



Submission to the consultation on the Reasonable Accommodation Fund

May 2022



St Patrick's Mental Health Services (SPMHS) is Ireland's largest independent, not-for-profit mental health service provider. St Patrick's Mental Health Services' vision is a society where all citizens are empowered to live mentally healthy lives. SPMHS works to provide the highest quality mental healthcare, to promote mental wellbeing and mental health awareness, and to advocate for the rights of those experiencing mental health difficulties. SPMHS achieves this through a human rights-based approach, through the enhancement of evidence-based knowledge, and by striving to be at the cutting edge of new initiatives and advances in the field. SPMHS is committed to furthering the development of the competencies of those choosing to work in mental health and of the organisations providing mental health care services, and to enhancing partnership with service users. Our strategic plan for 2018-2022 – [‘Changing Minds. Changing Lives’](#), is firmly rooted in these principles and commitments.

SPMHS welcomes the opportunity to contribute to this consultation on the Reasonable Accommodation Fund. This brief submission will focus on the significance of mental health difficulties as they relate to reasonable accommodations.

(Suggested question no. 1, as per consultation guidance note)

What problem will your proposed change address?

Mental health stigma and discrimination

Mental health difficulties are considered under the ground of ‘disability’ within the Equality Acts, and people experiencing mental health difficulties may require reasonable accommodations in the workplace. This may be especially pertinent on a return to work after a period of time off due to mental health difficulties. It may also be especially pertinent for people entering or returning to the labour market who have an enduring and or severe mental health difficulty.

However, findings from the 2021 Mental Health Attitudes Survey carried out by SPMHS, indicate persistence of mental health stigma and discrimination within both the world of work and the larger community. From a nationally representative sample of 842 adults, 26% had experienced, or knew someone who had experienced, discrimination on the basis of mental health difficulties in the workplace.¹ The 2018 Disability and Discrimination in Ireland report highlights mental health discrimination in the context of employment as a significant and complex problem, and notes that more generally for people with disabilities “discrimination – or the fear of discrimination – discourages people with disabilities from seeking work or remaining in employment after the



onset of disability".²

Reasonable Accommodations and Mental Health Difficulties

The review of the Reasonable Accommodation Fund provides a valuable opportunity to increase awareness of the rights and obligations of employees and employers or job-seekers respectively, regarding the importance and nature of reasonable accommodations for people with disabilities, including mental health difficulties. With regard to the Employment Equality Acts, employers need to be aware of an employee's mental health difficulties and related accommodation needs in order to fulfil this obligation. Many reasonable accommodations of relevance to mental health difficulties may be low-cost and or relatively straightforward in nature, including flexible working arrangements, time off to attend ongoing mental healthcare appointments or accessing different forms of support within the workplace.³ However, awareness and understanding amongst employers regarding the relevance of such accommodations can be limited.⁴ Furthermore, a fear of disclosing a need for reasonable accommodations due to mental health difficulties and experiencing subsequent discrimination from employers has been identified as a barrier to reaping the benefits of such accommodations.⁵ In SPMHS' 2021 Mental Health Attitudes Survey, only 61% of respondents said that they would "be OK explaining to their boss they needed time off due to a mental health". For people with severe and enduring mental health difficulties, accessing and retaining work can pose further barriers, and this group are under-represented in the workforce.⁶

(Suggested question no. 2 and 4)

What is the proposed change?/ Please describe what successful implementation of the proposed change would look like.

Notwithstanding that many accommodations for mental health difficulties may be of low-cost to the employer, there may be some adaptations of benefit to people with mental health difficulties that may require financial support via the Reasonable Accommodation Fund, and that employers and employees could be made aware of. The Employee Retention Grant and the Workplace Equipment Adaptation Grant may be of particular relevance, and it may be helpful to highlight one or two examples of mental health-related situations that would fall under the schemes within accompanying literature. For example, for a job-seeker or employee with a potentially enduring or severe mental health difficulty such as schizophrenia, the support of a job coach and or a work-related assessment by an occupational therapist may be beneficial. Another example may be an autistic employee or job-seeker who may benefit from



sensory-friendly adaptations to the workplace to support potential mental health needs.

(Suggested question no. 3)

How will the proposed change help solve the problem?

Ensuring it is made clear that mental health difficulties are included under the relevant grant schemes covered by the Reasonable Accommodation Fund would be important to increase awareness and understanding of rights and obligations concerning mental health difficulties and associated needs in the workplace.

_____ Submission Ends _____

References

¹ St Patrick's Mental Health Services (2021) Attitudes to Mental Health Survey: Key Findings. Available at: <https://www.stpatricks.ie/media/3310/attitudes-to-mental-health-survey-2021.pdf>

² Banks, J., Grotti, R., Fahey, E., & Watson, D. (2018, p. 61) Disability and Discrimination in Ireland: Evidence from the QNHS Equality Modules 2004, 2010, 2014. (July 2018). Available at: <https://www.ihrec.ie/app/uploads/2018/09/Disability-and-Discrimination.pdf>

³ McDowell C, Fossey E. Workplace accommodations for people with mental illness: a scoping review. *J Occup Rehabil.* 2015 Mar;25(1):197-206. doi: 10.1007/s10926-014-9512-y. PMID: 24841728.

⁴ Amnesty International Ireland and Mental Health Reform (2012) Employment and Mental Health: A Briefing Paper. Available online at: <https://www.mentalhealthreform.ie/wp-content/uploads/2012/12/Employmentand-Mental-Health-Briefing-Paper>

⁵ World Health Organisation Europe (2010) Mental health and wellbeing at the workplace: protection and inclusion in challenging times. Copenhagen: WHO Regional Office for Europe. Available at: http://www.euro.who.int/_data/assets/pdf_file/0018/124047/e94345.pdf?ua=1

⁶ McDowell et al (2021) Vocational Service Models and Approaches to Improve Job Tenure of People with Severe and Enduring Mental Illness: A Narrative Review. *Frontiers in Psychiatry.* 9 July 2021. <https://doi.org/10.3389/fpsyt.2021.668716>