Disability Capacity Review Action Plan 2022-2025. **It is of utmost importance that the Action Plan, ahead of publication, informs the current budget planning.** It is essential that Budget 2023 takes a strategic approach to addressing the unmet need highlighted in the Capacity Review to ensure that individuals and families and service providers are not left without indication of when or how the urgent needs they are experiencing will be met.
- 2.13 The stark picture provided in the Disability Capacity Review validates the evidence our members report on a daily basis on the lived experience for individuals with intellectual disabilities and their families.

⁷ M. McCarron, P. McCallion, E. Reilly, N. Mulryan. A prospective 14-year longitudinal follow-up of dementia in persons with Down syndrome, Journal of Intellectual Disability research, Vol 58, Issue 1, 2014 <https://doi.org/10.1111/jir.12074>

⁸ Hithersay, Rosalyn; Hamburg, Sarah; Knight, Bernice; Strydom, André. Cognitive decline and dementia in Down syndrome. Current Opinion in Psychiatry: March 2017 - Volume 30 - Issue 2 - p 102-107 <https://doi.org/10.1097/yco.0000000000000307>

The Disability Capacity Review to 2032 highlights that a lack of action means ‘There will be a significant human cost for the individuals concerned and their families.’

Disability Capacity Review 2021 p138

There are a number of key areas of policy that require action in the context of Budget 2023 to facilitate the best use of the resources provided:

- 2.14 At present, funding is decided on a year-by-year basis, which represents poor value for money for the State and crisis-driven, rushed decision-making that affects outcomes for the individual. **Detailed planning for the implementation of a multi-annual funding approach, including capital investment, should be prioritised in 2023.**
- 2.15 The current absence of an agreed costing methodology does not support equitable resource allocation, provide for assessment of value-for-money, or support costing of new services and forward planning with confidence. The development of an agreed, uniform and consistent national costing methodology should be prioritised so that an equitable, sustainable funding and resource allocation programme can be agreed.
- 2.16 The waiting lists for children’s services and access to multidisciplinary / therapeutic supports should be prioritised to meet the needs of children with a disability, along with a continued commitment to the full implementation of the *Progressing Disability Services for Children and Youth People* (PDSCYP) programme.
- 2.17 The *National Policy on Access to Health Services for Children with Disability or Developmental Delay*, 2019 provides for equity of access and consistency across the country and easier referral pathways. Full implementation of this policy in the context of the Action Plan should ensure all children have timely access to the most appropriate service, regardless of the support being disability or primary care. This will necessitate stronger links between disability and primary care services and with Child and Adult Mental Health Services.
- 2.18 The allocation of funding to provide transport to day services, upon which many people with intellectual disability rely to access their supports, is not currently provided to the HSE. However, this responsibility is not at this time taken up by the Department of Transport. Investment to address the ageing transport fleet in disability services, and clarity of funding responsibility is urgently required to ensure safety and accessibility.
- 2.19 HSE has indicated that the Day Services programme does not provide funding for employment supports to those entering its services. However, the mainstream Intreo services have not at this time been resourced to take up the specialised requirements for supported employment required by people with intellectual disability. The responsibility for this key driver of independence and active citizenship should be clearly delineated.
- 2.20 Special schools are not currently allocated guidance counsellors, while children attending mainstream school have access to this support. A funding allocation to provide equal access to guidance counselling in the context of transition planning is required to adequately, equitably and positively plan for the future of young people attending special schools.
- 2.21 Specialist end of life care services – as the population of people with intellectual disability is ageing, there is a need for investment to meet future needs and comprehensive plans as to how appropriate services to support good quality of life in ageing will be developed. There is also a need for equitable access to specialist gerontological services and end of life care. Aging ‘in place’ will require investment and additional supports to ensure that people with a disability have the choice to remain in their own home.

- 2.22 There is a need for continued investment in the safeguarding of adults with an intellectual disability. Implementation of the HSE Adult Safeguarding Policy needs to be adequately resourced, in particular to address challenges arising from people living together whom may not wish or have chosen to live together. Where there are high levels of peer-to-peer issues arising, services should be resourced to address these and this may require identifying alternative living arrangements.
- 2.23 A mechanism is needed to ensure the required support is provided to essential frontline disability services to deal with the growing and serious funding requirements associated with the current extraordinary levels of inflation.

3. What action will be required to provide staffing to meet the needs of people with intellectual disabilities?

National Federation members, who deliver essential intellectual disability services, are now in crisis regarding the retention of existing staff and recruitment of new staff members, coupled with the growing crisis in relation to inflation. In the Department of Health's own report, the *Disability Capacity Review to 2032*, there are very significant requirements relating to future need. Currently delivering more than 70% of services on behalf of the State; Section 38 and 39 organisations will be central in the response to the crisis in disability services but can only do so with the appropriate staffing in place.

- 3.1 **A Workforce Planning Group for Disability should be established without delay** to focus on workforce planning to ensure availability of sufficient staff, with the right skills and capabilities, to support people with a disability and meet the existing requirements and those that will emerge as the Disability Capacity Review is implemented. A *Strategic Workforce Advisory Group on Home Carers and Nursing Home Health Care Assistants* was set up earlier this year and provides a template which can be applied to the disability service staffing crisis.
- 3.2 The Disability Capacity Review, published in July 2021, confirms that 70% of disability services are provided on behalf of the State by not-for-profit service providers. There are legal requirements on services to implement national pay awards, pension entitlements and measures required by regulation. **When agreements and regulations are made at national level, it is essential that the full cost of implementation is equally allocated to not-for-profit service providers who are contracted by the HSE to provide services on behalf of the State and those provided directly by the HSE.** Funding should also be allocated on a multi-annual basis which would improve forward-planning in relation to recruitment.
- 3.3 **It is concerning that the resource requirements set out in the Disability Capacity Review, do not include “pay changes, additional staffing for regulatory compliance, and increasing prevalence of intensive support needs” – all of which the report indicates could drive unit costs up further.**⁹ For services to remain sustainable, these issues will need to be addressed.
- 3.4 **The recruitment crisis is significantly exacerbated for Section 39-funded members, who cannot compete with pay levels provided in Section 38 or HSE-funded disability services.**¹⁰ This is affecting the delivery of existing services; and planning for meeting emerging and unmet needs. **Boards of Directors in Section 39 disability**

⁹ Disability Capacity Review to 2032 A Review of Disability Social Care Demand and Capacity Requirements up to 2032, p 24. Prepared by the Department of Health, <https://www.gov.ie/pdf/?file=https://assets.gov.ie/154163/8fe32ca7-2154-4fb0-8a41-6931c5f15471.pdf#page=1>

¹⁰ National Federation paper June 2022 – available on request info@fedvol.ie
The Voluntary and Community Sector in the 2020s, Forsa, page 4: <https://www.forsa.ie/wp-content/uploads/2021/09/ANewSystemicFundingModel1.pdf>

services are increasingly concerned about level of risk that organisations are currently carrying and the future viability of these organisations.

3.5 Most importantly, the high rates of staff turnover are also negatively affecting the people accessing services who are entitled to the same standard and continuity of care as provided by the HSE and Section 38 organisations. The current Public Sector pay talks have resulted in a proposal of a 6.5% uplift in public sector pay. If agreed, this must be similarly provided in the Section 39 disability services, to avoid catastrophic staffing flight from these services which are already paying significantly below the rates provided to staff working in the same roles in Section 38 and HSE-funded services.

For the State, the recruitment and retention crisis in section 39s will represent an inability to grow and provide new services to individuals that need them, as without adequate funding to pay staff at equal rates to their counterparts and to address inflationary costs, this need will remain unmet.

3.6 In this budget campaign, **the National Federation is calling for equivalent pay for staff members in Section 39 disability provider organisations.** For organisations to be able to recruit and retain high-quality staff, they must show existing staff members and prospective candidates that they are valued equally; paid equally for the same work, whether they work for a Section 38, Section 39 organisation or the HSE. Equality in pay is also essential to enable Section 39 services to provide supports to the citizens who use these services on an equal basis with those services provided by HSE and Section 38 service.

To bridge the pay gap, **€20 million should be invested into section 39 organisations in Budget 2023. Most critically, this will need to be index linked into the future so as to prevent this pay gap from developing again with a corresponding mechanism to address matters of inflation***. The governance, regulatory and financial requirements on providers in Section 38 and Section 39, and the needs of the people that they support through services are equal.

3.7 Investment is needed **to ensure that disability service providers can attract staff in senior operational positions.** Currently, the voluntary sector is unable to compete with salaries offered by the private sector in key areas such as administration, finance and human resources.

**€20million is the current gap that needs to be bridged to address risk to Section 39 services before agreement on current Public Sector Pay talks*