



# **Barnardo's NI Response to The Northern Ireland Disability Strategy 2025-2035 Consultation**

Barnardo's NI is the largest children's charity in Northern Ireland. In the past year we worked with approximately 18,000 children, young people and families across more than 45 different services and programmes. We are a leading provider of schools-based support, reaching more than 32,000 children in schools across the UK and Ireland through our NI-managed social and emotional literacy programmes. We deliver a wide range of services, from providing family support and early intervention, to working directly with children and families who have experienced adversity and need our support. Our goal is to achieve better outcomes for more children. To achieve this, we work with partners to build stronger families, safer childhoods and positive futures.

Barnardo's NI welcomes the opportunity to respond to the Executive's draft Disability Strategy. Our response is informed by our work supporting children and young people with disabilities, as well as their families and carers, through a range of services that provide group work supports, home visits, capacity building workshops, and short-term respite breaks. A robust Disability Strategy is integral to supporting d/Deaf and disabled people to live full and enriching lives, with public services built and maintained in collaboration with those with lived experience at the centre.

## **Overall Direction and Strategic Approach**

With this context, we are concerned that this proposed Disability Strategy fails to meet the fundamental structures for a successful Strategy that will provide the crucial interventions and investments for d/Deaf and disabled people, children, and their families and carers. The absence of a clear action plan and prioritisation framework is a major gap and risks losing urgency without interim accountability. This creates significant uncertainty as to whether the necessary resources will be available and how long it will take to implement actions.

Barnardo's NI calls for an ambitious Strategy with a rights-based approach that has defined priorities across all departments and public services, including a costed action plan, clear accountability and monitoring, in-built lived experience for d/Deaf and disabled people- particularly children and young people- and alignment between stated outcomes, indicators, and actions.

## Outcome 8- Deaf and Disabled Children and Young People

The Disability Strategy Expert Advisory Panel raised a number of barriers for d/Deaf and disabled children and young people, including a significant lack of data on their lived experiences, barriers to participation in decision-making, limited support services, a lack of community-based services, and a lack of specific measures and policy frameworks for d/Deaf and disabled children. Their report<sup>1</sup> notes that the 2019 Children and Young People's Strategy includes measures specific to d/Deaf and disabled children, and it is important that the Disability Strategy acknowledges this and develops measures that allow actions across strategies to be aligned and maximised. Some proposed measures included:

- Take action to collect and resource the collection of data on the numbers of d/Deaf and disabled children in Northern Ireland, and in line with the CRPD rights-based indicators
- Ensure that the Disability Strategy and Children & Young People's Strategy are consistent and fully align with each other
- Building on the Children & Young People's Strategy and Disability Strategy, develop a specific rights-based comprehensive action plan for the full and meaningful inclusion of d/Deaf and disabled children
- Ensure that the Anti-Poverty Strategy is inclusive of families with d/Deaf and disabled children and takes account of the extra costs they incur
- Provide adjusted rates of disability poverty that excludes disability benefits from income
- Provide and signpost d/Deaf and disabled children and their families with appropriate service through an agreed services pathway, including information, peer support, advice and advocacy services
- Provide d/Deaf and disabled children with a comprehensive and integrated package of services for transition to adulthood, from a sufficiently early stage, by coordinating legislation, policy and programmes across relevant sectors. Ensure children are fully informed, and their personal choices are considered in the transition, by involving them in the design of services and by providing advice and information on available options

---

<sup>1</sup> <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-disability-expert-advisory-panel-report.pdf>

- Ensure d/Deaf and disabled children are supported (both in terms of human assistance and financial investment in appropriate supports) to express their views and to have their views given due weight in all decision-making that affects them, including on access to and choice of personal support and education
- Take specific measures to prevent bullying against d/Deaf and disabled children
- Agree a Short Breaks policy between the Department of Health, health agencies and children with disabilities and their families. This should not be restricted to overnight stays but include breaks that are fun, developmental, work for d/Deaf and disabled children and their families and are available on an equitable basis across Northern Ireland
- Ensure sufficient and disability-sensitive childcare is a statutory duty
- Develop guidance on inclusive play for d/Deaf and disabled children
- Take forward the following five recommendations from NICCY (2018) 'Still Waiting' report (37-40):
  - A comprehensive and integrated mental health service model across Northern Ireland for children and young people with a learning disability should be agreed and implemented. This model must ensure that young people with a learning disability can access comparable services and support to young people without a disability
  - Assess how widespread the practice of determining eligibility of access to specialist mental health services (CAMHS) solely or mainly on the basis of IQ is, and take all necessary measures to ensure that access to services is always on the basis of need
  - A comprehensive review of community based emotional, mental and behavioural support services for young people with a learning disability should be carried out without delay
  - Immediate steps must be taken to ensure that all detentions of children and young people in the Iveagh Centre under the Mental Health (Northern Ireland) Order 1986 is proportionate and appropriate

- In addition, the Department of Health should assess the extent to which CAMHS is accessible for all other children and young d/Deaf and disabled people including those who require access to sign language

This is only a snapshot of the proposals for d/Deaf and disabled children and young people produced by the Expert Advisory Panel; in comparison, it is evident that the current draft Strategy does not replicate the dedication and emphasis on children and young people. Outcome 8 does not include clear actions under their commitments; there is a lack of detail on how the Strategy will “ensure that d/Deaf and disabled children are visible”, “ensure that the rights of d/Deaf and disabled children and young people will be respected”, and that “all departments will engage with d/Deaf and disabled children and young people”.

We are especially concerned that Outcome 8’s progress indicators revolved entirely around school qualifications. Outcome 8 does not take into account the whole child and a lifecycle approach, which includes early years support, support with mental health and diagnosis, school support, purposeful childcare, recreational opportunities, access to transitional support, and learning and employment. Outcome 8 is shortsighted and reduces d/Deaf and disabled children and young people to their educational attainment. While we welcome the joined-up approach with focus on the Autism Strategy, we strongly recommend broadening the scope of outcome indicators to include the diverse lived experiences of all d/Deaf and disabled children and young people.

## **The United Nations Convention on the Rights of People with Disabilities**

The UN Convention on the Rights of People with Disabilities (UNCRPD) was adopted in 2006 with the purpose to promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity. The UK ratified the Convention in 2009, agreeing to protect and promote the human rights of disabled people, including:

- eliminating disability discrimination
- enabling disabled people to live independently in the community
- ensuring an inclusive education system

- ensuring disabled people are protected from all forms of exploitation, violence and abuse

In 2017, the UN Committee on the Rights of Persons with Disabilities released their report on how well the UK is implementing the UNCRPD, which included a recommendation to incorporate the treaty into domestic law, “recognizing access to domestic remedies for breaches of the Convention, and adopt an appropriate and comprehensive response to the obligations enshrined in the Convention in its policies and programmes across the State party, including all devolved governments”<sup>2</sup>.

This draft Strategy commits to commissioning a legal scoping exercise to identify and compare benefits of and models for incorporation of the UNCRPD; we call for a stronger commitment to full incorporation of the UNCRPD into domestic law, and the need to demonstrate implementation of convention rights in the interim. A rights-based framework is integral to accountability mechanisms and ensuring that all the other outcomes listed in the Strategy are legally binding. Incorporation would not only formalise Northern Ireland’s existing commitment to the principles of the UNCRPD, but would also bridge the gap between policy intention and lived experience, meaning that our systems, institutions, and public services consistently deliver rights and responsibilities, and provide legal remedies for people who experience discrimination. Incorporation would place a duty on public authorities to comply with the UNCRPD and create a duty to consider wider UN committee documents in all decision making, ensuring that d/Deaf and disabled people are enabled to fully exercise their human rights.

## **Disability and Poverty**

The Disability Strategy Expert Advisory Panel highlighted numerous issues in its report with regards to social security support for persons with disabilities, including the need for a human rights based approach to social security, drawing on the Scottish model, assessments for Personal Independence Payments (PIP), and the role of private companies in PIP assessments<sup>3</sup>.

The disability pay gap is widening; in 2023/24, it was £2.35 per hour (17.2 per cent). This is wider than the previous year, when <sup>4</sup>£1.99.

---

<sup>2</sup> <https://www.equalityhumanrights.com/our-work/our-human-rights-work/monitoring-and-promoting-un-treaties/un-convention-rights-persons>

<sup>3</sup> <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-disability-expert-advisory-panel-report.pdf>

<sup>4</sup> <https://www.tuc.org.uk/research-analysis/reports/disability-pay-and-employment-gaps>

The disability equality charity Scope UK has highlighted that *‘Life costs more for disabled people and their families, spending more on essential goods and services such as heating, insurance, equipment, and therapies. These extra costs mean disabled people have less money in their pocket than non-disabled people or go without. The result is that disabled people are more likely to have a lower standard of living, even when they earn the same’*<sup>5</sup>.

Child poverty remains stubbornly high, with around 1 in 4 children (24%, or 110,000) growing up in poverty. Families including a person with a disability (28%) experience higher-than-average rates of child poverty<sup>6</sup>. Children who are disabled are 6% more likely to experience poverty compared to children who are not disabled.

With this context, we are concerned that the draft Strategy does not adequately address the connections between disability and poverty and lacks specific outcomes and commitments to tackling poverty for d/Deaf and disabled people. The draft Disability Strategy states that “Actions to address the root causes and impact of poverty will be taken forward primarily through the Executive’s Anti-Poverty Strategy but there are commitments below which relate to how d/Deaf and disabled people access benefits”<sup>7</sup>. Barnardo’s NI has been clear that, to eradicate child poverty, the Anti-Poverty Strategy must provide targeted interventions for children with specific additional vulnerabilities. It is important that actions taken under the Anti-Poverty Strategy are coordinated with the Disability Strategy to fully protect working-age persons with disabilities from poverty.

Barnardo’s NI’s PosAbility group- which provides support for young people aged 8-25 with a special need/disability- developed a poster to share their thoughts on how we should be tackling poverty in Northern Ireland, and their biggest priorities revolved around the experiences of people with disabilities experiencing poverty:

- Cutting benefits traps people with disabilities in a cycle of debt and poverty
- Raise or uncap benefits, especially for people with disabilities
- Implement anti-discrimination laws for fair wages and workers protection

---

<sup>5</sup> <https://www.scope.org.uk/campaigns/extra-costs>

<sup>6</sup> <https://www.jrf.org.uk/poverty-in-northern-ireland-2025>

<sup>7</sup> <https://www.communities-ni.gov.uk/sites/default/files/2025-12/dfc-ni-executive-disability-strategy-2025-35.pdf>

## Recommendations

The Disability Strategy Expert Advisory Panel produced their report with an extensive list of recommendations for a robust Disability Strategy<sup>8</sup>. Barnardo's NI fully supports these recommendations, in particular-

- Full incorporation of the UNCRPD
- Prioritise the views and participation of d/Deaf and disabled people in policy design, implementation, and monitoring
- Clear structures to oversee implementation and monitoring of the strategy should be established in advance of the Strategy's commencement
- Ensure that the Disability Strategy and its actions are appropriately resourced for their entire duration through ring-fenced funding for each of the strategy actions
- The Strategy lead department should have the power to ensure cooperation across departments in respect of Strategy actions
- All departments should have a clearly identified lead person responsible for taking forward the Strategy implementation and monitoring therein

We also recommend that the Executive listen to the views and opinions shared by Disabled People Against Cuts (DPAC), who drafted a briefing paper in response to the draft Disability Strategy<sup>9</sup> in collaboration with members of the former Disability Strategy Co-Design Group.

*For further information, please contact:*

**Meg Stith**, Policy and Public Affairs Officer, Barnardo's NI

[megan.stith@barnardos.org.uk](mailto:megan.stith@barnardos.org.uk)

---

<sup>8</sup> <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-disability-expert-advisory-panel-report.pdf>

<sup>9</sup> <https://dpacni.com/2025/12/09/disappointment-with-the-draft-disability-strategy-a-briefing-paper/>