

## Opening statement by the Money Advice and Budgeting Service (MABS) to the Joint Committee on Finance, Public Expenditure and Reform, and Taoiseach, to discuss the Disabled Drivers and Disabled Passengers Scheme and financial inclusion issues

Dr Amie Lajoie, Social Policy & Research Executive, MABS Support CLG

(Wednesday 16 February 2022)

1. Good afternoon Chairman and Committee Members.
2. MABS, the Money Advice and Budgeting Service, very much welcomes the opportunity to contribute to the Committee's deliberations on this important topic. I am joined today by my colleague, Mr Ger O'Brien, Business Manager (Acting) of MABS Support CLG.
3. The Disabled Drivers and Disabled Passengers Scheme (DDDP Scheme), operated by the Office of the Revenue Commissioners, provides a range of supports towards the purchase and operation of specially constructed and adapted vehicles by disabled drivers and passengers, including tax relief from VRT and VAT, an exemption from motor tax and an annual fuel grant. We flag that direct commentary on the logistics and tax implications of the Scheme is not in the MABS area of expertise. However, as an essential, frontline service with a holistic approach to assisting clients with their immediate debt problems and becoming financially independent in the long-term, we can offer in-depth insight into the ways this Scheme, and related welfare supports, work on the ground. In addition, after 30 years of promoting financial inclusion for Ireland's most marginalised communities, MABS is in a unique position to comment on the on-going challenges faced by persons with disabilities who access our services. It is through this context that we position our statement and engagement with this Committee today.
4. In preparation for this meeting, MABS Support issued a comprehensive survey to all MABS Staff and Money Advisors around the country, and consulted with our funders, Citizen Information Board. The CIB Social Policy Team sent us collated data arising from Transport and Disability queries to local CISs,<sup>1</sup> to which we also refer.

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<sup>1</sup> Briefing Note on the Disabled Drivers Scheme (February 2022). Data arising from Transport and Disability queries to CISs, collated by the Citizens Information Board.

5. To start, we list the five primary issues highlighted by local MABS Services and/or CIS regarding the DDDP Scheme as it currently operates. We include examples of our clients' lived experiences to illustrate these points.<sup>2</sup>
6. (1) Medical criteria: The DDDP Scheme is inaccessible for many, due to the restrictive medical criteria for accessing the Primary Medical Certificate (PMC) necessary for approval. If an initial PMC application is rejected, an appeal may be lodged to the Disabled Drivers Medical Board of Appeal (DDMBA).<sup>3</sup> To qualify, an applicant must satisfy at least one of six medical criteria that focus predominantly on physical disabilities, in particular a lack of limb function. This criterion is exclusionary for persons with other disability types – including, chronic illnesses, brain or neurological conditions, cardiovascular diseases and so on. For example, a Money Advisor from North Dublin spoke of a client with Chronic Obstructive Pulmonary Disease (COPD) who uses a wheelchair and is on oxygen; she is unable to walk unaided and not more than a few steps at once. Her application for a PMC and subsequent appeal were denied as she was deemed to have use of her legs.
7. (2) The appeals process: When operational, the PMC appeals process requires persons to travel to Dublin for an in-person assessment. This can often be extremely challenging (if not impossible) and costly for those clients who live far away. A client in a local CIS office<sup>4</sup> lost her appeal after she was unable to travel the 5-hour journey from her home to attend an assessment in Dublin. The client lives alone and had no means of personal transport.
8. (3) Exclusionary due to cost: Even if their clients satisfy the physical requirements, Money Advisors highlighted that the majority of their clients cannot access the DDDP Scheme as they cannot afford the purchase of a vehicle, let alone maintenance, even with tax reliefs and rebates. Many MABS clients with disabilities rely solely on social welfare payments to live, and face increased living costs – in particular for transport.<sup>5</sup> A Money Advisor in Cork discussed how her clients who are wheelchair users must take taxis to medical appointments, as public transport is unavailable and inaccessible. While they can get their taxi fare reimbursed by the local Community Welfare Office, this could take up to two weeks. In the interim, she has seen clients opt to go without food in order to cover transport costs.

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<sup>2</sup> Please note that the case studies included here are just a select sampling of the types of examples raised in our preliminary analysis of this issue by both MABS Money Advisors and local Citizen's Information Services.

<sup>3</sup> This group, to the best of our knowledge, is no longer operational as the DDMBA members collectively resigned in January 2022. For more, see: <https://www.rte.ie/news/ireland/2022/0111/1272941-disabled-drivers-medical-board-of-appeal/>

<sup>4</sup> Briefing Note on the Disabled Drivers Scheme (February 2022). Data arising from Transport and Disability queries to CISs, collated by the Citizens Information Board.

<sup>5</sup> For more, see: [gov.ie](http://gov.ie) - [The Cost of Disability in Ireland – Research Report \(www.gov.ie\)](http://www.gov.ie)

9. (4) Inflexibility of the Scheme: CISs<sup>6</sup> identified how the DDDP Scheme can also be restrictive, for instance when there is a sudden change of familial circumstances. A family member of a disabled passenger can be eligible for the Scheme if they are living with, and responsible for, their transport, and own a vehicle for that reason. However, problems arose for one CIS client<sup>7</sup> with disabilities when her husband died, who was the driver of her specially adapted vehicle with the VRT/VAT rebates. The client's son-in-law was available to take over driving responsibilities, but in this case, the client had to explore transferring ownership of the vehicle to her son-in-law (which was not what the client wanted).
10. (5) Replacing previous grants: In 2013, the Government closed the Mobility Allowance and Motorised Transport Grant schemes to new applicants. The DDDP Scheme therefore took on an increasing importance for people with disabilities. However, the DDDP Scheme in its current guise is not effective to provide relief to those who truly need it – in particular low-income persons. MABS Money Advisors called for the return and/or the replacement of the prior grants, and the Mobility Allowance in particular, arguing that it contributed greatly to their clients' overall health and wellbeing, easing financial burdens for transport and providing increased opportunities for participation and social engagement. Since 2013, CISs have also repeatedly highlighted this issue, and the Citizen's Information Board raised this in successive Pre-Budget Submissions.<sup>8</sup>
11. It is important to draw connections between these points and underlying issues of financial inclusion faced by persons with disabilities. Research from the European Disability Forum<sup>9</sup> found that 38.1% of persons with disabilities in Ireland are at-risk of poverty and social exclusion, a number that has grown since 2010 and is worryingly higher than the EU average of 28.7%. MABS services work to help alleviate financial pressures for those who are struggling, and we find that, particularly for clients with disabilities, there are a number of barriers to accessing available social welfare supports (including but not limited to the DDDP Scheme).
12. This includes a lack of knowledge of rights and entitlements. Most clients are not aware of what they are entitled to until they come to MABS and/or CIS, and that they have the right to appeal a decision to reject their applications for social welfare. Also, clients with disabilities face increased difficulties with the required online applications due to digital exclusion, not owning or able to

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<sup>6</sup> Briefing Note on the Disabled Drivers Scheme (February 2022). Data arising from Transport and Disability queries to CISs, collated by the Citizens Information Board.

<sup>7</sup> Ibid.

<sup>8</sup> Ibid.

<sup>9</sup> See the European Disability Forum, Human Rights Report 2020: Poverty and Social Exclusion: <https://www.edf-feph.org/publications/european-human-rights-report/>

afford the necessary ‘smart’ devices, lack of home broadband access (particularly the case in rural areas), and lower than average levels of digital literacy.

13. Persons with disabilities also face increased household expenses, for instance someone may have to keep warm when they are not mobile, and/or they may be homebound and require continuous electricity, lighting, and so on, and therefore are even more sensitive to rises in energy prices than the general population. Lack of accessible public transport, in particular in rural areas, leads to the reliance on taxis and personal transport options, that are, for many, simply too expensive.
14. Unfortunately, we would posit that challenges have exacerbated in recent months, due to Covid-19 and the spike in the cost of living.<sup>10</sup> Individual actions from our clients in terms of budgeting and entitlement maximisation are becoming insufficient in the face of insurmountable structural barriers.
15. We list below a number of direct actions to support the increased financial inclusion of persons with disabilities, and, in turn, combat exclusion.
  - Extension of employment supports and awareness of supports to enable those with a disability to find meaningful employment. Allow retention of medical card solely on medical need if working and regardless of income.
  - Provide a savings incentive scheme<sup>11</sup> for all on social welfare, including those with disabilities.
  - Support the training of frontline staff to assist those with disabilities with specialised needs – including Post Offices, Banks, Credit Unions and Public Services.
  - Enhance educational and financial literacy incentives – for example, fully funded third level courses with extra supports that have occupational outcomes.
  - The provision and long-term accessibility of non-fee and Basic Bank Accounts with preferential overdraft and loan rates.
  - Available interest-free loans for capital spends – such as housing adaptation, equipment purchases, vehicle adaptation, disability aids.

To conclude, we strongly support the efforts of this Committee to examine the DDDP Scheme and further promote the full participation and financial inclusion of persons with disabilities. We look forward to discussing these matters further. Thank you.

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<sup>10</sup> Notwithstanding the cost of living package from the Government announced last week. For more, see: [gov.ie - Ministers McGrath and Donohoe announce €505 million package in measures to mitigate the cost of living \(www.gov.ie\)](https://www.gov.ie/en/news/2022/05/ministers-mcgrath-and-donohoe-announce-505-million-package-in-measures-to-mitigate-the-cost-of-living/)

<sup>11</sup> An example is the ‘Help to Save’ Scheme in the UK: <https://www.gov.uk/get-help-savings-low-income>