

## **Public Consultation on the Reasonable Accommodation Fund**

**Submission from the Dyslexia Association of Ireland**

**28.04.2022**

The Dyslexia Association of Ireland welcomes the opportunity to respond to this public consultation on the Reasonable Accommodation Fund and sets out the following key recommendations for consideration.

1. In recognition of the complexity of neurodiverse profiles and the fact that many people have more than one disability, it would be useful for the current four grant pathways (and separate DASS) to be amalgamated into one overall scheme that serves to support a person's needs holistically rather than in separate categories. This would reduce the overwhelm for applicants of multiple forms. This amalgamated scheme could be renamed the 'Access and Inclusion Fund' to reflect that it can be accessed for funding for training, workplace support or equipment.
2. The above would serve to highlight the need for a holistic approach to providing support to dyslexic employees (e.g. coaching and mentoring) and not just the overt current focus on technological hardware or software. Due to the nature of dyslexia, the requirements of managing a dyslexic profile in employment does not typically require the purchase of hardware equipment or software at any great expense. There should therefore be an equal focus on other types of support (e.g. coaching, awareness raising training ) that are just as vital to support a dyslexic person and that can be funded where appropriate by the Access and Inclusion Fund.
3. There should be a review of the disability awareness training packages that are available to employers. The biggest impact in the workplace towards easing the challenges associated with dyslexia are the training of staff, deepening an awareness of dyslexia outside of commonly assumed challenges of just reading, writing and spelling. Employers should be offered access to funding for specific dyslexia training to learn how best to embrace the differences and unique talents that dyslexic individuals can bring to a workplace.
4. There should be clarification made as to the specialist/medical information that is required to accompany applications to the fund. This should avoid putting applicants under any burden to prove their disability and should respect an individual's rights to privacy and choice as to when and how their disability is disclosed in their workplace. It is recommended that a summary report or redacted/truncated version of a previous report be deemed sufficient, and would prevent the unnecessary provision of sensitive information by the applicant, or the unnecessary processing of sensitive data by the data controller operating the scheme. The respect and dignity of the applicant should be to the forefront of the grant application process at all times.

5. It is well recognised that there is not a 'one size fits all' approach to supporting dyslexia in the workplace. There should therefore be a more intelligent and collaborative approach to identifying relevant supports. Currently, under the WEAG, the applicant is required to provide a rationale for their requested supports. However, many adults with dyslexia may not be aware of all the supports available appropriate to their needs or duties. The complexity of researching, building an awareness of dyslexia resources and seeking endorsement from their employer may prove an unnecessary barrier. A better approach would be, as part of the application process, a Case Worker make contact with the applicant to discuss collaboratively the relevant additional supports required as part of the application. Accessible guidance documents and videos should also be developed to support applicants.
6. The current Employee Retention Grant supports employers 'if a worker has become disabled while working for them'. Consideration needs to be given to including those adults whose disability is only formally identified later in life, often due to lack of awareness and access to assessment at an earlier age. The language of any new scheme must reflect the diversity and lived experience of adults with a wide range of disabilities and neurodiverse profiles.
7. To support the above recommendation, there should be a comprehensive package of awareness raising training offered to case officers and Disability Policy Unit staff to ensure that they are familiar with different disabilities (including dyslexia), how these can impact in the workplace and how different supports, including those funded under this scheme, can assist them to reach their potential in the workplace.
8. Finally, there should be a clear and timeous appeals process for those who are unsatisfied with the outcome of their application, with a suitably independent and expert panel charged with ensuring that decisions made are compliant, fair and reasonable.

### **About the Dyslexia Association of Ireland**

The Dyslexia Association of Ireland (DAI) works with and for people affected by dyslexia, a specific learning difficulty which affects the acquisition of fluent and accurate reading and spelling skills, that affects approximately 10% of the population. DAI works to empower individuals. We do this by providing information, offering support services, engaging in advocacy and awareness raising for people with and affected by dyslexia. Our vision is a society that values and meets the needs of people with dyslexia, and where dyslexic individuals reach their full potential in all aspects of life. Services offered by DAI include: the provision of information; assessment for dyslexia and dyscalculia; specialist tuition for children and adults; courses for parents; training for teachers and other education personnel; and lobbying and advocacy.

Address: Dyslexia Association of Ireland, 107-110 The Windmill, Windmill Lane, Dublin D02E170.

Tel. 01 8776001

Email: [info@dyslexia.ie](mailto:info@dyslexia.ie)

Website: [www.dyslexia.ie](http://www.dyslexia.ie)

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