

## Disappointment with the Draft Disability Strategy – a briefing paper

### **Inadequate valuing of Deaf and Disabled people by the Northern Ireland Executive**

Deaf and Disabled people have been without a disability strategy in Northern Ireland for over a decade. This current draft consultation strategy has been more than five years in the making. This has placed Deaf and Disabled people in Northern Ireland at a disadvantage compared to counterparts in other parts of the UK.

- Deaf and Disabled people in Northern Ireland do not enjoy parity with counterparts in the rest of the UK in a number of key areas. For example: we do not have the same level of rights protections; access to Direct Payments lags behind the rest of the UK, denying Disabled people the same opportunity to live in the community with equal chances.
- Deaf and Disabled people have been experiencing regression as a result of measures implemented by the Westminster government under reserved powers. For example, as a result of the Universal Credit Act, an additional 50,000 Deaf and Disabled people will be pushed into poverty across the UK by 2029-2030.

We had hoped for a strategy of better quality and with substantial commitments aiming to progress the rights of Deaf and Disabled people in Northern Ireland given the delayed publication and the wider picture of regression. The draft strategy has left us feeling disillusioned and devalued. We believe that more broadly Deaf and Disabled people will feel the same, having made clear to us in engagement around the Strategy that what they wanted most was a Strategy that changed things not another document that does nothing.

### **Failure to meet legal requirements**

From reading the draft strategy we are concerned it will not be published in full range of accessible formats including easy read or BSL / ISL formats despite commitments within the strategy being to provide information in accessible formats. Without these, the strategy

consultation does not meet legal requirements concerning accessibility and reasonable adjustments.

Disability plans put out for consultation by other governments within the UK have been available in accessible formats:

- Wales: draft Disabled People's Rights Plan consultation in [easy read and BSL](#)
- UK wide national disability strategy action plan consultation in [easy read, interactive easy read and BSL](#)
- Scotland: Disability Equality plan in [easy read part 1](#) and [easy read part 2](#)

## **Inadequate co-production**

Although the vision and outcomes of the draft strategy were co-produced with Deaf and Disabled people through the co-design group, the commitments were not. This is not proper co-production and represents inadequate engagement in the development of the strategy. It contrasts with the approaches taken in other parts of the UK.

- The Welsh disability task force which informed its Disabled People's Rights Plan operated on the [principle of co-production](#). Over 350 external stakeholders and 200 Welsh Government policy officials worked together through ten working groups chaired by Disabled people and produced over 300 recommendations.
- The Scottish Disability Equality Plan was [developed in co-production](#) with three core funded Disabled People's Organisations to ensure that the voices and experiences of disabled people meaningfully considered from the outset of policy making
- The draft UK wide national disability strategy was [informed by a range of engagement methods](#) including: a survey which was responded to by thousands of Disabled people, carers and family members; 42 Regional Stakeholder Network meetings; lived experience research; 10 meetings with the Disability Charities Consortium; 4 meetings of the Disabled People's Organisation (DPO) Forum; 11 roundtable discussions with a total of 98 Disabled people about their experiences in daily life; 6 cross-cutting thematic groups with a total of 130 attendees including

Disabled people and representatives from DPOs, charities, academia and think tanks

### **Poor quality and inadequate commitments**

The draft strategy notably lacks concrete commitments. The targets are not specific, measurable, achievable, relevant or time-bound (SMART) and this undermines the quality of the strategy.

The strategy makes frequent reference to the United Nations Convention on the Rights of Disabled People but fails to adhere to the Convention – which places an obligation on State parties to progress the rights of Deaf and Disabled people – by its omission of concrete commitments to drive forward improvements in our lives.

There is no new money attached which is needed in order to achieve much needed progress.

Many of the commitments in the strategy are nothing more than stating that the government will meet its existing legal requirements in specific areas or continue to offer existing provisions. For example: provision of information in accessible formats and continuing to run the Blue Badge scheme.

A commitment to create a Regional Disability Forum of Deaf and Disabled people is positive. However, we question the value of such a forum if it's role to help deliver the current draft Strategy.

### **Where do we go from here?**

Other governments have listened and acted on criticisms to their draft plans:

- The Welsh government was heavily criticised for a lack of concrete targets and no new money for its draft Disabled People's Rights Plan - not only by Disabled people and DDPOs in Wales but also by the [Equality and Human Rights Commission](#) who said it "risked failure". Consultation on the plan – which did include an action plan of 48 short term targets - closed in August and the Welsh government is currently addressing the concerns before publishing the final plan.

- Scottish Disabled People's Organisations withdrew support for the draft Disability Equality plan in October 2024, highlighting a profound disconnect between government promises and real action on disability rights. As a result, [Scottish government revised the plan](#) which was published in June 2025 with an increase in funding of £2 million for implementation.

We would urge our Executive to show the same commitment to listening to Deaf and Disabled people and our organisations.

## **Recommendations**

To delay publication of the consultation until all accessible formats including easy read and BSL / ISL formats are confirmed as available.

To review the strategy commitments in co-production with Deaf and Disabled people and our organisations, and replace the existing commitments with SMART targets, ideally with new monies attached.

To commit to develop an Action Plan for the Strategy in co-production with Deaf and Disabled people and our organisations.

To include one or more new commitments that reflect the key priorities of Deaf and Disabled stakeholders. Suggestions could include:

- An inquiry into the need for legislative reform to strengthen the rights protections of Deaf and Disabled people in Northern Ireland to establish parity with the rest of the UK
- A SMART objective to embed the social model of disability throughout the Executive
- A commitment to reform social care in partnership with Deaf and disabled people which rules out social care charging
- A target date for expansion of the Independent Living Fund to new applicants in Northern Ireland as they have done in Scotland.
- A commitment to introducing free travel for Disabled people in parity with the rest of the UK and Ireland.