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Introduction

The Society of St Vincent de Paul offers this submission on a Cost of Disability Payment as our preliminary thoughts – given the scale and opportunity presented by this potential Payment, the true starting point for any decision-making on a Cost of Disability Payment must be the proposed 13th of May 2026 Summit. Several of the areas outlined below must be driven by a co-design process with disabled people and disabled peoples’ organisations. Any future consultation must be based on themes and concerns identified by disabled people through this pre-consultation process. Further consultation should take place in line with both the 2025- 2030 National Human Rights Strategy for Disabled People and the United Nations Convention on the Rights of Persons with Disabilities.

SVP welcomes the commitment in the Programme for Government to further support the rights of disabled people by committing to *“improving supports and ensuring that the social welfare system is progressive and empowers people with a disability to live full and independent lives.”*¹ However, we are concerned that this present consultation has not drawn on themes and concerns raised in previous submissions, e.g. responses to the withdrawn Green Paper on Disability Reform.

In 2025, SVP received 260,799 requests for assistance, representing an increase on 2024. We support many households and individuals with a disability. Our submission is based on the experience of our members supporting households with a disability. Further, it draws on experiences of our members in Northern Ireland in supporting households with the Personal Independence Payment, which targets the costs of disability, albeit imperfectly.

Members of SVP regularly support households with disabled people. Working in people’s homes, our members see disabled people rationing energy and cutting

¹ Programme for Government (2025). Programme for Government 2025: Securing Ireland’s Future. [programme-for-government-securing-irelands-future.pdf](#)

back on needed energy expenditure, unable to afford food, prioritising their children's health at the expense of their own, or otherwise going without the basics required to live a life of dignity.

Along with disabled peoples' organisations and other voluntary and community sector organisations, SVP recognises that a rights-based, social model of disability² framework must be developed to deliver a Cost of Disability Payment as an impactful support that ensures people with a disability are empowered to live lives independently and free of poverty, with the same opportunities and freedoms as non-disabled people.

Poverty and Disability

The 2021 Indecon report estimates³, when adjusted for headline inflation, found that the annual cost of disability ranged from €10,766 to €15,221 per year⁴ – this figure is likely an under-estimation, given higher levels of inflation in key categories of extra expenditure for disabled people, such as energy. In 2025, the ESRI found that disability carried an extra weekly cost of between €488 and €555⁵.

The result of these additional costs is that disabled people are at a greater risk of poverty than their non-disabled peers. This is true for those both in full-time employment and those unable to work. These additional costs do not include the opportunity costs of barriers to full or part-time employment, or the costs of discrimination within work and access to services. The effects of these barriers and discrimination are nonetheless felt and effective in contributing to higher poverty rates for this group.

² Disability Federation of Ireland (2024). Submission on Green Paper on Disability Reform May 2024. <https://www.disability-federation.ie/publications/dfi-submission-on-green-paper-may-2024/>

³ Indecon International Research Economists (2021). The Cost of Disability in Ireland – Final Report. [the-cost-of-disability-in-ireland-research-report.pdf](https://www.indecon.ie/publications/the-cost-of-disability-in-ireland-research-report.pdf)

⁴ Disability Federation of Ireland, Irish Wheelchair Association, and Access for All (2026). Factsheet: Cost of Disability. <https://www.disability-federation.ie/publications/factsheet-cost-of-disability-the-lived-reality/>

⁵ ESRI and IHREC (2025). Adjusting Estimates of Poverty for the Cost of Disability. <https://www.esri.ie/publications/adjusting-estimates-of-poverty-for-the-cost-of-disability>

The 2025 Survey of Income and Living Conditions found that people unable to work due to illness were at a far greater risk of poverty: 28.4% compared to a national average of 12.6%⁶. Further, 39.2% of individuals in this group experienced enforced deprivation—this was an increase on 2024, compared to a decrease for deprivation in the general population. Consistent poverty rates for this group were 13.9% compared to the much lower national average of 4.7%. These are the figures *before* the withdrawal of one-off payments, estimated at €1404, are taken into account⁷.

Over-arching recommendations

The Society of St Vincent de Paul recommends that the Cost of Disability Payment be a universal, non-means tested payment to all disabled people. The payment should not count as ‘means’ for other social protection payments, nor should it exclude otherwise eligible recipients from receiving secondary supports. The payment should not be taxable.

Further recommendations include:

- **Clear guiding principles:** the Payment should be built on a social model of disability and embed a rights-based approach with active and meaningful participation, independence, dignity, agency, and inclusion at its core.
- **A social model of disability:** this Payment, as with all government approaches to disability, should be rooted in a social model of disability, not a medicalised model. This is a model that looks to the barriers disabled people face as the defining features of disability, not to the individual themselves or their condition as the ‘problem’.
- **Flexibility:** the Payment and surrounding frameworks should be flexible. This includes flexibility in approaches to different presentations and variations of disability, as well as a flexible understanding of how disability may change with time. For example, it should accommodate changes for those with episodic or fluctuating conditions (e.g. mental health issues, neurological conditions,

⁶ Central Statistics Office (2026). Survey on Income and Living Conditions (SILC) 2025.

<https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2025/>

⁷ Oireachtas Disability Group (2025). Memo: Budget 2026 and the Cost of Disability. <https://www.disability-federation.ie/news/2025/10/21/oireachtas-disability-group-memo-budget-2026-and-t/>

Cystic Fibrosis), progressive conditions, and 'invisible' conditions, among others.

- **Further consultation:** Again, we stress that the development of this Payment must involve early, regular, and in-depth consultation with disabled people and disabled peoples' organisations.

This payment must be situated within an inter-departmental approach that addresses the additional costs of disability: it is not enough that we finance the added costs of, for example, transportation, we must also address those structural issues that limit disabled peoples' ability to access public transportation equally to their peers. It is difficult to see this payment having its desired effects without a thorough review of existing supports, harmonisation, and cross-department co-operation.

The Disability Federation of Ireland calculates that the loss of one-off measures totals a NET loss of €1264 a year of support for disabled people⁸. The at-risk-of-poverty rate was 28.4%⁹ with these measures in place; it is clear the withdrawal of these measures will increase poverty rates for disabled people beyond this already unacceptable level. Given the time required for such a consultation process, and the impact of the withdrawal of one-off payments from disabled people, interim measures must be taken to support people with a disability.

Our recommendations on a Cost of Disability Payment are provided below. Again, these are preliminary recommendations: a co-design process with disabled people and disabled peoples' organisations is needed to develop the framework for this payment.

1. What is the purpose of the payment?

The purpose of the Cost of Disability Payment is to provide disabled people with support for the costs they incur because of their disability. SVP believes the payment

⁸ Oireachtas Disability Group (2025). Memo: Budget 2026 and the Cost of Disability. <https://www.disability-federation.ie/news/2025/10/21/oireachtas-disability-group-memo-budget-2026-and-t/>

⁹ Central Statistics Office (2026). Survey on Income and Living Conditions (SILC) 2025.

<https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2025/>

should *not* be framed as a substitute for employment. As a result, SVP recommends that this payment be universal: it should apply irrespective of employment status or other social protection payments.

Given this recommended purpose and considering the complexity of disabilities as outlined in the 2021 Indecon Report, and the diverse impact any given disability can have on a person's life, further consultation is needed. Further consultation should be evidence-led, co-produced, and co-designed with disabled people and disabled peoples' organisations to develop the Cost of Disability Payment.

Baseline Principles and Aims

At its core, the Cost of Disability Payment must be based on costs and challenges experienced by disabled people and informed by the lived experience of disabled people and disability-led/disabled peoples' organisations. Further, we echo calls from disabled people and disability support organisations for the Payment to be developed based on a social model of disability. What this means is that the Payment must target and categorise *barriers*, not people or disability, in line with UN recommendations¹⁰.

SVP recommends that the Cost of Disability Payment supports and enables disabled people to meet the added costs they incur as a result of the barriers and consequences of their disability. These are costs that non-disabled people do not experience, and which contribute to higher rates of poverty for disabled people: SILC 2025 estimates that 28.4% of those unable to work due to long-standing health problems were at risk of poverty in 2025, compared to a national average of 12.6%¹¹. Existing figures are likely an underestimate: joint research from the ESRI and IHREC

¹⁰ UN Office of the High Commissioner on Human Rights (2014). The Convention on the Rights of Persons with Disabilities – Training Guide. <https://www.ohchr.org/en/disabilities/ohchr-training-package-convention-rights-persons-disabilities>

¹¹ Central Statistics Office (2026). Survey on Income and Living Conditions (SILC) 2025.

<https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2025/>

finds that Ireland consistently and significantly underestimates the poverty levels of disabled households¹².

Disability Federation of Ireland, the Irish Wheelchair Association, and Access for All estimate that households with disabilities require between 41% and 93% extra disposable income to achieve the same standard of living as similar households with no disabled members¹³. The ESRI finds that the cost of disability is an estimated 52-59% of disposable income for disabled households and may be as high as 93% of disposable income for some¹⁴. Once these costs are included, the at risk of poverty rate for this group rises to an estimated 65-76%¹⁵ -- this is unacceptably high.

These costs, and the precarity that come with them, are faced by disabled people regardless of employment status and are a key barrier to equality in Ireland. A universal Cost of Disability Payment, as outlined in this submission, is expected to address these costs and therefore reduce the alarming rates of poverty among disabled people.

2. How would we decide which people would qualify for a Cost of Disability Payment?

The Society of St Vincent de Paul recommends that the Cost of Disability Payment be universal, non-means tested, non-taxable, and payable to individuals at any age. If the aim of the payment is to address the cost of disability, this is a cost borne by all disabled people of any age, though this cost understandably varies with age, and disability may carry greater cost in older age.

¹² ESRI and IHREC (2025). Adjusting Estimates of Poverty for the Cost of Disability.

<https://www.esri.ie/publications/adjusting-estimates-of-poverty-for-the-cost-of-disability>

¹³ Disability Federation of Ireland, Irish Wheelchair Association, and Access for All (2026). Factsheet: Cost of Disability. <https://www.disability-federation.ie/publications/factsheet-cost-of-disability-the-lived-reality/>

¹⁴ ESRI and IHREC (2025). Adjusting Estimates of Poverty for the Cost of Disability.

<https://www.esri.ie/publications/adjusting-estimates-of-poverty-for-the-cost-of-disability>

¹⁵ Disability Federation of Ireland, Irish Wheelchair Association, and Access for All (2026). Factsheet: Cost of Disability. <https://www.disability-federation.ie/publications/factsheet-cost-of-disability-the-lived-reality/>

For under 16s, the existing Domiciliary Care Allowance, while not means-tested, only applies to children with *severe* disability. Eligibility is driven by the level of care and attention needed, not type of disability or illness – this is welcome. However, once the requisite level of care needed is established, a flat rate of €380 is generally applied. Though the existing Domiciliary Care Allowance does target the level of care needed, it is an inflexible payment and does not capture the full range of support needed for children of varying circumstances to lives of dignity and equality.

For over 66s, the transition to non-contributory state pension is means-tested, with less favourable means testing than the Disability Allowance. With a non-means tested Cost of Disability Payment, there is a clear argument for over 66s to be eligible on the same basis as those aged 16-66.

Eligibility and Existing Welfare Payments

A Cost of Disability Payment should be non-means tested and be available to individuals irrespective of employment status: the payment should be aimed at mitigating the additional costs of disability, costs which place disabled people at a greater risk of poverty than non-disabled peers. To this end, the Cost of Disability Payment should not be counted as ‘means’ in assessments for other social protection and secondary benefits. To do so would undercut the principles of this payment and continue to leave disabled people at greater risk of poverty.

The relationship between this payment and existing social protection payments requires further consultation. An argument may be made for consolidating assessments, e.g. allowing eligibility for Disability Allowance to automatically qualify an individual for a Cost of Disability Payment, though not being a prerequisite to eligibility.

Disability and Eligibility

The approach to disability adopted by the Cost of Disability Payment must be a social model of disability, focused on structural barriers, inclusion, participation, and independence. Any eligibility criteria should be rooted in dignity, agency, inclusion,

and be flexible to the variety of forms disability may take, including fluctuations in severity and presentation.

We strongly recommend against any eligibility based on a medicalised definition of disability. Further, when determining who qualifies for the payment, we recommend against any categorisation of disability or impairment. Rather, in line with the UN's Convention on the Rights of Persons with Disabilities Training Guide, we recommend that any determination be based on a categorisation of the barriers faced by the individual¹⁶.

Any requirements around disability require further consultation. There is a range of shapes and effects disability can have in a person's life: the Department must therefore consult directly with the relevant groups to understand these variable impacts and how they may be accommodated in a Cost of Disability Payment. By way of example, SVP highlights issues with 'invisible' disabilities, disabilities with variable intensities, and progressive illnesses.

3. How should the payment amount be decided?

The Cost of Disability payment should be graduated and offer tailored support based on differentiated needs and international best practice; the exact levels, criteria, and assessment operation should be separately consulted on with disabled people. Where we make recommendations on assessment etc., these are with an eye to establishing baseline principles for further development.

These costs are only part of the wider cost of disability, which includes barriers to employment experienced by disabled people and the impacts of discrimination socially and professionally. A Cost of Disability Payment addresses the independence and security of the disabled individual, but the Government must

¹⁶ UN Office of the High Commissioner on Human Rights (2014). The Convention on the Rights of Persons with Disabilities – Training Guide. <https://www.ohchr.org/en/disabilities/ohchr-training-package-convention-rights-persons-disabilities>

continue to address these wider structural inequalities to ensure dignity and equality. This fact bears mention here firstly because it highlights that that costs covered by this payment, however significant, will not be the whole cost of disability for any individual, and secondly because it highlights the need to recognise that this payment cannot replace active effort by Government to address a lack of employment equality, access to services, or means-tested income supports.

Any payment should be indexed to a real-world evidence base. That is, the payment should not rely on fixed value increases as part of Budget negotiations. This is a wider issue within Ireland's social protection system: SVP advocates for social protection payments to be benchmarked and indexed to ensure they keep pace with wider economic changes and meet minimum living costs. Attention should be paid to the relationship between cost of disability and inflation in certain areas – the headline level of inflation may not represent the impact of inflation in disabled peoples' lives as, for example, people with a disability often have higher energy use, and energy has in recent years seen higher levels of inflation.

Income Inadequacy in Existing Payments

The Cost of Disability Payment must not be used to supplement or mitigate already inadequate incomes arising from existing social protection payments. Inadequacy in existing payments is well documented and continued under Budget 2026¹⁷.

These ongoing concerns must be addressed within each payment; we cannot look to this Cost of Disability Payment to 'solve' all existing issues. However, the development of a Cost of Disability Payment may provide an opportunity to assess the adequacy of existing disability and care-related payments.

¹⁷ SVP Vincentian MESL Research Centre (2025). MESL Impact Briefing Budget 2026. <https://budgeting.ie/wp-content/uploads/2025/11/MESL-Impact-Briefing-Budget-2026.pdf>

The Cost of Disability

Figures from the 2021 Indecon report, when adjusted for headline inflation, suggest that the annual cost of disability ranges from €10,766 to €15,221 a year¹⁸. In 2025, the ESRI found that the extra cost per week for disabled people was between 488 and €555¹⁹. The Disability Federation of Ireland, Irish Wheelchair Association, and Access for All find that households with disabled members require between 41% and 93% extra disposable income to meet the standard of living of the general population²⁰. These added costs all place people with a disability at much greater risk of poverty and hardship than non-disabled peers.

Research from the Vincentian MESL Research Centre at SVP found that, in 2016, core costs for a single adult with vision impairment was 18% higher than that of a single adult with full sight²¹. A key weekly cost was the need for taxis, which play an important role in social inclusion for people with vision impairment and facilitate travel to and from medical appointments. Further MESL Research on behalf of Family Carers Ireland found that the core costs for a two-parent household caring for an adolescent child with profound intellectual disability was 48% higher than a household without these caring responsibilities²². Both findings were based on in-depth focus groups with the relevant household types.

Universal or Means-Tested?

The Cost of Disability Payment should be a universal payment conditional on disability only. It should not be subject to means-testing and should not be taxable;

¹⁸ Indecon International Research Economists (2021). The Cost of Disability in Ireland – Final Report. [the-cost-of-disability-in-ireland-research-report.pdf](#)

¹⁹ ESRI and IHREC (2025). Adjusting Estimates of Poverty for the Cost of Disability. <https://www.esri.ie/publications/adjusting-estimates-of-poverty-for-the-cost-of-disability>

²⁰ Disability Federation of Ireland, Irish Wheelchair Association, and Access for All (2026). Factsheet: Cost of Disability. <https://www.disability-federation.ie/publications/factsheet-cost-of-disability-the-lived-reality/>

²¹ Vincentian Partnership for Social Justice and NCBI (2017). A Minimum Essential Standard of Living for a Single Adult with Vision Impairment. https://budgeting.ie/wp-content/uploads/2024/08/full_report_vpsj_ncbi_2017_a_mesl_for_a_single_adult_with_vision_impairment.pdf

²² Vincentian Partnership for Social Justice and Family Carers Ireland (2022). Care at Home: Costs of Care Arising from Disability. <https://budgeting.ie/wp-content/uploads/2024/08/care-at-home-costs-of-care-arising-from-disability-2022.pdf>

further, the Payment should not be included as 'means' in assessing an individual's ability to other social protection payments or related secondary benefits.

The Payment should be designed to address the greater costs associated with living with a disability – these costs arise regardless of employment status. Even for disabled people in full employment who would not satisfy any means test, their income goes less far than their peers' because of these increased costs.

In the roll-out of the payment, social protection recipients may be prioritised; however, the payment should ultimately be available to all disabled people.

Any Differences within the Payment

It would make sense for payment to differ where need differs: the costs associated with disability vary widely both between conditions and between individuals with the 'same' condition. Given variability between and within conditions, any differentiation in support levels should be based on need, not on the condition itself. Payment should not be based on any 'hierarchy' of disability, but on the cost of disability, with social inclusion, equality, and independence as the guiding principles.

We would highlight that a tiered approach may put an emphasis on placement within broad categories, as opposed to facilitating the independence of a given disabled person. Though there will undoubtedly be a range of costs of disability, we recommend that any differentiation in payment be as individualised as possible.

Change 'downward' within tiers, to a lower level of support, should not result in a sharp cliff-edge for payment recipients. The nature of this payment requires a more nuanced approach that minimises harsh jumps up and down in payment value.

How Differences are Determined

There is insufficient evidence to provide a recommendation on what the different levels of payment should be. Rather, SVP recommends that the Department engage with disabled people and disabled peoples' organisations to pursue an evidence-led approach to develop payment amounts and the determinants for these amounts.

In setting different thresholds, we would advise that attention be paid to the variable nature of many disabilities and to progressive conditions. Given these factors, consultation and decision-making on the payment thresholds should take place alongside consultation on assessment, as any issues in speed of re-assessment will impact on how payment thresholds should be set.

4. How should the payment work?

As outlined above, the Cost of Disability Payment should be a new universal, non-means tested and non-taxable payment. It should not impact on an individual's existing social protection payments or secondary benefits. Further, SVP believes the Payment should be a weekly cash payment, in line with the over-arching principle of flexibility.

Principles of the Cost of Disability Payment

SVP believes the Payment should enable disabled people to live their lives with independence and dignity on equal footing to their non-disabled peers. To that end, we propose that the Cost of Disability Payment be universal, non-means tested, non-taxable, and not included as 'means' for other supports or social protection payments. This approach may require harmonisation with other payments – SVP believes this harmonisation within the wide array of disability-related social protections is much needed.

The Payment, as SVP understands it, exists to put disabled people on more equal footing with their peers – to count it as 'means' in any of the above ways would undermine this aim.

Frequency of the Cost of Disability Payment

SVP recommends the Payment be a weekly payment, given that the 'costs' of disability are often day-to-day expenses. A weekly payment would enable recipients to offset those regular, daily outgoing costs and meet the complex needs of disabled

people. Further, where relevant, it would align with the frequency of other income support payments such as the Working Family Payment and Disability Allowance.

Disability and long-term illness are complex, and conditions can change quickly for many. If this payment is to be empowering, it must be regular so that it can enable recipients to manage their lives and meet the costs of their needs as they occur. If the payment is not regular, it will prevent recipients from being able to purchase and access what they need and create a 'hold' on their lives and needs. Waiting for a large payment would not support disabled peoples' regular management of their needs and costs. Simply put: a yearly or monthly payment would not meet the aims of equality or dignity.

People with a disability, similarly to many on lower incomes, often pay a 'poverty premium' for items which may appear 'optional', but for them may be the only option to meet their needs. Examples include shopping in more expensive local shops due to mobility issues, or buying pre-cut vegetables, smaller portions of items, or pre-made meals. In developing the Payment, the Department must be attentive to these dynamics and ensure that use of the Payment is not unduly constrained. A cash payment is well-suited to this.

Review and Reassessment

In operation, the delivery and review of the Payment must be responsive to individual needs: the needs and barriers associated with an individual's disability may change over time, and the Payment must reflect this.

Any review process must be developed in consultation with disabled people and disabled peoples' organisations. Setting up a universal periodic review for all recipients of the Payment would likely strain Department resources and undoubtedly place undue stress on Payment recipients. An automatic review process likely does not make sense for all disabilities; however, all recipients should be allowed to request a review. Further, any review procedure should not be understood as

‘replacing’ or ‘addressing’ the need for a nuanced and flexible initial application process.

Not an Alternative to Work

The Cost of Disability Payment is not a replacement of wages, but a separate payment for people who qualify because of disability and its related costs and barriers. The 1996 Commission on Disability states that a cost of disability payment should apply *“irrespective of the persons age and employment status”*²³.

Eligibility for the Payment must not distinguish between those who work and those who do not work, as there is a cost of disability regardless of employment status. All people living with a disability incur additional costs driven by needs and societal barriers that non-disabled people do not experience. Employment may improve a person’s income, but a disabled person will still incur additional costs as a consequence of disability, making their financial position more precarious than a non-disabled peer in similar employment.

As highlighted in SVPs 2024 Submission on Disability Reform²⁴, disabled people face structural barriers in accessing work. These barriers go beyond a person’s ‘motivation’ or ability to work: there are many societal barriers may ‘lock’ a disabled person out of the workforce, leaving them to face the financial and social consequences of this. Separate measures are needed to address these barriers.

Strategies to remove the barriers disabled people face in accessing work and education opportunities should continue to be considered; further consideration should also be given to the adequacy of existing means-tested disability supports.

²³ Commission on the Status of People with Disabilities (1996). A Strategy for Equality: Report of the Commission on the Status of People with Disabilities. <https://www.lenus.ie/entities/publication/7d248f91-1a76-4425-8d1a-8e3b0bf202be>

²⁴ Society of St Vincent de Paul (2024) Submission on Disability Reform. <https://www.svp.ie/wp-content/uploads/2024/05/SVP-Response-to-Green-Paper-April-2024.pdf>

5. Assessment

SVP is concerned that assessment was not specifically queried in this consultation. Though not specifically consulted on, it is important even at this early stage to consider how disabled people would access this payment. Any difficulties or barriers to access must be considered when developing other aspects of the payment, e.g. flexibility in payment amounts. Assessment should be holistic, conducted with participation of disabled people and use, as a baseline, their own assessment of their capacities, restrictions, and costs.

Here, we provide a set of guiding principles for assessment based on our members' experiences supporting households with existing processes in Ireland and with the Personal Independent Payment assessments in Northern Ireland. However, any assessment model must be developed in frequent and direct consultation with disabled people.

Nature of Assessment

The costs of disability cannot be established with medical assessment alone. As recommended by the European Disability Forum, any assessment of the costs of disability should focus on the barriers the individual faces because of their disability and the costs incurred by the individual to live a life of dignity, with independence and dignity as guiding principles²⁵.

Exact details on the nature of assessment should be established in consultation with disabled people and disabled peoples' organisations. For some conditions, the costs and pathways within the condition are well-documented; for others, costs are more individualised. We stress that even for conditions with well-documented costs, a given person's needs must be taken into account by the assessment process.

²⁵ Hammersley, Haydin on behalf of European Disability Forum (2021). Improving Disability Assessment Procedures in the EU. European Disability Forum. <https://www.edf-feph.org/disability-assessment-and-social-protection/>

‘Getting it Right’ at Initial Assessment

The existence of pathways for disputing decisions or decision amounts in no way negates the need to make the correct decision at initial assessment.

Lessons must be learned from ongoing issues in Ireland’s existing disability payment assessment processes. For example, in 2022, 43.2% of appeals for Disability Allowance were allowed, the highest rate across payment types in that year²⁶. Between 2014 and March 2024, 69% of appealed decisions were subsequently allowed or partially allowed.²⁷ Again, this suggests issues in the initial assessment. Given the scale of this new payment, a potentially large number of appeals could be avoided by a stronger initial assessment process.

Most recent statistics from the UK show that PIP appeals account for over half of all social security-related appeals²⁸. Between May 2020 and April 2025, nearly 31% of mandatory reconsiderations – a precursor to appeals – resulted in a change of award²⁹. Of the 130,000 appeals that made it to hearing, 64% had the decision overturned, with only 44,000 (33.8%) seeing the DWP’s decision upheld. These figures do not include the 22% of lodged appeals where the DWP changed the decision in favour of the applicant ahead of a tribunal hearing³⁰. This high rate of overturned decisions suggests flaws in initial assessment and an unacceptable level of undue distress and precarity for those in need of these payments.

²⁶Social Welfare Appeals Office (2022). Social Welfare Appeals Office Annual Report 2022. [News and Publications from the Social Welfare Appeals Office](#)

²⁷ Dáil Éireann Debate, Thursday - 25 April 2024 (2024). Social Welfare Appeals – Answer by Minister for Social Protection. <https://www.oireachtas.ie/en/debates/question/2024-04-25/8/#:~:text=Of%20these%2039,658,%20or%2069,provide%20it%20to%20the%20Deputy.>

²⁸ Ministry of Justice (2026). Tribunal Statistics Quarterly: October to December 2025. <https://www.gov.uk/government/statistics/tribunals-statistics-quarterly-october-to-december-2025/tribunal-statistics-quarterly-october-to-december-2025--2#social-security-and-child-support>

²⁹ Department for Work & Pensions (2026). Personal Independence Payment: Official Statistics to January 2026. <https://www.gov.uk/government/statistics/personal-independence-payment-statistics-to-january-2026/personal-independence-payment-official-statistics-to-january-2026>

³⁰ Department for Work & Pensions (2026). Personal Independence Payment: Official Statistics to January 2026. <https://www.gov.uk/government/statistics/personal-independence-payment-statistics-to-january-2026/personal-independence-payment-official-statistics-to-january-2026>

Participation in Assessment

Disabled people should be involved in the assessment process beyond merely submitting medical documentation for systematic review. Many conditions are ‘invisible’ and/or fluctuate, presenting as more or less severe or ‘active’ at different times, and therefore incurring varying costs. Any evidence from a single face-to-face meeting with an assessor, for example, cannot outweigh evidence provided by the individual themselves, any carers, or others involved in their support.

A Northern Ireland Public Services Ombudsman investigation³¹ into the use of further evidence in PIP, a similar payment to that proposed here– including information provided by the claimant, evidence from health professionals, and evidence from those supporting the claimant – found that further evidence was under-requested, improperly handled, and given too little weight by assessors. The Ombudsman expressed concern that face-to-face consultations were considered by assessors to negate the need to pursue other evidential opportunities, and that obvious contradictions in assessors’ reports were uninvestigated. These issues must be avoided for Ireland’s Cost of Disability Payment.

Frequency of Assessment

A key issue to be addressed is the frequency of assessment for this payment. We understand that the Payment may be linked to the duration of a person’s restriction: how this works in practice should be subject to early review and allow for a clear, structured dialogue between the Department and disabled people to ensure that durations are not too restrictive, and that any reassessments are not too onerous for applicants. We stress that the risk of incorrect non-payment should be minimised with the understanding that the costs of disability place disabled people at greater risk of poverty, even when in employment. Consideration must be given to people with permanent and unchanging disabilities, for whom re-assessment may carry undue risk of non-payment and distress.

³¹ Northern Ireland Public Services Ombudsman (2021). PIP and the Value of Further Evidence. <https://www.nipso.org.uk/our-findings/search-our-findings/pip-and-value-further-evidence>

Recommendations on the Strategic Focus Network

Summit on the Cost of Disability

Summit Topics

The Summit on the Cost of Disability provides a welcome opportunity for disabled people and disabled peoples' organisations to establish key concerns and areas for a Cost of Disability Payment. SVP recommends that this Summit be used as the basis for further consultation on a Cost of Disability Payment. Further, previous consultations on topics such as the Green Paper on Disability Reform have made clear that there are ongoing issues and inconsistencies in how disability is treated within existing social protection schemes. These wider issues, which undoubtedly will impact on any Cost of Disability Payment, require consultation at this Summit.

The Summit Format

The Summit is an opportunity to *initiate* a co-design process on the above issues. Participants must be given sufficient notice of the topics to be addressed and relevant evidence or figures, enabling them time to discuss, involve those they represent, and think through the implications of different choices.

SVP further recommends that the Department outline a clear follow-up schedule either at or ahead of the Summit to ensure that the Summit is the *beginning* of a process, not a single event.

Summit organisers should consult with disabled people and disabled peoples' organisations in advance to ensure that the format and logistics of the Summit itself are accessible to all. Providing materials and agendas ahead of time are an important part of this process.

Conclusion

SVP welcomes the development of a Cost of Disability Payment and looks forward to continued engagement on this issue. Again, we emphasise that the Cost of Disability Payment must be developed with regular, direct consultation with disabled people and disabled peoples' organisations.

We highlight that this Payment will not exist in a vacuum: a Cost of Disability Payment must be accompanied by improved service provision for disabled people, improvements to accessibility across public life such as in transportation, measures to address gaps in employment and education, and much-needed change in existing social protection payments. These additional measures must also address regional differences in service provision, education, and employment.

Specific Further Recommendations include:

- **Income adequacy must be addressed as a related but separate issue:** Social welfare payments should be benchmarked to the Minimum Essential Standard of Living to ensure that disabled people unable to work have an adequate income to meet their needs.
- **Harmonisation of disability-related social protection payments:** existing social protection payments relating to disability are in need of harmonisation to ensure that disabled people do not face cliff edges that result in reduced ability to meet their needs as they age. For example, attention should be paid to the transition from Disability Allowance to Non-Contributory Pension for those over the age of 66: given barriers to employment, disabled people are often subject to this lower income, with less favourable means-testing than the Disability Allowance. Alternatives must be developed to afford a continued level of support to disabled people over 66. These harmonised approaches should not rest on an assumption that payments for carers will mitigate potential losses in income.
- **Targeted attention to the employment and education gap:** the Department should use previous submissions to the Green Paper to develop and consult on a new employment strategy for disabled people. A new strategy should

include actions that target structural barriers in work and education and provide wrap-around services and support to support people toward work.

- **Whole-of-Government approach:** Welfare supports alone will not address the structural inequalities disabled people face. A whole-of-government approach is needed to address barriers disabled people face day-to-day and ensure that their needs are 'mainstreamed' in policy design.