



The European Anti-Poverty Network (EAPN) Ireland Policy Group

Submission to National Reform Programme 2017

March 2017

The European Anti-Poverty Network (EAPN) Ireland Policy Group welcomes the opportunity to make a submission to Ireland's National Reform Programme (NRP) 2017.

The aim of the EAPN Ireland Policy Group is to bring together interested EAPN Ireland members to coordinate our efforts in the fight against poverty and to connect this to EU policy development and their implementation in Ireland, including the Europe 2020 strategy. It is made up of the following organisations:

- Age Action Ireland
- Congress Centres Network
- Disability Federation of Ireland
- EAPN Ireland
- Irish National Organisation of the Unemployed
- Irish Traveller Movement
- Migrant Rights Centre Ireland
- National Adult Literacy Agency
- National Youth Council of Ireland
- National Women's Council of Ireland
- One Family
- Simon Communities of Ireland
- SIPTU.

EAPN Ireland is a member of the Better Europe Alliance.

Introduction

The National Reform Programme provides an ongoing opportunity to review progress towards Ireland's commitments to the goal of an integrated approach to smart, sustainable and inclusive growth as outlined in the Europe 2020 Strategy. It also has to provide specific information on how Ireland is implementing the Country Specific Recommendations it received in 2016¹. The NRP must also respond to the range of issues raised by the European Commission in its 2017 Country Report for Ireland².

The Policy Group continues to be concerned that economic and social goals are not seen as of equal importance or developed in a complementary manner. It is also clear that while there are some signs of progress many people are still not benefitting from the economic recovery. Major challenges still exist in the provision of services and supports to people and in the quality of jobs.

The housing crisis continues to deepen and no progress has been made in addressing inequality in health outcomes or access to health services for those on lower income and or living in marginalised communities. While the Survey of Income and Living Conditions for 2015 shows a

¹ Council of the European Union, Country Specific Recommendations for Ireland 2016 [http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016H0818\(16\)&from=EN](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016H0818(16)&from=EN)

² European Commission, 2017. Country Report for Ireland 2017 https://ec.europa.eu/info/files/2017-european-semester-country-report-ireland_en

welcome fall in material deprivation it remains a reality for one quarter of the population. The levels of those at-risk of poverty is high while 8.7% of the population are in consistent poverty. This is up from 4.2% in 2008 and with little change over the past four years, despite economic growth over this period. Certain groups in society experience particularly high levels of poverty, for example people who are unemployed, lone parents, people with disabilities, travellers and so on

However, the Policy Group does welcome some of the changes announced in Budget 2017 including the announcement of the first stages in the development of a new Affordable Childcare Scheme and the first increases in working age social welfare payments since they were cut twice in Budgets 2010 and 2011. Unfortunately the age inequality in welfare supports still remains. We also welcome the reduction in income inequality shown in SILC 2015 and the fact that the unemployment rate has fallen to 6.6% from a high of over 15%.

However, this is only the beginning and much progress still needs to be made on a wide range of areas if everyone is to really benefit. The Policy Group therefore repeats its call that as Ireland's economic recovery begins to take shape that **people on the lowest incomes and from the most marginalised groups in society do not get left behind**. Economic and social objectives must go hand in hand, alongside environmental objectives, if we are to have a sustainable and inclusive recovery. This is necessary if Ireland is to achieve the goals it has set itself under the Europe 2020 Strategy. As with previous years this submission is focused on achieving a **balanced approach** and **ensuring that no-one gets left behind**.

It is also important to continue to highlight the inter-relationship across the different targets of the Europe 2020 strategy and the related policy areas. Progress, or lack of progress, under one target can support or undermine the achievement of another target. For example the provision of quality jobs could help support progress towards the target to reduce poverty and social exclusion, whereas an increase in bad quality, precarious jobs will undermine it.

EAPN Ireland and some of the other members of the Policy Group are also members of the Better Europe Alliance. The Alliance will publish its response to the European Commission's 2017 Country Report for Ireland in the coming weeks.

We look at five areas below:

1. Impact Assessment and Budgetary Policy
2. Employment
3. Education
4. Poverty and Social Exclusion
5. Stakeholder engagement in the Europe 2020 and Semester Process

1. Impact Assessment and Budgetary Policy

Economic, social and environmental policy must be progressed in a balanced and integrated manner and this must be reflected in the NRP and wider Government policy to deliver on Ireland's commitments under the European Semester.

In order to support the achievement of this goal the Irish Government needs to **implement effective poverty, equality and gender impact assessments** across all relevant policy areas, including economic and budgetary policy. This is process that must be carried out in a transparent way at policy design stage.

The failure to carry out poverty, equality and gender impact assessments over the past ten years has been evident in increasing poverty levels. However, as the economy expands and Government introduces expansionary budgets, poverty, equality and gender impact assessment is even more critical. Until Budget 2017 the annual Budgets saw little real income gain for those on the lowest 20%³ Budget 2017 is slightly more progressive, but there is still little real actual gain, relative to inflation for those on the lowest incomes⁴.

We welcome the commitment in the Programme for Partnership Government to *'develop the process of budget and policy proofing as a means of advancing equality, reducing poverty and strengthening economic and social rights'* including the commitment to equality and gender proofing and developing the infrastructure in the Oireachtas to achieving this⁵. While the proofing of the annual budgets is an essential process the commitment to wider policy proofing must involve a major review and strengthening of the current ineffective process.

The European Commission Country Report for 2016 and the recent 2017 Report highlight Ireland's low tax levels, which are 10% below the EU average. This is a challenge when tackling the huge infrastructure deficit in a range of public services in Ireland including in transport, housing, health, water, childcare, education and other areas. The need for investment in infrastructure is also a central element in the first CSR for 2016. Adequate levels of taxation are essential to fund high quality social protection systems and essential public services. The Government needs to introduce measures which increase tax levels in a progressive and fair manner rather than implementing policies which reduce the tax take, such as cuts to the Universal Social Charge (USC). Changes in Ireland's demographic profile, as also highlighted in the Commission Report, makes this an even more urgent priority.

³ ESRI 2015. Distributional Impact of Tax, Welfare and Public Service Pay Policies: Budget 2016 and Budgets 2009-2016. <https://www.esri.ie/publications/distributional-impact-of-tax-welfare-and-public-service-pay-policies-budget-2016-and-budgets-2009-2016/>

⁴ Vincentian Partnership for Social Justice 2016, Budget 2017 Minimum Essential Budget Standards Impact Briefing <http://www.budgeting.ie/publications/budget-2017/> and ESRI 2016, Distributional Impact of Tax and Welfare Policies: Budget 2017. www.esri.ie/news/budget2017/

⁵ A Programme for a Partnership Government, May 2016. http://www.merrionstreet.ie/MerrionStreet/en/ImageLibrary/Programme_for_Partnership_Government.pdf

The Commission's Country Report for Ireland and CSRs do not address the fact that Growth and Stability Pact rules, implemented through the European Semester also limit the potential for investment. The recent moves to increase flexibility are welcome with further reference to this possibility on the 2017 Annual Growth Survey. This flexibility is also essential to allow the Government to access additional revenue to invest in social infrastructure. However, this should be progressed alongside a widening of the tax base as outlined above.

2. Employment

We welcome the continued fall in unemployment to 6.6%, including the fall in long-term unemployment, and the increase in the numbers of people in employment to over two million people. Within these numbers the continued increase in the proportion of those in full-time work is particularly welcome while ensuring the availability of quality part-time and flexible working options for those who want it. The overall focus in creating jobs must be on **ensuring that workers have the capacity to bring home an adequate weekly wage.**

Ireland has already achieved its Europe 2020 employment target for Europe 2020 of 69%-71% for those age 20-64 years of age. While it is clear that achieving this target alone is not enough and the Action Plan for Jobs seeks to develop and move beyond this, a greater focus must be on ensuring that the growth in employment is inclusive and also results in a reduction in poverty. This means that measures to address the creation of jobs and supporting people into employment, including those measures outlined in the Action Plan for Jobs, need to focus on the creation of quality jobs and have a focus on the particular needs of those most distant from the labour market.

Those who are distant from the labour market includes those parenting alone, people with disabilities, qualified adults, people who are long-term unemployed, those living in disadvantaged communities and people from ethnic minority backgrounds including Travellers. This is clearly linked to the focus on low-work intensity households but is also wider. The European Commission has brought a greater focus on some of these groups through the Country Specific Recommendations and it is also addressed in the 2016 and 2017 Country report for Ireland. We are concerned at the still high levels of youth unemployment of 14.5%⁶, which is more than double the general unemployment rate.

The third EU Country Specific Recommendation for Ireland in 2016 is that Ireland *"Expand and accelerate the implementation of activation policies to increase the work intensity of households and address the poverty risk of children. Pursue measures to incentivise employment by tapering the withdrawal of benefits and supplementary payments. Improve the provision of quality, affordable full-*

⁶ CSO Monthly Report, February 2017

<http://www.cso.ie/en/releasesandpublications/er/mue/monthlyunemploymentfebruary2017/>

time childcare”⁷. This gives an indication of some of the measures that need to be taken to make the Irish labour market more inclusive.

It is critical that measures to address the needs of those distant from the labour market are implemented in a balanced way as outlined in the EUs active inclusion strategy⁸ involving an **integrated policy approach** to adequate income supports, inclusive labour markets and access to quality services. Within this approach there must be a clear recognition and a focus on supporting people to address the range of barriers they experience in accessing the labour market. This is crucial if progressing towards the employment target is also going to result in progress in addressing poverty and social exclusion.

i. Pathways to Work

EAPN Ireland has actively engaged with the development of the Pathways to Work strategy to ensure that it is inclusive and works in a positive way to support all people of working age, who need support, to improve the quality of their lives. This includes the publication of a Position Paper on Positive Activation in 2015.⁹

Pathways to Work 2016-2020 expands its focus past those on the live-register to others of working age including people with disabilities, lone parents, qualified adults as well as supporting walk-ins who may not be on any social welfare payment is positive. However, we continued to be concerned about ongoing issues highlighted in our Position Paper about in the implementation of activation measures in Ireland.

The key concern of EAPN Ireland is **culture** that underpins the Public Employment Service. The existing and dominant culture is a managerial one which involves increased levels of conditionality and works from a position of mistrust of clients. Instead activation services must be **person focused** and work from a **culture that is positive, supportive and enabling of the clients** accessing their service. This same culture must apply to JobPath services and to the delivery of the Youth Guarantee. It should also be at the heart of the development of a Pathways to Work Strategy for Jobless Households. It is only in this way that they can ensure positive outcomes for people.

The existing negative culture experienced by many could turn what should be the positive expansion towards creating a more inclusive activation service into a negative experience for those who could not engage with it. As highlighted above any engagement with those distant from the labour market must address the barriers experienced by these groups and involve an active inclusive approach.

Case officers and all frontline staff working in Intreo, JobPath and other employment services should be trained so that they can provide a professional, positive and enabling service to those who need it.

⁷ European Commission 2016. Country Specific Recommendations for Ireland 2016. http://ec.europa.eu/europe2020/pdf/csr2016/csr2016_ireland_en.pdf

⁸ European <http://ec.europa.eu/social/main.jsp?catId=1059&langId=en>

⁹ EAPN Ireland 2015. Position Paper on Positive Activation. <http://www.eapn.ie/eapn/wp-content/uploads/2015/07/position-paper-on-positive-activation1.pdf>

This includes having the most up to date information and a knowledge of the range of different people they will meet and their needs.

An additional concern is the proposal in Pathways to Work to consider extending the 'payment by outcome' approach currently in place in Momentum and JobPath to other programmes including the Local Employment Service and Jobs Clubs. Applying this approach to programmes would impact negatively on those the service works with and the quality of the engagement or the relationship with customers.

As highlighted above, an active inclusion approach must be taken to engaging with those distant from the labour market. This involves an all of Government approach whereby Department of Social Protection works closely with other Departments to provide the best supports for its customers. Not addressing the wider needs of customers and focusing on work first potentially results in those most distant from the labour market and on lower incomes ending up in a cycle of unemployment/low-pay. One way of breaking this cycle is to ensure that people of working age are supported to access good quality education and training programmes which raise their literacy, numeracy and digital skills where necessary and will improve their chances of securing sustainable and decent employment.

ii. An inclusive labour market

a. Gender equality

The focus on a more inclusive labour market must also explicitly address the issue of gender equality in the labour market. In order to bring focus to this goal we continue to call for the employment target should be broken down separately for men and for women. **Specific policy measures** would then have to be implemented to support the achievement of this target including addressing caring responsibilities and the gender pay gap.

b. One-parent families

One-parent families continue to experience very high levels of poverty 36.2% were at-risk of poverty in 2015, almost 58% in material deprivation and over 26% in consistent poverty. Consistent poverty rates are over three times the levels for the general population. **An integrated response** is needed to address poverty among these families. This includes the range of integrated measures to address adequate income, access to quality services and access the labour market, where this is possible.

We welcome the inclusion of one-parent families in Pathways to Work 2016-2020. However, the labour market activation of one-parent families must only be done as part of the positive and enabling approach outlined above, while acknowledging the challenges these families face in balancing parenting and work.

While workers should primarily be able to receive a living wage from their employer in-work supports play an important part in ensuring that low income workers have an adequate income. This is particularly the case for workers with dependents, including one-parent families. The Family Income Supplement, the Housing Assistance Payment and the Back to Work Family

Dividend are key payments. Issues effecting access to these payments need to be addressed e.g. having to work 19 hours per week (or 38 per fortnight) in order to qualify for FIS.

We welcome the reversal of some of the cuts to in income disregard for those on the One-Parent Family Payment and the Jobseeker's Transitional Payment in Budgets 2016 and 2017 which brings the disregard to €110. The full reinstatement of the income disregard is needed to address the additional costs for one parent families in returning to work. This must be alongside access to affordable quality childcare and after school care. The full roll-out of the Affordable Childcare Scheme should play an important role in delivering on this. However, the new proposed scheme, while attempting to address affordability, will not address issues parents have accessing childcare places, particularly out-of-school care. It is important that there is a clear understanding of the different supports available to lone-parents and how they overlap and impact one each other so that the most effective range of supports is available for lone-parents and their families.

As for others who are distant from the labour market, access to quality and relevant education and training is critical to support access to and progression in the labour market for lone parents. A report commissioned by the Department of Education examining the barriers lone-parents experience accessing higher education has yet to be published. The recommendations contained within that report should be adopted by Government as a matter of priority.

c. People with disabilities

The European Commission's Country Report for Ireland highlights that Ireland has the lowest employment rate of people with disabilities in the EU of only 26.5% against an EU average of 48.5%. People with disabilities have also been found to be more likely to leave the workforce than they are to enter it and there has been little sign of recovery for people with disabilities¹⁰.

Addressing this requires a concerted effort to address this on behalf of the Government and in particular ensuring the successful implementation of Comprehensive Employment Strategy for People with Disabilities. This must be done through ensuring both targeted and integrated approached under Pathways to Work 2016-2020.

It is critical that the **positive and enabling approaches** outlined above are implemented, addressing in an integrated way issues related to income, services and measures to ensure the labour market is inclusive.

d. Age

The reduction in youth unemployment in recent years is welcome, but the overall rate of youth unemployment of 14.5%¹¹ remains high and is over double the general unemployment rate of 6.6%. The most recent data available from Government (end October 2016) indicates that of the

¹⁰ ESRI March 2017, Two pronged Approach needed to ensure jobs for all those with a disability who want to work.

¹¹ CSO Monthly Report, February 2017

<http://www.cso.ie/en/releasesandpublications/er/mue/monthlyunemploymentfebruary2017/>

32,106 young people in receipt of unemployment supports, 42% or 13,559 are doing so for 12 months or more¹². It is disappointing three years on from the initiation of the EU Youth Guarantee in Ireland that so many young people are in long term unemployment. These figures do not include the 16,941¹³ and 9,828¹⁴ young people in receipt of Disability Allowance and the One Parent Family Payment respectively. We also note as pointed out in the EU Commission Country Report for 2017 that the rate of young people “not in education, employment or training” is 2.3% above the average EU rate.

We are concerned that the commitment of Government to deliver and implement the EU Youth Guarantee has dissipated. The significant numbers of young people unemployed for one year or more indicates that the “guarantee” to offer a quality education, training and/or work experience opportunity within four months of unemployment has not been delivered. We are of the view that the reduction in youth unemployment is primarily due to two factors, the general improvement in the economy and a (temporary) reduction in the youth population. We do not believe that that the systematic, collaborative and supportive approach envisaged under the Youth Guarantee to prevent and ameliorate youth unemployment has been delivered to date in Ireland. We would be of the view that if the Irish economy were to suffer another shock, that youth unemployment would again increase rapidly and significantly with fewer safety valves in the form of emigration to the UK and US available as in the past. Additionally many of the cohort currently unemployed are young people furthest from the labour market, without the services and supports envisaged under the EU Youth Guarantee, they will struggle to gain the skills and qualifications they need to access employment. Therefore the rationale for investing in and delivering on the Youth Guarantee is as strong as ever.

We welcome some of the measures which the Government has taken to support young people who are unemployed. The decision in Budget 2017 to increase the education and training allowances for young people from €160 to €193 per week (adult rate) will enhance and support participation. The expansion of apprenticeship opportunities beyond the traditional craft and construction sectors will offer more young people alternative routes to employment in a wider range of occupations. The decision of the Government to abolish the flawed “JobBridge” internship scheme is also welcome, although it is important that any replacement programme focuses on offering good quality work experience for participants. Finally we welcome the decision of the Department of Children and Youth Affairs to fund the Youth Employability Initiative to support the youth work sector to address youth unemployment. In 2016 twenty eight youth projects were supported to deliver innovative programmes targeted at approximately 1,000 disadvantaged young people aged 15-24 who are most at risk of unemployment and who are not in education, employment or training.

¹² Parliamentary Question 393, November 15th 2016 <https://www.kildarestreet.com/wrans/?id=2016-11-15a.1021>

¹³ Parliamentary Question 395, November 15th 2016 <https://www.kildarestreet.com/wrans/?id=2016-11-15a.1027&s=%22under+26%22#g1028.q>

¹⁴ Parliamentary Question 393, November 15th 2016, <https://www.kildarestreet.com/wrans/?id=2016-11-15a.1030&s=%22under+26%22#g1031.q>

Much of the focus of the government's employment strategy has been on younger workers. However, it is important to also focus on the needs of older workers. Older unemployed people face challenges in returning to work and many need access to targeted activation programmes which are developed to get older people back to work. Training and additional supports are also needed to assist older people to stay in work, targeted not only at older people but also importantly at employers. At the same time adequate income protections must be provided for those who cannot work into older age due to the nature of the sector in which they work, because of illness and/or disability or as a result of caring duties.

iii. Demand side issues in the labour market

The majority of Government and EU policy to address unemployment and low-work intensity in families has over concentrated on supply side issues of the 'activation' of those not in work, with too little focus on demand side issues related to creating an inclusive labour market. Some of the demand side issues include tackling discrimination in access to employment and in workplaces; creating greater flexibility in the workplace, while maintaining quality employment standards and the availability of employment opportunities across the country. The NRP needs to outline how demand side issues will be addressed, and how programmes like JobsPlus will be built-on.

iv. Decent Work

The issue of in-work poverty and access to quality jobs continues to be a major concern. The latest Survey of Income and Living Conditions for 2015 shows that Consistent poverty levels for those in work has fallen to 2.1% but still remains high remain high with over 16% experiencing material deprivation. This is one in four of all those experiencing material deprivation.¹⁵

The Low Pay Commission plays an important role in highlighting some issues in relation to pay. However there has been little progress in closing the gap between the National Minimum Wage of €9.25 per hour and the living wage of €11.50 necessary for a decent income for a full-time single worker as calculate by the Living Wage Technical Group.¹⁶ There is also some way to go to increasing the National Minimum Wage to €10.50 as committed to in the Programme for Partnership Government.

Wage levels need to move towards a level which provides workers with an adequate income. The hourly rate calculated by the Living Wage Technical Group provides a clear target for the adequacy of the National Minimum Wage.

While an adequate hourly rate is a critical element of decent pay for workers it is only one element of ensuring that workers and their families have an adequate weekly income to provide them with a decent standard of living. The issue of precarious work is a particular problem which needs to be tackled if people are to have a **quality working life and a decent standard of living**. This issue has been well spelt out in the reports from the University of Limerick¹⁷, the Joint Oireachtas Committee on Jobs,

¹⁵ CSO 2017, Survey of Income and Living Conditions 2015.

<http://www.cso.ie/en/releasesandpublications/er/silc/surveyonincomeandlivingconditions2015/>

¹⁶ <http://www.livingwage.ie/>

¹⁷ University of Limerick 2015. A Study on the Prevalence of Zero Hours Contracts.

<https://www.djei.ie/en/Publications/Publication-files/Study-on-the-Prevalence-of-Zero-Hours-Contracts.pdf>

Enterprise and Innovation¹⁸ and previously in the 2012 report on decent work by the Mandate Trade Union.¹⁹ Women and migrant workers are in particular impacted on by issues of precarious work.

Access to and affordability of services, including care, housing, health, transport services is also critical to the levels of pay necessary for a decent living, in particular for low-paid workers who have dependents for whom they will have to pay for care services. The number of hours worked and how income from work interacts with social welfare supports is also critical to ensuring a decent standard of living.

While the responsibility for providing a living wage which means workers and their families can afford an adequate standard of living should always be primarily the responsibility of the employer the reality is that many low paid workers rely on access to social welfare supports to supplement their income. In 2015 **social transfers** helped reduce the risk of poverty for those in work from 20.3% to 5.8%. Therefore in work benefits play a major role in supporting the transition from welfare to decent work and maintaining the adequacy of take home pay. The Commission Country Report also highlights their importance in ensuring that work pays and addressing disincentives to work. The tapering of benefits is also a key element of the second Country Specific Recommendation for Ireland. The Housing Assistance Payment and the Back to Work Family Dividend are new payments which play an important role in supporting the transition to work for those on low incomes.

However, many elements of the social welfare system are inflexible and many very low paid workers cannot qualify for supports. The following are some of the specific issues which would contribute to improving the situation for workers.

Under the current system, part time workers can only qualify for jobseekers' payments (Jobseekers Benefit and Jobseekers Allowance) if their hours are worked within three days or less in a week. Many low paid part-time workers, even if working only a small number of hours, have these hours spread over more than three days thus making them ineligible for social welfare support. The criteria for access to jobseekers' payments should therefore be changed from one based on days to one based on hours. This now also impacts on lone parents with children over 14 years who were transitioned from the One Parent Family Payment and the Jobseekers Transitional Payment.

The Family Income Supplement (FIS) plays an important role in supplementing the income of low paid workers with children and protecting them from the worst impact of low income from work. However, despite information campaigns on FIS, many people who are eligible do not access it. The application process for FIS also involves the employer, which can act as a barrier to application even for those who are aware of it. The Family Income Supplement needs to be reformed so that those who qualify for it automatically receive it.

¹⁸ Joint Committee on Jobs, Enterprise and Innovation, November 2015. Report on Low Pay, Decent Work, and a Living Wage <http://www.oireachtas.ie/parliament/media/committees/Low-Pay,-Decent-Work-and-a-Living-Wage.pdf>

¹⁹ Mandate Trade Union (2012), Decent Work? The Impact of the Recession on Low Paid Workers, http://issuu.com/mandate/docs/mandate_decent_work_report_2012

The Department of Social Protection is currently consulting on a new proposed Working Family Payment. It is critical that if this new payment is introduced that it should not make any worker or their family worse off than under the current arrangements.

Following the coming into force of the Industrial Relations (Amendment) Act 2012, which reforms the Joint Labour Committees (JLC), the Labour Court is still in the process of putting in place the infrastructure for the new JLCs. To date only two of the eight Employment Regulation Orders outlining the wage rates in these sectors (cleaning and security) have been agreed. This process needs to be sped up and is essential that the JLCs are set at a level which provides workers with a fair wage for their work.

The NRP needs to look at the above issues and outline in a comprehensive manner how the issue of in-work poverty and decent work will be addressed as an integrated part of its jobs strategy.

3. Education

We welcome that Ireland has already surpassed its target for early school leaving and is slowly making progress towards the ambitious target for third level attainment.

However, in relation to the national education targets the Europe 2020 Working Group continues to emphasise two key issues which need to be addressed in Government policy and highlighted in Ireland's National Reform Programme 2016.

- i. The education target could be achieved without any improvement in the educational outcomes for children from some of the most marginalised groups. Delivering Equality of Opportunity in Schools (DEIS) programme evaluation identifies that *"the gap in achievement between DEIS and non-DEIS schools has not narrowed over time."*^[1] The Department of Education noted the challenge as to *"whether the scale of additional funding under DEIS is sufficient to bridge the gap in resources between disadvantaged and non-disadvantaged settings."*^[2] To address this there therefore needs to be **sub-targets under the education target** which can highlight the different participation and outcome levels for specific groups of young people. This can help to ensure more equitable educational outcomes for all children and social groups across the whole system. This includes Traveller children, children with disabilities or special learning needs and children living in disadvantaged areas. Including sub-targets would result in a greater focus of policy development and implementation for these groups of children either in terms of mainstream policy or the development of specific measures. It might also prevent future cuts or changes to supports for these groups without first thoroughly investigating the implications of these cuts on participation and outcomes. This has been referenced above under the section of this submission dealing with Impact Assessment and Budgetary Policy with reference to the

^[1] ESRI (2015) Learning from the Evaluation of DEIS <http://www.esri.ie/pubs/RS39.pdf>

^[2] <https://www.education.ie/en/Press-Events/Press-Releases/2015-Press-Releases/PR2015-04-09.html>

European Commission's 2016 Country Report which highlights the negative impact of cuts in the education budget²⁰.

- ii. The education target needs to include an **adult literacy target**. This is a major gap under the current target and would strengthen and prioritise policy responses to adult literacy. In addition all publically funded education and training programmes (to level 6) should adopt an integrated approach and embed literacy and numeracy development within courses. The National Skills Strategy 2025 has set a target to upskill 165,000 people from Level 1 or below for literacy from currently 17.5% to 12% by 2025.²¹ Currently adults (both working and unemployed) can usually only access between 2 and 6 hours adult literacy tuition per week (through the ITABE programme – Intensive Tuition in Adult Basic Education) or a Back to Education Initiative part-time course if available. With the current gap in intensive or full-time provision in adult literacy, this target presents a significant challenge. The National Reform Programme therefore needs to report on the goals set out in the National Skills Strategy including addressing specific challenges related to literacy and numeracy. This must include the provision of more intensive and flexible opportunities for adults to develop their literacy and numeracy skills, in particular at Levels 3 and 4 for people who are unemployed. This should include a greater use of blended learning and distance learning approaches.

4. Poverty and Social Exclusion

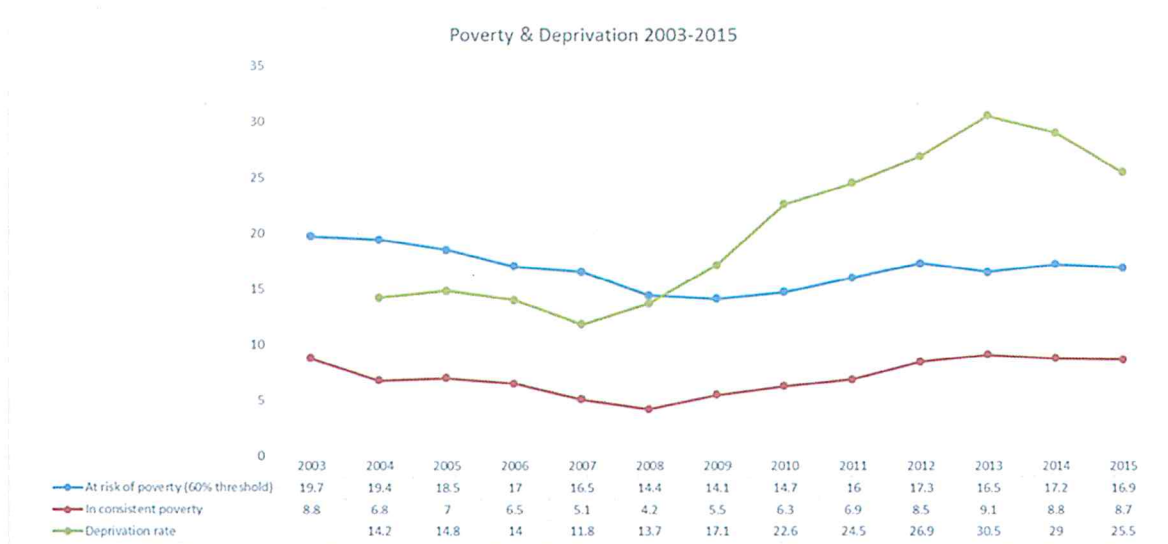
The Survey of income and living Conditions 2015 shows that poverty and social exclusion levels are still at crisis levels. This can only be addressed through the delivery of an integrated strategy. In December 2015 EAPN Ireland published a briefing paper on poverty and outlined the key elements of an integrated strategy for addressing it.²²

The graph below shows the changes in poverty levels since 2008. In that time consistent poverty has doubled with over 403,000 people in consistent poverty.

²⁰ European Commission 2016. Country Report for Ireland 2016, p51
http://ec.europa.eu/europe2020/pdf/csr2016/cr2016_ireland_en.pdf

²¹ Ireland's National Skills Strategy 2025 https://www.education.ie/en/Publications/Policy-Reports/pub_national_skills_strategy_2025.pdf

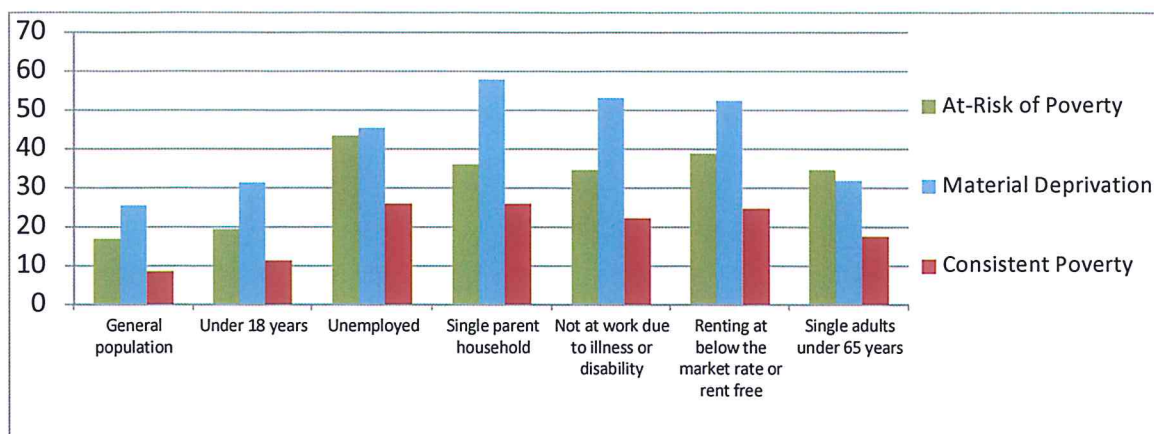
²² EAPN Ireland, 2015. Briefing on Poverty 2015 and Proposals for 2016-2021. <http://www.eapn.ie/eapn/briefing-on-poverty-2015-and-proposals-for-2016-2021>



Ireland's commitment under the overall EU poverty reduction target is to reduce by 200,000 people in combined poverty (either consistent poverty, at-risk-of poverty or basic deprivation). However there are now more people in combined poverty than 2010. The Commission's Country Report for Ireland states that *'the number of people at risk of poverty or social exclusion decreased from 1.27 million in 2014 to 1.20 million in 2015. This remains significantly above the pre-crisis level of 1.05 million in 2008. Achieving the national target remains ambitious.'*

EAPN Ireland has consistently highlighted that much of the increase in poverty levels have not just been as a result of the crisis but due to the policy choices of Governments in responding to it. It is essential then that the Government moves quickly to implement its commitment to developing an integrated Framework for Social Inclusion, to tackle inequality and poverty. This framework must be an all of Government anti-poverty strategy which is effective in preventing and addressing the multi-dimensional nature of poverty and social exclusion.

The table below highlights that different groups in society are experiencing poverty to different levels. The Survey of Income and Living Conditions highlights that poverty levels of children are higher than the general population but that those who are unemployed, one-parent families, those not at work due to illness or disability and those renting at below the market rate or rent free have particularly high levels of poverty. The high poverty levels for single adults under 65 years of age with no children also needs to be looked at and responded to.



A sub-target for child poverty exists which is to “lift over 70,000 children out of consistent poverty by 2020, reducing the number of children in consistent poverty from 107,000 (using 2011 levels). In 2015 there were over 143,000 children in consistent poverty. Having a sub-target brings focus to the issue of child poverty and the measures needed to address it.

As proposed earlier in this submission it is also important that the **Government introduces sub-targets for other groups with higher than average poverty levels**. This is to ensure that as measures are introduced to reduce poverty that they are also effective in addressing poverty for these specific groups or that additional measures are also taken to target these groups. For example children living in one-parent families are twice as likely to live in poverty as other children and they live in the most socially excluded families in Ireland. There are also other groups not captured by the SILC which have high levels of poverty. This includes people who are homeless, migrants and people from minority ethnic groups including Travellers.

While the Survey of Income and Living Conditions presents the statistics on poverty levels for many groups it is important to understand how this impacts on people directly and the complexity of this reality. The Community Platform publication ‘*Now you see us: The human stories behind poverty in Ireland*²³’ gives the opportunities for some people to present their stories and struggles of living in poverty and exclusion. Poverty and social exclusion have multidimensional causes and consequences and the policies to address them must reflect this while being implemented in a co-ordinated and strategic manner. This must **involve addressing their structural causes including issues of equality and redistribution of wealth**.

The current Updated National Action Plan for Social Inclusion 2015-2017 is not sufficiently holistic to effectively address the multidimensional nature of poverty. In particular it relies almost solely on labour market responses to address poverty and social exclusion for those of working age. While access to a quality job is an important element it will not provide a solution to poverty and social exclusion for many people and must be part of a more holistic approach. An **integrated approach** must not only address issues related to the labour market, but also to access to adequate income

²³ <http://www.eapn.ie/eapn/wp-content/uploads/2014/02/now-you-see-us-the-human-stories-behind-poverty-in-ireland-final.pdf>

and services for everyone across the lifecycle; as well as tackling other issues such as discrimination and the capacity to participate in decisions which impact on their lives. As highlighted above the EAPN Ireland Poverty Briefing 2015 and Proposals for 2016-2021 presents **proposals for the development and implementation of a five year anti-poverty strategy**.²⁴

I. Income

Social transfers play an important role in reducing poverty and providing many people with an essential safety net. In 2015 social transfers helped to reduce at-risk of poverty levels from 46.3% to 16.9%. This is one of the most effective uses of social transfers in the EU. However it also draws attention to the fact that Ireland has one of the highest levels of market inequalities in the EU and public resources are then needed to close this gap.

While highlighting the effectiveness of social transfers in reducing the effects of market inequality in Ireland it is important to recognise that current social welfare levels are not sufficient to prevent people from falling into poverty or to provide them with an income to have a decent life.

The issue of adequacy, coverage and take-up of social welfare rates is therefore crucial if they are to be effective in preventing people falling into poverty. These issues are clearly outlined in the Irish Country Report produced for the European Social Policy Network's 2016 Thematic Report on minimum income schemes.²⁵

In terms of **adequacy**, social welfare levels should be set using a double lock benchmark of lifting people above the at-risk of poverty threshold, while also providing them with a minimum essential standard of living. Despite the welcome €5 increase in social welfare rates for working age adults over 25 years in Budget 2017 social welfare levels are inadequate to lift people above the 60% at-risk of poverty threshold.

Currently most working age social welfare rates are almost €37 below the poverty line and in 2016 are inadequate to provide 198 of 214 urban family types dependant on social welfare with an income for a minimum essential standard of living.²⁶ This is a critical element which needs to be addressed as a part of an integrated approach to addressing poverty.

While numbers of unemployed people under 26 year of age has reduced, the reduced social welfare rate continues to create major problems for young resulting in poverty and limiting their capacity to become independent. For some it has resulted in enforced emigration. While the stated goal of the policy is to encourage young people to be active in the labour market, living on

²⁴ EAPN Ireland, 2015. Briefing on Poverty 2015 and Proposals for 2016-2021. <http://www.eapn.ie/eapn/briefing-on-poverty-2015-and-proposals-for-2016-2021>

²⁵ European Social Policy Network, 2016. Thematic Report on minimum income schemes (including Country Reports) <http://ec.europa.eu/social/main.jsp?langId=en&catId=1135&newsId=2506&furtherNews=yes>

²⁶ Vincentian Partnership for social Justice October 2015, Budget 2016 Minimum Essential Budget Standards Impact Assessment http://budgeting.ie/images/stories/Publications/Budget_Analysis/Budget_2016_-_MEBS_Impact_Briefing.pdf

a very small budget can in fact restrict their ability to look for work due to the costs involved. The lower social welfare rate also creates problems for many of the families on whom they are dependent. The changes in Budget 2017 have increased the inequality for adults over 26 years of age on Jobseekers payments.

SILC data indicates that 53.2% of people who are not at work due to disability or illness experience enforced deprivation, an increase of over 30% since 2008. SILC under-estimates the real economic cost of living with a disability. The reliance on income levels to measure poverty means that the level of poverty is underestimated, as disability reduces the standard of living in a household due to the extra costs associated with having a disability and the decline of disability supports. The issue of cost of disability therefore needs to be addressed in assessing the adequacy of social welfare supports.

Alongside the issue of adequacy of social welfare levels is that of **access and coverage**. This relates to addressing the rules for accessing supports which can restrict access, even for those on very low or no incomes. It also relates to the length of time it takes to process applications.

Ireland is alongside Lithuania as the only two EU countries where asylum seekers are not allowed to work while awaiting a decision on their refugee application. Asylum seekers also continue to live in the Direct Provision system on €19.10 per week for adults and €15.60 for children. At a minimum the rates should be increased to that proposed by the Working Group to Report to Government Working Group on the Protection Process on Improvements to the Protection Process, including Direct Provision and Supports to Asylum Seekers of €38.74 for adults and €29.80 for children²⁷.

ii. Services

There is an urgent need to **address shortfalls in access to quality services** as an essential element of addressing poverty and social exclusion. This includes access to the range of services for example health, education, accommodation, care, transport and utilities.

Public services must be **affordable** and of **high quality**. They must also be **accessible** to everyone and recognise that different groups of people have different service needs e.g. the specific accommodation needs of people with disabilities, older people and Travellers. Services must demonstrate an understanding of poverty, social exclusion and equality and the role targeted measures play in addressing exclusion e.g. targeted supports in education for Travellers and children with special learning needs.

While many of the areas outlined above require a high level of additional investment, as outlined in the European Commission's Country Report for Ireland in both 2016 and 2017, others require a prioritisation of investment to ensure that the needs of those on the lowest incomes or in the most

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<http://www.justice.ie/en/JELR/Executive%20Summary%20of%20the%20Report%20to%20Government%20on%20Improvements%20to%20the%20Protection%20Process.....pdf/Files/Executive%20Summary%20of%20the%20Report%20to%20Government%20on%20Improvements%20to%20the%20Protection%20Process.....pdf>

marginalised groups are addressed. For example the *Healthy Ireland* strategy highlights the issue of health inequalities, but policy measures are not in place to address this in a comprehensive manner.

a. Housing

The shortage of housing and the crisis in access to social and affordable housing and in homelessness has been well publicised. It is also a key issue in the Commission's Country Report for Ireland, which highlights that housing completions are well behind demand, creating a further build-up of pressure for houses. The current crisis in housing and homelessness have been developing over a number of years, partially due to the economic crisis but to a great extent due to policy decisions taken by successive Governments, including the dependence on the private market to address social housing needs.

At the end of January 2017 there were 1,172 families homeless in Ireland including 2,407 children. There were a total of 4,760 adults²⁸. While there was a small reduction in the number of children in homelessness in January the overall number is the highest on record. Families headed by a lone parent are disproportionately represented in homeless figures with 67% of homeless families headed by a lone parent.

The Government has put in place a range of housing measures, including the implementation of Rebuilding Ireland – an Action Plan for Housing and Homelessness which was published in July 2016. It is clear that these measures are not adequate to meet the demand and are also not addressing the immediate crisis of individuals and families ending up homeless as they cannot afford their rent, often because their Rent Supplement is not adequate to meet the levels of rent in their area. It will also take some years to deliver on the number of social housing units that are currently needed, but demand is also growing. In the meantime the number of households on the social housing waiting list has grown, including Traveller families awaiting appropriate accommodation, where there is increasing unmet need on an annual basis²⁹.

The **role of Approved Housing Bodies** needs to be fully supported included ensuring access to finance. It must also provide adequate resources to fully implement a Housing First approach to homelessness.

People need to **move out of emergency accommodation** as soon as possible and not become trapped in homelessness longer than is necessary. We welcome recent measures to ensure that Rent Supplement and Housing Assistance Payment are set at levels which meet market rents so that people can take up accommodation and avoid falling into homelessness. This must be kept under review and be implemented alongside measures to control the increase in rents.

²⁸ Department of Housing, Planning, Community and Local Government 2017. Homelessness Report January 2017. http://www.housing.gov.ie/sites/default/files/publications/files/homeless_report_-_january_2017.pdf

²⁹ Department of Housing, Planning, Community and Local Government 2015. Total Number of Traveller Families in all categories of Accommodation http://www.housing.gov.ie/sites/default/files/publications/files/total_number_of_traveller_families_in_all_categories_of_accommodation-2016-02-05_table_2.pdf

Discrimination from landlords is still a big issue. Even those who are eligible for the Housing Assistance Payment (HAP) find it very difficult to find a willing landlord, it also doesn't offer a longer term housing solution for vulnerable families, particularly given that recipients of HAP are deemed to be housed and are removed from the social housing list.

There is a need for an **independent Traveller Accommodation Agency** to oversee the provision of appropriate and quality accommodation, including Traveller specific accommodation that meets the needs of all Traveller families in a reasonable timeframe.

b. Early Childhood Care and Education

The Country Specific Recommendations for Ireland in 2016 recommends that the Irish Government '*improve the provision of quality, affordable full-time childcare*'. This builds on an analysis of then needs for such an early childcare infrastructure over many years including the critical element of 'quality', as well as 'affordable' early childhood care and education. This is extremely important in informing the design of the system to be developed which meets the needs of the children, their parents and those working in the sector.

We therefore welcome the announcement of a new Affordable Childcare Scheme in Budget 2017. We see this as the first step towards the development of quality and affordable childcare infrastructure in Ireland.

As with other public services such an infrastructure will require investment, with Ireland well behind the level of investment in Early Childhood Care and Education in the EU. Ireland needs to therefore **increase its investment, while at the same time ensuring that this results in a quality, accessible and affordable system which meets the needs of everyone, including those on the lowest incomes.**

c. Health

Urgent action is needed to **address health inequalities** in Ireland. Health inequalities are directly related to both the social conditions in which people live and people's inability to access and receive appropriate and preventative primary care. This results in worse physical and mental health outcomes for people from poorer and more marginalised communities and groups. This situation has deteriorated during the years of the crisis due to changes in policy and cuts to services. Some of the issues which need to be addressed include General Medical Service (GMS) eligibility levels, the inequitable configuration and distribution of essential primary care as well as its underfunding, the poor quality of community care services and waiting times for acute treatment. While the Working Group supports the need to ensure there are cost efficiencies as proposed in the EUs Country Specific Recommendation for Ireland in 2014 and 2015, we strongly feel that an over focus on this area ignores many of the long term unintended consequences of deterioration in health caused by reduction in and explicit rationing of access to public health services. It is essential that any cost effectiveness and savings does not result in making health services less accessible or effective by

displacing costs to other government departments or individuals, or passing costs around health services.

The Commission's 2016 Country Report does highlight the inequality in Ireland's two tier system, but does not go far enough in highlighting the inequality in outcome for those in lower socio-economic groups. There are also lower health outcomes for some groups such as Travellers³⁰.

The Community Platform, of which EAPN Ireland is a member, has proposed six principles which need to be applied if health inequalities are to be addressed³¹. These are:

- i. The State takes responsibility for delivering the right to a high level of health and wellbeing for all. All social, economic and environmental policies will promote this right by identifying and addressing the social determinants of health across all Government Departments and policy through undertaking health and health equity assessments.
- ii. Adequate resources are available to develop a universal, publically funded healthcare system, free at the point of access.
- iii. A fully functioning primary and community healthcare service is a core part of the health system and the first point of contact for most people.
- iv. Everyone has equal access to high quality healthcare. This should be regardless of socio-economic status, gender, civil or family status, sexual orientation, religion, age, disability, race or membership of the Traveller community. There should be a requirement to pay particular attention to groups or sections of society where health and wellbeing is below that of the rest of the population.
- v. Everyone is able to participate in the design, implementation and evaluation of all health policies and programmes and be empowered to claim and enforce their right to health and wellbeing. Members of groups experiencing the highest levels of health inequalities and their organisations will need particular supports to achieve this.
- vi. The State defines its responsibilities in relation to the health of people beyond its borders, including through:
 - pooling and allocating resources to health;
 - ensuring adequate investment in research and development; and
 - Not harming the health of people in other countries (for example, as a result of pollution and climate change).

iii. Discrimination

Discrimination is an issue which is experienced by many groups in society and has a very negative impact on the quality of life of those who experience it, often excluding people from access to goods and services, labour market and other opportunities. Discrimination is a particular issue

³⁰ School of Public Health, Physiotherapy and Population Science, University College Dublin, 2010. All Ireland Traveller Health Study. http://health.gov.ie/wp-content/uploads/2014/03/AITHS2010_TechnicalReport3_HR_PartA.pdf

³¹ Community Platform 2016. Six principles for an inclusive health policy <http://www.eapn.ie/eapn/community-platform-press-statement-six-principles-for-an-inclusive-equal-and-effective-health-policy>

which has been largely ignored in the past number of years. The NRP must ensure that the issue of **discrimination, including racism, is addressed as a cross cutting issue** in the NRP including in labour market policies as an essential element of an inclusive labour market.

Irish Human Rights and Equality Commission Act 2014, provides for the introduction of a public sector equality and human rights duty. The new Government needs to support the IHREC to roll out the effective implementation of this positive duty throughout the public service at national and local level.

5. Stakeholder engagement in the Europe 2020 and Semester Process

It is essential that the **level of stakeholder engagement in the Europe 2020 and the European Semester process needs to be greatly improved**. EAPN Ireland has engaged with this process since 2010 and as part of the Better Europe Alliance which has made further collective submissions and held meetings with the Department of the Taoiseach and the European Commission. These opportunities have been important and welcome.

However, the Policy Group believes that as the lead Department on this process the Department of the Taoiseach needs to **proactively organise opportunities for wider engagement** with civil society and other stakeholders to discuss and debate key elements of the Europe 2020 and the wider Semester process. This should include key issues such as how to implement these strategies in a balanced and sustainable manner; something which the Policy Group strongly believes is not currently the case.

The European Commission has been providing important opportunities for engagement in the Semester process, with the European Semester Officers playing an important role. These must continue to be further developed.

The reductions in support for local autonomous groups representing the most marginalised communities and groups, reinforced by restructuring of programmes, has greatly undermined stakeholder engagement. This is particularly the case at local level but directly impacts on voice of these communities and groups in policy development at national level, including in policies related to the European Semester and Europe 2020 process³². This needs to be urgently addressed with resources put in place to support an autonomous community sector.

³² Irish Congress of Trade Unions Community Sector Committee, 2012. Downsizing the Community Sector. <http://www.ictu.ie/download/pdf/downsizingcommunitysector.pdf>