



Citizens **Information** Board
information · advice · advocacy

Social Policy Resources

Social Policy - A Comprehensive Guide for Citizens Information Services

July 2019



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Section 1:

Social policy work – Citizens Information Board and the delivery services

The Citizens Information Board (CIB) and social policy work

The Citizens Information Board has produced a set of four Social Policy Resources to promote understanding of and engagement in social policy for staff in delivery services. The Resources are as follows:

- [Social Policy Returns in Citizens Information Services – A training workshop](#) (PowerPoint presentation)
- [How to become involved in Social Policy in your Citizens Information Service](#) (introduction to social policy for all staff)
- [How to Manage Social Policy Work in Citizens Information Services](#) (Guide for CIS and CIC managers)
- [Social Policy – A Comprehensive Guide for Citizens Information Services](#) (this document)

Social policy can be defined as the way in which the State organises and delivers the services, benefits and supports that people rely on. Social policies affect people's living circumstances – for example health services, income supports, disability benefits, housing, education and taxation. Social policy can be seen in legislation, codes of practice and administrative guidelines relating to various services.

Social policy work has a foundation of core values and principles:

- Empowering individuals and communities
- Participation in the policy-making process
- Creating a more equal and inclusive society
- Translating “private troubles” into public policy issues

Social policy work is about noticing the impact of particular policies on people's lives. When it is obvious policies are not working, not just for one person but for many, evidence of difficulties is collected - for example where the service delivery system is not working properly or there are blocks and barriers experienced by people in accessing and using social services. Social policy can also identify new trends or gaps that can help alert policy makers and service providers to the emerging needs of communities and specific groups of people.

The **Citizens Information Board (CIB)** is a statutory body with a social policy remit. One of its roles is to support, promote and develop the provision of information on the effectiveness of current social policy and services and to highlight issues which are of concern to users of these services. This role is given a specific priority in legislation - see (Section 7(d) of the Comhairle Act 2000).

Therefore, CIB has a **statutory responsibility** to feed back information and evidence to government on the ways in which its policies are impacting on people.

The Social Policy and Research team in CIB analyses client data, responds to requests for inputs from state and other bodies, undertakes in-house or commissioned social policy and research reports and publishes material such as [Social Policy Update](#). This work is undertaken to support and strengthen the work of CIB's delivery services and to influence policy considerations of various government departments and agencies.

CIB receives regular data from front-line delivery services giving an accurate picture of the current issues that are bringing people into the Citizens Information Centres (CICs) or telephoning the Citizens Information Phone Service (CIPS). The data also highlight difficulties and anomalies within schemes and policies which are preventing people from accessing their rights and entitlements. It is a core role of CIB to highlight needs arising through feedback and make submissions to have these issues addressed.

Information Providers record Social Policy Returns when they notice administrative and policy issues that need to be addressed. Evidence in the form of Social Policy Returns can be recorded in CICs on Oyster (for queries) or the Electronic Case Management System (for advocacy cases). CIPS has its own system for recording Social Policy Returns.

This evidence is submitted to policy makers and to those who have responsibility for the administration of services. The submissions make recommendations for changes that would improve the policies and practices that are having a negative impact. Many other organisations also get involved in social policy work and sometimes it is this combined effort that provides enough evidence from different sources to bring about change.

There has been a consistent increase in social policy feedback submitted by services to CIB in recent years - the level of Social Policy Returns submitted by staff throughout the CIS/CIPS network has increased by over 50% from 2015 to 2018. This upward trend points to a growing awareness and appreciation among staff of the role that policy plays in underpinning the provision of social and public services and also how broader policy (and the administration of policy) impacts on a diverse range of individual circumstances.

The CIB Strategy describes the social policy priority as follows, to **highlight issues of concern so that policy and administration of public services is continually enhanced**.

The underlying assumption of this strategic priority is that CIB can make an important and necessary contribution to policy development by analysing on an ongoing basis the factors that impact on people's lives and engaging with government around ways of addressing these deficits. A key platform in this regard is using Social Policy Returns data collected by CISs, CIPS and other delivery services each year.

CIB will achieve better outcomes for citizens by working with other organisations to enhance access to citizens' information and advice. It will continue to collaborate with other government, statutory and voluntary agencies.

CIB will use the various networking channels available within the public and civil service to highlight relevant policy and administrative difficulties that have been highlighted through the Social Policy Returns data.

CIB's social policy strategic priority will be met by:

- Working with other organisations to make sure citizens can access the information and advice they need
- Using the various networking channels available within the public and civil service to highlight relevant policy and administrative difficulties that have been brought to CIB's attention through the Social Policy Returns data

- Using Social Policy Returns data collected by delivery services each year to predict trends and to guide future targeted approaches with a particular focus on people who are in vulnerable situations
- Undertaking and funding research to identify policy issues impacting on service users and to support targeted service interventions or responses
- Contributing to public policy formulation through submissions and responses to policy consultations
- Publishing reports on current and topical social policy issues
- Using citizensinformation.ie to highlight changes or amendments to schemes and policies

Success will be measured by:

- Structured engagement with policymakers in government departments and other relevant stakeholders on public services, resulting in policy changes where appropriate
- The number of reports and submissions on social policy issues

The Social Policy and Research team in CIB contributes to this strategic priority by:

1. Making submissions to government departments, working groups, advisory groups and other public mechanisms on the areas of public policy
2. Participating in working, consultative and advisory groups established by the government
3. Communicating directly with government departments and other public sector agencies, highlighting those issues which are of concern to the public and in particular to vulnerable people and communities
4. Collaborating with other agencies to highlight and gather evidence on issues of mutual interest
5. Resourcing its delivery services - Citizens Information Services (CISs), the Citizens Information Phone Service (CIPS), National Advocacy Service for People with Disabilities (NAS) and Money Advice and Budgeting Service (MABS) so they are better equipped to recognise and report on social policy issues that are impacting on people using their services.

The Board of CIB has approved a Strategic Plan for 2019 – 2021 – it sets out CIB’s social policy remit to:

Develop our social policy role through the full cycle of activity from an individual query through to action by the Board of CIB, so that we make more effective use of feedback systems. In particular, the Board of CIB will play a more active role in reviewing social policy priorities arising from our interactions with the public and providers and in promoting policy change where appropriate.

Prioritising social policy research areas

In making decisions as to which areas in social policy to research in greater depth, specific priorities in CIB social policy research can include:

- Issues that have been identified through feedback from delivery services based on client experience
- Issues that are currently in the public domain – for example through Non-Governmental Organisations (NGOs), Oireachtas debates and Parliamentary Questions (PQs) and general policy-related research

- Policy changes being introduced or considered by government
- Issues requiring further analysis identified by CIB delivery services at local, regional or national levels
- Social policy matters arising from the implementation of the CIB strategy
- The need to focus attention on specific population sub-groups such as people with disabilities or private rented housing sector tenants
- Areas where policy impact evaluation would be most relevant to CIB and deliverable within a specific timeframe

How CIB selects issues for research and submissions

A number of factors are taken into account in establishing priorities for the CIB social policy and research programme in any given year. They are:

- Matters that arise from the implementation of the CIB strategy
- Policy issues that have been identified through feedback from the delivery services
- Issues that are currently in the public domain
- Policy changes being introduced by government
- Research initiatives identified by delivery services at local or national level.

Other factors to be considered in relation to submissions are as follows:

- Does CIB have a position on this area?
- Does CIB bring a unique insight to this area?
- Can we draw from service experiences in compiling this submission?
- Does this area impact on any of the CIB target groups, including people with disabilities?
- Is the CIB submission likely to make an impact?
- Does CIB have the resources to complete this submission within the timelines set out?
- Are there any alternative avenues for CIB to influence in this area?
- Does this area impact on CIB's strategic priorities?

Areas relevant to the 2018 Social Policy and Research Programme were:

- Brexit research
- Social housing and homelessness
- Responding to the ongoing problem of mortgage debt
- Advocacy development within CISs
- Meeting the needs of migrants
- The implementation of the Assisted Decision-making Act 2015
- Regulation and quality standards for home care
- Implementation of the Employment Strategy for People with Disabilities
- Fair administration
- The digital divide

Citizens Information Board – submissions and policy outcomes

The extent to which policy has changed or has emerged in response to evidence from CIB varies over time and from issue to issue. As policy is constantly being shaped and re-shaped by a variety of

interests and actors (both in the short-term and over a longer period) it can be difficult to measure or assess the impact of particular policy positions or recommendations that are routinely put forward by CIB.

Nonetheless, there have been a number of areas where the issues raised by CIB (typically in the form of recommendations made in submissions or reports) have been subsequently addressed in legislation, policy or administrative changes. CIB makes submissions on different areas of social and public policy. Most of these are in response to invitations by government departments.

Cost of Disability: The need for a Cost of Disability was regularly called for by CIB over the years and recommended in various submissions including a submission on the National Disability Inclusion Strategy. Budget 2019 provided €300,000 for the commissioning of research on the cost of living with a disability – an independent study has commenced.

PRSI contribution statements: In 2017, following significant feedback from services, CIB forwarded an informal, focussed submission to Department of Employment Affairs and Social Protection (DEASP) highlighting the difficulties caused by the changes in the processing of requests by DEASP from clients for their PRSI contribution statements (which had been switched to online access only). In response, the DEASP put in place an alternate means (dedicated telephone line) by which clients could access their PRSI records.

More recent submissions include:

[A more equitable Ireland for Travellers](#) (June 2019)

The Citizens Information Board (CIB) in its submission to the Seanad Public Consultation identified a number of key areas that need to be addressed when looking at inequality and social exclusion among the Traveller community. These include ongoing policy implementation issues in relation to the delivery of Traveller accommodation at local authority level, the recognition of traveller ethnicity (with specific reference made to the collection of data around the use of public services), financial inclusion and the development of an innovative approach to Traveller employment and participation.

[Direct Provision and the International Protection Application Process](#) (May 2019)

This submission to the Joint Oireachtas Committee on Justice and Equality on the direct provision and international protection process was in response to the Committee seeking the views of interested parties and stakeholders regarding what can be done in the short to medium term to develop a better accommodation system for asylum seekers and a more streamlined and efficient international protection application process. The CIB submission noted that, despite a good deal of evidence from a number of different sources and reviews in recent years, significant difficulties remain for people who are living in Direct Provision and in the administration of the international protection application process.

[Consultation on Draft National Social Enterprise Policy for Ireland 2019-2022](#) (May 2019)

This submission was in response to a Government consultation on a draft national social enterprise policy. CIB welcomes the inclusion of a social enterprise policy as part of a suite of measures for the development of the voluntary and community sector. Our submission notes the need for social enterprise policy to be located clearly within a local development framework.

Primary Care Reimbursement Service Strategic Plan 2019-2021 (April 2019)

The main area of engagement by CIB and its delivery services with the PCRS is through its National Medical Card Unit (NMCU) and CIB has highlighted a wide variety of issues that have been identified by services and clients around medical card application processes and some aspects of eligibility. The Strategy places much emphasis on the online development of its service, especially in relation to the implementation of Slaintecare. While welcoming the benefits of online systems, CIB is of the view that there is a significant need for assisted digital channels and supports for people who do not easily have online access because of affordability issues.

National Volunteering Strategy (February 2019)

This submission to the Department of Rural and Community Development on a National Volunteering Strategy provides observations on a range of specific questions laid out in the consultation in relation to key areas: the role of volunteering and Volunteer Involving Organisations (VIOs) and volunteer supporting structures (including central government, local government and business) in developing volunteering; the actions that should be included in a volunteering strategy to encourage training, development and retention of volunteers and actions to raise awareness of the benefits of volunteering, of volunteering opportunities and of the explicit participation of young people and marginalised groups in volunteering; and the need for the development of a code of conduct for volunteers (and for VIOs).

National Digital Strategy (December 2018)

The CIB submission notes key areas that the Strategy should focus on: digital public services, inclusion and well-being, and trust, security and privacy. The submission suggested that one of the main challenges in the delivery of digital public services was the unintended consequence of reducing access to public services among low income groups (including older people, those with disabilities, and those with low levels of education, literacy or computer literacy), a trend which seems to be increasing among clients who attend CICs having encountered barriers in accessing online services. The submission noted that these groups are further impacted by issues of affordability (in terms of connectivity and equipment) as well as the uneven penetration of broadband across the country. While the submission agreed with the broad principle that services should be digital by default, it emphasised the need for an assisted or alternative routes to services for those who cannot (or do not want to) access them digitally.

Details of all [CIB policy submissions](#) can be found on www.citizensinformationboard.ie.

Participation in policy-making fora

The CIB Social Policy and Research team participates in policy-making fora on a regular basis. Past and present groups include:

- **Make Work Pay for People with Disabilities - The National Disability Inclusion Strategy Implementation Plan** contained a commitment to publish a Comprehensive Employment Strategy for people with disabilities. This is a cross-government approach that brings together actions by different Departments and state agencies in a concerted effort to address the barriers and challenges that impact on employment of people with disabilities over a 10-year period. The CIB SP&R Manager was a member of the **Make Work Pay group**.

- **Disability Consultative Forum** – This Department of Employment Affairs and Social Protection (DEASP) Forum progresses work relating to people with disabilities who access DEASP services. CIB’s Social Policy and Research team is represented in this group.
- **Advisory Group on Tax and Social Welfare** – CIB was represented on the Advisory Group on Tax and Social Welfare appointed by the then Minister for Social Protection, Joan Burton. The Group met over a three year period from mid-2011 to mid-2014 and was chaired by Ita Mangan, now the Chair of CIB. The Advisory Group on Tax and Social Welfare was responsible for considering a number of key areas of social welfare and taxation policy relating to child and family income supports; the extension of social insurance coverage for the self-employed; working age family support payments; and payments to people with disabilities. The Group produced a number of reports relating to the above areas and CIB made submissions to all the consultations undertaken.
- **Hard Times for the Self-Employed** - In 2012 CIB published a report [Hard Times for the Self-Employed](#) which looked at the difficulties caused by the gaps in social insurance cover for self-employed people (based on feedback from CIS and MABS staff). The government’s Advisory Group on Tax and Social Welfare (see above) went on to examine the provision of social insurance cover for self-employed people. The ensuing report (published in 2013) reflected the issues covered and referenced many of the recommendations that had been made in the CIB publication in relation to extending social insurance coverage. Invalidity Pension was extended to self-employed workers in December 2017. In Budget 2019, it was announced that Jobseeker’s Benefit would be extended to self-employed people in late 2019.

Published reports

Social Policy and Research Reports can be accessed on the Citizens Information Board website http://www.citizensinformationboard.ie/en/publications/social_policy/research.html

Information provision and access to public and social services for the Deaf Community (2018)

This independent study commissioned by CIB focuses on the experiences of the Deaf Community in accessing public and social services and related information on rights and entitlements in Ireland. The research is both timely and relevant in the context of the recent passing of the Irish Sign Language Act which gives state recognition to the indigenous language of the Deaf Community. Members of the Deaf Community have faced severe difficulties in accessing public information in their preferred language which impacts on the realisation of their rights. The report considers the current provisions by public agencies for meeting the needs of the Deaf Community and identifies the main issues in developing more accessible services.

Housing Assistance Payment – The Experience of Citizens Information Services (2017)

In 2017, CIB also published a research report on the experience of CISs in their dealings with the roll-out of the Housing Assistance Payment (HAP), as part of its ongoing series of thematic social policy reports. This scheme is considered to be a key element in the government’s response to meeting the needs of households seeking long-term housing support and CISs were well-placed to facilitate an exploration of the challenges and learning from the implementation of the scheme in light of the level of housing and HAP specific queries received by services.

Case Study showing how CIB social policy work can influence government policy:

Another different type of policy input that CIB engages in can be seen in its liaison with the National Medical Card Unit (NMCU). The Medical Card is the subject of a significant number of queries and Social Policy Returns within CISs nationwide, and CIB staff have been meeting with staff from the Unit on an ongoing basis during the past number of years in order to highlight the main policy and administrative concerns from delivery services as they arise for clients. CIB also organised an Information Exchange Meeting involving CISs and NMCU which provided an opportunity for all to discuss and share relevant concerns.

In addition, many of the concerns that CIB have been expressing around the administrative and policy issues for Medical Card applicants during the past number of years were reflected in the NMCU Strategic Plan 2016 – 2018. CIB also made a submission in response to a HSE stakeholder engagement on the formulation of this plan.

You can read the full case study on Medical Cards in Appendix 8.

The role of the Citizen Information Board's delivery services in social policy work

Citizens Information Services (CISs), Citizens Information Centres (CICs) and the Citizens Information Phone Service (CIPS) have social policy work as part of their remit.

Citizens Information Services

Members of the public access information, advice and advocacy services from Information Providers in CICs, mainly face-to-face. CICs are managed locally by Development Managers who report to Regional Managers. There are eight regional CIS companies, each with a Regional Manager.

Each Company receives their funding from the Citizens Information Board and in turn that funding comes from the Department of Employment Affairs and Social Protection. The funding is given to each service on the basis of an agreement by the service to provide information, advice and assistance and advocacy services to the public and to make **Social Policy Returns**. This agreement is called a Service Level Agreement.

CISs are obliged to be involved in social policy work. This obligation is written into the Service Level Agreement between CIB and each CIS as follows:

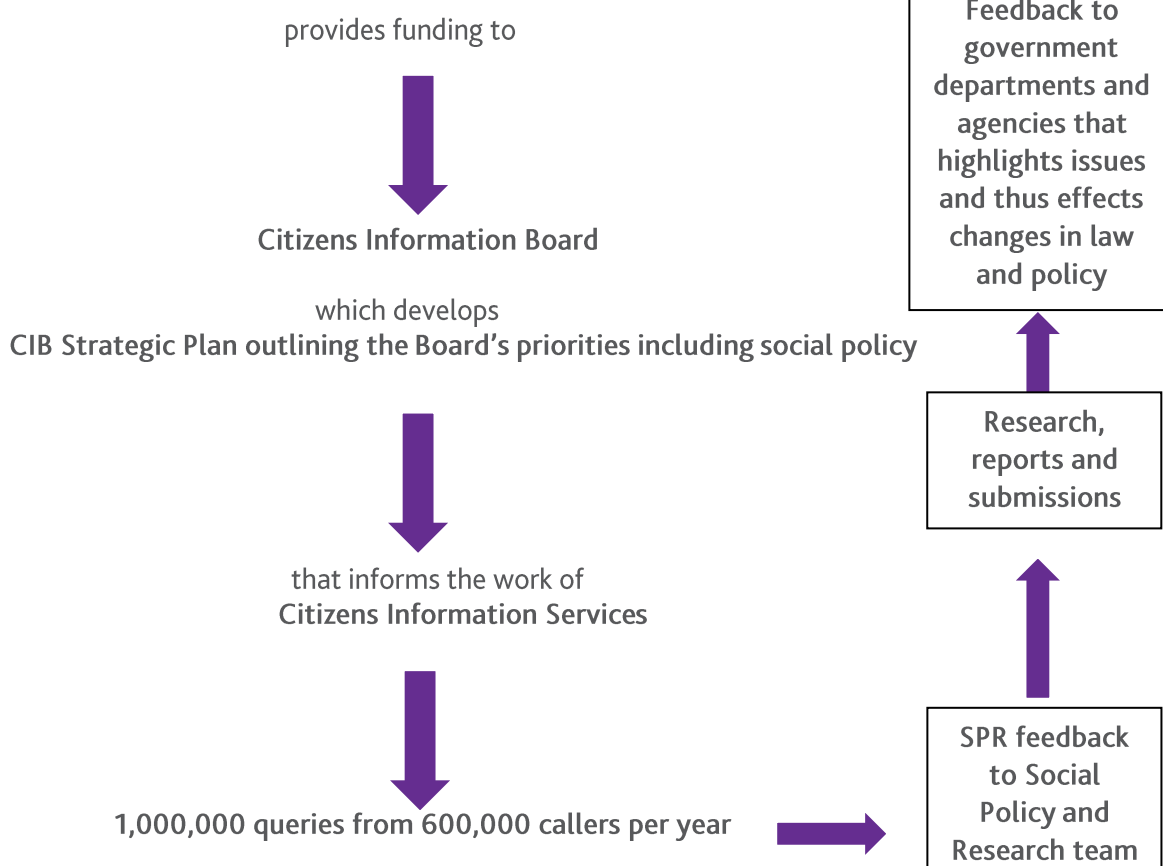
Social Policy and Research

CIB is committed to its function of supporting the effectiveness of current social policy and social services and to highlight issues of concern to users of those services. To this end **the Company will support CIB in data collection, the gathering of social policy information and evidence and in any research initiated by CIB.**

1. CIB should be notified of any research being commissioned directly by the Company or of any involvement by the Company in third party research or data sharing with third parties.
2. Where a Company commits its own resources to research or social policy reports it should seek approval in writing from CIB in advance and work with CIB’s Social Policy and Research team to ensure best practice in research methodology and report writing. Additional resources may be allocated to the Company for social policy and research, at the discretion of CIB.
3. CIB funding and support should be acknowledged in all reports published online or in print.

CIB social policy cycle:

Department of Employment Affairs and Social Protection



Approximately a million queries per year are dealt with by CISs through the CICs. As a result of this direct and regular contact with the public, CISs have an important role in filtering the experiences of citizens as they try to access their rights and entitlements, and identifying instances when the system is not working. CISs have a very wide reach across a number of areas of public service provision.

The daily encounters that information staff have with people provide an important insight into situations where policies and practices are failing to meet existing or emerging needs and can point to where reform is needed. The CIS can act as a “voice” of the citizen by channelling feedback (evidence and comment) on people’s lived experiences. Social policy work is usually about making known the blocks and barriers experienced by people as they try to:

- Obtain income supports (such as social welfare payments)
- Access and use services (such as health, housing, training and education)
- Ensure that their rights and entitlements are upheld (for example, employment rights or redundancy payments)

Citizens Information Phone Service (CIPS)

The Citizens Information Phone Service (CIPS) is funded and supported by the Citizens Information Board to provide a comprehensive and confidential telephone information service. CIPS staff deal with approximately 140,000 callers per year.

Information Providers in CIPS are involved in social policy work although they do not use Oyster to record Social Policy Returns. The CIPS system for making Social Policy Returns is described in Section 3 of this manual.

The same wording on Social Policy and Research is included in the Service Level Agreement between CIB and CIPS.



Section 2:

Managing social policy work

Managing social policy work in CISs and CICs

The Citizens Information Service (CIS) Board of Management, the CIS Regional Manager and the Citizens Information Centre (CIC) Development Manager all have an important role to play. Information Providers record Social Policy Returns as part of their work in answering queries and handling advocacy cases.

How to manage Social Policy work in Citizens Information Services set out a best practice approach on how to manage social policy work in the CISs and CICs. It is part of a set of Social Policy Resources developed by CIB.

Role of the CIS Regional Board of Management

Each CIS Board has an important oversight role, ensuring that social policy work is taking place both in terms of monitoring the number of Social Policy Returns (SPRs) per month and also encouraging and monitoring local social policy work. Social policy should be on the Board meeting agenda at least once per quarter and should include quantity and quality of Social Policy Returns, ensuring the engagement of all CICs in social policy work, identifying and meeting training needs and encouraging local social policy work initiatives.

Role of the Regional Manager, CIS

Each of the eight CISs has a Regional Manager who reports to the Board. The role of the Regional Manager is to develop the strategic plan with the Board, including social policy work, and to implement this plan for their region. CIB staff support Regional Managers to ensure a consistent approach that meets quality standards.

Role of the Development Manager, CIC

Development Managers are central to the management of social policy work in the local CICs. They ensure that social policy work is carried out efficiently and effectively. There may be some variation depending on the size of the service involved. They should:

- Make sure all staff are introduced to social policy from the very start
- Check that staff understand the reasons for and benefits of social policy work and the effect it can have on people's lives
- Ensure staff are trained to the highest standards in identifying and categorising social policy issues
- Ensure that all new staff and volunteers can make a Social Policy Return on Oyster
- Provide ongoing support to all staff doing social policy work
- Monitor quantity and quality of Social Policy Returns on Oyster and ECMS on a monthly basis, assess the effectiveness of the social policy work of the team
- Ensure experienced staff are trained in recording social policy issues on ECMS (Electronic Case Management System)
- Discuss relevant issues with staff as a result of reviewing a sample of Social Policy Returns
- Set up a social policy feedback system in the service
- Read [Social Policy Update](#), circulate to staff and discuss at team meetings
- Network with other organisations and community groups locally

- Manage local social policy initiatives: review ongoing policy issues with staff and decide on possible actions such as contacting a local named official, networking with another organisation, applying for a social policy grant from CIB to carry out some research or organising an event locally
- Set up a buddy system so that new staff can review Social Policy Returns with an experienced staff member

Procedures and systems to support social policy work in the CIC

The implementation of a documented system for social policy work will help all staff to understand and value the importance of social policy work in the CIC and should also ensure that the work is carried out to the highest standards. System procedures should include:

- Training and mentoring
- Setting goals
- Monitoring returns and taking action if necessary
- Holding social policy meetings or
- Having social policy on the agenda at meetings
- Engaging in local social policy work
- Having a quarterly Social Policy week with a strong focus on social policy

Training and mentoring

All new volunteers and staff should receive training in social policy as part of their induction training in the CIC. The training is delivered in two parts:

1. Each new person is given access to *How to become involved in Social Policy in your Citizens Information Service* to read. Ideally, informal study groups should be organised in the centre to discuss the document. It is up to the Development Manager to decide how these are organised.
2. The Development Manager or nominee holds a training workshop (using the PowerPoint Resource), once *How to become involved in Social Policy in your Citizens Information Service* has been read.

Note that there is also a module on Social Policy in the Essential Training for Information Providers (ETIP) course which Information Providers complete online.

Additional support can be provided by assigning a social policy mentor in the Centre to a group of newer staff. They should be encouraged to ask the mentor if they are uncertain about whether an issue has a social policy element or not or which category it belongs to. They need to know they have someone to turn to if in doubt.

Refresher training should be held in the CIC if necessary – for example, if there is a downward trend in Social Policy Returns (SPRs) or if the quality is not at the required standard.

Setting goals

One of the workshop learning outcomes is goal-setting for each staff member. Each person should be encouraged to complete one administration-related Social Policy Return per day and one policy-

related Social Policy Return per week. More experienced staff should have to record more returns of a more complex nature.

Goals that are set with paid staff should be reviewed as part of the Performance Management Development System (PMDS). If goals are not being met, reasons why this is happening should be explored. If it is a training issue, then more training should be provided. If it is a time issue, opportunities to allocate more time for this work should be explored.

Volunteer Information Providers should be encouraged to do social policy work. It is a routine part of the process of dealing with clients and answering their queries. Reception staff should also be encouraged to do social policy work. They are likely to notice administrative and access barriers such as people not being able to access an online service or to get through on the telephone.

Monitoring Social Policy Returns

Social Policy Returns must be correctly recorded on Oyster. It is up to the Development Manager or nominee to check monthly Social Policy Returns and investigate reasons if there is a downward trend in numbers recorded.

It is good practice for someone within the CIC – the Development Manager or a staff member who has been given specific responsibility for social policy co-ordination – to look over all the Social Policy Returns recorded on Oyster, in order that the CIC is satisfied with their quality and accuracy. Different CICs have different systems for doing this. Action should be taken if quality standards are not being met.

Giving feedback

Social policy work moves slowly and it can be frustrating for staff who do not see an immediate outcome when they record social policy issues on Oyster. They can become demotivated and make fewer Social Policy Returns.

Therefore, it is very important to give as much feedback as possible to those working in the CISs. Feedback at **local level** should focus on the quantity and quality of Social Policy Returns and on any local social policy initiative. Feedback at **regional level** should focus on quantity and quality across the region on any regional Social Policy initiative.

Feedback at **national level** on submissions, research reports, briefings or policy changes is communicated to staff in CISs and CICs by CIB via [Social Policy Update](#). Development Managers should make sure staff have access to this publication online or in hard copy and are encouraged to read it.

Social policy meetings

Meetings provide an opportunity to give feedback on social policy initiatives at local, regional and national levels and allow staff to discuss issues that have arisen from the Social Policy Returns. Training needs can be identified. Meetings also provide a forum to identify possible future local policy work. Some CICs hold meetings dedicated to social policy. Others put it on the agenda at general meetings. Social policy should be on the agenda at every meeting. It is useful to discuss the most recent edition of [Social Policy Update](#) at team meetings.

Social policy should be included on the agenda of CIS board meetings at regular intervals, ideally every quarter.

Recording Social Policy Returns

Recording Social Policy Returns on Oyster

The document *How to become involved in Social Policy in your Citizens Information Service* explains in greater detail how to record a Social Policy Return on Oyster.

Information Providers should regard social policy work as an integral part of their role, not an optional extra. Unless they record Social Policy Returns, social policy work will not happen. Most do this immediately after the caller has left the Centre by logging the query on Oyster and then clicking Yes on the Social Policy Feedback tab; selecting the nature of the policy issue; and saying what the issue is and the impact it is having on the client in the box provided.

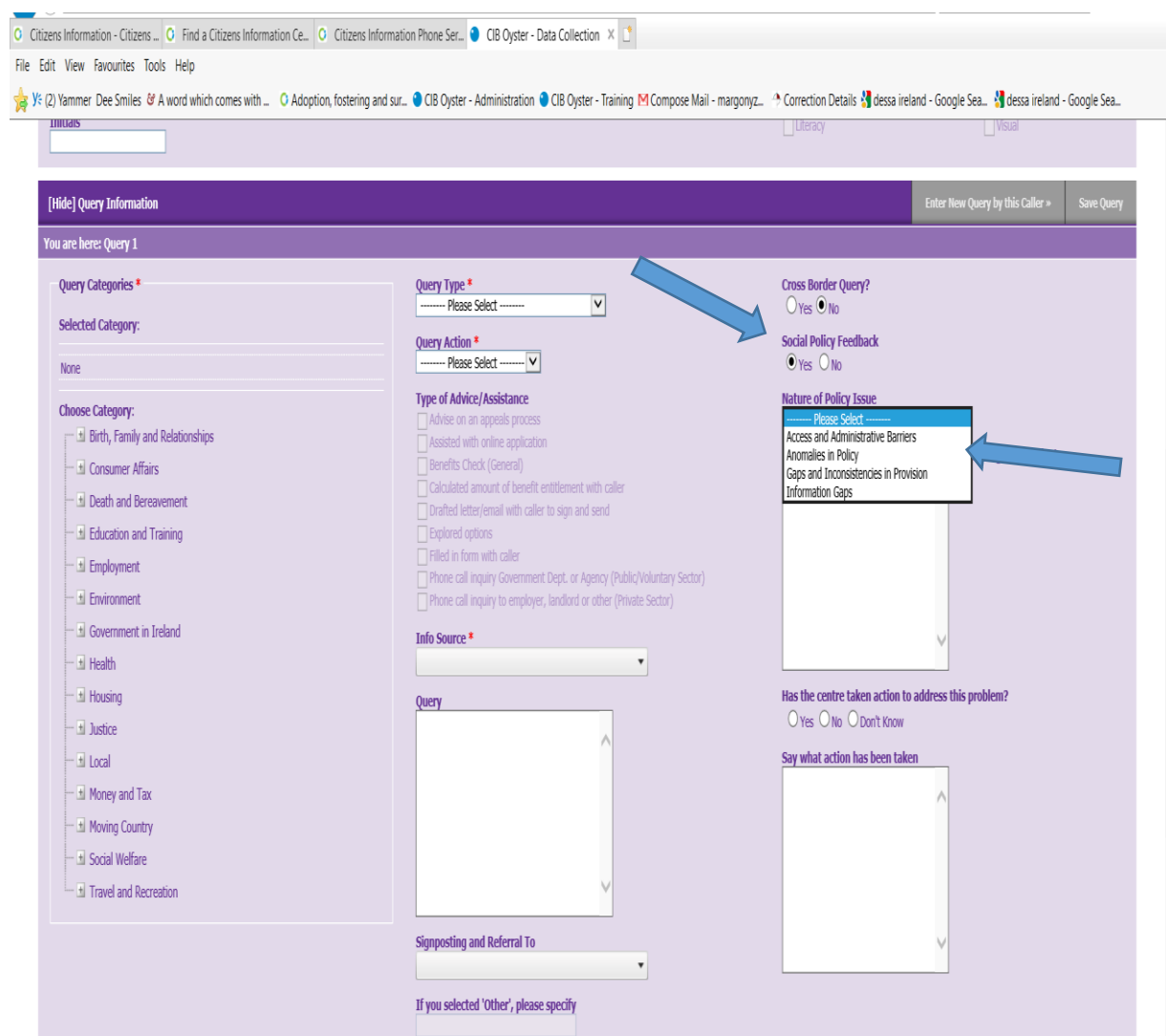


Figure 1: Entering a Social Policy Return on Oyster

Alternatively, they can note the Oyster query number and prepare the Social Policy Return, coming back to it later when they have more time. This approach allows time to word the issue as accurately as possible, spell check and ensure all aspects of the issue are covered. It also allows the opportunity to review the description of the issue with a more experienced member of staff. However, it is a more time-consuming approach.

The following diagram shows how to categorise social policy issues:

Nature of policy issue

- 1. Access and Administrative Issues** - use this category when a person has:
 - experienced delays, backlogs and/or errors in applications and appeal processes
 - communication and 'gatekeeping' problems, such as being unable to contact a public service office by phone or email and therefore not being able to get the information needed
 - been treated discourteously by a member of staff delivering a public service.
 - found public offices are inaccessible because of their location or restricted opening hours or because they are not fully accessible to people with disabilities.
 - had access or admission issues such as long waiting lists for legal aid or public health care
 - experienced situations where services are only available online
 - has cultural and language barriers with no interpreter available
 - no computer skills but must apply online for services or information
- 2. Information Gaps** - use this category when a person has
 - been given information in the wrong format
 - been given the wrong information
 - not been given any information
 - not been given enough information
- 3. Anomalies in Policy** – use this category if you have evidence that a policy has been designed or is delivered in such a way that some people benefit from it while others in a very similar situation do not benefit. For example:
 - problems in primary or secondary legislation (including departmental guidelines) which means that the policy is working for some people but not for others with similar needs
 - cases of a service/scheme deficit that leaves some people without supports that they need or acts as a disincentive to accepting a job/taking up employment after PRSI and USC charges have been applied
 - if essential services or payments are withdrawn via primary or secondary legislation – for example the Mobility Allowance
 - adequate services and supports are not being legislated for in a timely manner and in response to an emerging social need (for example asylum seekers living indefinitely in direct provision).
- 4. Gaps and Inconsistencies in Provision** – use this category where a service might have been legislated for nationally but is unavailable or not consistently available to those in need, for example:
 - services are available in some geographical areas but not in others (for example homeless hostels, services to young people, supports for people with mental health problems)
 - inconsistencies across housing authorities in applying differential rent or in their approach to housing needs assessment
 - inconsistent interpretation of policy in different geographical areas, for example different interpretations of the Habitual Residency Condition (HRC)
 - when discretion is not consistently applied in relation to the same payment or service

Recording Social Policy Returns on the Electronic Case Management System (ECMS)

Information Providers use Oyster to record Social Policy Returns on information, advice and advocacy queries. On occasion, they may do advocacy work as part of their role.

If there is a need for advocacy work on a client’s behalf, the Information Provider transfers the case to a dedicated system called the Electronic Case Management System (ECMS) which is only used for advocacy casework. Advocacy work involves working in more depth over a longer period of time with the client and provides a greater opportunity for identifying and fleshing out social policy issues related to the case. Social Policy Returns can be entered during or at the closing of a case.

There is a social policy tab on ECMS which allows the Information Provider to add multiple Social Policy Returns at any time during the case. Because advocacy work is complex and cases can take considerable time to resolve, several social policy issues can arise while the case is ongoing, hence the need to record more than one issue associated with a particular case.

Information Providers get support when doing advocacy work from the Advocacy Support Worker (ASW) - there is one ASW per region. You can read more about advocacy work and how it relates to social policy in the [2018 Advocacy Annual Report](#).

The social policy categories on ECMS are the same as those on Oyster. Data needs to be anonymised so there is no personal information recorded. Reporting facilities on Oyster and ECMS allow access to all Social Policy Returns and enable CIB to analyse them.

See below two screen shots from the test server showing the ECMS Social Policy screens:

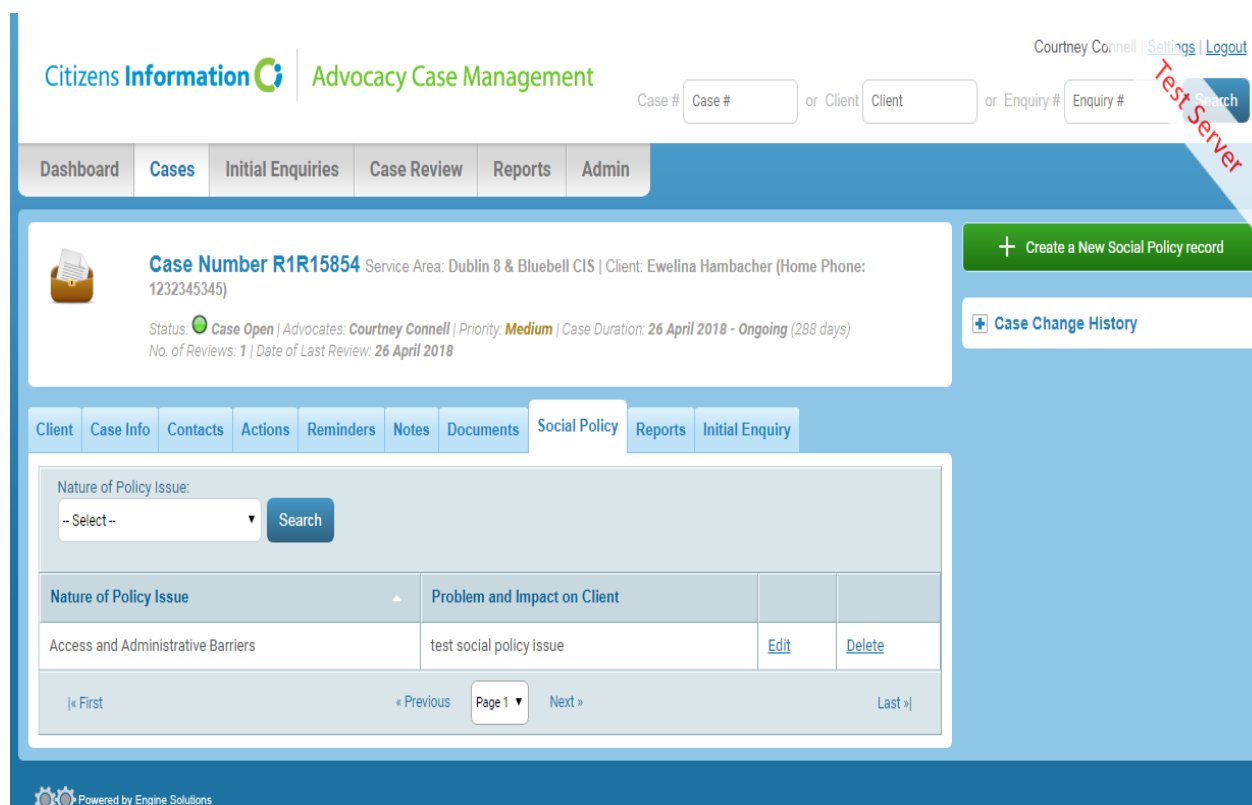


Figure 2: Social Policy tab on ECMS

Case Number R1R15854 Service Area: Dublin 8 & Bluebell CIS | Client: Ewelina Hambacher (Home Phone: 1232345345)

Status: ● **Case Open** | Advocates: **Courtney Connell** | Priority: **Medium** | Case Duration: **26 April 2018 - Ongoing (288 days)**
 No. of Reviews: **1** | Date of Last Review: **26 April 2018**

Client | Case Info | Contacts | Actions | Reminders | Notes | Documents | **Social Policy** | Reports | Initial Enquiry

Social Policy Information

Nature of Policy Issue *

-- Select --

Say what the problem is and the impact it is having on the client *

What is the policy issue? What is the impact on the client?

Has the advocate taken any action locally to address the policy issue?

Yes

No

If yes, please note what action has been taken

Figure 3: Entering a Social Policy Return on ECMS

The following is an example of Social Policy Returns arising out of a complex advocacy case:

PRSI Records - Two Social Policy Returns recorded under different headings

R1R16645 Representative Low Case Closed 13 13/08/2018 - 02/04/2019 (232 days) *

Subcategories: Other

Case Summary: Employer PRSI non-complaint in the years 2013-15. The client is unable to claim the Invalidity Pension until the record is updated. Due to no English language skills, the client required help with the process. PRSI records system was explained to the client.

The client was asked to bring the evidence confirming PRSI deduction. He brought pay-slips and P60 for the full years 2013-15. I have drafted a letter on behalf of the client reporting the employer non-compliance, attached evidence and posted to the PRSI record section.

This process took about 6 months. The record was successfully updated. Unfortunately, PRSI record section refused to issue any correspondence regardless of authority to act supplied. The client provided an updated record on request. Additionally, I have noticed that the number of PRSI noncompliance cases for EU workers increases. This was brought to the Manager and ASW attention and reported as a social policy issue.

Nature of Policy Issue 1: Access and Administrative Barriers

Problem and Impact on Client: I have been refused an official response to the PRSI non-compliance/PRSI update request by PRSI records section regardless of the authority to act submitted. The client provided an updated record on request.

Nature of Policy Issue 2: Anomalies in Policy

Problem and Impact on Client: PRSI non-compliance: I have noticed that the number of PRSI noncompliance cases for EU workers increases in our service. This client was unable to claim Invalidity Pension due to employer PRSI non-compliance in the years 2013-2015. Due to no English language skills, the client required help with the process. The process took about 6 months.

Doing local social policy work in the CIS

Local submissions can be made by individual CICs or CISs relating to specific local or regional social policy issues. This can involve:

- providing direct feedback to the relevant statutory authority either locally, regionally or nationally
- channelling information through CIB or other national organisations, either statutory or voluntary/community
- becoming involved in local or regional projects or initiatives, either alone or in co-operation with others

CICs do not have to carry out local social policy work but many do, and have been very successful at bringing about or being involved in changes at a local level. Some of the benefits of local social policy involvement are that:

- i) Staff can readily connect with issues that are local

- ii) It is easier to make contact with the people involved (for example local social welfare or housing authority staff)
- iii) Change at local level – particularly as regards the interpretation or implementation of policy – can be more immediate than at national level
- iv) Relationships developed with local public services staff during policy initiatives can continue to bear fruit as regards advocacy for the people being assisted by the CIC

If a CIC or CIS has developed, or wishes to develop, a local social policy role, CIB can offer small grant support and/or assistance with this. Grant support might be available for initiatives such as commissioning local policy research, organising a policy seminar, producing materials or the establishment of local/regional policy fora.

Local policy work might be something that a CIC or CIS does:

- on its own
- in collaboration with other CICs, CISs or MABS
- in collaboration with other local services/projects

More information on the Social Policy Grant scheme is given later in this Section.

Examples of local social policy work in the CIS: January 2018 – December 2018

CIS	Heading/name/title	Summary
Ballyfermot CIC	Homelessness in Ballyfermot and Chapelizod	Member of the Homeless Forum and involved in launch of a research report 'A Step on the Pathway to Home', looking at responding locally to homelessness in Ballyfermot and Chapelizod.
Ballyfermot CIC	Updating Community Directory	Working together with the local Partnership company and local drug task force to create an updated community directory that will include signposting with regard to services/supports for people experiencing or at risk of homelessness.
Ballyfermot CIC	Development of a Ballyfermot homeless supports specific information leaflet	Leading out on a piece of work with the Homeless Forum to develop a Ballyfermot specific leaflet on supports for people experiencing homelessness and or at risk of homelessness.
Dublin City North Bay CIC	Newsletter	Produced a newsletter on the issue of half-rate Carer's Allowance as it had noticed that many people were unaware that they were unable to apply for it. The newsletter was distributed widely to relevant groups in the CIS catchment area - organisations working with older people and people with disabilities. It was also given out at information stands.
Dublin North CIS	Member of Social Policy Network (DCC CICs)	The role of the Social Policy Network is to share information and ideas on the respective work of the

		member organisations and to act as a support and learning network.
Dublin North CIS	Member of Migrant Consultative Forum (DCC CICs)	Membership of Migrant Stakeholder Group and Migrant Consultative Forum has assisted in improving access to social protection for migrants as group meets with DSP to raise issues of concern.
Dublin North CIS	Homelessness (D15)	Internal review and research of homeless services supports in practice, shared with D15 homeless network. Meeting with HAP section of Local Authority to clarify supports and procedures. Currently taking notes of all clients presenting with homeless/housing issues to report to local authority. Close working relationship with the Housing clinic initiated with CLM.
North Munster CIS	Various activities	Social Policy CIS-based training covering three core elements: what is policy/social policy; the fundamentals of making an SPR on Oyster; and a discussion of current policy issues as reflected in the Social Policy Returns coming from CISs. Contributed from a CIS perspective to the Irish National Organisations for the Unemployed regional information and discussion event in Limerick.
South Leinster CIS	Social housing support form	Co. Wicklow CIS made two submissions to Wicklow County Council regarding proposed changes at national level to the Social Housing Support Form. Almost all of our recommendations were included in Wicklow County Council's submission.
South Leinster CIS	Public Service card survey and report	Co. Wicklow CIS, in conjunction with the Older Person's Council, designed a survey which was issued to 91 older people on their attitude to the PSC. A short report was then drafted by the CWCIS' volunteer data analyst.
South Leinster CIS	Learning from a Resettlement Project: Somali Families in Arklow - A review of resettlement, reunification and integration.	Secured funding from CIB's SP grant scheme for €3,000 in August 2017 to investigate the needs of the Somali Community in Arklow. Wicklow County Council also secured funding and we joined our funding together in Feb. 2018 to engage a researcher. A report entitled <i>Learning from a Resettlement Project: Somali Families in Arklow - A review of resettlement, reunification and integration</i> was launched in Nov 2018 and the Development Manager was one of the speakers at this event. Development Manager is now on a committee which is looking at implementing the recommendations.
South Connacht Citizens	Social Policy Returns	Administrative procedures within the Galway service to track and implement social policy feedback has developed greater awareness among Information Providers.

Information Service		
Tallaght CIC	Closure of local tax office	In 2017, the local tax office in Tallaght closed. Locals were well used to having all services locally. As a result, there was an increase in callers to Tallaght CIS but Information Providers could not help as the issues were very specifically tax-related. The CIS created a template letter which outlined a case for the reopening of the tax office which they gave to every caller and asked them to sign and send to Revenue. There was a great take-up and the tax office reopened at specified times.

Further detailed examples of local social policy work can be found in Appendix 5.

Local social policy work arising out of advocacy work

Advocacy Support Workers have a key role in social policy work as they have an overview of policy issues across a range of services. Here is an example of social policy work in action.

The Migrant Consultative Forum (MCF) is comprised of representatives from the DEASP and various stakeholder groups including Crosscare, One Family, FLAC, New Communities Partnership and Dublin City Centre CIC. The Forum is underpinned by the Department of Justice and Equality's Migrant Integration Strategy with the purpose of engaging on migrant-related aspects of social protection services on an ongoing basis over the lifetime of the Strategy (ending in 2020). The Strategy is intended to '*work towards the long-term vision in which integration is embedded in communities, workplaces and broader society.*'

An Advocacy Support Worker participates in the MCF, providing case studies and sharing information on the CIS experience of dealing with migrant-related issues relevant to the accessing of services and schemes from the DEASP. The ASW representative works in consultation and collaboration with CIB's Social Policy and Research team in raising issues at the Forum as captured by CIS social policy reporting on Oyster and the ECMS nationally.

The issue of certain sections of the DEASP refusing to engage with CISs and clients over the phone on the grounds of GDPR requirements was raised at a recent MCF meeting. All stakeholder groups were able to provide examples of how migrants had been affected by this misinterpretation of the GDPR.

Thanks to the work of CIS frontline staff in recording this social policy issue, the ASW representative was able to demonstrate to the DEASP that the issue was not limited to isolated incidents or specifically affecting migrant communities, but was being reported nationally as affecting many CIS clients when trying to access information in relation to payments and claims. The DEASP committed to investigating the matter further on the basis of this information.

This example demonstrates how collectively social policy reporting can serve to provide a comprehensive and national picture of an anomaly or administrative barrier. Through this process organisations working in the field can then present a compelling case to a government department or public body to investigate such matters and implement effective changes accordingly.

Writing a report arising out of social policy work

Reports can be a useful way of presenting evidence and argument that can lead to a change in local policy. Local councils, TDs, councillors and local media are always interested in issues that affect local people and a report is a useful and respected way to pull together their stories. However, report writing is time consuming and requires skill in presenting facts in a logical order. See Producing a local social policy report which sets out some good practice guidelines for planning, writing and publishing a report on a local social policy issue. Alternatively, services can apply for a CIB social policy grant towards the cost of a report.

Challenges associated with social policy work

The extensive social policy work carried out by CISs demonstrates that staff have the skills and knowledge of local issues based on the actual experience of citizens to carry out social policy work and a responsibility to bring their findings to the attention of policy makers and service providers.

However, there are challenges to overcome when doing social policy work:

- **Time:** Some services point to the significant challenge of the time required to compile and complete a Social Policy Return. Given how busy CICs can be, sometimes social policy slips down the list of priorities.
- **Understanding and appreciation of social policy:** Some services see social policy work as a specialist area that requires careful training and exposure over time in order to develop confidence and competence to compile and complete returns. However, it should be part of the mainstream work of an Information Provider. Sufficient training and support, including mentoring from more experienced staff, will ensure that all staff feel competent and motivated to do social policy work.
- **Feedback and motivation:** it is important to let people know that Social Policy Returns can change and/or shape policy development. Although this is not a quick process, results should always be communicated to staff. *Social Policy Update* contains this information in detail.
- **Skills and resources:** Doing social policy work requires the investment of resources if it is to be effective. The ability to document evidence and collate feedback from client experience, to liaise or negotiate with other bodies and to engage in publicity are all skills which are important in social policy work. It might sometimes be necessary to identify individuals outside the organisation to undertake research or write a report on a once-off or occasional basis, either in a voluntary or in a paid capacity. It may also be possible to source funds for specific projects from local or national organisations, including the CIB Social Policy Grant (further details in this Guide).

Suggestions for strengthening social policy work

The following approaches can strengthen social policy work within CISs:

- Organise induction training for all new staff so that all are involved in social policy and have all the information they need from the start and see they are part of the bigger picture – without their input, social policy work cannot take place.
- Provide ongoing training including refresher training for social policy work. Ensure that this training is grounded and practical and allows space for Information Providers to integrate their learning into their everyday work.

- Champion social policy work by purposefully enhancing its visibility, significance and value through regular exposure/discussion, workshops and presentations.
- Cultivate the belief that social policy work makes a positive difference. A good way to start is by showing how Social Policy Returns work in practice.
- Step up communication about social policy and showcase examples of its power to influence change.

Suggestions on raising the profile of social policy work in the CIS

Sometimes, social policy work can take a back seat! Here are some ideas on how to raise the profile of social policy in the CIS and help staff to look out for social policy issues when dealing with clients. They include:

- Holding a social policy-themed week (see below)
- Having a discussion on contents of [Social Policy Update](#) e-bulletin with the staff. *Social Policy Update* is the way the Social Policy and Research team give feedback to the CISs, CICs and CIPS on the Social Policy Returns submitted and the outcomes from policy submissions and reports
- Setting the completion of Social Policy Returns as a PMDS goal
- A local “champion” is needed to drive social policy work in the service. This is normally the Development Manager but in some services an Information Provider takes on this role.
- Allocating a dedicated time each week for Social Policy work
- Setting aside 5 minutes at the end of the day to review if there were any social policy issues and why they were an issue
- The Development Manager should print off the annual national Social Policy Returns statistics and discuss these with the staff
- Having a laminated Social Policy Information sheet at every desk
- Putting a Social Policy screensaver on every computer screen

The Development Manager in North Kildare CIC initiated a social policy-themed week within the CIC. Its primary focus was to get people to engage in social policy and to demonstrate the impact of social policy work. A small group planned the structure of the week and the following initiatives took place:

- A social policy-themed week was held at the start of each quarter, with all staff getting two weeks’ notice
- The Development Manager explained to the team how to record Social Policy Returns and had an open door policy that week for staff to call in to discuss whether cases had a policy dimension and how they could write them up their Social Policy Returns
- Slides of 2 or 3 recent cases where Social Policy Returns were recorded were presented and discussed at the team meeting in the SP week
- All staff were expected to be involved in social policy – for example, reception staff can note that people are coming in to ask for a form as they don’t have access to broadband

Subsequently, when the Development Manager organised in-house learning on a range of topics for Information Providers throughout the year, a few minutes was spent on social policy at the end of each training session.

The Development Manager moved to Meath CIC and initiated social-policy weeks there also. They now take place several times a year in the service.

Social Policy Returns increased significantly in both services as a result of this initiative, as staff developed a greater interest in social policy and felt that they were more able to identify social policy issues.

Responding to a Social Policy Alert

In the case of a government call for submissions on a particular topic, there is sometimes very little time available to CIB to write a submission. In this case, the Social Policy and Research team will usually rely for evidence on feedback already received through Oyster.

Where there is a longer lead-in time to the submission deadline date, or where the Social Policy and Research team are producing a policy report or submission that has no set deadline, a Social Policy Alert may be circulated to delivery services. This is a data gathering and issue based tool used by CIB to alert services to the need for specific feedback relating to a policy consultation or a themed social policy report. The SP Alert will contain information as to the focus of the report or submission, a deadline date for receipt of information, along with contact details of the person in the Social Policy and Research Team who the evidence should be emailed to.

A Social Policy Alert will usually ask delivery services to try to do three things:

1. Look out for queries relating to the policy report/submission being written, making sure to submit as much information as possible where policy implications are spotted.
2. Gather and submit any particularly rich and relevant case study material on the topic in question.
3. Give their perspective on key issues impacting on their clients relating to the policy matter under consideration.

The Development Manager should inform all Information Providers of the Social Policy Alert and ask them to be on the lookout for relevant material. The Development Manager may delegate the task of compiling case study material to an experienced staff member.

Two examples of Social Policy Alerts follow. One is a straightforward request for feedback on a strategy for the rental sector. The other is more complex as it is based on a detailed consultation on the Total Contributions Approach to the state pension system.

Social Policy Alert

To: CISOs, CIPS and NAS

Re: CIB Submission on the Strategy for the Rental Sector

Rebuilding Ireland, the Government's Action Plan on Housing and Homelessness, includes provision for the development of a strategy for the rental sector as a key commitment. The Department of Housing, Planning, Community and Local Government is currently preparing this strategy for publication before the end of this year and has invited submissions to help inform the development of the strategy.

In preparing the CIB Submission, we are reviewing the Social Policy Returns (SPRs) on Oyster for issues and indicative cases. Since this is an area of significant social policy feedback, we would very much appreciate any further observations your service might have on the rental sector generally. We would ask you to pay particular attention to the following areas and, if possible, to identify ways in which the problems experienced by service users might be addressed:

- 1) Greater security and certainty for both tenants and landlords
- 2) Improving the quality and standards of rental accommodation
- 3) Broadening and strengthening the role and powers of the Residential Tenancies Board (RTB) to more effectively provide key services to tenants and landlords

Other areas referenced for inclusion in the Strategy for the Rental Sector are the introduction of an Affordable Rental Scheme; encouraging 'build-to-rent'; and support for greater provision of student accommodation -- we would also welcome observations/suggestions on any of these.

The consultation timeframe is extremely tight (less than 10 days) with a closing date of Monday 7th November. Therefore, we would ask you, if possible, to please provide feedback and any case material by **Wednesday 2nd November**.

Social Policy Alert

To: CISs, CIPS, MABS

Re: Consultation on Total Contributions Approach

The Department of Employment Affairs and Social Protection is managing a consultation process on behalf of the government on the forthcoming Total Contributions Approach (TCA) reform to the State pension system. The Citizens Information Board is preparing a submission in response to this consultation and would welcome feedback from services.

We are requesting feedback from services in relation to priorities, issues and impacts of different policy approaches outlined in DEASP's Consultation Paper. Comments are welcome on the following questions:

- How many contributions should be needed for full pension?
- What credits will be available and for how long?
- What arrangements should be in place for those outside the PRSI system (people who provided care in the home; self-employed prior to 1988)
- Should there be a phase-in period?

The consultation paper (Total Contributions Approach Consultation 2018) outlines how the National Pensions Framework 2010 proposal and the TCA 2012 proposal differ in relation to:

- The number of contributions required for a full pension
- Provisions for home-carers – how far to back-date
- Number of years of care and age of children
- Transitional measures to take account of greater difficulty in working up a 40-year record prior to the 1990s.
- Both proposals also refer to the amount of ordinary credited contributions that could be used and the number of paid contributions required to qualify for a payment.

The consultation paper rules out a universal pension on cost grounds. It highlights difficulties with continuing with the current Yearly Average system, as people with fewer contributions can receive a higher rate pension than someone who contributed more into the system; also it is not sufficiently targeted on need and equity and does not recognise periods of home-caring prior to 1994. People becoming pensioners in the 7-year period 2012 to 2019 can choose between TCA and Yearly Average later this year. The Paper also rules out extending this to future pensioners.

Reform options being considered are:

- The number of contributions required to qualify for a full pension
- A limit on the number of credited contributions that may be counted
- Effective date of homemaking provisions allowed for
- Potential guarantees of a certain percentage of the rate which applied under the Yearly Average scheme
- Phasing in/out of various options

The three concepts identified in the design of a pension system are:

- Adequacy - rate of payment should be at a level enough for pensioners to live on
- Equity - those who pay contributions receive appropriate reward
- Sustainability – demographic changes will not push up costs to level where they will not be sustained in longer term

The consultation consists of a series of questions taking the above concepts into account, under four headings: general approach; priorities in the TCA formula; ensuring sustainability; special arrangements. If you wish to give more detailed comments, you may address the following issues:

1. General approach: greater reward for those who paid PRSI contributions; greater recognition of credited contributions (eg when on JA); greater gender equality; periods of low PRSI coverage (self-employed, caring) should be recognised; changes from Yearly Average to TCA should be gradual; pension system should encourage longer working.
2. Priorities in the TCA formula: rate of contributory pension should be indexed to cost of living; payment should reflect total contributions paid; caring duties should be recognised with credited contributions; maximum rate of non-contributory pension should be increased relative to contributory pension (currently NCP is 95% of CP).
3. Ensuring sustainability: impose greater control over future increases in rate of payment; increase conditions for pensions (more contributions required); reduce CP relative to NPC; increase state pension age; increase rate of PRSI contributions.
4. Special arrangements: phase in period 2020-2027; more generous home-caring provisions for people retiring before 2030; special arrangements for people who were self-employed prior to 1988 when Class S was introduced; some people with limited PRSI contributions are on higher means-tested payment – should benefit from their contributions.

Services are welcome to provide illustrative case studies. We are interested in cases where people have been given a choice between TCA and Yearly Average and issues arising for them; cases of people coming close to retirement who are trying to decide which approach is more favourable and issues arising which we may not be aware of. There may be people who are considering retiring prior to 2020 to ensure they have a choice of approach as they know the TCA will be less favourable for them. We do not need cases showing difficulties experienced since 2012 - the issue of women in particular losing out due to the yearly average over their working life has been recognised in the establishment of this consultation process.

The government's closing date for receipt of feedback is 3 September 2018. We would appreciate if you could return your feedback by **Friday 10 August** to allow time for responses to be reviewed and a formal submission prepared. **Thank you.**

Following responses to the Social Policy Alert, CIB made the following submission:
[Automatic Enrolment Retirement Savings System for Ireland \(December 2018\)](#)

Social policy grants

The purpose of the Social Policy Grant Scheme is to provide small-scale support for social policy initiatives being undertaken at local level by CISs working on their own or in conjunction with other CISs and/or local voluntary/community organisations. The grants payable under this scheme usually range between €1,500 and €3,500 and it is envisaged that they would be provided to assist in areas such as:

- Analysis of social policy issues identified by the service and the preparation of a short report which would be submitted to relevant organisations and agencies, as well as CIB;
- Networking between a number of local agencies in order to identify common social policy issues and the compilation of relevant submissions;
- Seminar/workshop for information staff at local level to explore issues around social policy work;
- Discussion forum between independent Information Providers and local statutory agencies to consider policy issues identified and how these might be addressed.

Application process

Applications or proposals should be submitted to the Manager, Social Policy and Research Service, CIB.

There is no specific application form for the social policy grant, but applications should contain the following details:

1. **Name(s) and contact details (address, telephone, fax, e-mail) of the centre or centres applying for a grant**
2. **Name of the contact person who has overall responsibility for the proposed project**
3. **Names of any other persons or organisations involved in the project**
4. **Brief statement of the policy issue to be addressed**
This section should provide clear answers to the following questions:
 - What is the issue or policy problem to be analysed or addressed, and how did it arise?
 - Why is it important to analyse and/or act on this issue?
5. **Implementation**
 - How do you propose to carry out this work?
 - Give details of the process involved
6. **Existing and ongoing work in the area**
 - Have you already done some work on this area?
 - Are there any other organisations that are already engaged in policy work in this area?
7. **Scope for co-operation**
 - Is there scope for involving other organisations in the work, either locally or nationally?
8. **Dissemination of findings and/or involvement of individuals and organisations in workshops and training**
 - How do you plan to use the information or analysis you have generated with the help of the grant?
 - If you are applying for funding for a workshop or training event, who are the target audience/participants?

9. Areas of responsibility

- Who is responsible for different parts of the project you are proposing?

10. Costs

- You need to provide a breakdown of the funds that you are requesting.

11. Timeframe

- When do you plan to start working on your project?
- Provide a timetable for progressing your project.
- What is the deadline for finishing the project?

Networking

Effective networking can be very important in undertaking local social policy work. A well-established pattern of communication or contact with other organisations can enhance such initiatives and perhaps result in them becoming more effective. Networking involves identifying, making contact and co-operating with other relevant organisations, locally, regionally and nationally. Networking is a two-way process which can:

- Be ongoing or short-term, structured or formal
- Occur around a single issue or focus on an area of interest
- Be broadly based and include regular contact on a wide range of topics of mutual concern
- Include working with voluntary and community organisations and statutory bodies
- Be developed at a local, regional or national level

For local social policy work to be effective, sufficient resources and management are required. CIB can make some funds available through the Social Policy Grant scheme.

Specialist supports available

CIB fund specialist support services such as the Immigrant Council of Ireland (ICI), Threshold, Treoir and FLAC to provide second tier support to the CIS network. They can also assist with policy related work by providing technical advice and in some instances, they provide policy updates to service, such as the quarterly Immigration Update provided by the ICI.

Section 3:

Social policy work in the Citizen Information Phone Service (CIPS)

Doing social policy work in CIPS

The Citizens Information Phone Service (CIPS) dealt with 140,915 calls in 2018. As it is a national service with a broad citizens information brief, dealing daily with a high volume of queries, it is uniquely placed to observe social policy trends and issues. Over 1,012 Social Policy Returns were submitted to CIB during 2018, identifying a number of recurring policy issues and barriers to entitlements.

Information staff spend the vast majority of their time taking calls. All staff can record social policy issues. However, some designated staff have a social policy remit and are allocated time to social policy work each month.

Social policy work in CIPS operates within a two-team structure, each team consisting of up to six staff, including a Social Policy Co-ordinator for each team. These teams engage with the broader staff body to maximise contributions to the data collected. The two Social Policy Co-ordinators are responsible for co-ordinating and reviewing Social Policy Returns and reporting to CIB. They are also responsible for training the other team members in relation to social policy.

During 2018, CIPS undertook a review of the social policy data collection methods and altered the initial recording method based on an analysis of work practices and feedback received. The changes have proved to be effective. The CIPS social policy methodology is outlined in the next sections.

Recording social policy Issues in CIPS






Step 1

CIPS staff devised an internal social policy recording system that allows staff to record issues as expediently as possible in the course of carrying out their other duties. The recording system is a Social Policy Capture Sheet which contains nine frequently occurring social policy issues for staff to select as they arise during phone calls. The sheet allows for the recording of further detail where available, as well as the date and the name of the Information Officer. The listing of these nine issues is a guideline to staff. In addition, the sheet has a number of blank spaces where any social policy issue can be recorded. This sheet, printed on yellow paper in order to be easily identifiable among other notes, is left at the workstation of each Information Officer and collected on a fortnightly basis. This initial capture method, while not a paperless solution, does suit the work environment as each Information Officer sits at an assigned desk and always has a pen in hand.

CIPS SOCIAL POLICY

Please tick where appropriate and fill in detail on second column if you can. If you do not have enough room to input your return please attach extra details overleaf. Please ask your SP colleague to get an extra sheet if you need one.

IO Name: _____

1		<p>Date: Caller cannot <i>make contact</i> with government department. (State dept., length of time and contact methods). Suffering financial hardship as a result.</p>		
2		<p>Date: Caller will lose <i>OPF</i> due to child age restrictions. Caller is experiencing financial hardship as a result</p>		
3		<p>Date: Caller is parenting alone with child aged between 7 and 13 inclusive. Can't get <i>WFP with JST</i>, although they could with <i>OPF</i>. Suffering financial hardship as a result.</p>		
4		<p>Date: A caller cannot find accommodation within <i>rent caps</i> (R.S/H.A.P). Caller is topping up, causing financial hardship. (Risk of homelessness?)</p>		
5		<p>Date: <i>Self-employed caller</i> cannot access <i>PAYMENT/SCHEME</i> even though they would pass the means test. (Put in family income details) suffering financial hardship as a result.</p>		
6		<p>Date: Caller's application for <i>WFP</i> rejected because they do not work 82.33 hours per month. Caller meets the 19 hr per week requirement as per <i>OP</i> guidelines. Suffering financial hardship as a result</p>		
PTO	PTO	PTO		




7		<p>Date: <i>Revenue</i> do not accept a <i>Cohabitant</i> as excepted person for tax credits and caller is worse off financially than his married colleagues.</p>		
8		<p>Date : <i>Lack of accessible housing</i> in caller's price range to buy or rent. Caller suffering stress as a result.</p>		
9		<p>Date: Caller is being directed by government body (please state) to go <i>on-line</i> to access payments etc. (please state) when they have no internet access/ literacy problems/ have limited knowledge of computers (please state).</p>		
		<p>▪</p>		
		<p>Date:</p>		
		<p>Date:</p>		
		<p>Date:</p>		
		<p>Date:</p>		
		<p>Date:</p>		

Fig 4: Data Capture Sheet

Step 2

Approximately half of CIPS staff are engaged in social policy work beyond the initial Social Policy Capture Sheet. These information Officers are assigned to two Social Policy Teams and a buddy system has been devised where each Social policy Team member is matched with a non-Social Policy Team colleague and has the responsibility of collecting and recording their own and their colleague’s Social Policy Capture Sheet onto a designated Excel document. This Excel document allows for the recording of each issue within standard CIB categories.

	A	B	C	D	E	F
234	20/06/2018	June	Access/Administrative Barriers	13. Social Welfare	Jobseeker's Allowance	Caller has failed to make contact with the Newbridge intereo office, they have tried calling and emailing on numerous occasions. They want to sign off
235	20/06/2018	June	Access/Administrative Barriers	13. Social Welfare	Supplementary Welfare Allowance	Caller is unable to make contact with the CWO section in Intereo Office in Cork Street in Dublin. They have tried calling on numerous occasions.
236	20/06/2018	June	Access/Administrative Barriers	8. Housing	Applying for Local Authority/Social Housing	Caller is seeking information regarding their placement on the LA list. They are unable to get thru to get their query answered.
237	20/06/2018	June	Information Gaps	13. Social Welfare	Disability Allowance	Caller cannot get through to the Disability Allowance section to get clarity as to why their claim was rejected. They received a letter but it's content is un trying to find out on what grounds they should appeal the decision of the DA section.
238	20/06/2018	June	Information Gaps	13. Social Welfare	Rent Supplement (RS)	Caller is on the state pension. He lives with his wife and his daughter who is in secondary school. He got a letter from the RS section stating that his RS called the number on the letter but was told they no longer deal with RS in his area. He was given another number that is not being answered. I checked distress as he cannot afford to pay his rent with this reduction (he is topping up as it is).
239	20/06/2018	June	Anomalies in policy	13. Social Welfare	Illness Benefit	Self employed caller will not qualify for illness benefit while recovering from an operation in spite of paying PRSI for over 20 years. Caller is suffering in
240	20/06/2018	June	Gaps/Inconsistencies in provision	11. Money and Tax	Income Tax Credits and Reliefs	Cohabiting couple with children. One is working and the other is stay at home parent. The partner who is working cannot claim tax credits for the other same circumstances by two different government departments.
241	20/06/2018	June	Access/Administrative Barriers	8. Housing	Housing Assistance Payment (HAP)	Caller in Dublin cannot find accommodation within the limits for HAP as she notes that landlords and agents are setting the rent above the thresholds to made homeless as she cannot continue to pay her rent.
242	20/06/2018	June	Gaps/Inconsistencies in provision	13. Social Welfare	Mortgage Interest Supplement (MIS)	Caller cannot afford to separate from her husband as they cannot avail of MIS to help with the mortgage if one of them moves out. She feels this is very
243	20/06/2018	June	Information Gaps	14. Travel and Recreation	Travel Abroad to Ireland	Caller cannot get in contact with the Passport Office by phone/email/online chat or twitter. She is travelling in 1 week and submitted her child's passport weeks ago. She is very distressed as she does not know if there is something wrong with the application.
244	21/06/2018	June	Access/Administrative Barriers	14. Travel and Recreation	Travel Abroad to Ireland	Caller needs an emergency passport after a family death abroad and is unable to reach the passport office, both Dublin and Cork offices are not resp
245	21/06/2018	June	Anomalies in policy	2. Consumer Affairs	Consumer Protection	Caller bought a clocked car from a private seller and wonders why the gardai will not prosecute this individual, whereas they will a dealership or compa
246	21/06/2018	June	Gaps/Inconsistencies in provision	8. Housing	Homelessness	Caller is being legally removed from his house and has struggled to find affordable housing, feels the council need to do more to address the housing i
247	21/06/2018	June	Access/Administrative Barriers	7. Health	Medical Card	Caller was awarded a medical card for 2019, caller went to doctor who told her her card was invalid, she rang the HSE who said they had revoked ghe or when they intend to have it sorted, says she has had to delay hospital treatment as a result.
248	21/06/2018	June	Information Gaps	7. Health	Medical Card	Caller had a short term script from a consultant, was told by pharmacy that this was not covered by the GMS Scheme but instead the Hospital emergen scheme, feels this is unfair.
249	21/06/2018	June	Anomalies in policy	13. Social Welfare	Working Family Payment (WFP)	callers daughter is 22 and will be 23 in the next academic year, she still lives at home and he was claiming FIS for her before but now has been told he
250	21/06/2018	June	Anomalies in policy	2. Consumer Affairs	Consumer Protection	Callers daughter was refused entry into a concert because she was 18 but only had a garda age card issued by the gardai as ID, feels it should be mai
251	25/06/2018	June	Access/Administrative Barriers	13. Social Welfare	Back to School Clothing & Footwear Allowance (BTSCFA)	Caller is unable to get through to the DSP to clarify a query regarding BTSCFA and called us instead.
252	25/06/2018	June	Anomalies in policy	13. Social Welfare	Back to Education Allowance (BTEA)	Caller has received letter confirming payment for BTSCFA, she receives the payment for 1 child but has to more qualifying children. One is going to C and will get the payment in September when the children are already back in education.
253	26/06/2018	June	Information Gaps	13. Social Welfare	Working Family Payment (WFP)	A Caller reports that they have received a letter from the WFP section that is incomprehensible to them. It is printed on the letter that they are not entitle just renewing the payment now. It is then handwritten at the bottom of the letter that they are now approved for WFP.

Figure 5: Social Policy Excel

Step 3

At the end of each month two designated Social Policy Co-ordinators review this Excel document, refresh the summary table, generate a report and forward to CIB.

Category	Count of Parent Category	Column Labels	January	February (blank)	March	April	May	June	July	August	September	October	October	November	December	Grand Total
(blank)																
9. Justice				1				1				2				4
8.Housing				2												2
8. Housing			2	4	4	2	6	9	5	10	15	9		5	4	75
7. Health				3	11	3	5	5	4	2	4	4		4		45
6. Government in Ireland				1	1	4	1									7
5. Employment				1		1		1	3					1		7
4. Education and Training					1	1	4	1		3	2			2		14
2. Consumer Affairs					1			2	1			1		1		6
14. Travel and Recreation				1	4	1	3	8	3		1			1		22
13.Social Welfare			1	2												3
13. Social Welfare			7	29	21	14	20	40	36	158	79	227	13	52	52	748
12. Moving Country				1		2	2			3	2	1		1	1	13
11. Money and Tax			2	6	4	2	4	2	12	4	6	12		3	4	61
10. Local							1	2								3
1. Birth, Family and Relationships						2										2
Grand Total			12	51	49	30	47	68	66	180	109	256	13	70	61	1012

Figure 6: Summary Report

Count of Parent Category	Column Labels	January	February (blank)	March	April	May	June	July	August	September	October	October	November	December	Grand Total
(blank)															
9. Justice			1				1				2				4
8.Housing			2												2
8. Housing		2	4	4	2	6	9	5	10	15	9		5	4	75
7. Health			3	11	3	5	5	4	2	4	4		4		45
6. Government in Ireland			1	1	4	1									7
5. Employment			1		1		1	3					1		7
4. Education and Training				1	1	4	1		3	2			2		14
2. Consumer Affairs				1			2	1			1		1		6
14. Travel and Recreation			1	4	1	3	8	3		1			1		22
13.Social Welfare		1	2												3
13. Social Welfare		7	29	21	14	20	40	36	158	79	227	13	52	52	748
12. Moving Country			1		2	2			3	2	1		1	1	13
11. Money and Tax		2	6	4	2	4	2	12	4	6	12		3	4	61
10. Local						1	2								3
1. Birth, Family and Relationships					2										2
Grand Total		12	51	49	30	47	68	66	180	109	256	13	70	61	1012

Figure 7: Summary Report

Roles of staff and allocation of time

<i>Staff</i>	<i>Activity</i>	<i>Frequency</i>
All staff	Record Social Policy issues on Social policy Capture Sheet as they arise during interactions with callers.	Ongoing
Social Policy Team Members	Collect the Social Policy Capture Sheet from their Social Policy buddy and record this information on the Excel sheet, along with the information from their own Sheet	Monthly
Social Policy Team Members	Attend internal Social Policy meetings to monitor discuss any changes that might need to be made to our returns document, organise social policy training for new staff, plan social policy work that is required for input to CIB reports or pre-budget submissions. This time is also useful to identify any trending social policy issues that may need immediate reaction and escalation to management and/or CIB	Monthly
Social Policy Team Members	All Social Policy Team Members contribute to creating an annual document to inform the CIB Pre Budget Submission. This involves reviewing our own records to capture and highlight relevant data.	Annually
Social Policy Team Members	One to two representatives attend the Social Policy Network meeting quarterly.	Quarterly
Social Policy Co-ordinators	Prepare the Excel sheet for submission to CIB by confirming that all social policy issues are recorded correctly. Submit Excel sheet to CIB Social Policy Executive.	Monthly
Social Policy Co-ordinators	Provide Induction Training to new CIPS staff. This is usually a one hour training session and uses a power point presentation, plus discussion of case studies, which were developed in-house. This training is provided to staff after they have received training in Social Welfare and Employment Law and have developed some experience taking phone calls. Additionally new staff are given an induction into how Social Policy issues are recorded.	As required

CIPS Social Policy Organisational Chart



Section 4:

Social Policy feedback from the CISs and CIPS – reviews and trends 2018

This feedback analysis is produced annually by the
Social Policy and Research team, Citizens
Information Board

Social Policy feedback from the CISs and CIPS, 2018

In 2018, 574,096 people contacted Citizens Information Services (CISs) across the country with over 1 million queries, which is similar to the level of demand experienced by staff in Centres during the previous year. Just over 140,000 telephone enquiries were dealt with by the CIPS team of Information Officers throughout 2018. The CIC response involved the provision of information, advice or advocacy to the clients – mainly in a face-to-face setting - as required. The information queries recorded by staff covered a broad range of 15 categories (ranging from health, and consumer affairs to travel and recreation), but were predominately focussed on social welfare and income support related areas (45% of queries), with health, housing and employment being the other most-queried categories. Within these broad query categories, the highest single-query issue was the Medical Card (64,931), with the next most-queried payments or benefits being State Pension (Contributory) at 34,304 queries and Jobseeker's Allowance at 27,443 queries.

Over and above the queries that were logged by CISs during 2018, information staff also submitted 4,910 Social Policy Returns (SPRs), an increase of 7% on the previous year. An additional 1,012 were recorded by the Citizens Information Phone Service (CIPS) – bringing the total received to 5,922. This is an **overall increase of 21%** on the Returns submitted in 2017 (which was itself, an increase of 13% on 2016). Information Providers are asked to submit these Returns when they perceive that their client is experiencing a particular difficulty in trying to access a social or public service. Essentially, these Social Policy Returns provide useful, anonymised case study material that can illustrate particular difficulties that some among the thousands of CIS clients have in their encounters with public services. This data helps us to get a clear picture of the problems that people are facing and we continue to use this evidence to make recommendations to government, to consultative processes, to regulators and other organisations on how to improve policy and – of crucial concern - the administration of policy.

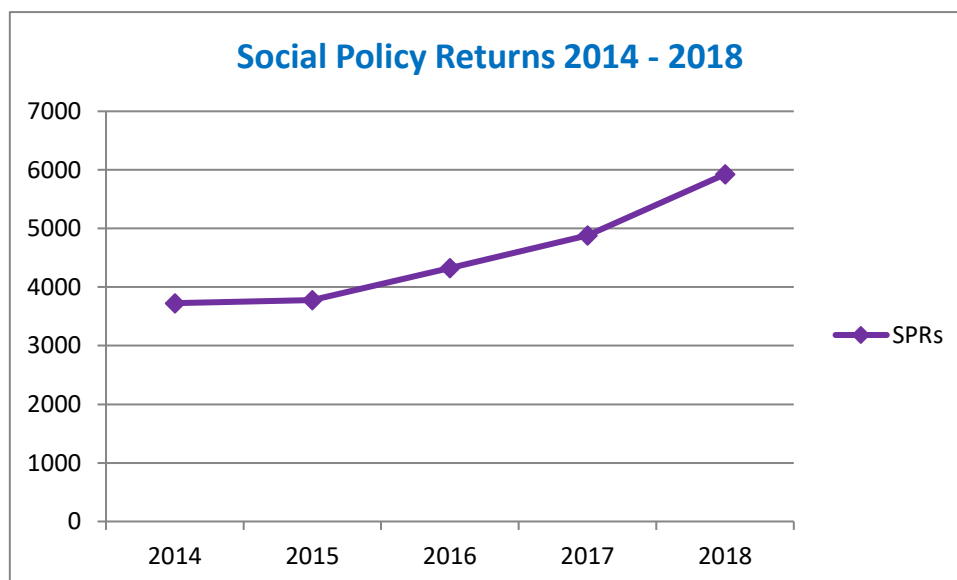
During 2018, CIB made a number of submissions on different areas of social and public policy¹. Most of these were in response to invitations by government departments and covered topics such as the National Digital Strategy, State Pension reform and Moneylending and Consumer Protection. A key submission that continues to be made on an annual basis is the Pre-Budget Submission, and this provides a useful insight into the broad range of issues that CIB delivery services are engaged in and are active on. Each of these submissions were drafted using different elements of the data provided by our delivery services and this broad base of evidence is central in helping us to identify emerging issues that people are facing, in relation to the provision of benefits or services.

Social policy feedback from information services

There has been a consistent increase in social policy feedback submitted by services to CIB in recent years - the level of Social Policy Returns submitted by information staff has increased by over 50% from 2015 to 2018. This upward trend points to a growing awareness and appreciation among information staff of the role that policy plays in underpinning the provision of social and public

¹ <http://www.citizensinformationboard.ie/en/publications/submissions/>

services and also how broader policy (and the implementation and administration of policy) impacts on a diverse range of individual circumstances.



The provision of information, advice and advocacy on social welfare-related matters continues to be the focus of much of the social policy feedback that is submitted to CIB by services. This is to be expected, given the size and the reach of the Irish social welfare system. As of mid-year 2018, DEASP stated that “there were 1.3 million persons in receipt of a weekly social welfare payment in respect of 2 million beneficiaries. In addition, a further 625,300 families received a monthly child benefit payment in respect of 1.2 million children. Of the weekly welfare recipients, 616,200 were in receipt of a pensions payment and 205,560 were in receipt of jobseeker’s payments. Some 194,010 received a disability allowance or an invalidity pension and 79,910 were in receipt of carer’s allowance or benefit.

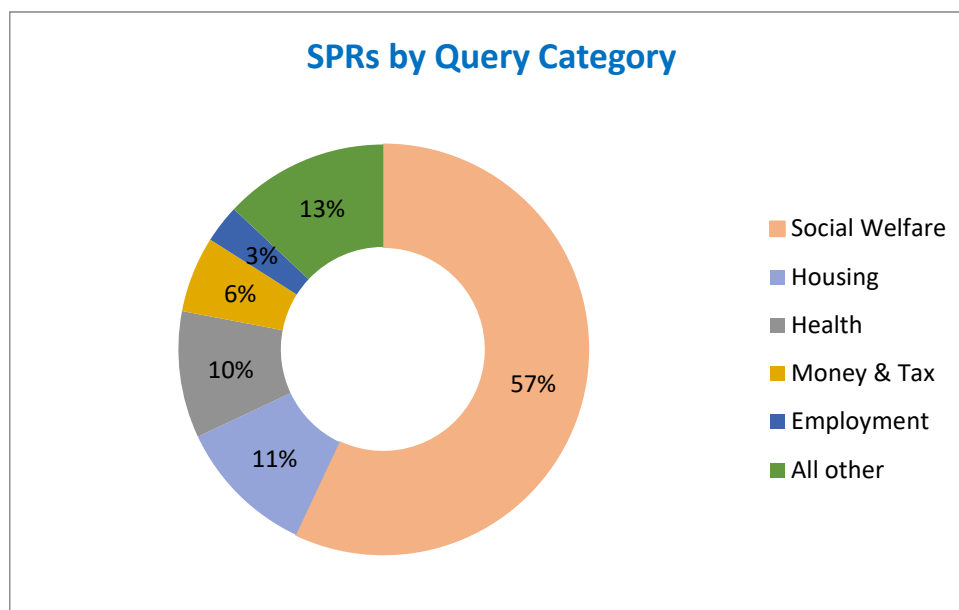
Taken as a whole, these numbers indicate that the payments and services operated by the Department of Employment Affairs and Social Protection (DEASP) impact, either directly or indirectly, on the lives of nearly everybody in the State”².

Trends and developments in 2018 – administrative issues increasing

An analysis of the main information query areas provides us with a more detailed account of the payments and benefits that were causing most concern for clients during 2018. During 2018, 45% of all queries made by callers to CICs were social welfare and income support related matters and some 57% of all Social Policy Returns reported by information staff to CIB were illustrative of difficulties that clients were experiencing with social welfare payments and schemes. This was followed by concerns in relation to housing issues and health service-related issues (at 9% each), Employment (7%) and Money and Tax (at 6%). When combined these five broad information categories

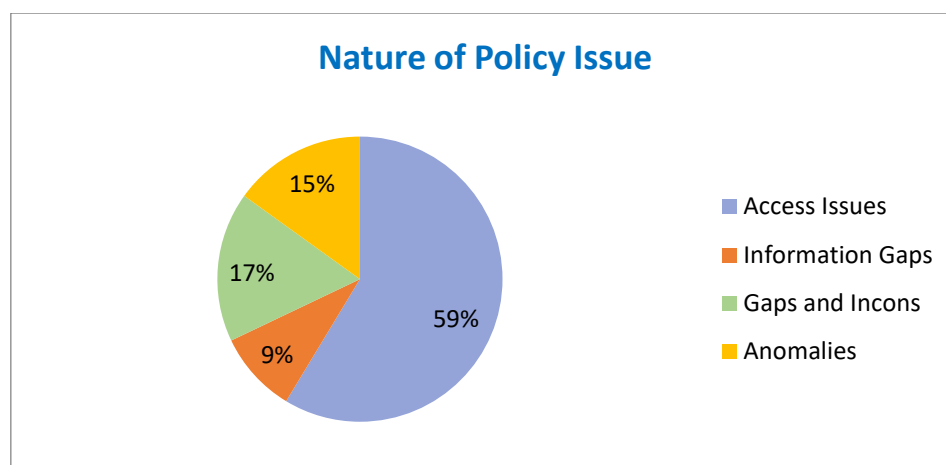
² Tax Strategy Group Social Protection Package – Budget 2019 Issues (DEASP July 2018)

amounted to 88% of all the cases that were submitted by services – with the remaining 10 query categories accounting for 13% of the Social Policy Returns.



This analysis indicates that, despite the wide range of topics being reported as problematic for clients by services, there are obvious and recurring trends and developments in particular areas – most notably in social welfare, housing and health which we will focus on in this review. We will also highlight more niche areas and emerging difficulties – that is, issues that may not be reported in significant numbers but, nonetheless, present as significant problems for clients.

The types of issues being reported by services indicate that the most common concerns with DEASP-administered payments during 2018 were communications difficulties with particular sections within the Department, and also delays in processing and information gaps, or deficits – specifically, over two thirds of feedback in relation to social welfare payments or schemes referenced these types of difficulties. This focus on operationally-based difficulties is also reflected in other policy areas such as health service entitlement (which is dominated by Medical Card queries) and housing. The remainder of the cases - 32% - are considered by Information Providers to be difficulties caused by the policies, legislation or guidelines that underpin the scope of schemes, benefits or services – that is, either '*anomalies in policy*' or '*gaps in provision*'.



Whilst the level of reporting of operationally-focussed issues or concerns has always been in the majority, there has been a shift in emphasis in recent years – in 2014, over half of issues were classified by Information Providers as operational or administrative and, as noted above, this had risen to over two thirds in 2018.

Most reported payments or schemes – social welfare

As Information Providers are asked to submit Social Policy Returns on the basis that they are indicative of a general difficulty that clients are experiencing, there are a broad range of issues represented among the Returns. It is not possible to deal with every SPR individually, but we are able to identify trends among the particular payments and schemes that were most often reported by services during 2018 – see the 'Top Ten' list below. This ranking of the ten main payments or schemes that have been evidenced as being problematic for clients by services provides us with a useful point of departure for this analysis.

Top Ten most-reported payments/ schemes

	Payment/Scheme	SPRs
1	Illness Benefit	833
2	Medical Card	440
3	Carer's Allowance	332
4	Jobseeker's Allowance	226
5	Working Family Payment (Formerly FIS)	216
6	Disability Allowance	188
7	Income Tax Credits and Reliefs	173
8	Housing Assistance Payment (HAP)	160
9	GNIB Applications and Renewals	143
10	Back To School Clothing and Footwear Allowance	127

These Top Ten individual payments or schemes accounted for almost half of all Social Policy Returns submitted by services and, within this, four (Medical Card, Income Tax Credits and Reliefs, HAP and GNIB Applications and Renewals) were not social welfare-related. The initial focus here is on the social welfare-related feedback.

Within the social welfare category, there was a 25% rise in the number of Social Policy Returns submitted from 2017 to 2018. This was a significant year-on-year increase and it should be noted that the query base from which these Social Policy Returns were generated actually decreased during this period (with social welfare-related queries decreasing from 467,694 in 2017 to 455,891 in 2018).

Returns were submitted concerning over 80 different payments or schemes within the broad range of social welfare sub-categories, and it is noteworthy that over 45% of social welfare-related Social Policy Returns were from within the Disability/ Illness and Carers sub-categories.

As highlighted in the table above, of the 5,922 Social Policy Returns submitted during 2018, Illness Benefit was the most often-reported individual payment or benefit – with 833 Social Policy Returns. This was an almost eightfold increase on the previous year's Social Policy Returns.

Many of these benefits/payments have featured consistently in the Top Ten Returns submitted by services during the past number of years. Although during 2018, there were significant increases in reports concerning difficulties with four particular benefits that have not featured as prominently before - the *Working Family Payment*, *Income Tax Credits and Reliefs*, *GNIB Applications and Renewals* and the *Back to School Clothing and Footwear Allowance*.

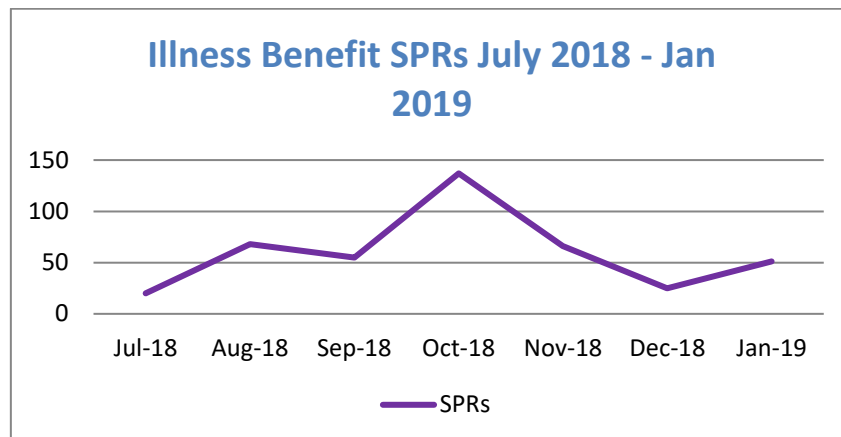
Illness Benefit concerns

Over 85% of the Social Policy Returns reported by services in relation to Illness Benefit (IB) were concerned with delays in processing applications, issuing payments and responding to callers.

The vast majority of these difficulties can be attributed to the introduction of new illness certification forms (IB1 form and MED1 form) and changed administrative and processing arrangements in August 2018. Following the submission of social policy feedback by CIB to the relevant section within DEASP in October 2018, the Department advised that services who could not get through to the helpline should direct their queries to the email address illnessbenefit@welfare.ie. It was stated that the Department had assigned additional resources to managing both the helpline and email queries from late October and they indicated that they would be monitoring emails from CISOs.

During this time, services around the country reported on cases where applicants were waiting many weeks (and months) for payment and cases where applicants (or CIC staff) could not make contact with the Illness Benefit section of the Department to clarify the status of their claim (or were holding on the telephone for long periods, with many on low incomes using call credit with no response). In addition, there were also reports of longer-term recipients of Illness Benefit whose payment was stopped without notice or explanation. In some cases, services noted additional difficulties for those applicants who were awaiting payment in accessing Basic SWA through the Community Welfare Service at their local office. Several cases were also reported where recipients were overpaid (substantially in some instances) and, as they were taxed on this overpayment, ended up with less take-home pay. Again, these issues were compounded for people by the difficulties in contacting the Department in order to deal with the overpayment immediately.

As noted in the chart below, the frequency of reporting of IB issues peaked in October 2018, and then dropped off but has started to increase into January 2019 – indicating that difficulties remain for applicants and recipients.



In response to a Parliamentary Question on 15 January 2019, Minister Regina Doherty stated that "although the system change has worked effectively for over 80% of IB customers, significant difficulties arose following implementation for a number of customers. My Department took three main steps to resolve the issues impacting on payments. First, we have deployed additional staff to process works and respond to the customer enquiries. Second, we have developed new IT workarounds that address the payment gap issues and to ensure a faster flow-through to payments. Third, we are continuing to review the design rules in the system to afford greater flexibility in processing of claims and certificates. Payment levels are now maintained at the expected norm, for the past two months. People who are due a payment and whose certificates and claims are in order now receive their payment entitlement promptly".

Minister Doherty also stated in November 2018 that an independent review was to be carried out of how the changes in Illness Benefit payments were planned, how they were implemented and how they were (or were not) communicated to clients.

Ongoing broader policy issues in relation to Illness Benefit also continue to be reported in the feedback from services – including difficulties for people on low incomes caused by the six day wait for the payment (which has been continually highlighted by services since the change to eligibility in 2014) and also difficulties for self-employed people who are not eligible for the payment but are in need of some form of short-term illness support.

Disability and carer's concerns

During 2018, a significant proportion of the social welfare-related Social Policy Returns logged were focussed on disability and carers issues – that is, 45% or 1,588 Social Policy Returns. Within this, Carer's Allowance was of particular concern, with Returns more than doubling on those submitted in the previous year. The main issues highlighted were related to the processing and administration of the payment – most notably the delays in processing applications. According to an answer to a Parliamentary Question put to Minister Doherty in January 2019 the average waiting time for a decision on a new Carer's Allowance claim was 17 weeks. In responding to the question, Minister Doherty also noted that "additional staff were assigned to the CA claims processing area from within the CA area and from other areas of the Longford Centralised Schemes Office to help improve the processing times. It is expected that processing times will improve further in the coming weeks as a result".

Services noted that the frustrations caused by these delays were exacerbated by difficulties that clients (and CIS staff) had in contacting the carer's section within the Department, when they were seeking information or clarity around their application or payment. Many of the cases that were submitted by services evidenced the confusion, stress and frustration felt by applicants and recipients due to their inability to speak directly with Department staff about their claim or payment – the on-hold waiting times were noted in many cases to be costly and frustrating for people. In light of the persistent processing delays, some services have suggested that there should be an improved telephone call management process in place within the Department - with callers being advised as to current call-queuing times when their call was placed on hold.

These difficulties in making contact with the carer's section are also impacting on the ability of information staff to assist or advocate for their clients. A number of services have suggested the benefit of establishing a dedicated telephone line between CISs and the carer's section within DEASP which would help to overcome some of the frustrations being experienced by CIS clients.

Other policy issues highlighted by services in relation to Carer's Allowance include difficulties caused by the fact that CA is not a qualifying payment for IQA or for Fuel Allowance and a number of services also noted the lack of awareness of the half-rate carer's payment among some clients - in particular, those who are transferring from Carer's Allowance to the State Pension (and who would be eligible to retain half their carer's payment).

The most frequently reported issues concerning Disability Allowance were operational in nature (noted as an issue in over 80% of the DA Social Policy Returns) and many referred to delays in the processing of applications - with cases noting typical waiting periods of 5 - 6 months. In December 2018, Minister Doherty stated that the average processing time for Disability Allowance stood at 12 weeks. The cases reported by information services indicated that these delays are acutely felt by those living on limited means, those who are claiming SWA whilst waiting for their claim to be processed, and also affected those transferring from DCA to DA (where a lead-in time for the transferral has been allowed). Some of the cases also highlighted the knock-on effects for applicants who are trying to access other benefits when DA is a qualifying payment (such as Free Travel or BTEA).

A repeated concern continued to be highlighted for DA claimants - that is, the frustration felt by claimants (and services) in trying to make contact with the DA section by telephone. This contributed to clients' difficulties on a number of levels – many clients (and staff assisting them) were on hold for significant periods of time, some were cut off while holding and some clients used up considerable amounts of phone credit while waiting to have their query dealt with. This also presented difficulties for clients who could not get a relevant or timely response from the Department in instances where their payments were stopped (or adjusted) without notification.

Jobseeker's Allowance concerns

There were 226 Social Policy Returns submitted by staff in CISs and CIPS during 2018 which detailed concerns with Jobseeker's Allowance (JA). Sixty per cent of these SPRs were concerned with administrative issues or information gaps – the issues highlighted included difficulties making contact with local Intreo offices and frustrations for applicants (particularly those with limited literacy or language skills) who were required to fill in multiple forms when applying for the payment – with many services noting that the same information was repeatedly asked of the applicant, suggesting the need for a more streamlined application process. Services also expressed concerns about the nature of communications around eligibility and entitlement, indicating the need for better practices regarding the communication of decisions to applicants and the signposting of

relevant schemes and payments – for instance, there were cases reported where people were confused and worried by letters sent from the DEASP (following their application) which stated their means but with no context or explanation as to how this affects their application or, indeed, the rate of payment. Other cases highlighted instances where potential claimants were informed verbally on inquiring at a local DEASP office that they would not be entitled to Jobseeker's Allowance – and thus were not given the opportunity to apply for it in the first instance.

Beyond these operational concerns, other key policy issues highlighted by services in relation to Jobseeker's Allowance included cases where the three-day rule is considered to act as a disincentive to take up work, and the situation for jobseekers under the age of 26 – with particular reports of hardship for young claimants who are not able to live in the family home. A number of cases also highlighted the particular situation of young JA claimants who were in the care of the state whilst minors – these claimants are eligible for the full-rate JA payment until they turn 25, at which time they must revert to the reduced rate for one year until they turn 26 and can then claim the full-rate payment.

Working Family Payment concerns

The number of SPRs submitted in relation to the Working Family Payment (WFP) in 2018 increased by 50% on the previous year and nearly three quarters of these SPRs were concerned with access/administrative issues or information gaps. The main issue reported was that of unreasonable delays in processing applications (and renewals), with many cases highlighting instances where applicants were awaiting decisions for up to three months. Information from DEASP indicates that the average processing time for WFP has increased during 2018 – at the beginning of 2018 the average processing time was two weeks, and as of November 2018, this stood at six weeks.

Coupled with this issue, there were a large number of cases reported where people could not make contact with the WFP section by telephone to clarify the status of their application or renewal. Claimants and CIS staff report of having to telephone the section on multiple occasions during the limited telephone access hours, of their calls being put on hold for 20, 30 and 40 minutes plus and then being cut off, and of emails that were not responded to. These difficulties added to claimants worries about the eligibility and status of applications and, in some cases, delayed their ability to make decisions on work offers based on the limited information available to them. Several cases were also reported where this delay in processing affected an applicant's ability to apply for the Back to School Clothing and Footwear Allowance.

Beyond these core issues of access and processing, there were also many cases where parents who are working irregular hours or engaged in seasonal work couldn't access the payment, and cases which highlighted the issues for CE scheme participants (or those who are self-employed) who are currently not eligible for the payment, but who meet other eligibility requirements (income and working hours). The annual-only review process also presented difficulties for recipients who experienced a cut in income or working hours.

Back to School Clothing and Footwear Allowance concerns

During 2018, the feedback received from services in relation to the Back to School Clothing and Footwear Allowance (BTSCFA) tripled when compared with the same period in 2017. In 80% of the cases reported, the key issues that were highlighted as problematic for clients were administrative or operational difficulties with the payment. These included:-

- Delays in processing the payment, with some cases reported where payments were still outstanding in September. In October 2018, Minister Doherty stated that "the delays in

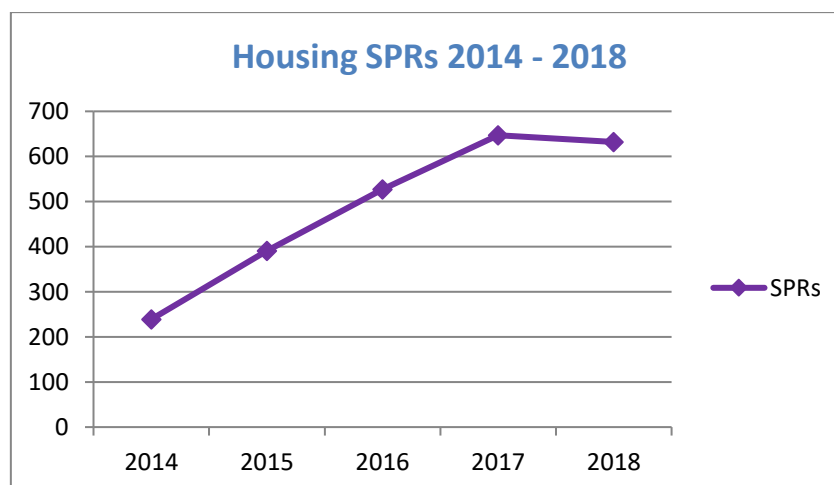
processing applications over the summer arose as a result of a combination of initial technical issues which arose due to the transfer of the scheme to a new IT platform and a very high volume of new applications received since the beginning of July.... As the new system for processing applications is now well established I am confident that improvements will be achieved in processing BSCFA applications for 2019”;

- Confusion among recipients who were expecting the allowance automatically, but who did not receive the payment and then had to reapply. In response to a Parliamentary Question on the issue in November 2018, Minister Doherty stated that “since 2010, in excess of 100,000 customers can be identified every year from the Department’s information systems as having an automatic entitlement to the allowance. These customers are notified of their entitlement and there is no requirement for them to make an application. In addition, approximately 45,000 customers may have an entitlement but need to apply to have this entitlement assessed”;
- Frustration for many applicants and recipients who could not contact the section within the Department by telephone to clarify the status of their application. These difficulties seem to have been exacerbated by limited phone contact hours, as advertised via the DEASP website;

Information staff in services throughout the country reported that these processing and communications difficulties were felt acutely by many clients who sought assistance in CISs – all of whom would have been dependent on their weekly social welfare payment to cover the considerable expense of returning their children to school.

Feedback on ‘Housing’ concerns

In the context of the main *Housing* category, there were 632 SPRs submitted in 2018 - which was a slight decrease (2%) on the 2017 figure. This the first year that we have seen a decrease in the number of housing-related returns from delivery services.



The focus of the housing concerns is most apparent in the SPRs that were logged in three main Housing sub-categories – reflecting the complex inter-relationship of issues related to both the private-rented market and social housing landscape. Fifty one per cent of the housing SPRs focussed on ‘Local Authority and Social Housing’, a further 21% on ‘Renting a Home’ and 13% on ‘Homelessness’ –

in particular, the specific sub-categories of '**Applying for Local Authority and Social Housing**' (105 SPRs) and '**Housing Assistance Payment**' (131 SPRs) registering most Returns.

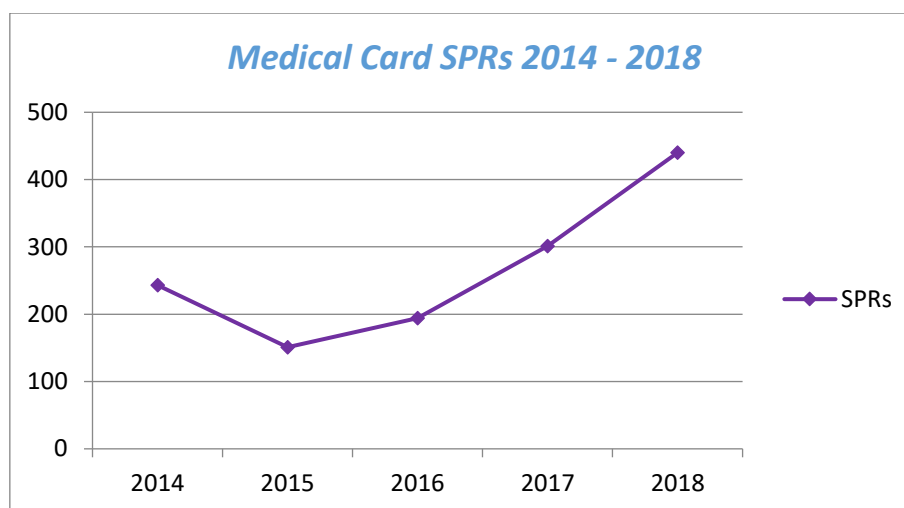
The key issues that posed difficulties for clients included the **level at which the income eligibility threshold for accessing the social housing** waiting list is set (with many services noting in particular that recipients of the Working Family Payment are deemed ineligible because of the payment) and the **difficulties for people in accessing (or transferring between) social housing waiting lists**. In many cases this involved a 2 – 3 month administrative processing period, which had a knock-on effect for tenants who were seeking HAP rental properties. Services also noted that for tenants who secured rental properties pending HAP processing, the **fact that arrears were not paid retrospectively** put them under significant pressure financially. Other key concerns included the underlying issues of the low level of social housing stock and the length of time that tenants are spending on social housing waiting lists.

Concerns that were raised by information staff around the HAP scheme include the limited stock of affordable private rented accommodation for HAP tenants – with particular difficulties caused by the level at which the rent thresholds are set (putting tenants under pressure to top-up the payment). The willingness of landlords to sign up to the HAP scheme continues to be reported as an issue for clients (particular for those who were asked to transfer from Rent Supplement to HAP). There were also a number of reports of difficulties for applicants in accessing HAP information and forms from local authorities.

Many of the SPRs that were submitted in relation to private rented accommodation also referenced the client's fear of homelessness. In addition to this, there 75 SPRs logged under the 'Homeless' subcategory – with much of the focus of these reports being on the difficulties in accessing emergency accommodation, and also the **problems for families living long-term in unsuitable emergency accommodation** or in over-crowded situations with extended family.

Feedback on 'Health' concerns

During 2018 the issue of Medical Cards continued to be the dominant one within the broad *Health* category - **Medical Card** related SPRs were the second most-logged SPRs by information staff during the year (after Illness Benefit) and these reports increased by 50% on the 2017 figure. The Medical Card was also the most-queried single issue in CISs nationwide during 2018 (logging over 64,931 queries – an increase of 10% on previous year).



Almost three quarters of the returns submitted in relation to medical cards were classified as access or administrative issues.

The main difficulty for clients during 2018 was in renewing, and applying for, their medical card online. Reports from services indicate that the online application system (which was launched in the latter part of 2017) is presenting difficulties for applicants who are not computer literate, **who do not have access to (or cannot afford) the necessary technology** to make the application (whether this is PCs, mobiles, tablets, scanning equipment or broadband), or people who have literacy or language difficulties. Services who have been supporting applicants in this process have also reported on technical difficulties with the system at various times during the year. In addition, services noted that for clients who are unable to renew their card online, the only option available to them is to request and send in a full application form – a much more involved process, which can add many weeks to the renewal process.

Other key issues that have been reported include cases where supporting documentation has been sent in by applicants but had not been received by the NMCU. In several cases reported by services, clients have been asked on repeated occasions to send in documents and, depending on the timing of the requests, some applicants have to re-submit the full application form. This, in turn, is leading to excessive delays in the processing of some applications (with between three to six month delays being reported in some cases). On the issue of correspondence from the NMCU, services have also reported regularly on the letters that are sent by the Unit requesting additional documents to support the application/ renewal, with many noting that applicants have to make further contact with the NMCU to ascertain which specific documentation is required.

Services also report on the difficulties caused by the fact that the staff that they speak with on the Medical Card helpline are not involved in the processing of the applications and that, at times, there seems to be a disconnect between these two aspects of the service from the NMCU. There are also concerns reported around the **application and awareness of the Medical Card Retention Scheme**, wherein some medical card recipients who take up work are entitled to retain their card for up to three years. Services have reported that, as this provision is not promoted widely (or highlighted in the application form), many recipients are not aware (or are not being assessed) in this context when renewing their card. Further, it is noted by services that these recipients are frustrated by the need to send a full application form when they take up work – despite the fact that their eligibility does not depend on their means under this provision.

Additional issues that have been reported during 2018 include the **ability of GPs in certain areas to take on new medical card clients**, confusion for people regarding the **reimbursement of expenses** when they have had to pay for medication or care while waiting for the outcome of an appeal against the withdrawal of the card, and also cases where young people living with their parents are unable to apply for the card as they are deemed to be living under the SWA threshold.

Feedback on 'Money and Tax' concerns

Within the broad area of **Money and Tax**, the number of SPRs (373) has increased by 27% on 2017 figures. Three quarters of the cases reported were highlighting administrative or access issues – with a particular underlying issue being highlighted across a range of query categories including *Income Tax Credits and Reliefs*, *Income Tax Credits and Reliefs for People with Disabilities*, *Income Tax Refunds* and *Revenue Online*.

The main issue highlighted by services during 2018 is focussed around the difficulties that their clients have been experiencing with the new requirements around online access to Revenue services. The cases reported during 2018 re-iterate many of the difficulties that were witnessed by services during the latter part of 2017 when Revenue confirmed that the *myAccount* facility was now the preferred single access point for all of Revenue's secure online services. Coupled with this change came the requirement that Revenue customers make an appointment in order to visit the regional/local offices to speak directly with Revenue staff, thus eliminating the option for drop-in consultations.

As we have seen in other instances, these new requirements seem to have disproportionately affected people who have limited literacy or English language skills, older people, people living in rural areas (with limited broadband access) and people with disabilities – many of whom are typically seeking advice from Revenue on what may be relatively complex tax affairs. Further, information services have pointed out that they can only offer limited support in such cases as, given the risk of malware, information staff cannot access (or create) clients email addresses to assist them in setting up the *myAccount* facility when they visit the CIC. The following difficulties were reported in multiple cases:-

- Difficulties for people who are trying to make contact with their local/ regional Revenue office by telephone (either to get clarity on an issue or to make an appointment), with calls often going unanswered or customers being placed on hold for long periods of time. Services have also reported that they, as a service, are unable to make general inquiries with the local Revenue office by telephone as a PPS number is required;
- Delays caused by these access arrangements are having a knock-on effect on people's ability to secure other payments and services, as well as the financial impact for people of delays in claiming tax credits (particularly when registering new employment), rebates and expenses.

Over-and-above these online-access issues, services have also reported particular issues relating to the **impact of differing treatment in the tax and social welfare codes**, where co-habiting couples are unable to transfer tax credits to their partner (as can happen in the case of married couples or those in a civil partnership).

Feedback on 'Moving Country' concerns

During 2018, there was a significant increase (over 70%) in the number of SPRs from services relating to the broad category of **Moving Country** when compared with 2017. Particular difficulties were evidenced in relation to the process by which people were **accessing the appointment service** offered through the Irish Naturalisation and Immigration Service at the Burgh Quay Registration Office in order to renew their residence permits (formerly known as GNIB Cards). The online-only appointment system was introduced in 2016 and allows non-EEA applicants to book an appointment for immigration registration and visa re-entry services up to ten weeks in advance.

Feedback from services during the latter part of 2018 indicated that a significant number of clients could not get an appointment within the timeframe allotted by the website. Many of the reports noted that clients were logging on to the online system on a daily basis over a number of weeks, but were still unable to secure an appointment in advance of their Irish Residence Permit lapsing. Depending on the timing for individuals, this could have knock-on effects in terms of accessing social welfare payments, employment, education and citizenship opportunities.

In a statement on the issue in the Dáil in February 2019, Minister Flanagan noted that *“some of these difficulties had arisen because third party agents had been able to secure multiple appointments through the use of automatic software. A set of software fixes was introduced in mid-September 2018 to prevent this abuse of the system. As far as can be determined, this software update has been successful in preventing the block booking of appointments by third party agents. The system is being regularly monitored in this regard. INIS is aware that some third party agents continue to book individual appointments with information supplied to them by customers. INIS strongly advises our customers not to provide sensitive personal data to these unregulated agents. I am also advised that INIS is currently developing a replacement online appointments system which will be operational later this year, and which is being designed to prevent the block-booking of appointments. This new system will also assist in streamlining and improving the current online booking process. As part of the INIS Service Improvement Plan 2018-2020, a number of other options are also being considered with a view to improving customer service and efficiency as well as meeting the growing demand for registration in Ireland”*.

CIS engagement with social policy feedback

The consistent growth in feedback (in the form of Social Policy Returns) from CISs and CIPS in recent years confirms an increasing appreciation and awareness among information staff of the role that policy plays in the provision of public services and also of how it affects the clients that they are dealing with on a daily basis. In the context of the feedback from CISs, the level of engagement in submitting Social Policy Returns has varied significantly across the network of CISs in the past – the Returns from the newly-formed regional companies are shown below and will provide the basis for future comparisons.



Section 5:

How policy is developed

Understanding policy formation and the legislative process

Political parties are distinguished from one another by the policies they offer to the electorate. One way of finding out about a political party's policies is by reading the promises in their **political manifesto**. Once a party gets into power, it sets out its policy agenda for its term in government in what is called the **Programme for Government**. However, public policy commitments set out in the Programme for Government may change significantly when it comes to delivering them for a variety of reasons, including funding restrictions; legal or technical difficulties; or shifting policy priorities. If two or more parties form a coalition, they usually have to compromise on some issues.

You can find out about the government's policy positions by reviewing:

- The current **Programme for Government** in which the government sets out its policy agenda for its term in office
- The budget which shows a government's financial commitment to certain policies
- Answers to Parliamentary Questions (PQs)
- Government Green Papers and White papers
- New or revised laws and regulations
- Funding plans for public services, such as education, health or social welfare, including the annual Budget and service budget plans , for e.g. [HSE National Service Plan](#)
- Websites of government departments or public bodies or agencies

Authority in Ireland is divided between the legislature (the Oireachtas), the executive (the government) and the Judiciary (the courts). The Oireachtas is the legislature of Ireland, consisting of:

- The President of Ireland
- Dáil Éireann (lower house)
- Seanad Éireann (upper house)

How laws are made

The material in this section is drawn from TASC's [Toolkit to Open Government](#) which provides detailed information on how government works. Resources from the Oireachtas Library & Research Service on legislative processes are also featured along with information from [citizensinformation.ie](#)

In any one year, between 30 and 50 new laws are enacted in Ireland. This means that they go before the Houses of the Oireachtas – the Dáil and the Seanad – as Bills (draft laws) before becoming Acts of the Oireachtas. All laws must be in accordance with the Irish Constitution, which is the country's basic law. Generally new laws must be introduced before any significant changes to policies can come into effect.

Because laws often deal with complex issues, they generally take a long time to prepare and enact. Bills are written by specialist barristers (parliamentary counsel) based in the Attorney General's Office. Because they must be drafted in legally precise language, they can often be difficult for non-experts to understand. There is also normally an Explanatory Memorandum published alongside the Bill. This sets out in non-technical terms what is proposed by the Bill. It can be useful to read both in

tandem. It can therefore take many years for government commitments to make their way onto the statute book as new laws.

In order to enact the Bills into legislation, each House of the Oireachtas separately debates and approve Bills. Detailed consideration of Bills take place in Oireachtas Committees. The Committees 'shadow' the work of government departments, including scrutinising proposed legislation.

After Bills are approved by the Dáil and Seanad, they must be signed by the President. If in doubt, the President has a power under the Constitution to refer Bills to the Supreme Court to check whether they are compatible with the Constitution. The President may do so only if she or he has grounds for believing that a Bill may contravene the Constitution.

The work of Oireachtas Committees

Oireachtas committees are sub-groups of legislators drawn from both government and opposition members of the Dáil and Seanad.

The idea behind the committee system is to allow tasks to be delegated to small groups of legislators who can operate more flexibly and effectively than the Houses themselves. One of the main roles of committees is to 'shadow' the work of government departments. This includes scrutinising draft laws and holding public hearings on issues that are relevant to the department whose work they are shadowing.

There are four different types of committee: joint, select, special and standing:

- A joint committee comprises members of both the Dáil and the Seanad.
- A select committee includes members from either the Dáil or the Seanad, but not both.
- A special committee is established for the sole purpose of considering a specific matter. It is usually given a deadline by which it must report back to the House(s).
- A standing committee is a permanent committee that is required by Standing Orders of either House to be established after a general election, for example, the Committee of Public Accounts.

The key functions of committees are

- Legislation – scrutiny of draft legislation in advance of its publication or before Committee stage; consideration and amending of Bills on Committee Stage; and consideration of draft EU legislative proposals
- Scrutinising the work of Government Departments – Ministers appear before Oireachtas committees to answer questions concerning all policy, expenditure and governance matters regarding their Departments
- Advising on policy issues – seeking submissions from and holding hearings with third parties; and conducting off-site visits and drafting reports outlining the committee's findings and recommendations with a view to influencing policy decisions or legislation.

The five stages in considering a Bill

Primary legislation starts life as a Bill. Bills can be introduced in either the Dáil or Seanad and proceed through five stages before being enacted into law. The second and third (or Committee) stages are the most important as they offer the fullest opportunities to discuss and amend the contents of the Bill.

The five stages are as follows:

First Stage: Permission is sought either by a Minister or Minister of State in either House to introduce the Bill. This involves presenting the title of the Bill to the Dáil (or Seanad). In effect, that just allows the Bill to be printed. The Bill is then circulated to all TDs (or Senators) and there is a second reading. Note that the text of a Bill is often complex, written in legal language and hard to read. Bills usually come with explanatory memorandums which simplify their content.

Second Stage: The Minister who is presenting the Bill explains what it is all about. This is a debate where the general principles are considered and this may result in amendments or improvements. When these are agreed, an Order is made for the Bill to be considered in Committee (or third) Stage.

Third (Committee) Stage: The Bill is considered in great detail at this stage and amendments may be put down either by the government or the Opposition. Much of the work of the Dáil and Senate is now done in Committees which have a significant role in the policy-making and policy-reviewing process.

Fourth (Report Stage): This consists of a review of changes made at the Third Stage and involves an overall discussion. Again, amendments may be put down and voted upon.

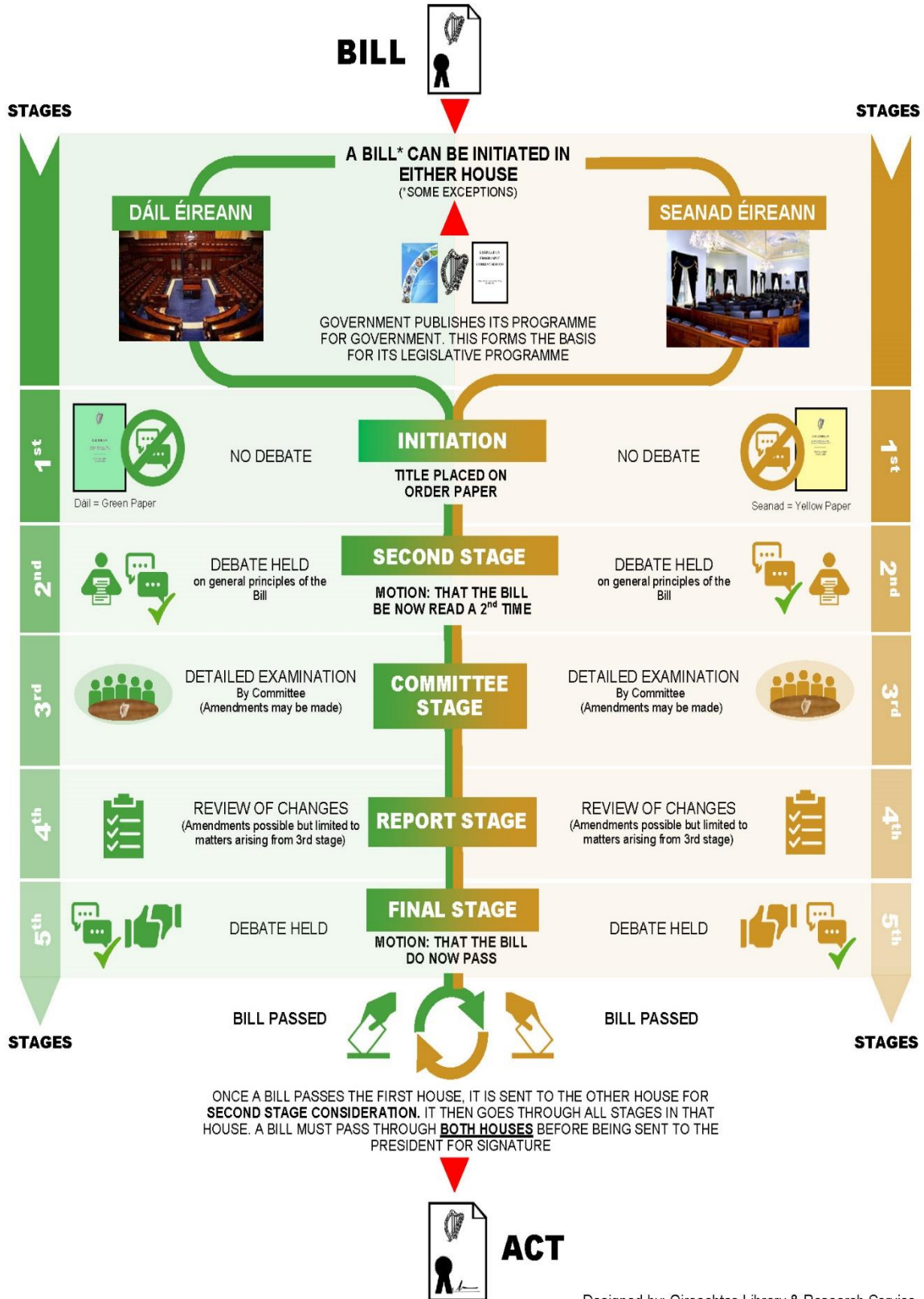
Fifth (Final) Stage: The Bill is sent to the other House (the Seanad) where a similar procedure is followed. A Bill amended by the Seanad is sent back to the Dáil for its agreement. The Seanad cannot amend or defeat a money Bill. It can amend and delay other Bills.

The Bill is finally considered before it is passed. When the Bill is passed by both the Dáil and Seanad, it is sent to the President for signature. The Bill is now an Act. It may become law immediately after the President signs or there may be a clause or clauses in it which specify when it will come into effect.

The stages are shown below in material reproduced with permission from the Oireachtas Library & Research Service.



THE OIREACHTAS LEGISLATIVE PROCESS





THE OIREACHTAS LEGISLATIVE PROCESS

THE 5 STAGES EXPLAINED

STAGE 1 INITIATION

DÁIL SEANAD

Standing Orders provide for two methods of initiating a Bill – (a) **presentation** and (b) **introduction**.

PRESENTATION

Where a Bill is to be **presented** (by Government, or parliamentary groups provided for in Standing Orders), the Bill is published by the Bills Office and circulated to Members.

OR

LEAVE TO INTRODUCE

Any Member may seek to **introduce** a Bill. The Dáil / Seanad must agree to a Motion before the Bill can be published and circulated to Members. If this Motion is agreed, the House makes an order for Second Stage and the Bill is published by the Bills Office.

In either case, the text of the Bill must be examined by the Ceann Comhairle / Cathaoirleach for compliance with Standing Orders who must also approve an outline description of its purpose (known as the *long title*). If the Bill complies with Standing Orders, its *short* and *long* titles are then placed on the Order Paper.

Exceptions: All Bills may be initiated in either House *except* (a) Money Bills (Dáil only); (b) Bills to amend the Constitution (Dáil only); and (c) Private Bills (Seanad only).

STAGE 2 SECOND STAGE

DÁIL SEANAD

Debate at Second Stage is on a motion, "That the Bill be now read a second time" (the motion for second reading) and relates to the content of the Bill. Limited amendments are possible but only to either **delay the motion** or to **state a special reason against the second reading**. The proposing Member (usually a Minister) speaks on the motion, followed by the main spokespersons of each of the political parties / groups, and finally all other Members. In the case of Private Members Bills (PMBs) the role is reversed.

STAGE 3 COMMITTEE STAGE

DÁIL SEANAD

All sections of the Bill are examined by a Committee. Opposition and Government Members (TDs/Senators) use this opportunity to discuss possible amendments and the reasons why changes to the Bill are necessary. The Minister indicates which amendments may be supported / opposed and clarifies the Bill's provisions.

In the Dáil, a Select Committee is the norm but a Committee of the whole House is also possible, as are Special Committees. Committee / 3rd Stage in the Seanad generally takes place in **Committee of the whole Seanad** but may be considered in a Special Committee.

STAGE 4 REPORT STAGE

DÁIL SEANAD

The outcome of Committee Stage (3rd Stage) is reported back to the House for consideration. Amendments may be made but scope for amendments is limited to matters arising out of Committee Stage (3rd Stage).

STAGE 5 FINAL STAGE

DÁIL SEANAD

A final debate and vote on the Bill is held. The Bill is revised to take account of agreed amendments and the debate takes place on a motion "That the Bill do now pass". The Bill is then sent to the other House and is re-entered at 2nd Stage. If a Bill is amended in the other House, it must be returned to the first House for those amendments to be considered. Once a Seanad Bill has been amended by the Dáil, it becomes a Dáil Bill.

WHAT ARE STANDING ORDERS?

Article 15.10 of [Bunreacht na hÉireann](#) (the **Constitution**) gives both Dáil Éireann and Seanad Éireann the power to make rules for the conduct of business – the [Standing Orders of the House](#). The Standing Orders are the written rules of procedure that have been decided and adopted by the House itself. The rules cover a broad range of topics, from the declaration which must be made on election by the Ceann Comhairle, to the deadlines for the submission of motions for the Order Paper.



WHAT IS THE ORDER PAPER?

The [Order Paper](#) is a single document which contains details of all the items of business which are before each House (items such as Bills and Motions). On the first sitting day each week, the Order Paper contains all business before the House. On subsequent days a shortened version is produced, containing only business scheduled for that day and notice of new business.



WHAT IS A MONEY BILL?

A **Money Bill** refers to financial legislation (changes to taxation, or public expenditure).

Under Article 20.1 of the Constitution, Seanad Éireann can not initiate Money Bills but can make recommendations (not amendments) to such Bills.

WHAT IS A PRIVATE BILL?

A **Private Bill** is a piece of legislation which is promoted by local authorities, private organisations or individuals. These are rare.

Implementation of Bills

The enactment of primary legislation (Acts) is not the end of the policy path. When policy is enacted (signed into law) it still has to be implemented. Implementation is a complicated (and sometimes very slow-moving) business.

One of the ways in which an Act gets implemented is through Statutory Instruments. There are five main types of statutory instrument: orders, regulations, rules, bye-laws and schemes. Statutory Instruments are not enacted by the Oireachtas but allow persons or bodies to whom legislative power has been delegated by statute to legislate in relation to detailed day-to-day matters arising from the operation of the relevant primary legislation. Specified government Ministers and other agencies and bodies are authorised to make Statutory Instruments. Several hundred instruments are made annually.

Here are two examples of statutory instruments that CISs are likely to come across:

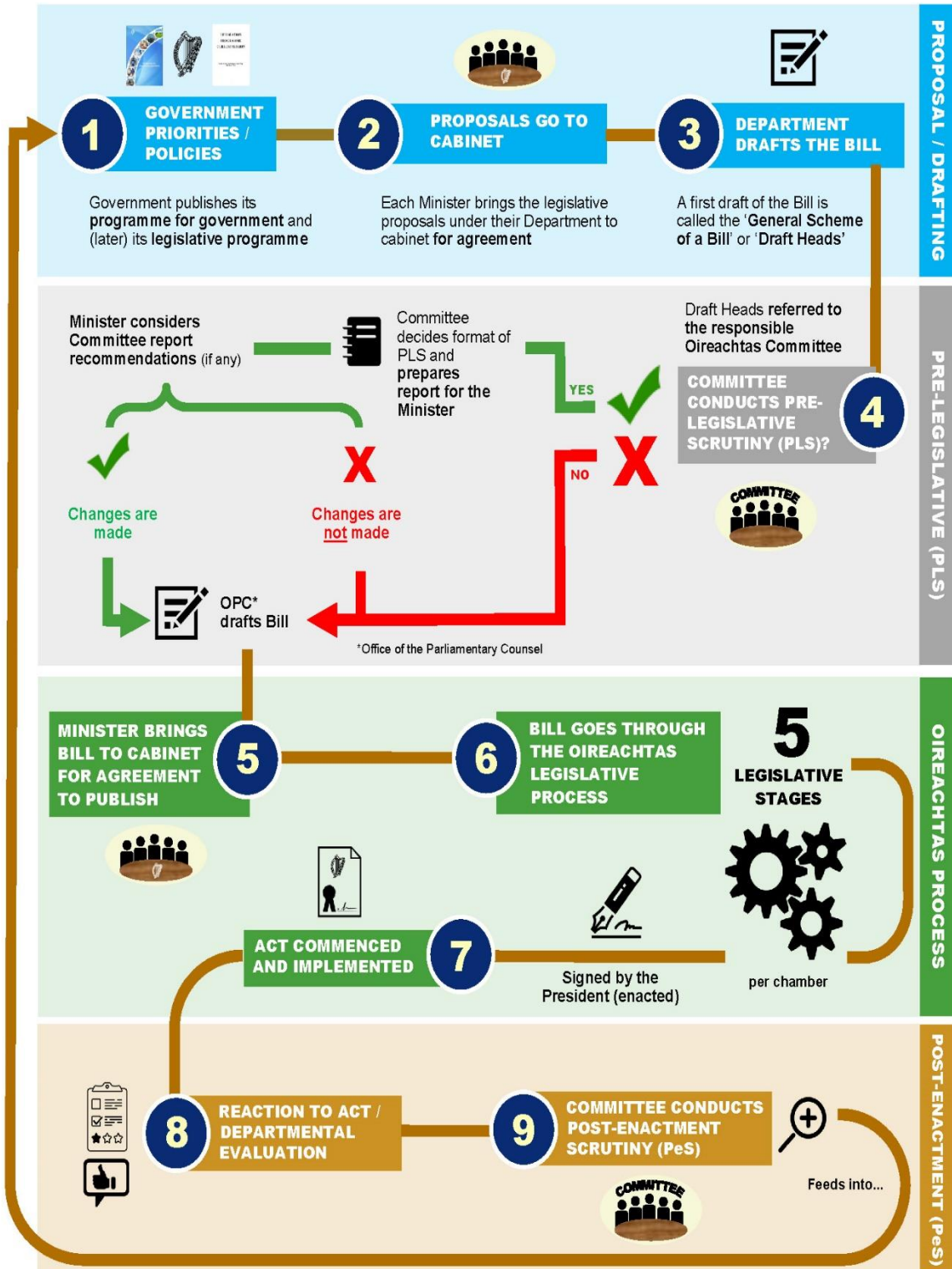
- S.I. No. 26/2013 — Social Housing Assessments (Summary) Regulations 2013
- S.I. No. 25/2013 — Social Welfare Act 2012 (Section 13) (Commencement) Order 2013

Finally, because laws deal with complex issues, they take a long time to prepare and enact which is one reason why social policy work is slow to bring results.

See below a visual representation (prepared by the Oireachtas Library and Research Service) of the process a Bill goes through before it becomes an Act. The graphic makes clear how complicated that process is.



THE LEGISLATIVE REVIEW LOOP OF GOVERNMENT LEGISLATION



April 2017

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THE LEGISLATIVE REVIEW LOOP OF GOVERNMENT LEGISLATION

PROPOSAL / DRAFTING

- Once a new policy is approved by Government and following consultation with the Attorney General's Office, the responsible Department prepares the draft heads of the Bill and Memorandum to Government for approval (with the advice of the Office of Parliamentary Counsel (OPC) within the Attorney General's Office).
- The Department then prepares the draft Heads in numbered Heads. Each Head should comprise (a) instructions for drafting and (b) explanatory notes.
- The draft Heads are circulated to the Department of Finance and to every other Department which may be concerned, as well as to the Attorney General's Office.
- Following this consultation, the draft Heads are revised. The draft Heads and Memorandum are then submitted to the Government for approval to publish.

PRE-LEGISLATIVE SCRUTINY (PLS)

- The purpose of PLS is to enhance the democratic process by allowing Members of the Dáil/Seanad to consider and debate legislative proposals before the final Bill is published.
- When the draft Heads are approved at cabinet, they are referred (by a letter from the Minister) to the relevant Oireachtas Committee requesting that PLS be undertaken. This letter should outline the Department's own pre-legislative preparatory work in advance of drafting the Heads and provide a list of all stakeholder submissions received (if any).
- Dáil Standing Orders (146A) give Committees the power to consider the Heads of Bills, but do not require them to do so.
- Where the Oireachtas Committee decides **not to proceed** with PLS (i.e. that consideration is not necessary), the Committee Clerk must inform the Minister in writing.
- Where the Oireachtas Committee decides to **proceed** with PLS, the Committee Clerk must inform the Minister in writing and detail the proposed timelines.
- PLS stage (usually) takes 8 weeks from publication of the Heads to publication of the Committee report. Ideally, drafting of the Bill awaits the PLS report from the Committee.
- Many different forms of PLS "report" can be produced by the Committee including:

(A) Letter / Communiqué	(B) Report	(C) In-depth Report
<p>Summarising the following:</p> <ul style="list-style-type: none"> Key issues raised by stakeholders and experts (thematic) Written submissions received Committee / hearing transcripts (usually included as appendices) 	<p>Incorporating the following:</p> <ul style="list-style-type: none"> Key issues raised by stakeholders and experts (thematic) Committee recommendations Some (brief) policy / legislative context and policy implications 	<p>Incorporating the following:</p> <ul style="list-style-type: none"> Key issues raised by stakeholders and experts (thematic) Committee recommendations Full, broad policy context and legislative background Policy implications Performance indicators

OIREACHTAS PROCESS

- When approval is given by the cabinet, the responsible Minister will request the Attorney General arrange for the drafting of a Bill. The OPC then assumes responsibility for the drafting of the Bill.
- The OPC drafts the Bill in conjunction with the legislative section in the Department.
- When the Department and the OPC are satisfied with the draft Bill, and all legal and outstanding policy issues have been resolved, the Parliamentary Counsel assigned to draft the Bill will transmit the final draft to the Department.
- The Minister will then present the Bill to cabinet for a decision to publish the Bill.
- Parliamentary Counsel also draft all Government amendments that are moved at Committee or Report Stage during the passage of the Bill through the Houses of the Oireachtas.

POST-ENACTMENT (PeS)

- The primary purpose of post-enactment scrutiny (PeS) is to ascertain whether the legislation (a) has achieved the original policy objective (b) should continue in force in its current form (c) requires amendment in some way; or (d) should be repealed or revoked in its entirety.
- PeS allows the Oireachtas to close the Legislative Review Loop and, among other things, improve the implementation and delivery of policy objectives, and expose teething problems to inform new legislation.
- PeS by Oireachtas Committees is mentioned in the Government's Programme for a Partnership Government and is set down in Standing Order 164A (Dáil Éireann) and Standing Order 137A (Seanad Éireann). This states that 12 months following enactment of a Bill (except the Finance Bill and Appropriation Bill), the responsible Minister will provide a report which "reviews the functioning of the Act". A number of PeS reports have been published by Departments to date including 4 in 2016. All PeS reports are available in the Library's online public access catalogue at opac.oireachtas.ie

REGULATORY IMPACT ANALYSES

The draft Memorandum seeking Government / cabinet approval for the General Scheme of a Bill should also be accompanied by a Regulatory Impact Analysis (RIA) for legislation involving changes to the regulatory framework. A RIA is a tool used for the structured exploration of different options to address particular policy issues including:

- Any possible side effects or hidden costs;
- Likely costs of compliance on the individual citizen or business;
- Costs of enforcement on the State;



The RIA Guidelines are available from the Department of An Taoiseach [here](#) (June 2009).

"EXCEPTIONAL CIRCUMSTANCES"

The Heads of all Bills, except in "exceptional circumstances" will be provided by Ministers to the relevant Oireachtas committee. "Exceptional circumstances" include:

- Emergency Bills;
- Bills which are required to implement Budget changes such as the Finance Bill and Social Welfare Bill;

OFFICE OF THE PARLIAMENTARY COUNSEL TO THE GOVERNMENT (OPC)

The OPC is a constituent part of the Attorney General's Office. The Attorney General is the legal adviser to the Government under the Constitution.

While no Government Bill can be initiated in either the Dáil or Seanad unless it has cabinet approval, a draft Government Bill will not be placed on the agenda for cabinet unless it has been drafted and cleared by the OPC.

The OPC also provides drafting advice to the Department in the drafting of the General Scheme / draft Heads.

Keeping up with policy developments

Key sources for identifying 'policy' on a particular topic are listed in the TASC [Toolkit for Open Government](#) as:

- the Programme for Government, effectively a government's 'work plan' for its period in office. These are typically based on political parties' pre-election manifesto promises. Programmes for Government change when new governments take office. Read the current Programme for Government.
- the Budget, this shows in money terms the government's commitment to certain policies.
- national plans from government departments or public bodies or agencies, which often set out targets, objectives and performance indicators.
- laws and regulations including Acts of the Oireachtas and secondary legislation or statutory instruments.
- government department consultation papers and proposals, including Green Papers and White Papers.
- government circulars which provide information, guidance, rules, and/or background information on policy or procedural matters, such as those issued by the Health Service Executive.
- parliamentary statements made by government Ministers, including answers to Parliamentary Questions.
- media statements made by government Ministers, or announcements in official press releases or speeches, including the regular stream of announcements from the Government Press Office, www.merrionstreet.ie.
- reports or analysis by public agencies.
- reports or analysis from international bodies, like the EU, the UN or the OECD.
- reports or analysis by the media around a given topic or issue, including social media and alternative media.
- academic books or papers with up-to-date reviews of a topic or issue.
- published research or analysis of a topic by activists or interest groups.
- official statistics, including public spending data.
- testimony by people who have first-hand experience of issues (this information may be reported in the media or available via community organisations).

Individuals and organisations who come across **policy shortcomings or implementation gaps** on a daily basis can put this experience to good use by bringing problems to the attention of policy-makers. Many groups working for change also often try to come up with workable suggestions as to how improvements can be made. CISs and CIPS are in a good position to do this, given their level of engagement with members of the public.

When feeding back information about the way in which policy (and its implementation) is affecting people's lives, it is very useful to know something of the policy context in which services are being delivered. This can help you to focus your feedback and to identify the key policy issues. It can also help you to recognise instances where services being delivered are 'out of step' with or do not fully meet the policy intent.

Here are some ways to keep up to date with policy in an area that interests you:

- Get in contact with organisations already **campaigning on an issue** you are interested in, or which are working in a related area
- Attend **talks and seminars**. It can be valuable, both in terms of hearing discussions, but also to identify experts, public officials and interested parties on a given topic

- Sign up for **updates or events** hosted by think-tanks and representative organisations, such as trade unions or employers' groups. These can be useful sources of expertise
- **Read blogs and websites** of research institutes, government departments, non-governmental organisations and media outlets. They are also useful sources for ongoing information and analysis on policy developments
- Attend Oireachtas **debates** and **committee hearings** or watch on television

Here are some recent policy documents that you might like to read:

- [National Disability Inclusion Strategy 2017 - 2021](#)
- [Make Work Pay](#)
- [Rebuilding Ireland](#)

To read more about the legislative process, go to:

www.taoiseach.gov.ie/eng/Taoiseach_and_Government/The_Government/ or download www.revenue.ie/en/about/publications/legislative-process.pdf or www.fsai.ie/legislation/irish_legislative_process.html

To check on the progress of a Bill or look up the full list of current bills. Go to:

http://www.taoiseach.gov.ie/eng/Taoiseach_and_Government/Government_Legislation_Programme/State_of_Play_of_Bills_before_the_D%C3%A1il/

You can find out "Who's Who" in your policy area:

There is a detailed listing of relevant policy-related organisations and websites in the Resources Section of this Guide for further policy-related resources.

Private Members' Bills

Individual members of the Dáil and Senate can introduce their own Bills. If you would like to learn more about the Private Members' Bill (PMB) Process in Dáil Eireann, the following link brings you to an Oireachtas Library and Research Service infographic on this topic.

https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2018/2018-06-26_the-private-members-bill-pmb-process-in-dail-eireann_en.pdf

Section 6:

Tracking the Impact of CIB Social Policy Reports: Submissions and Research

Tracking the Impact of CIB Social Policy Reports: Submissions and Research – A Preliminary Analysis

This section is a paper written by Dr Michael Browne for the Social Policy sub-committee of the board of the Citizens Information Board, May 2019

Overview

Priority areas that are identified in CIB policy reports, submissions and related research are often reflected to a greater or lesser extent in policy changes and many CIB recommendations are eventually taken on board (fully or partially) and subsequently addressed in legislative, policy or administrative changes. Some areas are quite specific, others are more general. Some changes take a long time to filter through, e.g., extension of PRSI benefits for self-employed.

While clear linkages between CIB policy proposals and policy changes are not always evident, CIB recommendations frequently mirror those of other agencies, in particular, NGOs (e.g., SVP, Family Carers Ireland, Social Justice Ireland, Threshold). It is thus reasonable to suggest that the CIB is very much part of the of the social policy development infrastructure in Ireland.

The tracking exercise carried out in this document provides a useful indication of where CIB feedback and policy proposals are reflected in policy and in administrative changes introduced. It does not address the wide range of areas where CIB recommendations have not been taken on board. This matter would obviously lend itself to further analysis. A possible approach to this has been outlined in a separate Draft Document, Guidance for Assessing the Impact of CIB Social Policy Feedback which could be applied to selected thematic areas which have been the subject of CIB policy feedback and proposals for change on a recurrent basis over a number of years.

Structure of Document

This document provides a snapshot of CIB policy submissions and reports in recent years and seeks to identify their impact where this can be tracked and identified.

Section 1 identifies a number of policy areas where CIB policy feedback and recommendations were broadly reflected in policy changes over the past 15 years.

Section 2 illustrates proposals in three recent CIB Pre-budget Submissions and identifies any related budgetary provisions. A summary of a sample of CIB responses to public consultations for the period 2016 -2018 is included in an Appendix.

Section 1: CIB policy feedback and recommendations and policy changes

Figure 1 provides an overview of CIB policy recommendations and related policy changes under a number of categories:

- People with disabilities
- Housing
- Health entitlements
- Financial inclusion and mortgage debt
- Pensions and benefits
- Employment rights
- Supports for family carers

- Other policy areas

Figure 1: Selected CIB recommendations and related policy changes

Policy Area	CIB Proposal/s	Relevant policy changes/developments	Media Coverage
People with disabilities	Supported decision-making and independent advocacy The concept of supported decision-making proposed by CIB and specifically in submissions on the Assisted decision making capacity legislation A need to make legislative provision for independent advocacy highlighted in all related submissions	Supported decision-making and included in Assisted decision-making (Capacity) Act 2015. Ratification of the UN Convention on the Rights of Persons with Disabilities Legislative provision for independent advocacy now included in Draft legislation.	
	Inclusion of people with disabilities in Housing needs assessment Recommended in The Right Living Space – A CIB/DFI Joint Report);	Local Authorities required since 2008 to include people with disabilities in their assessment of housing	
	Housing Strategy for People with Disabilities Recommended in The Right Living Space	The Right Living Space strongly referenced in the National Housing Strategy for People with Disability (2011).	
	Make Work Pay CIB Submission	Significant references to CIB submission and recommendations included in 2017 Make Work pay Report; actions for CIB and CISs are also included in the report. CIB was a member of MWP Interdepartmental Group.	
	A personalised budgets approach to service provision for people with disabilities – included in various CIB submissions and strongly supported in 2017 Submission on the matter;	Task Force on Personalised Budgets Report published by Dept of Health in June 2018; Matter under ongoing consideration by Government.	
	Cost of Disability The need for a Cost of Disability regularly called for by CIB over the years and recommended in The Right Living Space and other submissions	Budget 2019 provided €300,000 for the commissioning of research on the cost of living with a disability.	
Housing	Housing Assistance Payment A long-term unified housing support payment to be administered by Local Authorities called for by CIB over for many years; HAP social policy report commissioned and published in 2017 – identified issues	Now an integral part of social housing provision.	HAP report featured on RTE evening news along with coverage of successful CIS WRC cases

Policy Area	CIB Proposal/s	Relevant policy changes/developments	Media Coverage
	emerging re roll-out of scheme. The CIB PBS also featured key priorities re accelerated rollout of HAP.		on equal treatment for HAP claimants. CIB PBS covered in Irish Times re housing queries.
	Private Rented Housing Sector A wide range of issues identified in CIB Rental Strategy Submission and in various other submissions.	Strategy for the Rental Sector published in 2016 issues identified by CIB featured.	Link to Irish Times article on CIB Annual Report 2017
Health matters	Medical Cards Issues relating to the administration of the Medical Card system regularly highlighted specifically in submissions to National Medical Card Unit and in submission to HSE Primary Care divisions;	A number of changes to the Medical Card Application system to make it more user friendly; policy gaps highlighted around retention of medical card on starting work and entitlement under EU rules. Ongoing engagement/dialogue between CIB and NMCU	
	Medical card for DCA recipients Recommended in CIB Submission to the Expert Panel (June 2014)	Implemented from June 2017	
	Home care services Shortfalls in provision and regulation of home care services highlighted over the years and in 2017 CIB response to DoH consultation.	The 2018 report of the outcomes of public consultation on how home care should be delivered broadly reflected the CIB view.	CIB submission picked up by Irish Ind. 12/2/18.
	Charges for residential care services Illegal charges on residents in nursing homes and other residential care facilities highlighted by CIB since the 1990s.	Eventually resulted in substantial refunds to people affected under the Health Repayments Act 2006.	
	Means-testing of families of nursing home residents highlighted by CIB in various submissions.	Abolition of means-testing of families of nursing home residents in respect of Nursing Home Subvention.	
	Micro-credit Briefing paper to Minister in 2013 highlighting issue of financial exclusion	Subsequent roll-out of Micro-Credit Scheme 2/3 years later - low cost loans now widely	

Policy Area	CIB Proposal/s	Relevant policy changes/developments	Media Coverage
<i>Financial inclusion, mortgage arrears and debt</i>	which proposed a personal micro-credit scheme.	available through a Credit Union.	
	Report Mortgage to Rent Scheme: An Analysis of Mortgage Arrears among South Mayo MABS Clients (2016)	Following a review of the mortgage-to-rent scheme, several changes were announced in February 2017; An increase of €5 million in Budget 2018 for expansion of MtR Scheme.	
<i>Pensions and benefits</i>	State pensions (Contributory) Averaging Rule – Changes urged by CIB in various submissions, e.g., 2018 PBS which advocated for the Total Contributions Approach to address the impact of the 'averaging' rule.	Since March 2018, people who applied for the State Pension (Contributory) after 1 September 2012 and whose pensions were reduced were reassessed under a Total Contributions Approach.	
	Self-employed Provision for additional social insurance cover strongly argued for in 2012 Report, Hard Times for the Self-employed and in various submissions.	Invalidity pension extended to self-employed in December 2017; Budget 2019 announced the extension of Jobseeker's Benefit to self-employed in late 2019.	
	Illness Benefit Feedback to DEASP (October 2018) on difficulties experienced by many Illness Benefit applicants following the introduction of new illness certification forms and processes.	The DEASP advised that CIB delivery services would be facilitated via email; Additional resources to managing both the helpline and email queries were provided; An Independent review of the changed administration of the scheme flagged.	
<i>Employment rights</i>	The need for a new system for enforcing employment rights highlighted by the CIB (From Information to Redress 2006); Issuing of employment permits to employee rather than to employer called for.	The Workplace Relations Commission eventually established in 2015. New legislation introduced in 2014 to enable this.	
<i>Supports for family carers</i>	A National Carers Strategy called for (Supporting Carers 2002); Introduction of Half-rate Carers Allowance recommended in various CIB submissions;	A National Carers Strategy published in 2012; Half Rate Carers Allowance introduced circa. 2005;	
<i>Other policy and research areas – See Appendix</i>	Returning Emigrants - CIB Submission in relation to Government consultation.	CIB featured in the Indecon report and subsequent allocation of resources to CIB to develop information content within citizensinformation.ie.	

Policy Area	CIB Proposal/s	Relevant policy changes/developments	Media Coverage
	Submission to Comreg on a review of non-geographic numbers. CIB Research into information needs and experiences of Deaf Community in accessing public services.	CIB evidence cited extensively in Comreg published report. Launched by Minister Regina Doherty Feb 18- coincided with legislation on recognition of sign language and requirements for public bodies. Extra resources provided to SLIS under NDIS.	

Section 2: CIB Pre-budget Submissions and related budgetary provisions

Budget 2019

An analysis of Budget 2019 shows that its provisions contain a number of measures that reflect issues that were raised in the CIB Pre-Budget Submission. The main social protection elements include a €5 weekly increase across all basic social welfare payments. For those on jobseeker payments, this brought the full adult rate to €203 – just short of the 2009 rate of €204.30.

There was an increase of €2.20 weekly for each qualified dependent child under 12 and €5.20 per week in respect of 12 and over, as well as a €25 increase in Back to School Clothing and Footwear Allowance rates. There was also an increase (€20) in the earnings disregard for the One Parent Family Payment (and Jobseeker's Transition Payment) and a new maintenance disregard (of €95) in respect of housing costs for the Working Family Payment. This reflects a focus on more targeted measures as proposed by CIB and should help in the broader context of enabling people to combine welfare supports with work – a key element of the CIB Pre-budget Submission. In this context also, there were changes announced to the threshold for families in accessing the Affordable Childcare Scheme which should pull more low-income households into that targeted support measure. The CIB Pre-Budget Submission also highlighted the issue of fuel poverty and recommended a Cold Weather Payment – while the latter was not introduced, the extension of the Fuel Allowance season was increased by one week

Fig. 2 Budgets 2017-2019: Selected CIB Recommendations and Related Budgetary Provisions

Budget Year	CIB PBS Proposals	Relevant Provisions in Budget
Budget 2019	Continue to phase out the reduced rate of payment of Jobseeker's Allowance to those 25 years and under;	People aged 25 and under to get full €5 across the board increase;
	Develop a streamlined, overarching system of subsidised childcare that provides affordable, quality, full-time childcare options for low income families;	Additional funding of €89 million provided for the Affordable Childcare Scheme; Changes to the income thresholds;

Budget Year	CIB PBS Proposals	Relevant Provisions in Budget
	Increase Fuel Allowance and introduce a Cold Weather Payment Scheme;	Fuel Allowance season extended by one week
	Continue to extend social insurance coverage to the self-employed, including provision for unemployment;	Jobseeker's Benefit to be extended to self-employed in late 2019.
	Address the continuing impact of mortgage arrears and household debt on low income clients	€23 mill. Allocated to Mortgage-to-Rent Scheme for 2019 (increase of 1 mill. in 2018)
Budget 2018	The further resourcing of accessible and affordable childcare;	Full second year of ECCE free pre-school scheme, increased capitation grant of 7% for all ECCE services;
	Refine FIS through the development of a new Working Family Payment;	Working Family Payment (replacing FIS), with increase in income threshold; Extension of Back To Work Family Dividend;
	Address particular hardship for young jobseeker claimants who cannot live in the family home;	Increase of €5 (full, not pro rata) for under-26 jobseekers claimants;
	Increase the rate of Qualified Child Increase for teenagers;	Increase of €2 for each Qualified Child on all relevant weekly payments;
	Need to increase resources for home care packages	Increase of €37 million for home care packages;
	Provide increased resources to LAs for Housing Adaptation Grant to enable older people to live in their own homes;	Increase of €5 million in funding to Local Authorities for Housing Adaptation Grant; (total allocation = €53 million);
	Need for improved supports for lone parents	An increase of €20 in the income disregard for those in receipt of the OPFP and JSTP;
Budget 2017	Provide additional supports for under-26 jobseekers	Increase in the Back To Education Allowance for under-26s; Reduction in the personal rent contribution for under-26 RS recipients;
	Develop measures to enable greater participation by people with disabilities in the workforce;	A commitment of €2 million in the Budget to provide 'pre-activation supports' for people with disabilities,
	Self-employed	Invalidity Pension extended to self-employed from December 2017;
	Provide for a reformed Working family Payment	Post-budget commitment by Minister to reform FIS in 2017

Appendix 1: Sample of CIB responses to Public Consultations

Automatic Enrolment Retirement Savings System: A response to DEASP Public Consultation Process (December 2018)

The CIB submission commented on the proposal in the context of a number of its core elements:-

- **Administrative arrangements and organisation approach:**
- **Employer and employee contribution rates:**
- **Range of investment options available to members:**
- **Arrangements for benefits and pay-out phase:**

The CIB submission noted the importance of information for members at the pay-out phase – a view which is based on the delivery service experience of the large numbers of soon-to-retain people who approach services for advice and information in the context of the pay-out phase of current pension provisions. Over and above the specific elements of the 'Strawman' proposal, the CIB submission also drew attention to the spouses of AE members and suggested the need for various protections for AE spouses in the event of death, divorce or judicial separation. The submission also highlighted the absence of any discussion in the Strawman document of the interaction between the AE scheme and means-tested benefits. It suggested that, once levels of projected benefits from various AE schemes become clear, the impact on eligibility for means-tested benefits should be analysed and addressed.

Submission to the National Digital Strategy (November 2018)

The CIB submission set out its position by noting the three most important areas that the Strategy should focus on: - digital public services; inclusion and well-being; and trust, security and privacy. The submission suggested that one of the main challenges in the delivery of digital public services was the unintended consequence of reducing access to public services among low income groups (including older people, those with disabilities, and those with low levels of education, literacy or computer literacy) – a trend which seems to be increasing among clients who attend CICs having encountered barriers in accessing online services. The submission noted that these groups are further impacted by issues of affordability (in terms of connectivity and equipment) as well as the uneven penetration of broadband across the country.

The submission concluded by noting that, in order to ensure inclusivity, three key areas need to be addressed in a national digital strategy:-

- The provision of digital assistance (also known as *assisted digital*) to people who cannot access digital services directly. Of crucial importance here is the fact that the underlying service is fully digitised but access to the service can take a non-digital route;
- The provision of broad-based education to ensure that those who can benefit from digitisation are fully able to benefit (in other words, education across ages and societal groups);
- The need to build trust in digital services - citizens need to know why a particular path has been chosen and how their personal data will be treated (with particular reference to GDPR)

Home Care Consultation Report (June 2018)

The CIB submission to the Department of Health argued for a shared funding approach between the individual and the State and for equality of access to funding for home care and nursing home care, with some in-built bias for home care.

- A need for a standardisation of the provision and access to home care services
- The need for increased investment in home care services and, in particular, the avoidance of reductions in the allocation of exchequer funding for home care, which has happened on occasions despite an increase in demand

- Broad support for the Government’s proposal to create a new regulatory environment for home care.

Central Bank consultation on money-lending: Review of the Consumer Protection Code for Licensed Moneylenders (June 2018)

The submission stated that any review of the Code must be considered in the broader context of the alternatives available to low-income borrowers – noting that many MABS clients have few choices when considering credit options and are, thus, reliant on the moneylending sector (regardless of whatever business model or cost applies). In this context, it highlighted the role of the Credit Union “It Makes Sense” loan (which CIB was instrumental in getting off the ground with a policy paper which was submitted to the Minister for Social Protection) and the need to further expand its roll-out across the Credit Union Sector. The submission also highlighted the MABS experience of licensed moneylenders, suggesting that many borrowers do not fully understand the overall cost of credit, or the cost relative to alternatives.

Advance Healthcare Directives (May 2018)

In May 2018, CIB made a submission to the HSE in respect of its consultation on Advance Healthcare Directives Codes of Practice. Notwithstanding the positive implications of advance healthcare directives, the submission notes that the application of advance care planning in practice is complex and that the attitudes, beliefs and practical considerations of health professionals have been shown to influence the uptake of Advance Care Directives. The need for recognition of the role of independent advocates in the Codes is also noted, as health and social care practitioners will encounter advocates who will be assisting people with expressing their will and preference in cases where capacity issues arise. The Submission also suggested the need for an ‘easy read’ version of the document on How to Make an Advance Healthcare Directive, in order to improve accessibility for all. (NAS also provided a response to this consultation).

- The HSE has indicated that, following the consultation process, the draft codes of practice will be amended, signed off by the Advance Healthcare Directives Multi-Disciplinary Group and submitted to the Director of the Decision Support Service, for consideration.
- Legislative provision for Independent advocates is being made under the Safeguarding Vulnerable Adults Bill 2017 and a Code of Practice for Independent Advocates is being developed by the Decision Support Service.

Submission on the Deprivation of Liberty: Safeguarding Proposals (March 2018)

The CIB submission addressed a range of specific questions put by the consultation in relation to the main provisions of the draft legislation (or ‘Heads’) which cover such areas as definitions of key terms and words, the application of the safeguarding legislation and the person’s capacity to make a decision as to where they live, admission procedures in both routine and urgent situations (specifically regarding legal authority and the role of medical evidence) and the use of restraint practices (in the context of deprivation of liberty, rather than for therapeutic reasons). The draft Heads of Bill also elaborate on areas such as review processes, record keeping and arrangements for existing residents once the legislation commences.

The CIB Submission broadly reflected the views of other agencies with an interest in this area. Work on progressing the legislation is ongoing in conjunction with related pieces of legislation, e.g., the Adult Safeguarding Bill 2017 and the National Adult Safeguarding Policy being developed for the health sector.

Submission to Commission on the Future of Policing in Ireland (2018)

The insights provided were based on the experience that CIB delivery services have in reaching out to vulnerable and marginalised groups in Irish society - such as people on low incomes who are living in deprived communities, people with disabilities and mental health difficulties, Travellers, and new communities/ immigrants. The submission went on to highlight specific areas which CIB felt require additional attention from An Garda Síochána – dealing with illegal moneylenders, access to policing by the Deaf Community, engaging marginalised and new communities, and helping victims of abuse (with specific mention of institutional abuse).

The Report of the Commission on Policing, while necessarily addressing issues of state security, is heavily focused on the protection of vulnerable people and the need to respect human rights.

Pensions anomaly and pension reform plans (2017)

CIB has raised this issue on a number of occasions during the past number of years in various submissions – most recently in the 2018 Pre-Budget Submission, which pointed to the “difficulties caused by the application of the ‘average’ rule, the 2012 changes to eligibility criteria (which delivered an effective cut in pension income for many pensioners), the limited application of the Homemaker’s Scheme for the current/ upcoming generation of pensioners and also the complexity of various PRSI classes”. The submission also noted that “these complications are serving to disproportionately affect women who took time out of paid work to care in the home, at various intervals in their working lives and services continue to submit case studies from clients which evidence such a gender gap in pension provision”.

Minister Regina Doherty has re-stated the Government’s intention to move to a total contributions approach from 2020 – but has noted that this would only apply to new entrants in the workforce from that time.

Public Consultation on Personalised Budgets for People with Disabilities (2017)

While noting that a key advantage of a personalised budgets approach is that it is aimed at empowering clients and family carers (giving them maximum control over the what, who and when of care) the CIB response suggested the need to ensure that the voice of people with disabilities is embedded in the service delivery system – and noted that this presents a significant challenge for people with more complex care needs. Thus, access to independent advocacy support may be necessary to ensure that provision is made for the full exploration of choices and options – in tandem with supported decision-making in accordance with the Assisted Decision-making (Capacity) Act 2015. The CIB paper also noted that a crucial element in implementing the personalised budget approach would be “an objective, independent, comprehensive, consistent, integrated and nationally standardised needs assessment process” and referenced the Law Reform Commission’s 2011 Report on the legal aspects of professional home care with regard to the assessment of care needs.

Indecon consultation on returning Irish emigrants (2017)

The CIB submission noted that most of the concerns of returning emigrants were common to that of the general population – for instance, the availability and cost of housing, access to schools and childcare, and access to public health services.

The submission also went on to address the specific administrative difficulties for this cohort that have been evidenced in feedback from information services during the past number of years. These difficulties include regaining their Irish driving licence, accessing affordable motor insurance (in the context of benefitting from claims-free driving while living abroad), returning to live with a non-EEA

spouse or civil partner (who has no automatic entitlement under Irish law to join them in Ireland) and awareness and clarity around the Habitual Residence Condition when applying for social welfare benefits. The submission concluded by noting that the need for integrated information is particularly important because of the fragmentation of the service delivery system and the diversity of the returning emigrant population.

ComReg Review of Non-Geographic Numbers (2017)

The CIB submission noted that the overall experience of Non Geographic Numbers within CIB delivery services was broadly similar to ComReg's initial research – that service user attitudes to these numbers are negative and that the lack of transparency around costs seems to discourage the use of NGN numbers. The submission also highlighted that people on low incomes and those experiencing indebtedness were particularly vulnerable when trying to access public services by telephone.

The public consultation proposed by ComReg suggested two regulatory measures which it plans on phasing in – that is, to retain the '1800' NGN class as Freephone (i.e. free to call from landline and mobile) and also to introduce a new linked pricing tariff ("Geo-Linked") for the 1850, 1890, 0818, and 076 NGNs. ComReg also noted the intention, over time, to reduce the five classes of NGN to two, so that consumers will more readily understand the cost of the calls they are making. The CIB submission was broadly supportive of these moves and also stressed the need to regulate the costs and conditions of these numbers, in the interests of transparency for consumers. Further, it suggested that all telecommunications providers should provide specific details for what is (and is not) included in pricing packages or 'bundles'.

Make Work Pay - Comprehensive Employment Strategy for People with Disabilities (2016)

The submission noted that people with disabilities are a diverse group, with major differences due to a variety of factors such as type of disability, age, and geographical location. It went on to address the broad range of factors that need to be taken into account in making work pay for such a diverse range of jobseekers – this includes access to transport, personal assistant services, the experience of transitioning from school to work and the cost of disability. The submission also elaborated on the barriers and disincentives to employment that affect people with disabilities and the general population alike – factors such as low educational levels, the poverty trap, the availability of affordable childcare and access to information in relation to making the move from welfare to work. Coupled with this, the submission laid out the specific difficulties relating to the Partial Capacity Benefit scheme, and the Wage Subsidy Scheme in the context of making work pay and linking the activation process, income supports and employment for people with disabilities.

National Traveller and Roma Integration Strategy - Phase Three consultation (2016)

CIB made a submission on Phase Three of the National Traveller and Roma Inclusion Strategy for the period 2016 – 2020. This element of the consultation set out to establish a number of key specific actions in respect of the broader objectives put forward in Phase Two of the Strategy (to which CIB made a submission in July 2015). This submission noted what CIB consider to be the essential aspects of Traveller and Roma inclusion and named specific measures that should be considered in Phase Three of the Strategy. These measures include the proactive involvement of Travellers and Roma with local development and social inclusion programmes, the provision of a particular model of Loan Guarantee Schemes for those on low incomes, the collection of data by public services around ethnicity, the implementation of local authority caravan rental schemes nationwide and, regarding employment, the exploration of whether a social enterprise model of job creation could be used to good effect.

The latest [Pre-Budget Submission](#) and other [CIB submissions](#) are available on CIB's website.



Section 7:

Resources

Resources

This section gives you suggestions of further reading which will deepen your knowledge of social policy work.

CIB Social Policy and Research team publications and resources

Social Policy Resources (2019):

- [Social Policy Returns in Citizens Information Services – A Training Workshop](#) (PowerPoint presentation)
- [How to become involved in Social Policy in your Citizens Information Service](#) (an introduction to social policy for all staff)
- [How to manage Social Policy in Citizens Information Services](#) (guidelines for CIS and CIC managers)
- [Social Policy – A Comprehensive Guide for Citizens Information Services](#) (a detailed guide which staff can refer to as needed)

[Social Policy Update](#) - a bi-monthly e-bulletin which gives information on the social policy work of CIB and its delivery services and on national social policy news and activity (including the social policy work of other organisations). It provides an analysis of recent social policy feedback submitted by services throughout the country. If you would like to be added to the circulation list, please email socialpolicy@ciboard.ie

CIB reports, publications and websites

Reports and submissions can be found in the Social Policy and Research section of the Citizens Information Board website under Publications. Recent submissions are described on a regular basis in *Social Policy Update*.

[CIB policy submissions](#) prepared by Social Policy and Research team on a range of topics.

[CIB Pre-Budget Submission](#) - it is recommended that everyone looks at this submission as it highlights most of the policy issues experienced in CICs

CIB publishes a range of [social policy and research reports](#). Some which may be of interest include:

- [Information provision and access to public and social services for the Deaf Community \(2018\)](#)
- [Housing Assistance Payment \(HAP\): The experience of Citizens Information Services \(2017\)](#)
- [Making an Impact – the Public Value of Citizens Information Services in Ireland \(2017\)](#)

Materials on Oyster:

- [Making a Social Policy Return on Oyster](#) can be accessed on Infonet in the [Social Policy and Research](#) section.
- [Caller and Query Guidelines for Oyster Data Collection Module](#): This guide is intended to help you use the Oyster data collection system and to understand how the data you enter is used (available in the User Manuals section on the [Oyster homepage](#)).
- [Oyster Data Collection Module Guidelines](#) provide a step by step guide on how you add a query to Oyster (available in the User Manuals section on the [Oyster homepage](#)).

[Relate](#), produced bi-monthly by CIB, outlines in straightforward terms recent developments in social services, policy and legislation in Ireland. It can also be downloaded at: <http://www.citizensinformationboard.ie/publications/relate/>

[CIS Advocacy Annual Report 2018](#) – the purpose of this report is to present and recognise the advocacy work that takes place on a daily basis in CISs across the country and to share learning across the network.

[National Advocacy Service Annual Report 2017](#) – contains many case studies.

[Citizensinformation.ie](#) has a lot of relevant policy and legislative material.

Government websites and other official sites of relevance to social policy work in delivery services

The **Central Statistics Office** publishes census statistics and also a range of thematic reports drawn from the Census - www.cso.ie

Government of Ireland website: For an overview of government departments, consultations, publications and policies, go to www.gov.ie.

The websites of **Government Departments** contain information about policy developments. Key ones to look at include:

Department of Health (DoH) - <https://health.gov.ie/>

Department of Education and Skills (DES) - www.education.ie/en/

Department of Justice and Equality (DJE) - www.justice.ie

Department of Housing, Planning and Local Government (DECLG) - www.housing.gov.ie

Department of Employment Affairs and Social Protection (DEASP) - www.welfare.ie; see also:

- **Office for Social Inclusion (OSI)** in DEASP supports the Minister and Government in developing and implementing Government strategies for preventing, reducing and ultimately eliminating poverty and social exclusion and in promoting greater social inclusion and social cohesion in collaboration with other stakeholders, including in particular people experiencing poverty - www.socialinclusion.ie
- The **Social Welfare Appeals Office** operates independently of the Department of Employment Affairs and Social Protection. It aims to provide an independent, accessible and fair appeals service with regard to entitlement to social welfare payments and to deliver that service in a prompt and courteous manner: www.socialwelfareappeals.ie
- **Social Impact Assessment (SIA)** is an evidence based methodology which estimates the likely distributive effects of policies on household incomes, families, poverty and access to employment. It is found on the website of the DEASP. <https://www.welfare.ie/en/Pages/Social-Impact-Assessment.aspx>

Houses of the Oireachtas – A brief guide to how your Parliament works:

www.oireachtas.ie/parliament/media/Oireachtas-A-Brief-Guide-To-How-Your-Parliament-Works-2017.pdf

Houses of the Oireachtas – How laws are made:

www.oireachtas.ie/viewdoc.asp?fn=/documents/bills28/guide.htm

KildareStreet.com is a website which provides a searchable copy of the official parliamentary record. You can [sign up for email alerts](#) every time a particular person speaks, or when a particular phrase or keyword appears. You can also combine both types of criteria to be alerted only when a particular person uses the keywords you have chosen.

Oireachtas.ie is the official website of the parliament or Houses of the Oireachtas. It contains the official parliamentary record – what was said in the Dáil, Seanad and Oireachtas Committees, as well as answers to written questions.

You can sign up to [receive weekly email alerts](#) with the schedule of business in the Dáil, Seanad and parliamentary committees. These are circulated on Friday afternoons for the following parliamentary week, which begins on Tuesday.

The Ombudsman's Casebook provides summaries of complaints the Ombudsman has dealt with over the previous months: www.ombudsman.ie/publications/ombudsmans-casebook

StatCentral.ie is maintained by the CSO and is the portal to Ireland's Official Statistics. It provides information about statistics produced by government departments and state organisations - www.statcentral.ie

Whodoeswhat.gov.ie is a government website which has the names and contact details of senior civil servants in government departments.

WholsMyTD is a website that allows users to insert their postal address and identify their TDs, MEPs and local councillors.

National Economic and Social Council (NESCC) analyses and reports to the Taoiseach and Government on strategic issues relating to sustainable economic, social and environment development in Ireland and publishes frequent reports that are of interest to those engaged in social policy work. For example, NESCC produced a report in June 2018 on [Moving from Welfare to Work: Low Work Intensity Households and the Quality of Supportive Services](#).

The **Economic and Social Research Institute (ESRI)** produces research that contributes to understanding economic and social change in the new international context and that informs public policy-making and civil society in Ireland. For example, a study by the Department of Employment Affairs and Social Protection examines who is most likely to have unmet needs for **formal childcare and professional homecare services**.

Irish Human Rights and Equality Commission: www.ihrec.ie This is Ireland's national human rights and equality institution. Its purpose is to protect and promote human rights and equality in Ireland and build a culture of respect for human rights, equality and intercultural understanding in the State. The Commission distributes a newsletter.

Ireland – A Directory, published annually by the Institute of Public Administration, is a comprehensive database of 'who's who' in the Irish public sector as well as a selection of major business and non-governmental organisations. It contains the names and contact

details of key personnel in central and local government, the public sector and private business.

Community and voluntary sector organisations' websites

The websites and publications of many community and voluntary sector organisations include useful commentaries and submissions on social policy. Some of these organisations work with and on behalf of specific sections of the community (for example older people; people with disabilities; lone parents; children; unemployed people) or on particular issues (housing; mental health). Others have a broader social inclusion or anti-poverty focus.

Age Action provides services including Care and Repair, computer training and information, and also campaigns for older people at a national level: www.ageaction.ie

Care Alliance Ireland is the National Network of Voluntary Organisations supporting Family Carers. www.careallianceireland.ie

Citizens Advice Policy Research: www.citizensadvice.org.uk/about-us/policy/

Citizens Advice Scotland works for a fairer Scotland where people are empowered and their rights respected. www.cas.org.uk

Community Law and Mediation formerly Northside Community Law Centre, is an independent, community-based organisation that works to empower individuals experiencing disadvantage by providing free legal information, [free legal advice](#), [education](#) and [mediation](#) services: www.communitylawandmediation.ie

Disability Federation Ireland advocates for the full and equal inclusion of people with disabilities and disabling conditions in all aspects of their lives: www.disability-federation.ie

FLAC (Free Legal Advice Centres) is an independent human rights organisation dedicated to the realisation of equal access to justice for all: www.flac.ie

Immigrant Council of Ireland is a national, independent non-governmental organisation that promotes the rights of migrants www.immigrantcouncil.ie

Irish National Organisation of the Unemployed (INO) works at local and national levels on issues affecting unemployed people: www.inou.ie

Mental Health Reform is Ireland's leading national coalition of organisations campaigning to transform mental health and well-being supports in Ireland: www.mentalhealthreform.ie

New Communities Partnership aims to empower and represent ethnic minorities and their representative organisations in Ireland: www.newcommunities.ie

Pavee Point Traveller and Roma Centre is dedicated to the realisation of human rights for Travellers and Roma: www.paveepoint.ie

Social Justice Ireland is an independent think tank and justice advocacy organisation that seeks to build a just society: www.socialjustice.ie

St Vincent de Paul Society is the largest voluntary charitable organisation in Ireland. In addition to providing direct assistance to those in need, caring for the homeless, providing social housing, operating holiday homes and other social support activities, the Society promotes community self-sufficiency, enabling people to help themselves. It produced a short film on poverty and its causes. <https://www.youtube.com/watch?v=Qi2radZxPpw>

Threshold aims to secure a right to housing, particularly for households experiencing the problems of poverty and exclusion: www.threshold.ie

Treoir - the national federation of services for unmarried parents and their children: www.treoir.ie

Policy work in Ireland

Think-tank for Action on Social Change (TASC) is an independent progressive think-tank whose core focus is addressing inequality and sustaining democracy. As a public-education charity, TASC seeks to raise the level of public knowledge about public policy, politics, economics, culture, the environment and related fields, to encourage a more equal, democratic and inclusive society.

The **Policy-Making section** of TASC's Open Government Toolkit (2016) provides information, tips and resources on how Government works, where to get information, how to get your voice heard. It contains ten separate guides covering three broad themes, the most relevant for CIS staff being Public Decision Making which covers policy-making, public spending, law-making and the European Union. This is an excellent resource and is highly recommended for all staff.

Social Justice Ireland Weekly Digest - this comes in the form of a weekly email. You can subscribe (free of charge) on <https://www.socialjustice.ie>

Casebase, a publicly accessible online database of social welfare appeals reports is produced by Community Law and Mediation. Look it up on: www.communitylawandmediation.ie

Report writing

How to plan, write and communicate an effective policy brief (Laura ffrench Constant: *Research to Action: The Global Guide to Research Action*) 2018

Research to Action (R2A) is a website catering for the strategic and practical needs of people trying to improve the uptake of development research

Producing a local social policy report - produced by **Advice Services Alliance**, the umbrella body for independent advice services in the UK. It looks at timing and planning; format and layout; consulting with specialists; editing; printing, distribution and launching the report.

Overview of Irish social policy

Irish Social Policy – A Critical Introduction, Fiona Dukelow & Mairéad Considine, second edition (2017). This book provides an in-depth analysis of social policy in Ireland. It looks at the development of Irish social policy, explains international concepts of social policy, looks at key services in the Irish context and examines how policy affects different social groups.

Appendices



Appendix 1: Contact details for Social Policy and Research team, Citizens Information Board

Geralyn McGarry

Social Policy and Research Manager

0761 07 9048

geralyn.mcgarry@ciboard.ie

Adrienne Collins

Social Policy and Research Executive

0761 07 9023

adrienne.collins@ciboard.ie

Bernie Kennedy

Social Policy and Research Executive

0761 07 9624

bernadette.kennedy@ciboard.ie

Margaret Zheng

Social Policy and Research Administrator

0761 07 9021

margaret.zheng@ciboard.ie

Appendix 2: Training handouts

Handout 1: Social Policy feedback - Nature of the Policy Issue - Guidelines for Oyster Data Recording

Access and Administrative Barriers

This includes:

- processing issues such as **delays, backlogs and/or errors in applications** and appeals processes
- communication and '*gatekeeping*' problems, such as being unable to contact a public service office by phone or email and therefore has not been able to get the information needed
- where a person has been treated **discourteously** by a member of staff delivering a public service. (may be deemed an access barrier because it might deter people from pursuing their rights and entitlements)
- where public offices are inaccessible because of, for example, their location or restricted opening hours, or because they are not fully accessible to people with disabilities
- access and admission issues, such as long waiting lists for legal aid or public health care, and situations where services are only available online

Information Gaps

Use this policy category when a person has:

- not been given any information
- not been given enough information
- been given information in the wrong format
- been given the wrong information

Anomalies in Policy

This includes:

- problems in primary or secondary legislation (including departmental guidelines), which mean that the policy is working for some people but not for others with similar needs
- cases of a service/scheme deficit that leaves (some) people without supports that they need or with unsatisfactory entitlements. For example, when payments are too low, or act as a disincentive to work after PRSI and USC charges have been applied

- examples when essential services or payments are withdrawn via primary or secondary legislation for example, the Mobility Allowance
- examples where adequate services and supports are not being legislated for in a timely manner and in response to an emerging social need (for example asylum seekers living indefinitely in Direct Provision)

Anomalies often become apparent when you can see people 'falling through the net'.

Gaps and Inconsistencies in Provision

This category should be used in instances where a service might have been legislated for nationally but is unavailable or *not consistently available* to those in need. Examples of this are:

- services available in some geographical areas but not others (for example homeless hostels; services for young people; supports for people with mental health problems)
- inconsistencies across housing authorities in applying differential rent or in their approach to housing needs assessments
- inconsistent interpretation of policy in different geographical areas, for example different interpretations of the Habitual Residency Condition (HRC)
- inadequate enforcement machinery to implement an agreed action (for example no affordable mechanism in place for enforcing an employment tribunal award)
- when discretion is not consistently applied in relation to the same payment or service

Handout 2: Writing an effective Social Policy Return

When inputting your social policy feedback to Oyster, it is important to remember that the CIB social policy worker who is reading the returns knows only what you tell us and must not speculate or 'read between the lines' if the detail is too sparse. While we can look at the original query if necessary to find out the caller details (for example age, gender), everything else that we need to know must be included in the policy feedback field.

To ensure that you submit good quality and useful social policy evidence, please follow these golden rules:

Be concise, use plain English, and keep sentences short and easily readable

⊗ *This client came into the centre because he is claiming a jobseeker's payment (jobseeker's allowance) which when he started to claim it was appropriate as he was in good health but he is not at the present time able to work due to his multiple ailments and indeed some of his conditions are likely to be of some duration and he is thus not currently in a position where he is available to take up any employment that might be offered nor is he likely to be for some unforeseeable duration but he is concerned that if he were to instead claim the relevant payment with regard to incapacity which is illness benefit to which we have advised him he is entitled he would be left without the necessary funding given what he understands to be the situation as regards lengthy intervals between the making of an initial claim and the payment being made. This is coming into the centre frequently, people who have an entitlement to particular benefits but are discouraged from changing from one payment to another even if they might be better off or should do so on other grounds because they have heard of other people being left without any money so even if in the particular case there wouldn't necessarily be any delay, it's the fact that there is so much delay across social welfare that is making people very reluctant to claim.*

☺ *Person claiming JA has become unwell and unable to work. His illness is not likely to be short term. He is entitled to Illness Benefit but reluctant to claim as he is aware of long processing times. This is one of a number of similar cases (reluctance to claim appropriate social welfare payment because of concern about processing delay).*

Be specific (name the social welfare payment, social service, waiting time)

⊗ *Person is ill and has developed a number of disabilities as a result. Has been waiting for an unacceptably long time for what she needs in relation to these disabilities. This includes not just welfare payments but also what she needs from HSE.*

☺ *This woman has a progressive and serious illness that has had rapid onset. She is now unable to perform most household tasks and struggles with personal care. She lives alone. Her claim for DA was made sixteen weeks ago. No decision communicated. She is living on her savings which she says are nearly gone. She was assessed at around the same time by a PHN for home help but is still waiting for a decision. She has been told that hours may not be available even though she is in obvious need. She is very distressed and feels unable to cope.*

Include any non-identifying details that are likely to be relevant

☹️ *Client's hours and wages have reduced and now won't qualify for FIS on renewal. Can't get second job due to family circumstances and lack of suitable work. Can't claim JA if stays in job. Will not be able to afford to run household on reduced wages and no FIS.*

😊 *This woman works as a cleaner in a private leisure facility. She reports that she has difficulty reading and writing, so is limited to manual work. Her employer has had to cut her hours from 20 to 15 per week (over five days). She has three teenage children and is a lone parent. Even if she could find a second job, she would be reluctant to take it as she does not think she could cope with her three teenagers and the demands of two jobs. Her WFP is due for renewal but she is now under the minimum number of qualifying hours. As she still works over five days, she cannot sign on for JB. This drop in wages coupled with no longer qualifying for WFP will leave her family in a situation of real financial hardship. By our calculation the family would be better off were she to leave work and claim JB, though they may face penalty re her voluntarily leaving employment.*

Avoid using judgmental/emotive terms. Let the facts speak for themselves

☹️ *It's outrageous that the government doesn't recognise the contribution that carers make and then just comes along and takes all their money off them for no reason, just adding to all the difficulties they already have to live with. It's immoral. The client has lost DCA when she needs this payment and is definitely in my book entitled to it.*

😊 *A mother of a 12-year old child with autism has been disallowed her Domiciliary Care Allowance on appeal, despite the child apparently needing more rather than less care than he did as a younger child when she was first awarded DCA. She has two other children, one older and one younger, whose care needs are very significantly less than those of their brother.*

Ensure that the policy issue is obvious to the reader

Remember that the reader knows nothing other than what you have written into the social policy field. Do not assume that the policy issue is obvious. If in doubt, name it.

Always select a policy category

The four social policy categories on Oyster are:

- Access and administrative barriers
- Information gaps
- Anomalies in policy
- Gaps/inconsistencies in provision

Handout 3: The Six Golden Rules when writing up a Social Policy Return

1. Be concise and use plain English
2. Be specific (about service, scheme or entitlement)
3. Include relevant details
4. Avoid judgements
5. Ensure your facts are correct
6. Ensure the issue is obvious



Handout 4: Pop quiz!

(Based on 2017 data)

1. Name the three Ministers at the Department of Employment Affairs and Social Protection (DEASP).

2. What was the expenditure in DEASP in 2017?

- a) €1.7 billion
- b) €12 billion
- c) €20 billion

3. What is the largest element of this budget?

- a) Pensions payments
- b) Child Benefit
- c) Disability, illness and carers payments

4. How many people receive a DEASP payment each week?

- a) 875,000
- b) 2.8 million
- c) 1.4 million

5. What is the State's annual expenditure on the Free Travel Scheme?

- a) €25 million
- b) €44 million
- c) €77 million

6. How much money was involved in the IMF/ EU bailout to the Irish state in 2010?

- a) €950 million
- b) €35 billion
- c) €84 billion

7. In Ireland, what proportion of domestic legislation is derived from the EU?

- a) 80%
- b) 25%
- c) 60%

8. What was the EU budget in 2017?

- €40 billion
- €89 billion
- €160 billion

9. What percentage of family carers receive Carers Allowance?

- a) 25%
- b) 60%
- c) 80%

10. How many information queries were made in Citizens Information Centres in 2017?

- a) 375,000

- b) 1.03 million
- c) 700,000

11. How many people are on the Social Housing Waiting List among local authorities nationally?

- a) 33,000
- b) 85,000
- c) 52,000

12. How many Social Policy Returns were submitted to CIB from CISs during 2018?

- a) 2,200
- b) 1,500
- c) 4,500

13. How many policy submissions did CIB make in 2017?

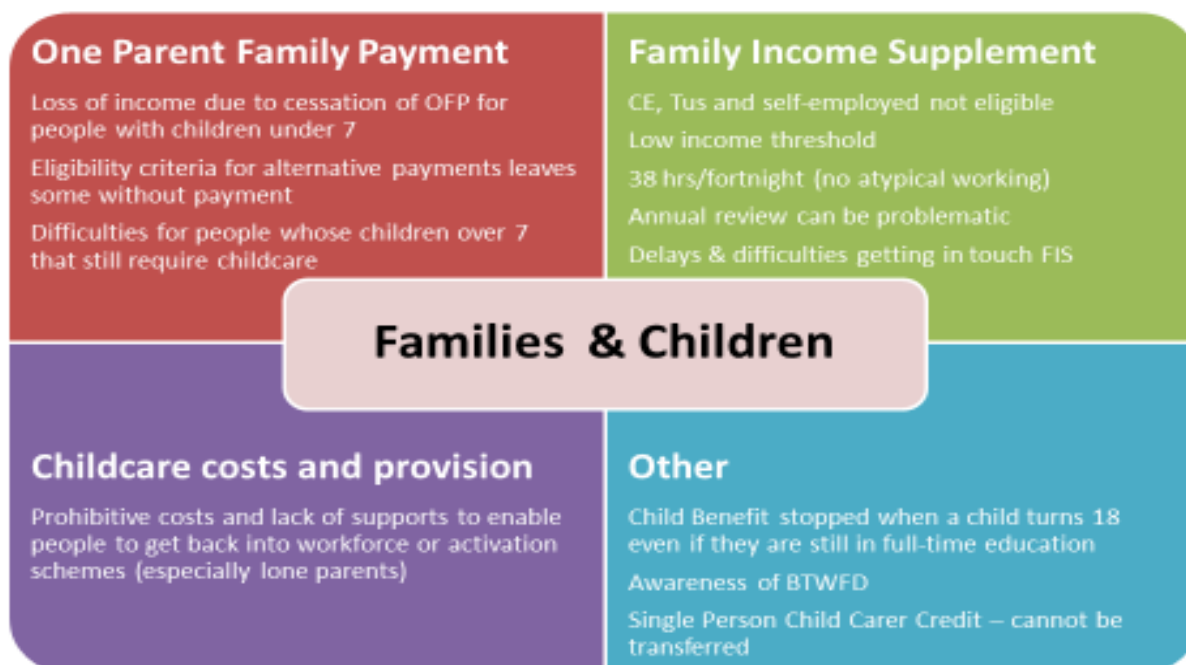
- a) Five
- b) Eight
- c) Seventeen

Pop Quiz answers

1. Regina Doherty, Finian McGrath (Disability) and Pat Breen (Emp and Small Business)
2. €20 billion – equivalent to total tax take of state
3. Pensions (€7.3b), CB (€2b), Dis (€3.8b)
4. 1.4 million
5. 77 million
6. €84 billion
7. 60%
8. 160 billion – or 1% of EU GDP (typical national budget is 40% of GDP)
9. 25% - (73,000 recipients, full-time care (35hrs)
10. 1.03 million (inc of 2% on 2016)
11. 85,000
12. 4,500
13. Seventeen

Appendix 3: Social policy CIS feedback by topic

Social policy feedback from CISs



Social Welfare is consistently the top category for queries and SPRs in the CISs and CIPS. 57% of the over 1 million queries to CISs in 2018 related to Social Welfare. Health = 10% and employment, housing at 11%

One Parent Family Payment

Loss of income due to change to the rules - July 2015 - people with children under 7 are no longer eligible for the payment and may receive less on alternative payments.

Eligibility criteria for alternative payments leaves some without a payment – eligibility for JST different so some who had been getting OFP are not entitled to JST due to the pattern of hours worked. They may also not be eligible for FIS as they may not be working enough hours worked. Also no disregard for self-employed income on JST, where there was €90 disregard on OFP.

Difficulties for people whose children still require childcare – cannot enter the workforce and leave a 7 year old child without childcare

More Affordable Childcare Scheme – could enable more parents to take up work. Teething problems with this.

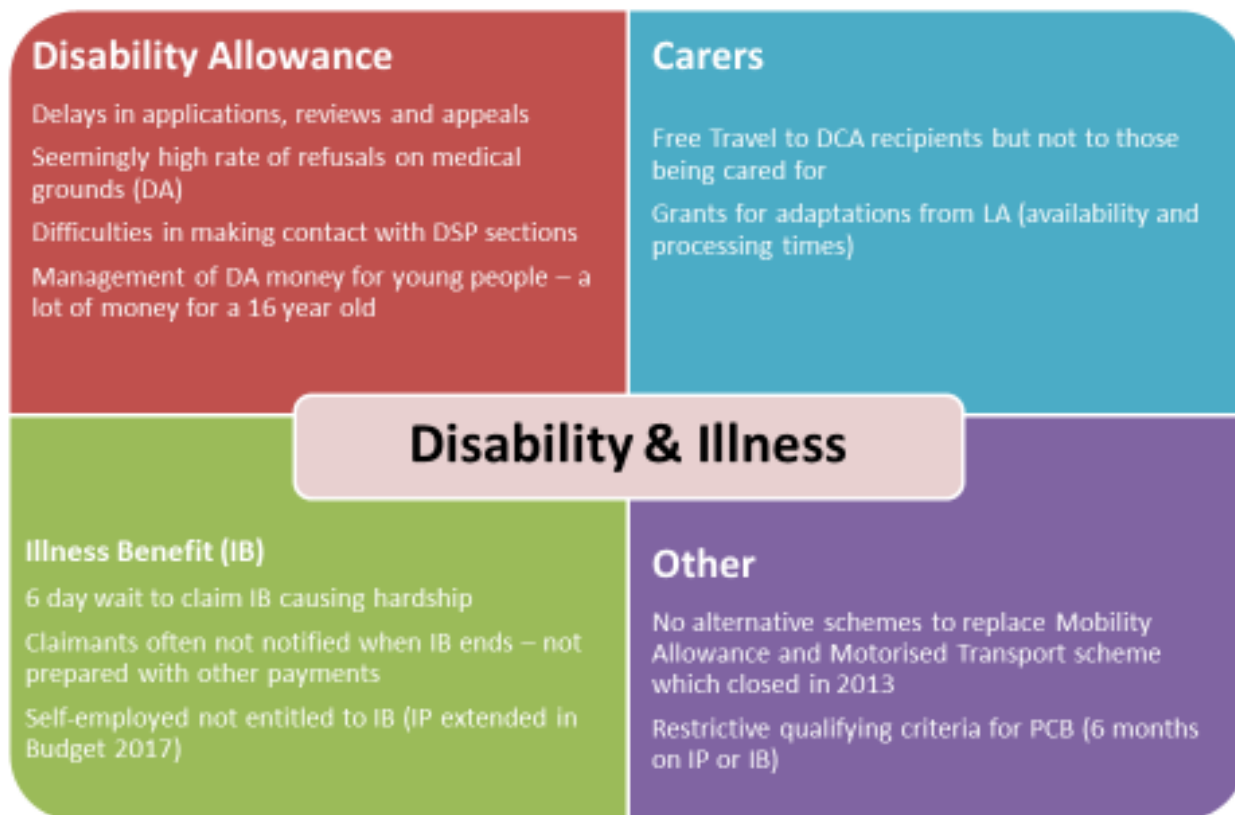
Back To Work Family Dividend

Payment new since 2015 and most SPRs during 2015 relate to low awareness of payment and lack of info from DSP

Child Benefit

Not paid to over-18's in full-time education, unlike IQC which is paid to u-22's if in FT ed.

Social policy feedback from CISs



Disability and Illness regularly comes up as a top category in Oyster returns.

Disability Transport Schemes

The closing of the Mobility Allowance scheme and the Motorised Transport Grant in February 2013 has compounded transport issues for people with disabilities and older people.

Carer's Allowance Applications – as of July 2017, the average processing time for new applications is 13 weeks (more if it goes to SWAO for Appeal)

Disability Allowance Applications– as of July, the average processing time for new applications is 12 weeks

Local Authority grants - Housing Adaptation Grant for People with a Disability and Mobility Aids Grant Scheme - means-tested, funded from each LA budget (fund runs out early in year and coverage differs from area to area).

Also problem in that work cannot begin on adapting the house until the application has been completed and approved and an OT assessment is needed (problematic due to OT waiting lists) – all leading to People with Disability (and older people) living in unsuitable accommodation for long periods of time and also delays in people returning to their home from hospital.

Social Policy feedback from CISs



Loss of RS as disincentive to work – emergence of HAP will help to reduce financial disincentive as HAP available to those in FT work.

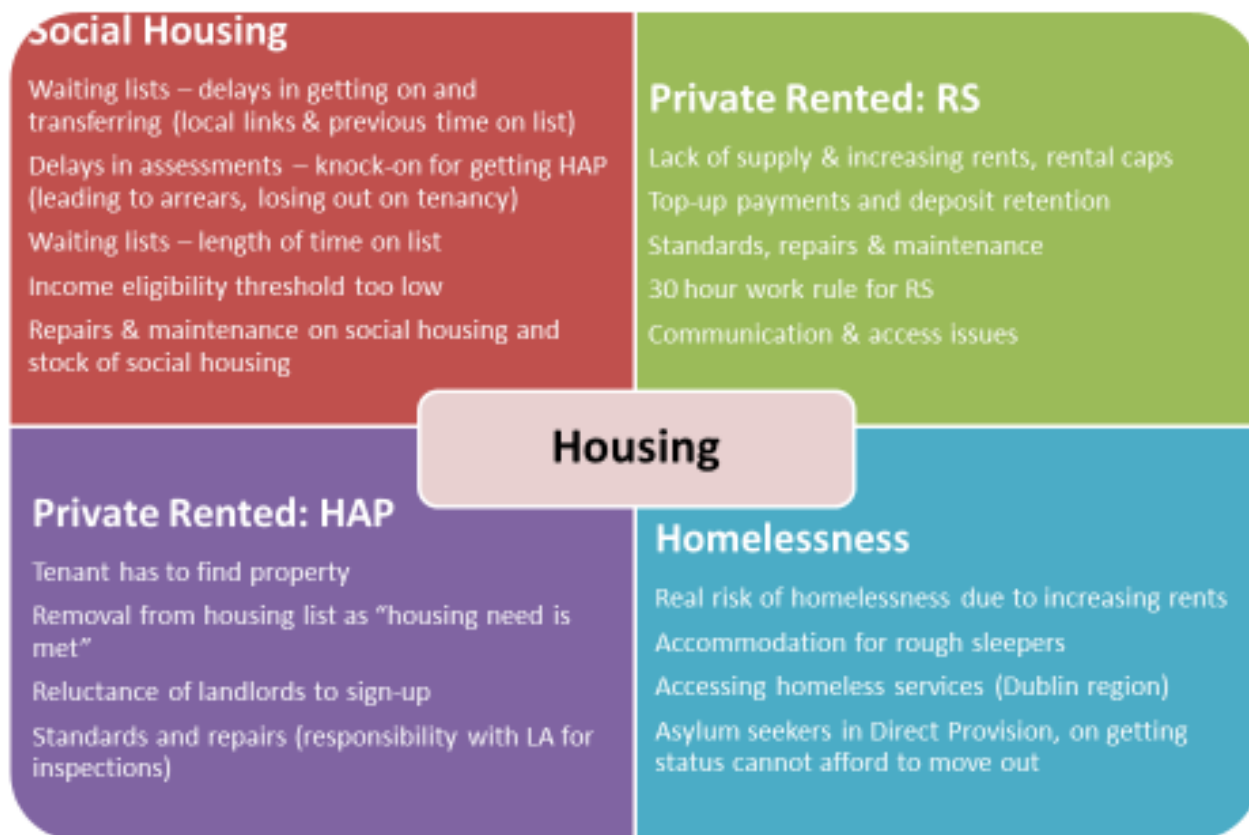
Poverty Trap/ Disincentive to work issues

In terms of moving from welfare to work, a 2015 ESRI report found that 8 out of 10 unemployed jobseekers would see their income rise by up to 40% upon taking up work and that 3% would be financially better off by not taking up work.

Also found that there are less valuable financial incentives for unemployed people with spouse and children to take up work, but that still only 1 in 15 would be better off not working.

But it should be noted that given the complexities of the Irish SW system, it can be difficult for people to make an informed judgement on best course financially.

Social policy feedback from CISs



Housing Assistance Payment (HAP)

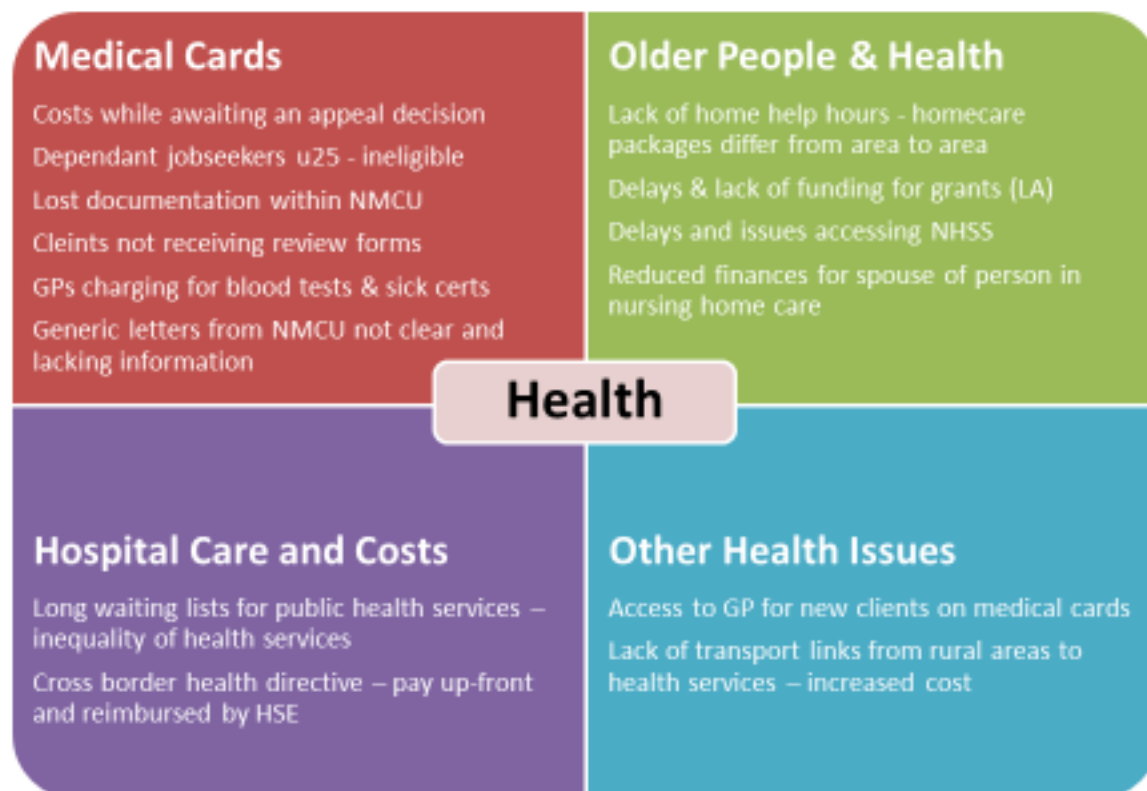
Introduced in 2014

Transfers responsibility for those with assessed long-term social housing need from DEASP to Local Authorities.

Started to see marked increase in HAP SPRs in early 2016 (as compared with 2015);

Estimated to be 90,000+ on lists nationally

Social policy feedback from CISs



Health is often the second or third most reported area in relation to Social Policy Returns. The majority of these cases and queries relate to medical cards and mainly administration issues. But there are other policy issues relating to health which I have included here. You may have dealt with some of them in your centre.

Medical cards

- Medical costs while awaiting an appeal decision – not reimbursed
- Dependant jobseekers under 25 are not eligible for a medical card as paid €100 (below the SWA rate) and living at home so parents income taken into account
- GPs charging medical card holders for blood tests & sick certs
- Loss of documentation by Medical Card section

Older People and Health

- **The Home Care Package scheme**, which provides a tailored range of home supports to the older person, is not established in law which means the individual has no automatic right to avail of services under the scheme. Each HSE Area has responsibility for the operation of the scheme within the resources allocated for it in that area. This means that the level of service or support a person receives may vary considerably in different parts of the country.
- **The Housing Adaptation Grant for People with a Disability and the Mobility Aids Grant Scheme** provide funding through the local authority's for adaptations to the person's home so it is accessible and safe for them. The grants are means-tested and funded from each local authority budget which means that funding can run out so a person may have to wait until the local authority's budget is allocated for the next year to access the grant. This also

means that coverage differs from area to area, with some areas running out of funding earlier than others. No work can begin on adapting the house until the application has been completed and approved as grants are not be paid retrospectively. An Occupational Therapist's assessment is required to complete the application process. There are currently long waiting lists for occupational therapy services in Ireland which can lead to long delays in applications and getting the work done.

- **The Nursing Homes Support Scheme (NHSS)**, also known as the "Fair Deal Scheme", provides financial support to people who need long-term nursing home care. Under the scheme, you make a contribution towards the cost of your care and the State pays the balance.
 - There is a set level of spending under the NHSS so there can be a waiting list for funding, which means people can be left waiting in unsuitable care situations for a place to become available
 - Delays in processing applications mean that people get into financial difficulty trying to pay for interim care privately
 - The Scheme does not backdate payments to the application date so people are not reimbursed for any care they have provided privately
 - The application form for the scheme is too complicated and can cause added stress for families already in a stressful situation
- **Reduced finances for spouse of person in nursing home:** when one spouse goes into nursing home care, the other spouse still living at home may end up with reduced income and benefits due to the way their initial Social Welfare claim was set up (they may be an IQA). This can lead to financial hardship as the spouse living at home has reduced income and supplementary benefits but may have increased costs in relation to visiting their spouse in the nursing home.

Hospital Care and Costs

- Waiting lists and hardship while waiting for procedures – inequality of two-tier health system
- Cross-border health directive (where people can get treatment abroad – some may do this due to extensive waiting lists for procedures in Ireland) – people on lower income excluded as you have to pay up-front and wait for the HSE to reimburse you. This excludes those without access to cash.
- HSE National Treatment Purchase Scheme may not cover aftercare in some cases – HSE pay for you to have your procedure in a private hospital as on public list so long – but then may not get access to public nursing home to recuperate

Other Health Issues

- New patients on Medical cards finding it difficult to get a GPs due to large patient lists – may have to try a number of different GPs to get on the books – access difficulty if have to travel to go to GP
- Centralised hospitals and centres of excellence leads to reduced services for rural communities – often have to travel long distances to appointments at increased costs as often public transport not available. Also means increased times to reach an Emergency Department as more and more local hospitals only open for certain hours or are closed altogether.

Appendix 4: Case studies for use in training

Oyster case studies

An unmarried couple where the man is working and his partner is job seeking came into the CIC. They cannot share tax credits which puts them at a financial disadvantage to married couples yet her JA takes into account his wages.

Category: Anomalies in policy

Concern: This unmarried couple is being treated differently to married couples and is at a financial disadvantage as a result.

The CIC spent 25 minutes trying to get through to the Carer's Allowance Section on the client's behalf without success.

Category: Access and Administrative Barriers

Concern: Client could not get the information he needed and was out of pocket as the 1890 numbers can be premium rate from mobiles.

The client has received refugee status. He cannot find private rented accommodation within the rent limits for a single person nor a landlord willing to accept Housing Assistance Payment. He says it is demoralising not to be able to leave the direct provision accommodation where he has been living for seven years to live independently and without sharing and house rules. Additionally, he is under increased pressure from the centre to leave as he now has his status.

Category: Gaps and inconsistencies in provision

Concern: The client cannot access housing as no landlord will accept HAP and the rent limits are too low to find suitable housing. He is particularly vulnerable as he has been in direct provision for seven years and is being pressurised to leave by the centre.

A family has four children and the eldest is about to start college. The family is claiming long-term social welfare payments. Their annual family income is above the threshold for qualification for the grant. As a result, the young person is giving up his place at college as he can't afford to go.

Category: Anomalies in policy - Cases of a service/scheme deficit that leaves (some) people without supports that they need or with unsatisfactory entitlements.

Concern: The family is on long-term social welfare payments but because they have four children the family income is above the threshold for the 3rd level grant meaning. Their eldest child cannot afford to go to college as a result.

A family with 3 children is in receipt of a combination of social welfare payments. Their eldest child is over 18 and in full-time education. The family is struggling financially to meet food and educational costs for this child since Child Benefit was removed.

Category: Gaps and inconsistencies in provision

Concern: Child Benefit is cut off at 18 when young person is still in education, when costs associated with that child rise and no other financial supports are available.

The client receives Carer's Allowance and Domiciliary Care Allowance in respect of her 14-year old daughter. Her child has to travel to Dublin every two weeks for medical treatment. The family must pay for her public transport and this puts an additional financial strain on an already limited household income.

Category: Anomalies in policy

Concern: Parents/guardians in receipt of Carer's Allowance receive Free Travel in their own right but must pay for any travel costs incurred by the child with a disability. This appears to be counter-intuitive and somewhat anomalous in that people claiming Disability Allowance and Invalidity Pension are automatically entitled to a Free Travel Pass while children under the age of 16 with long-term illness and disability do not have the same entitlement.

A man who was on low income from employment and whose wife is on Invalidity Pension was in hospital for one week but was not entitled to sick pay from his employment. He did not have entitlement to Illness Benefit for the first six days of his illness and was not in a position to look for any other social welfare payment.

Category: Gaps and Inconsistencies in provision

Concern: The change introduced in January 2014 which means that no illness benefit payment is made for the first 6 days of illness - known as the 6 waiting days - affects people greatly who are not provided paid sick leave by their employer and can result in financial hardship in some instances.

Client received letter to renew her medical card but the letter did not clearly state which form to use and did not enclose any form. Client does not have a landline or computer so cannot fill the form online as instructed in the letter from the HSE department. Client does not want to ring as it is expensive to call from her mobile.

Category: Access and administrative barriers

Concern: It was not clear from the letter from the HSE department whether to use same form as original application. The client was at a disadvantage as he had no access to a computer and did not know how to use one and could not afford to use his mobile phone to call the department for clarification. Clear instructions in the letters sent out by department are needed.

Applicants who do not have online access should be enabled to access the relevant forms/ information in a hard copy format.

A client was looking for treatment under the National Treatment Purchase Fund. He went on to their website to find a telephone number but there was none listed. He eventually found a contact number and was referred to a NTPF co-ordinator in the local hospital. This information was also not on their website.

Category: Information gaps

Concern: Client could not find the information he needed as it was missing.

An Invalidity Pension claimant was refused the Household Benefits Package on basis of her spouse's income, which was marginally over the threshold. The family have high household expenses and children with disabilities; there is no appeal process in place.

Category: Anomalies in policy

Concern: The lack of an appeal process means that this family, who may be entitled to HBP because of their circumstances (high household expenses and children with disabilities) are not able to claim.

The client has been caring for her husband for over 3 years, from the time when he was diagnosed with dementia. He is incontinent and fully reliant on her. She said that neither the public health nurse nor any health official told her about the Carer's Allowance. She only found out about it when a friend mentioned it to her recently.

Category: Information gaps

Concern: The client was entitled to the Carer's Allowance but knew nothing about it and her life has been made more difficult as a result over the last three years.

The client was under the age of 26 and in receipt of the reduced rate of Jobseeker's Allowance. He was not living in the family home as he was estranged from his parents. He was finding it very difficult to live on his income and his mental health was suffering.

Category: Gaps and inconsistencies in provision

Concern: The young person was living independently and was unable to live on the reduced rate of Jobseeker's Allowance. He was receiving no financial help from his family.

The client could not provide a utility bill in relation to his daughter's SUSI application as his rent included all utilities. SUSI insisted he provide a utility bill in his own name regardless. They refused to accept his tenancy agreement which stated utilities were included.

Category: Access and Administrative Issues

Concern: Rules and regulations relating to the SUSI grant scheme are too rigid and do not take account of a circumstance such as this one. As a result the person cannot access the grant for their daughter.

This client applied for housing supports (housing needs assessment) but was not accepted as the family income was over the threshold (Galway County Council). He lives immediately adjacent to Galway City Council administrative area where he would have been accepted on to the city housing lists.

The differential between city and county income thresholds is substantial yet housing costs are the same (€25,000.00 county and €35,000.00 city). The issue of the income bands should be revised to reflect housing costs and needs.

Category: Gaps and Inconsistencies in Provision

Concern: Inconsistencies across housing authorities in their approach to housing needs assessment.

The client had recently completed a paper form 11 for Revenue and has now received a notification from them stating that he is obliged now to complete all future returns and payments by electronic means through ROS. Client is 69 years and is not capable of doing so. While there is an option to request to be excluded from filing online (which we did on behalf of client), it should not be mandatory and should be left open to the client to have the choice as to how they wish to complete their returns.

Category: Access and administrative issues

Concern: The client has no computer skills but must apply online to Revenue.

This client is a full-time student (26 years old) and has numerous health problems. He is living at home and being supported by with his parents. He applied for a medical card but was refused as he has no source of income.

His parents are on low income and have a medical card, but he cannot be added as a dependent, as he is over 25. He requires regular medication and visits. This is causing significant hardship for the family.

Category: Anomalies in Policy

Concern: The client is in great need of a medical card which is designed to help people on low income access medical treatment but because of the over 25 rule, he cannot avail of it.

The client has started a job after more than a year receiving Jobseeker's Allowance. He is renewing his Medical Card, which he should be able to keep on retention grounds for three years without a means test. However there is no place on the form to alert the Medical Card processing unit of this.

We have advised him to attach a note to this effect.

Category: Information Gaps

Concern: The form is designed incorrectly and as a result the client cannot guarantee his right to a medical card

Allocated Social Housing for client and ill son – but the condition of property is unacceptable. The entire house is covered in dampness with fungus growing on the walls and floors under floor covering.

Category: Gaps and Inconsistencies in Provision

Concern: The client has accessed their right to housing but the accommodation is sub-standard.

The client was on the housing list for over 7 years (single parent with two children). She applied for and obtained HAP. She obtained part-time work and was also eligible for WFP which she is now in receipt of. She notified the HAP section and has been told she is now over the income threshold.

Category: Anomalies in Policy

Concern: The supplementary payment of WFP should not be a barrier / should not prevent client from obtaining other supports.

Client was refused Working Family Payment on the basis of hours worked. She does 20 hours every week but is paid monthly. DEASP assessed her as working less than 19 hours per week based on her payslips despite having letters from her employer confirming she works 20 hours every week.

DEASP said if she was paid every two weeks instead she would satisfy the working hours condition.

Category: Gaps and Inconsistencies in Provision

Concern: The rules for this payment are being inconsistently applied and as a result the client cannot access her entitlement to WFP.

A self-employed caller cannot access WFP even though they would pass the income and hours tests. They are a family with one child and the caller earns €405 per week. The caller is suffering financial hardship as a result.

Category: Gap/ inconsistency in provision

Concern: Self-employed person on low income is not entitled to same income support measures/ protections as PAYE worker.

One parent in Lucan could not find accommodation suitable for her and 3 children, for the €900 limit set in Rent Supplement guidelines. Claims it is too low. Says the rental market value for a 3 bed in Lucan is €1200. She has been looking for more than two months. She is living at home with parent, with herself and the 3 children in 2 beds, one sleeping on the floor. Serious over-crowding in home place. Detailed that when looking for accommodation, landlords offered to put 900€ on Rent Supplement form but said she could make up the difference. As she highlighted, she couldn't afford this.

Category: Anomalies in policy

Concern: Policy is supposed to provide housing for those who need it but it is not working in practice

Local Property Tax (LPT) can't be deducted directly from Jobseeker's payments because it take a claimant below the recommended SWA rate. It is allowed on other schemes. Barrier for people trying to manage finances and debts.

Category: Anomalies in policy

Concern: Policy for deducting LPT is not being applied consistently. It differs between different schemes.

Carer (previously on JA) has been waiting 9 months for the section to process her Carer Allowance (CA) application. Her information indicates that she meets all the guidelines and means test requirements for CA. The person she was caring for dies. She could not get SWA during the 9 months because of husband's income. She had to rely on family help and says that family experienced financial hardship.

Category: Access and administrative barriers

Concern: The impact of this unreasonable delay has had a very detrimental effect on this women and she has suffered financial hardship while being in a very stressful situation.

Caller working 31 hours per week. He was disqualified from applying for Rent Supplement even though he would pass the means test for support if he worked 29 hours.

Category: Anomalies in policy

Concern: The policy is working for some people but not for others with similar needs.

Family Income Supplement (FIS) is only reviewed every 52 weeks. A caller qualifying for €33/week with 3 children has had a loss of income. The new net take home is €350/week. Normally the family would qualify for €211.80/wk on first assessment. They will have to survive on the €33/wk FIS payment until it is reviewed next March. As the caller pointed out, they would be better off on the dole, receiving €402.80/week instead of €383. A change of income or circumstances should be substantial grounds for review like other schemes.

Category: Access and administrative issues

Concern: The way the reviews work need to be changes. 12 months is an unreasonably long time period in which to wait before a review can be held

Married couple with 3 children who are both working. One is full-time and the other part-time. An offer of full time work was made to the part-timer. Both parents are on a fairly average income (but over any of the SW/medical card limits). There is no incentive for both to work full-time and therefore contribute further to the economy. They are just managing to meet all of their expenses and keep up with mortgage payments. If they both work full-time, once all of the deductions are made and the couple have paid out child-minding and other associated expenses, the increase in family income is very little.

Category: Anomalies in Policy

Concern: The cost of working does not make it worthwhile. Policies should be designed and delivered so that the recipients benefit – in this case to act as a support for working families, not as a deterrent to work.

The mobility allowance schemes have been closed since 26.02.13. This leaves a huge gap for people who may previously have qualified under one of these schemes. No date has been provided for the new scheme and in the meantime many people are left without any support whatsoever.

Category: Anomalies in Policy

Concern: Essential service has been withdrawn and nothing put in its place. As a result many people are being impacted negatively.

Self-employed person temporarily unable to work due to illness. He can't get SWA because his spouse works and he can't qualify for Illness benefit with class S. Client detailed that this would pose difficulties for sustaining living costs for family.

Category: Anomalies in policy

Concern: Client suffering hardship because of the way in which the policy is being applied. He is being left without the support that he needs.

Old Age Pensioner (OAP) on oxygen for most of the day. Has high electricity costs. Struggling to afford bill since budget cut. Was turned down for exceptional needs payment.

Category: Gaps and inconsistencies in provision

Concern: Discretion is not being consistently applied here in relation to exceptional needs payment

Client is 21 and on €100 (wage) and Rent Supplement. Has to contribute €30 towards the rent, leaving €70 to pay bills and living expenses. The client cannot pay for bills and food. Living in extreme poverty and sometimes relies on SVP for food and can't pay for heating. Younger people treated less favourably for social welfare but have voting rights and the same tax obligations as plus 25 year olds.

Category: Anomalies in policy

Concern: This is an example of a scheme which leaves this young person without supports because of his age.

Client applied for Invalidity Pension (IP) eight weeks ago. She received a medical report form which her doctor completed and returned. She went to the CWO for Supplementary Welfare Allowance and the CWO could not find her pending IP application on the DEASP system. CWO rang IP section and they said they have no record of the application and told the client to complete another application. (Co Donegal CIS)

Category: Access and administrative issues

Concern: Because of administrative errors the client has to go back to her doctor and apply again for IP and the payment is delayed significantly.

Client has been on Illness Benefit for the past seven years. He applied for Invalidity Pension (IP) in February and is awaiting a decision. He was not aware (until recently) that he could apply for IP which is a more suitable payment for his situation and will give him an entitlement to extra benefits such as Household Benefits Package and Fuel Allowance.

Category: Information gaps

Concern: Client was not given the information he needed.

Part 10 of Disability Allowance form requires clients to outline how their medical condition affects daily life. Client's first language is not English and he is not able to communicate the information required for this section. This is an additional administrative barrier for clients with language issues.

Category: Access and administrative issues

Concern: The client has language issues which prevents him from accessing the payment he may be entitled to.

Client's weekly Disability Allowance payment was not received. It took Information Provider multiple attempts (40 minutes altogether) to get through to a supervisor who could deal with the query. Several times the IO got through to the DA section only to get a recorded message followed by the call being dropped. This is frustrating and expensive for callers.

Category: Access and administrative issues

Concern: Communication problem, where the appropriate public service could not be contacted because of telephone problems.

Electronic Case Management System (ECMS) case studies

These examples have arisen out of advocacy work with clients. Advocacy work can take place over an extended period of time, cases can be complex and more than one SPR may be logged.

Example 1: Rent Pressure Zones (RPZ)

R1R15812 Representative Medium Case Closed 16 19/01/2018 - 06/03/2018 (46 days)

Subcategories: Other

Case Summary: Client is an EU citizen with language difficulties. She had been renting with rent supplement for 7 years. A few months ago she received a notice of termination due to substantial renovation but with CIC intervention this notice was withdrawn. Shortly afterwards, the agent called the client and advised that he was going to issue her another 1 year fixed term lease and that he would also fill in her HAP forms. When the client went to sign the lease she asked if there were any changes to the contract from previous years and the agent told her that the only change was the 4% rent increase. The client signed the lease and was awarded HAP.

The following month the agent requested that she pay €250 and pointed out a clause hidden in the middle of the lease that stated that she was to make a monthly contribution to the management fees. The agent stated he had discussed this with the client before she signed it but the client was adamant that she had not been aware of it. CIC assisted client with negotiations in which agent agreed to lower the contribution slightly but would not reduce it to a level which client felt she could manage to pay.

CIC discussed options with client re: referring case to RTB for unfair term in contract and circumvention of Rent Pressure Zone legislation. Client was considering doing this but was anxious about it. Client decided she wanted to try to get landlord to accept a more manageable amount first. CIC contacted agent again and assisted with further negotiations which resulted in an agreement which they were both happy with and a saving of €1800 per year for the client.

Nature of Policy Issue: Information Deficits

Problem and Impact on Client: The client had been renting for a number of years and the landlord, through his agent, stated that he wanted to put up the rent to market rate. However he was restricted by the Rent Pressure Zone legislation so firstly he tried to terminate the tenancy on the grounds of substantial renovation. After CIC intervention he was forced to withdraw this notice.

Later the agent called the client, who has limited English, and asked her to sign a new fixed term lease. The agent did not tell her that he had inserted a new clause in to the middle of the lease under tenant's obligations which stated that she was to make a contribution towards management fees of €250 per month. The client signed the lease and the agent chased her the following month for the additional payment.

In the end, the client decided not to pursue the matter via the Rent Tenancies Board (RTB) and instead negotiated the contribution down to an amount she could manage. We are aware of a number of cases where letting agents have been trying a number of ways to circumvent the Rent Pressure Zone legislation. There has been some clarification from the Rent Tenancies Board recently in relation to the substantial renovation issue which was being used regularly, but it would be useful if they would also clarify the situation in this case where extra charges are being added on top of the rent, so that tenants would have clear information about whether this is allowed under the Rent Pressure Zone legislation or not.

Example 2: Domiciliary Care Allowance – Three Social Policy Returns recorded over course of case duration

R1R15809 Representative Medium Case Closed 72 19/01/2018 - 27/02/2019 (404 days) *

Subcategories:

Domiciliary Care Allowance

Case Summary: Client requested the support of CIS with her application for both Domiciliary Care Allowance (DCA) and Carer's Allowance (CA) in respect of her child. Both of the applications were turned down. We supported the client with seeking a review and appeal. We advised client to gather further medical evidence in respect of her child and supported her through her written submission outlining her child's condition. The Appeal for Domiciliary Care Allowance was successful and the Carer's Allowance as it is dependent on the child being awarded DCA was also awarded. Both payment were backdated to date of claims being submitted. Client is now in receipt of DCA half rate Carer's Allowance, the One Parent Family Payment and The Household Benefits Package and also received arrears of €13,616.

Nature of Policy Issue: Access and Administrative Barriers

Problem and Impact on Client: Domiciliary Care Allowance (DCA) Issue: The delay in processing time for new applications for Domiciliary Care Allowance is causing undue hardship to this client. The One Parent Family Payment is payable to parents of children in receipt of Domiciliary Care Allowance until the child turns 16. This client would have an entitlement to OPFP, half Rate Carer's Allowance, Carer's Support Grant, Household Benefits Fuel Allowance and Free Travel if Domiciliary Care Allowance is awarded. Processing time for new application for DCA: Client made application for Domiciliary Care Allowance and Carer's Allowance in respect of her child on 24th April 2017. Client is parenting alone and is currently in receipt of Jobseekers Allowance. Client was notified on 17th July 2017 that she is not entitled to the Carer's Allowance as her child is under 16 and not in receipt of Domiciliary Care Allowance. I phoned Domiciliary Care Allowance on 19th July 2017 for update on the client's application. The Department was currently processing applications received in February 2017 and it will take a number of weeks before client's application is processed. Client was notified on 26th September 2017 that she was not entitled to Domiciliary Care Allowance (DCA).

Client lodged an appeal 12th September 2017. Client received confirmation from Appeals Office 23rd October 2017. On 7th October 2017 I phoned the Appeals Office for update on case, I was put through to DCA as the file had been sent back to that department. They were working on reviews from September 2017 and it will be another while before client's case is dealt with. I phoned DCA again on 17th January 2018. The client file was received back from Appeals Office on 23rd October 2017 and is still waiting for deciding Officer to look at the file. The delay is causing undue hardship as while client is in receipt of Jobseekers Allowance she may be referred to Seetec. This will cause further hardship to client because if she does not attend appointment with Seetec as she is at risk of losing her payment. The client will be unable to participate on the activation programme designed by the Department to get people back to employment as she is providing full time care and supervision to her child who has special needs.

Nature of Policy Issue: Access and Administrative Barriers

Problem and Impact on Client: Unable to make phone contact with the Carers Allowance section. After waiting over 15 minutes, the phone just went dead. Further to a letter sent to the Department 2nd August 2018 and a number of phone calls, client has still not received any information regarding her application for Carer's Allowance since she was awarded Domiciliary Care Allowance. This is causing client undue hardship.

Nature of Policy Issue: Access and Administrative Barriers

Problem and Impact on Client: I waited 15 minutes before someone answered. I was not given any information as client was not present with me. I informed the person whom I spoke to that an Authority to Act form signed by my client had been sent in with a letter. The person said she would ring client directly late and speak with her regarding update of claim

Local Action Taken:

Example 3: Social Welfare Overpayments – Two Social Policy Returns recorded under different headings

R1R13304 Representative Medium Case Closed 57 05/10/2016 - 29/05/2018 (601 days)

Subcategories: Other Illness Payments, Other

Case Summary: Client called in very distressed with letter from Debt Recovery re an overpayment of €112,921.40. Client had not received revised decision letter. Had copy of natural justice letter to which she had replied and which alleged she had used two PPS numbers to claim Deserted Wife's Benefit (DWB) and Illness Benefit at the same time. When CIC phoned them Illness Benefit could not confirm whether a decision letter had been issued. CIC requested decision letter which was then received stating that client not entitled to Illness Benefit from 2004 to 2016 as she already had a social welfare payment. CIC appealed decision and sent copy of appeal acknowledgement letter to Debt Recovery requesting them not to pursue recovery of debt until outcome of appeal was heard.

FOI requests for DWB and Illness Benefit files. From file it was clear that client's claim for DWB had been under a claim number, not PPSN. Client had later claimed Illness Benefit under PPSN. Client said she had checked with local office several years previously whether she was entitled to both payments and they had not stopped either payment. (Client would originally have been entitled to half rate Illness Benefit). CIC checked with Client Identity Services who said 2nd PPSN had been issued in 2015. Client was unaware of this 2nd PPSN. CIC submitted detailed letter of appeal to Appeals Office requesting cancellation of debt. Appeals Office then confirmed that DEASP had not submitted their file as they were reviewing the decision themselves. Several emails and phone calls to Illness Benefit section over a year requesting updates. CIC advised verbally in July 2017 that overpayment would be cancelled. Letter confirming cancellation of overpayment eventually received following April. 20 hours and 55 actions.

Nature of Policy Issue: Access and Administrative Barriers

Problem and Impact on Client: Client was issued with notification to recover debt letter re an alleged overpayment of €112,000. No revised decision letter had been sent to client. CIC had to request decision letter from DEASP. Client would not have known about appeal procedure if she had not called to a Citizens Information Centre.

Local Action Taken: CIC requested revised decision letter.

Nature of Policy Issue: Information Deficits

Problem and Impact on Client: Unnecessarily long process to cancel overpayment. DEASP did not release file to Appeals Office because they decided to review the decision themselves. A decision was taken to cancel the overpayment but the process took 16 months, causing great distress and worry for client.

Local Action Taken: CIC was in constant contact with DEASP re progress on decision.

Appendix 5: Examples of local social policy work in CISs (2017)

Restructuring took place in 2018 and services reported on a regional basis. Examples of local social policy work in 2018 can be found in Section ** of this document. The table below shows local social policy work done in 2017 by local services.

Name	heading	summary
Blanchardstown / Dublin 15 CIS	Housing - anomaly	Private tenants of a local authority owned estate are not eligible for Rent supplement. Representation is being made to the council on the general policies around this.
Dublin City Centre CIS	Meetings with local DSP	Several meetings have been held with Regional Managers of the local DSP office to discuss issues of concern. DCC CIS is a member of the Immigrant Information Network which raises issues of concern at regular meetings with the Garda National Immigration Bureau & the Irish Naturalisation and Immigration Service. DCC CIS has been represented at 2 meetings of the Immigrant Information Network and has met with the Garda National Immigration Bureau & Irish Naturalisation and Immigration service regarding issues of concern. The IIN provided feedback on the new Spouse of Irish Citizen form and the INIS website in addition to other matters identified by the group such as the operation of the new online appointments system and the difficulties in making appointments.
Dublin City Centre CIS	Immigrant Information Network	
Dublin City Centre CIS	Participation in CIB Research on ENPs	Case Studies contributed and staff shared experiences with researcher
Dublin City Centre CIS	Participation in UCD Anti-Discrimination Research	DCC CIS participated in a research project undertaken by the Equality Studies Centre, UCD School of Social Justice & the Irish Council for Civil Liberties 'A Critical Review of Anti-Discrimination Law in Ireland'
Dublin City Centre CIS	Crosscare ' Person or Number? 2'	DCC CIS has contributing Case Studies to this Report on the barriers faced by Migrants in accessing Social Protection.

Dublin City Centre CIS	Migrant Representative Stakeholder Group	<p>DCC CIS is a member of the Migrant Representative Stakeholder Group and the Migrant Consultative Forum which has met with the Joint Committee on Public Service Oversight and Petitions and the Tanaiste. This group also meets regularly with the DSP. DCC CIS has been represented at 4 meetings of the Migrant Stakeholder’s Group in 2016 & 3 meetings of the Migrant Consultative Forum which meets with the DSP to discuss issues of concern. DCC CIS & Crosscare have drawn up a document on Supplementary Welfare Allowance and Exceptional Needs Payments to open discussion with the SWA unit regarding issues faced by migrants. This document was presented at the MCF in May 2016 and the SWA unit have recently agreed to meet again to discuss ways of addressing some of the issues</p> <p>This is listed under collaborative projects, but it is also a forum where social policy issues are coming together. The Development Manager attended one meeting at CIB with INTREO early 2016.</p>
Clondalkin & Lucan CIS	CIB/DSP/CIS	
Clondalkin & Lucan CIS	Needs of People in Direct Provision (Asylum)	<p>Clondalkin CIS continues to manage the information sessions to residents of the Towers who have been granted leave to remain. We also now have the residents listed as a target group for advocacy under the new Dedicated Advocacy Pilot. We bring issues arising to the attention of Social Policy personnel in CIB on a regular basis.</p> <p>Last year we had two meetings with Managers at the local INTREO centre, to share issues arising and endeavour to address these. Some progress, but it is a slow process. There was some collaborative work in relation to the Direct Provision Residents in 2016, but meetings scheduled between Intreo & CIS personnel were postponed at short notice by the Intreo manager. Will continue to offer meetings twice a year.</p>
Clondalkin & Lucan CIS	CIS & INTREO Meetings	
Clondalkin & Lucan CIS	Support for ex-Asylum Seekers Social Policy Officer Appointed	<p>Preliminary discussions with the Partnership Social Inclusion Officer with regard to developing shared approach to address the information needs of ex-asylum seekers/new citizens in the area. (this work led to the Bridge Team project re people in Direct Provision, however further work with those granted asylum envisaged).</p>
Co Cavan CIS	Social Policy Training	<p>Social Policy Officer appointed - Irene Donegan</p> <p>Social Policy Training delivered in Cavan on 10th February by Teresa McCourt.</p>

Co Cavan CIS	Social Policy Alert -ENP's	Social Policy Alert responded to, Re: ENP's and follow up telephone interview with Kathy Walsh.
Co Cavan CIS	Pre Budget Submission	Feedback sent for considered inclusion into Pre Budget submission.
Co Cavan CIS	Social Policy	Social Policy an agenda item for discussion at Team meetings. Renewed focus and targets set and agreed. Social Policy reports circulated and cases discussed.
Co Cavan CIS	Social Policy Returns	39 Returns from Cavan CIS for Qtr 1&2
Co Cavan CIS	Social Policy Returns	82 Social Policy Returns
Co Cavan CIS	Review of Specialist Supports	Feedback on Specialist Supports provided to CIB
Co Cavan CIS	Strategy for the Rental Sector	Social Policy Team provided feedback to CIB
Co Clare CIS	CIB Submission on the Strategy for the Rental Sector	The service prepared a response to the call for submissions outlining issues and indicative cases on the rental sector generally. The response focussed on identifying ways in which the problems experienced by service users might be addressed.
Co Clare CIS	Social Policy Alert in Relation to SWA and ENPs	Contributed to the social policy alert in relation to SWA and ENPs. Monitored cases during the month of March that presented to our service where clients have to apply either for a basic SWA payment as an interim/short term payment or for a once off emergency/urgent needs payment. Documented and submitted case examples to CIB. This policy analysis sets out to explore CISs experience of dealing with cases under SWA and in situations of need. The main emphasis is on the extent to which SWA meets the needs that cannot be met under other payments. It also explores whether SWA can support people in these circumstances and if there are any gaps in provision.
Co Clare CIS	Medical Cards: Information Exchange	Participated in an information exchange with the National Medical Card Unit (NMCU) and CISs which was facilitated by the CIB Social Policy Team
Co Clare CIS	INOUE Regional Discussion Forum	Participated in the Regional Discussion meetings facilitated by the INOU which provides a forum to meet with frontline Information Providers from Unemployed Centres. The meeting focused on the sharing of experiences of dealing with core issues affecting unemployed people which are then taken on board as policy formation by INOU.

Co Clare CIS	CIB Pre-Budget Submission	Responded to CIB's 2017 Pre Budget Submission by providing feedback in the core areas of concern(housing, moving form welfare to work, families & children, older People and people with disabilities).
Co Clare CIS	Housing Assistance Payment Research	Contributed to research on the HAP that was undertaken by CIB. IOs also provided reflective responses to the survey which was circulated. This was to provide the researchers with valuable evidence for the basis of their report.
Co Donegal CIS	DCIS Board Meetings & Reports	Local social policy issues are brought to the attention of the board by the Service Delivery Committee as they arise. The Board is comprised of representatives of key agencies, statutory bodies and community and voluntary sector representatives, including HSE, Department of Social Protection, Donegal County Council, Letterkenny Institute of Technology, Donegal Down Syndrome Association and Donegal County Community Forum.
Co Donegal CIS	Service Delivery Committee	The Service Delivery Committee of the board includes within its remit the function of reviewing local social policy issues and making recommendations to the board where appropriate.
Co Donegal CIS	Participation in Social Policy Alerts	Comprehensive feedback provided to CIB in 2015
Co Longford CIS	Board meeting 2016	Social Policy item on agenda. Forum for discussion. Ongoing
Co Longford CIS	Social Policy Oyster Input	Ongoing input of social policy issues as they arise
Co Longford CIS	Team Meetings Bi-Weekly	Bi-weekly review of social policies recorded on oyster. Team meetings provides the forum for discussions, training oportunities.
Co Longford CIS	Social Policy Training Presentation	Developed with Teresa McCourt for formal training of Longford Staff on 20th July 2016
Co Monaghan CIS	Zero Hours Contracts - Employment Rights	Working with Citizens Advice Mid-Ulster, in conjunction with University of Bristol, to assist in their research on the issue of zero hours contracts and the erosion of workers' rights in both jurisdictions.
Co Monaghan CIS	Social Inclusion	Joined working group, organised and led by Monaghan County Council, to address issues of Social Inclusion and the duties of statutory agencies, in terms of their policy & practice with regards to human rights and equality as prescribed in Human Rights & Equality legislation, in particular S.42 duties.
Co Monaghan CIS	Social Policy Training	Training on Social Policy delivered to the Board of Management, Staff and Volunteers

Co Monaghan CIS	Inniskeen Community Forum	Working with Inniskeen Community Forum to raise and pursue issues of concern to the wider community in the Inniskeen area of south Co. Monaghan, in particular community/public transport, lack of GP access and general lack of public services in the area.
Co Offaly CIS	Added Social Policy to agenda on BOM	Added social policy issues to BOM and if an social policy issue appears locally, the Development Manager brings it to the boards attention for advise as to how deal with the issue locally.
Co Offaly CIS	Add Social Policy to agenda on Volunteer Meetings	We are allowing an hour to discuss social policy at Volunteer meetings. Development Manager is printing out all SP reports made in Oyster with staff and we are having open discussions. Hoping this will have a positive effect on our long term returns.
Co Offaly CIS	Add Social Policy to agenda for staff meetings	We are allowing an hour to discuss social policy at staff meetings. Development Manager is printing out all SP reports made in Oyster with staff and we are having open discussions. Hoping this will have a positive effect on our long term returns.
Co Offaly CIS	Social Policy at Advocacy Case Supervision	At monthly case supervision social policy issues are highlighted and reported.
Co Offaly CIS	Social Policy Training at Team Meeting	Had trainer meet staff and review social policy role
Co Offaly CIS	Social Policy Training	CIB to deliver SP training
Co Roscommon CIS	Social Policy Case Study Day	Joint team meeting (all staff) reviewing client case studies with focus on shared knowledge and Social Policy dimensions.
Co Roscommon CIS	Dedicated Social Policy Research Time	Dedicated Social Policy Research Time – each IO and IP is allocated 3.5 hours per month (subject to Rota constraints) dedicated Social Policy research time to allow for report writing and submissions.
Co Tipperary CIS	Increase in recording Social Policy	86 Social Policy reports were logged for the period January - December 2016 which is a 7.5%increase on last year. Social Policy training took place in Nenagh and Thurles in June 2016.More Social Policy training to be organised for 2017.
Co Westmeath CIS	Interagency Group - PPN	Led by Westmeath County Council C&V - a cross county public participation network (previously SIM). Westmeath CIS are an engaged and active participant attending 6 scheduled meetings per year.

Co Wicklow CIS	Research into inappropriate placement of people with disabilities into nursing homes.	Co. Wicklow CIS, NAS and Bray Area P/ship was successful in securing funding from CIB to undertake research into the inappropriate placement of people with disabilities in Nursing Homes. It is expected that tendering for research will begin in early 2011
Co Wicklow CIS	Older People's Network Ambassadors' Project	The Older Persons' Network's Ambassador Project is now well established in the south of the county and there are now plans to extend it to the east of the county. The ambassadors act as a conduit to direct social policy issues from their local communities back to the OPN's Social Policy sub committee of which the Development Manager is a member (as well as being on the Executive of the OPN). Training is being provided by Co. Wicklow CIS and other agencies.
Co Wicklow CIS	Bray Local Social Policy Forum	Co. Wicklow CIS promotes the Local SP Forum which meets on an ad hoc basis to discuss local social policy issues. Members included Bray Area Partnership's LESN, MABS, Wicklow Trade Union Centre and Bray Community Addiction Team. This was revived in Sept. 2014 and will now form part of Bray Area Partnership's Marginalised and Unemployment Cluster Group meetings. One of the outcomes of feedback from the CIC mobile unit evaluation was the lack of knowledge around the Living Alone Allowance. Bray CIC wrote an article on this for inclusion into the Co. Wicklow Older Persons' Network Newsletter in order to promote this allowance among this cohort.
Co Wicklow CIS	Older Person's Network Social Policy committee	The need for a guide to the Nursing Homes Support Scheme was established through the Older Persons Network and this was listed as an action for the SP sub group. Co. Wicklow CIS took up this project and 'A Step by Step Guide to the Nursing Home Scheme' was produced. We are now looking at establishing a 'Social Policy Corner' in the Older Person's Quarterly Newsletter.
Cork City South CIS	Pre-Budget Submission - Feedback Report	Analysis of SP Returns and Feedback to CIB on Current Concerns and recommendations for action
Cork City South CIS	Housing Action Plan Consultation - Research	Capture and Compilation of Key SP Housing Issues experienced by clients to inform participation in National Housing Action Plan Consultation.

Cork City South CIS	Contribute to CIB Research on Exceptional Needs Payments (ENPs) under the Supplementary Welfare Allowance (SWA)	Ran alert, captured issues, compiled report, submitted to CIB
Cork City South CIS	Housing Assistance Payment Research	Gather evidence of issues via surveymonkey
Cork City South CIS	Make work pay for people with disabilities	Contribution based on observations within the CIS of issues arising when dealing with clients with disabilities returning to work.
Cork City South CIS	Illness Benefit - secondary supports	IB is not a qualifying payment for HBP, FA, Free Travel or Living Alone. Recommend that if a client has a cancer diagnosis that these payments should be available for them to apply for. Client will hopefully only need assistance for up short period but it is very important that she get the help while she needs it
Cork City South CIS	Blind Pension	Lack of information on how means are assessed for Blind Pension. Different answers received from different people in the DSP. Applicants not aware of how means will be assessed, or if means are assessed correctly when deciding award of payment or not. CIB contacted re same. Clarification sought and obtained.
Dublin 12 & 6w CIS	Exceptional Needs Payment	Procedures around applications and refusals in respect of Exceptional Needs Payments.
Dublin 8 & Bluebell CIS	Housing and Homelessness	Continuing to work with the Mercy Law Resource Centre to develop ongoing social policies on housing and homeless issues. Attended 5 meetings of the Mercy Law Social Policy Working Group, 15th march, 28th April, 16th June, 11th October and 6th December 2016.
Dublin 8 & Bluebell CIS	Supplementary Welfare Research CIB	Submitted a Case Study on Supplementary Welfare Rent Allowance to researchers and followed up with a telephone conversation
Dublin City North Bay CIS	Newsletter on Carers Allowance half-rate	The CIS produced a newsletter in March on the issue of half-rate Carers Allowance as it has been our experience that many relevant people were unaware that they were entitled to apply for it. The newsletter was disseminated widely to relevant groups in our catchment area, i.e. organisations working with older people and people with disabilities and given out at information stands.

Dublin City North Bay CIS	Social Policy Returns	The CIS made 10 social policy submissions through the Oyster system in the first six months of 2016 (one of which was highlighted in the CIB's first quarterly Social Policy Bulletin). This represents a very significant increase in Social Policy Returns compared to other years.
Dublin City North Bay CIS	Oyster Social Policy Returns	The CIS made 25 Social Policy Returns through the Oyster system in 2016
Dublin City North Bay CIS	'Fair Deal' Nursing Home policy explained	Briefing paper on Fair Deal nursing home policy distributed to clients and throughout the catchment area.
Dublin City North Bay CIS	Higher Education maintenance grants explained	Briefing paper on Maintenance grants distributed to clients and throughout the catchment area.
Dublin City North Bay CIS	December 2010 Budget main points	Briefing Paper on the December 2010 detailing man changes on social welfare payments, USC etc. Distributed to clients and throughout the catchment area.
Galway CIS	JobPath	Meeting with Seetec to clarify issues around the implementation of JOBPath and the impact on clients, i.e. issues around clients having to travel long distances to seek employment or the securing of employment which leaves clients less well off. The Galway CIS Development Manager was invited to visit the local DSP offices and was given a tour, introduced to staff and given an overview of the work of the various sections within the Galway offices. A number of issues were discussed and noted, including FOI/Data Protection requests from clients (as advised by CIS staff), and the issues with the local DSP's phone service. With a view to a better understanding between the services, we agreed to organise reciprocal presentations on the roles of each service.
Galway CIS	Department of Social Protection	
Galway CIS	SWA and Exceptional and Urgent Needs Payments	Galway CIS provided feedback to CIB regarding SWA payments and urgent needs payments under SWA to meet social need.
Galway CIS	Housing Assistance Payment	Galway CIS provided feedback to CIB regarding the Housing Assistance Payment, and the main queries, and key challenges, facing clients who are seeking to access the new payment.
Galway CIS	PreBudget Submission	Galway CIS provided feedback to CIB to highlight the difficulties and challenges that people experience when they are accessing social and public services. Galway CIS provided feedback on the following: < Moving from Welfare to Work. < Housing. <

Families and Children. < Disability, Illness and Carers. < Older People. < Employment. < Immigration.

Co Meath CIS	Housing SPC	Development Manager sits on Housing SPC
Co Meath CIS	MERAN	Development Manager member of Meran
Co Meath CIS	NERDTF Drugs Rehab Project CE	Meath CIS sits on steering group of NERDTF DRP CE programme and assists with information needs of the project
Northside CIS	Social Policy Roundtable	A roundtable meeting around issues of social policy attended by local groups.
Cork (West) CIS	West Cork Social Policy Forum	West Cork CIS met with other local agencies which have a remit to work with vulnerable people in the West Cork area to explore social policy issues that arise. It is planned that the forum will meet 3 - 4 times each year. The first planning meeting was held on 19/5/2017 and a subsequent meeting on 12th October

Appendix 6: Data Sources for Social Policy and Research team in CIB

This document was prepared by the CIB Social Policy and Research team as part of its quality assurance system. Many of the sources included are also listed in Section 7 - Resources.

Introduction and Overview

There are a number of sources available that provide reliable data about the social environment and economic factors affecting people in Ireland, such as income, education, living conditions and labour market participation. The following report outlines some of the most popular and relevant data sources for social policy and research work in the Citizens Information Board context³. Section one listed the internal CIB reports that present information and analysis on services provided by our delivery services.

Citizens Information

The Citizens Information Board is the statutory body which supports the provision of information, advice and advocacy on a broad range of public and social services. It provides the Citizens Information website, www.citizensinformation.ie and supports the voluntary network of Citizens Information Centres and the Citizens Information Phone Service. It also funds and supports the Money Advice and Budgeting Service (MABS).

The CIS Activity 6 month and End of year Reports provide a breakdown of CIS caller and query information across a number of areas (demographics, contact type, location, query type) and the type of intervention and referrals provided by services.

The Citizens Information Phone Service (CIPS) 6 month and End of Year activity reports provides an overview of Caller volume and query categories.

The Waiting Times Report

1. Irish Context

The Central Statistics Office

The Central Statistics Office was established in 1949 as Ireland's national statistical office. The Office exists primarily to meet the needs of government for quality statistical information. It also serves the needs of the wider national and international community (media, researchers, students, businesses, representative organisations, the EU, international organisations, and the public generally) for impartial and relevant information on social and economic conditions.

CSO Databank (www.cso.ie)

³ This is a working document, so new sources and updates will be made to the document a number of times annually.

CSO's online Databank of Official Statistics provides access to a range of databases and reports, such as Census Population Interactive Tables and links to other public sector databases, for example:

› [Department of the Environment, Community & Local Government](#)

› [Department of Education and Skills](#)

› [Irish Maritime Development Office \(IMDO\)](#)

It also provides a link to Statistical Databases from International Organisations

› [Eurostat](#)› [ECB](#)› [OECD](#)› [UNECE](#)› [UNSC](#)› [IMF](#)

As well as the census and other statistical information, the CSO publishes a numbers of reports on areas of social and economic importance such as inflation and unemployment in Ireland. It also conducts a number of Household Surveys. These surveys gather information on the economic and social situation of households in Ireland. The surveys include the:

Quarterly National Household Survey (QNHS) - measures employment and unemployment levels.

The Quarterly National Household Survey (QNHS) began in September 1997, replacing the annual April Labour Force Survey (LFS). The primary purpose of the survey is the production of quarterly labour force estimates, which includes information on employment, unemployment, occupations, regional and age group data etc. The QNHS also produces reports on special social topics (eg, Crime and Victimization, Housing, Recycling, Travel to Work, Health).

Information is published quarterly, normally between two and a half to three months after the reference period. Data is also held on the CSO Data Dissemination Service and also published in the CSO's Statistical Yearbook.

The QNHS is extensively used by universities and economists as well as having a large influence in policy making decision at both national and international level. See

www.cso.ie/en/media/csoie/releasespublications/documents/labourmarket/2013/qnhs_q42013.pdf for the latest publication, Q3 2013

The principle statistics from the QNHS are:

- [Employment and Unemployment \(ILO\) 000's](#)
- [Seasonally Adjusted Standardised Unemployment Rates](#)
- [Persons Aged 15 Years and Over Classified by Sex and Principal Economic Status](#)
- [Industrial Disputes Involving Stoppages of Work \(Disputes in Progress During Year\)](#)

The Income and Living Conditions (SILC) - measures living standards in Ireland

The Survey on Income and Living Conditions (SILC) in Ireland is a household survey covering a broad range of issues in relation to income and living conditions, conducted by the Central Statistics Office (CSO). It is the official source of data on household and individual income and also provides a number of key national poverty indicators, such as the at risk of poverty rate, the consistent poverty rate and rates of enforced deprivation. This report currently presents the results for 2012 and comparable data for previous years.

The survey also collects information on poverty and social exclusion.

A representative random sample of households throughout the country is approached to provide the required information. The survey is voluntary from a respondent's perspective; nobody can be compelled to co-operate. The 2003 survey, the first in the series, commenced on June 16th 2003.

The core outputs from the SILC each year will include:

- Detailed income data on households and individuals.
- The number/proportion of persons at-risk-of-poverty.
- The number/proportion of persons living in 'Consistent Poverty'.
- Information on enforced deprivation.

While annual SILC data is available on income, poverty and deprivation rates, further analysis can also be carried out to specifically look at a particular subject, such as the April 2014

www.cso.ie/en/media/csoie/releasespublications/documents/silc/2012/silc_2012.pdf

About CSO Statistics

CSO statistics are disseminated by the office in a variety of ways as follows: **Statistical Releases** These provide the more recent results of regular statistical inquiries (e.g. Monthly Retail Sales Index, Quarterly Industrial Earnings) as soon as they become available. Since 1998, the CSO has published all statistical releases on their website at time of publication. Go to www.cso.ie/en/statistics/ to access the Statistics area of the website.

Statistical Publications

These provide the detailed results of large-scale inquiries (e.g. Census of Population reports, annual Census of Industrial Production results).

Special Analyses

It is not always practical for the CSO to publish the full range of information and analyses available from statistical inquiries. The specialist requirements of some users may, therefore, not be met by the published releases and reports. To meet these requirements the CSO provide, on a fee basis, special series and analyses to individual users tailored to their particular needs.

Press Releases

The CSO issues Press Releases for many detailed statistical publications, highlighting the principal features of the results.

Press conferences

Press conferences are arranged by the CSO in conjunction with the release of important statistical results and publications.

The Central Bank

Go to www.centralbank.ie

The Central Bank of Ireland undertakes data collection, statistical analysis, economic analysis and research designed to inform economic policy making across a wide range of areas. The central Bank also contributes to the development of the European System of Central Banks (ESCB) statistical framework, particularly in relation to new requirements for the European Systemic Risk Board.

You can access useful data for social policy and research work in the Economic Policy and Statistics section. For example the latest statistical release on mortgage arrears, restructures and repossessions for the period ending September 2013 can be found at

www.centralbank.ie/polstats/stats/mortgagearrears/Documents/2013q4_ie_mortgage_arrears_statistics.pdf

ESRI (www.esri.ie)

The ESRI produces research that contributes to understanding economic and social change in the new international context and that informs public policymaking and civil society in Ireland.

ESRI researchers make extensive use of data bases at the Central Statistics Office. They have also collected primary data for research purposes in Ireland, through state-of-the-art surveys and through the use of administrative records. In addition the Institute manages two national data sets (HIPE and NPRS) on behalf of the Health Service Executive.

- HIPE is a computer-based system designed to collect demographic, clinical and administrative data on discharges and deaths from acute hospitals nationally.
- NPRS - The National Perinatal Reporting System has as its principal aim the provision of national statistics on perinatal events. The NPRS collects data on approximately 75,000 birth records each year from 20 maternity units and all participating 20 independent midwives. Data collected include morbidity, mortality, and socio-economic data.

The Institute's principal output is knowledge that is disseminated widely in books, research papers, journal articles, reports, and public presentations. All knowledge output is quality assured through rigorous peer review processes. For example, go to www.growingup.ie/index.php?id=60 to access key findings from the Growing Up in Ireland Study.

- ***Growing Up in Ireland*** is a national study of children. It is the most significant of its kind ever to take place in this country and will help us to improve our understanding of all aspects of children and their development.

The study is taking place over seven years and following the progress of two groups of children; 8500 nine-year-olds and 11,000 nine-month-olds. The main aim of the study is to paint a full picture of children in Ireland and how they are developing in the current social, economic and cultural environment.⁴

2. European Context Go to www.cso.ie/en/silc/aboutthesilc/coresilcoutputs/

The EU Survey on Income and Living Conditions (EU-SILC)

Key tables of European Statistics can be accessed through the CSO homepage. The Income and Living Conditions (SILC) survey has also been conducted throughout the European Union as the

⁴ **Growing Up in Ireland** is a government study. The [Department of Children and Youth Affairs](#) is funding it, in association with the [Department of Social Protection](#) and the [Central Statistics Office](#). The Department of Children and Youth Affairs is overseeing and managing the study, which is being carried out by a consortium of researchers led by the [Economic & Social Research Institute](#) (ESRI) and [Trinity College Dublin](#).

European Council and the Commission has given high priority to fight against poverty and social exclusion.

European Community Household Panel (ECHP)

epp.eurostat.ec.europa.eu/portal/page/portal/microdata/echp

The European Community Household Panel (ECHP) is a panel survey in which a sample of households and persons are interviewed year after year. These interviews cover a wide range of topics concerning living conditions. They include detailed income information, financial situation in a wider sense, working life, housing situation, social relations, health and biographical information of the interviewed. The total duration of the ECHP was 8 years, running from 1994-2001 (8 waves).

Due to the confidential character of the ECHP microdata, direct access to the anonymised data is only provided by means of research contracts (see below for standard contract model). Access is in principle restricted to universities, research institutes, national statistical institutes, central banks inside the EU and EEA countries, as well as to the European Central Bank. Please note that individuals cannot be granted direct access. Contact point: estatmicrodata-access@ec.europa.eu. However, ECHP based data is available from the website.

99% of the "income and living conditions" domain under theme "Population and social conditions" is derived from ECHP. This includes many indicators of relative monetary poverty and of income inequality, analysed in different ways (e.g. different cut-off thresholds, by age, gender, activity status, tenure status).

It also includes a selection of indicators of social exclusion and non-monetary deprivation derived from ECHP, notably on housing.

Of these, 4 have been chosen as structural indicators, namely the at-risk-of-poverty rate before cash social transfers, the persistent at-risk-of-poverty rate and the s80/s20 income quintile share ratio. The at-risk-of-poverty rate after social transfers is a headline indicator.

A selection of indicators in the "health status" and "health care" collections of the "public health" domain also under the above-mentioned same theme are derived from ECHP as well.

Eurostat

Eurostat data are available on the Eurostat website: www.ec.europa.eu/Eurostat

About European Social Statistics

The European Statistical System (ESS) is a partnership between Eurostat (the EU Statistical Office), the National Statistical Institutes of the member states, and other national authorities responsible for the development, production and dissemination of European statistics. The primary objective of the ESS is to guarantee that European statistics, compiled in all the Member States of the European Union, are comparable, reliable, relevant and usable. Eurostat has the central function in the cooperation, and leads the work by developing statistics across country borders and ensuring the availability of harmonised European statistics of a high quality.

See http://epp.eurostat.ec.europa.eu/cache/ITY_PUBLIC/1-28112012-AP/EN/1-28112012-AP-EN.PDF for a recent release **Comparing demographic, economic and social trends among the G-20 members**.

Eurostat does not collect statistics from respondents, but compiles and quality controls national statistics that are collected and reported by the national statistics producers. These are published on the [Eurostat website](#).

With the introduction of the euro there is a need to measure the development of Economic and Monetary Union (EMU). The euro is the single currency for EMU and is compared with other currencies such as the dollar and yen. This has fuelled the harmonization of methodology between Member States. Just as there is one inflation rate and one GDP rate for the USA, Eurostat now publishes economic indicators for the whole euro-zone.

As the national statistical institute of Ireland, the CSO is an integral part of the ESS.

European Social Statistics partners

Links to the National Statistical Institutes of the EU can be found at [Eurostat National Statistical Offices](#).

Apart from the national institutes, other national authorities are involved in the production of European statistics. In Ireland, these are:

- [Bord Iascaigh Mhara](#)
- [Commission for Communications Regulation](#)
- [Department of Agriculture, Food & the Marine](#)
- [Department of Communications, Energy and Natural Resources](#)
- [Department of Education and Skills](#)
- [Department of Finance](#)
- [Department of Health](#)
- [Department of Justice and Equality](#)
- [Department of the Environment, Community and Local Government](#)
- [Environmental Protection Agency](#)
- [Forfás](#)
- [Health and Safety Authority](#)
- [Office of the Revenue Commissioners](#)
- [Sea-Fisheries Protection Authority](#)
- [Sustainable Energy Authority of Ireland](#)

3. International Organisations

European Central Bank

Go to www.ecb.int/home/html/index.en.html

The European System of Central Banks (ESCB) releases its statistics and related methodologies via the websites of the European Central Bank and the national central banks. The [purpose of ECB statistics](#) is to provide all the statistics required in the tasks of the ESCB and of the European Systemic Risk Board.

The ESCB subscribes to a [policy of free access and free reuse](#) regarding its publicly released statistics, irrespective of any subsequent commercial or non-commercial use. ECB statistics can be downloaded from the [Statistical Data Warehouse](#).

OECD Go to www.oecd.org/

The Organisation for Economic Co-operation and Development (OECD) promotes policies that will improve the economic and social well-being of people around the world. It provides a forum in which governments can work together to share experiences and seek solutions to common problems.

OECD uses information on a broad range of topics to help governments foster prosperity and fight poverty through economic growth and financial stability. OECD's work is based on continued monitoring of events in member countries as well as outside OECD area, and includes regular projections of short and medium-term economic developments. The OECD Secretariat collects and analyses data, after which committees discuss policy regarding this information, the Council makes decisions, and then governments implement recommendations.

OECD publications are a prime vehicle for disseminating the organisation's intellectual output. OECD publishes regular outlooks, annual overviews and comparative statistics. Among them:

- OECD Economic Outlook assesses prospects for member and major non-member economies.
- OECD Factbook is a key reference tool for everyone working on economic and policy issues.
- OECD Economic surveys provide individual national analyses and policy recommendations.
- Going for Growth presents comparative indicators and evaluations of national performance.

4. Additional websites of interest:

- UK: Family Expenditure Survey www.esds.ac.uk/government/fes/

Some good examples of surveys that concentrate on attitudes and opinion and therefore provide into the complexity of people's attitudes and opinions are:

- The Northern Irish Life and Times Survey (NILT) www.ark.ac.uk/nilt
- The Northern Irish Young Life and Times Survey (YLT) www.ark.ac.uk/ylt

5. CIB Social Policy and Research team publications

Pre-Budget Submission – it is recommended that everyone looks at this submission as it highlights most of the policy issues experienced in CICs

Information provision and access to public and social services for the Deaf Community (2018)

Housing Assistance Payment (HAP): The experience of Citizens Information Services (2017)

Making an Impact – the Public Value of Citizens Information Services in Ireland (2017)

Submissions made by Social Policy and Research team

Relate, produced bi-monthly by CIB, outlines in straightforward terms recent developments in social services, policy and legislation in Ireland. It can also be downloaded at:

<http://www.citizensinformationboard.ie/publications/relate/>

National Advocacy Service Annual Report 2017 – Contains lots of case studies.

National Advocacy Service Strategic Plan 2018-2021

Appendix 7: Social Policy – Extract from CIS Clients, Processes and Outcomes report

Extract from *CIS Clients, Processes & Outcomes*, Ann Clarke & Anne Eustace, Eustace Patterson Ltd., December 2015, independent research commissioned by CIB. Chapter 10 of the report is on the topic of social policy and the work of CISs and is copied here in full.

10.1 Introduction

This chapter places a spotlight on social policy as a CIS function. It draws on the analysis of secondary data held within the CIB and consultation with Development Managers and Chairpersons.

10.2 National Trends

One of the functions of CISs is to gather information from queries that have implications for social policy. The data gathered on access issues and other difficulties encountered by clients as well as individual cases inform the Social Policy Returns (SPRs). The number of Social Policy Returns has grown every year since 2007 when 1,373 Social Policy Returns were returned to the CIB. By 2014, the number of Social Policy Returns had more than doubled to 2,991.

Social Policy Returns

	2007	2010	2013	2014
Social Policy Returns (SPRs)	1,373	2,669	2,445	2,991

(Source: CIB Annual National Activity Reports)

There is clearly a link between the type of queries presenting and the SPR topics covered. For example, in 2014 queries related to social welfare accounted for 45% of all queries and 54% of all Social Policy Returns addressed social welfare issues. Eight percent of all queries related to health and 10% of SPRs covered health issues. Seven percent of queries related to money/ tax and 10% of SPRs also did.

	2010		2013		2014	
	All queries	SPRs	All queries	SPRs	All queries	SPRs
Social welfare	47%	61%	45%	53%	45%	54%
Employment	11%	11%	8%	3%	7%	3%
Health	8%	7%	8%	8%	8%	10%
Housing	5%	6%	5%	5%	6%	7%
Money/tax	5%	4%	9%	19%	7%	10%

(Source: CIB Annual National Activity Reports)

Common themes have emerged over the years that come up regularly in SPRs. For example, in social welfare SPRs these include supplementary welfare, FIS, disability/illness, rent supplement, unemployment, families/children, etc.

The majority of SPRs (77% in 2013, 80% in 2014) arise out of queries classified as complex.

10.3 Staff Involvement

The site visits and consultations with Development Managers explored views on social policy work within the scope of their remit. A range of views and practice in relation to social policy were evident.

The majority of Development Managers (67% or 20) consider social policy as a stated element of the role of the Information Provider and expect that all understand this. In these CISs all staff members are engaged in compiling and completing Social Policy Returns. Some feel that it is more appropriate that social policy be the remit of a designated and specifically qualified person and in these CISs this task is assigned to one dedicated member of staff. This is based on the view that social policy is a specialist area that requires specific levels of expertise and training.

Some believe it is unrealistic to expect all volunteers and staff to be as highly trained in social policy work as they may be in information provision. Also they may not have sufficient time or motivation for this type of work. In these CISs a small number of staff members are involved in social policy. There are also instances where the Development Manager has sole or primary responsibility. As a result 33% of Development Managers indicated that not all staff members are engaged in Social Policy Returns.

10.4 Impact of Social Policy Work

Development Managers gave examples of how social policy work has had an impact at local and national levels in recent times. Sixty percent gave examples. These examples are encouraging and relate to improvements in systems, forms, customer focus and ways of working with the DSP and HSE in particular. Forty percent⁵ were unable to recall or cite examples.

Examples of Local Movement and Changes as a result of Social Policy Work

A CIS noted barriers to accessing HEO clinics due to reorganisation of local services. The CIS managed to identify and make contact with a relevant person and achieve a direct contact and local HEO clinic information.

A report funded under the Social Policy Grants Scheme about older people and ICT demonstrated that older people are reluctant to check if they are in receipt of all of their entitlements. A local committee was formed to look at the recommendations emanating from this report and one such recommendation is conducting a benefits check for older people. It is now intended to hold a benefits check day locally for older people during Positive Ageing Week.

A CIS noticed that there was a lack of information on the Nursing Homes Support Scheme in hard copy. The CIS produced a Step by Step Guide to the Nursing Homes Support Scheme in December 2014 and this publication was distributed via their network of CISs, the Older Person's Network and the HSE.

A CIS noted issues experienced by separated couples when dealing with the Housing Section of the local County Council. There has been much improvement in this area and the area of Housing (i.e. getting on the Housing List) in general.

A CIS created links with the Department of Social Protection on behalf of the deaf community.

A CIS communicated with the local authority on Public Group Water Schemes and liability for water charges and water application process. The local authority contacted Irish Water on this issue. Initially Irish Water stated that Public Group Water Scheme customers were not Irish Water Customers. However, two months later this policy was changed.

⁵ Seven DMs did not answer this question, four could not recall and one said that they never receive feedback on SPRs.

A CIS worked on improving communications with local CWO offices and CWO accessibility and availability.

A CIS met with a local authority to streamline criteria for applicants and simplify a complicated form.

Informal phone calls/meetings between a CIS and the DSP and HSE yielded some successful responses, e.g. list of documents required to apply for SWA payment.

A CIS highlights issues with the local Superintendent Community Welfare Officer who meets with the Development Manager quarterly. Cases that have a continuing impact on clients' circumstances and which changes can be effected at a local level, are discussed, i.e. rent caps, ENPs, administration of other payments. This had the benefit of improving and/or adapting existing systems of delivery by some CWOs in their interaction with clients.

Discussing policy issues at a CIS Board meeting on which a senior official from the DSP is a member addressed instances of inaccurate or inadequate information locally.

Development Managers also cited examples of the impact of social policy work at national level:

Examples of National Movement and Changes as a result of Social Policy Work

In May 2012 Joan Burton TD, Minister for Social Protection, launched a CIB social policy report on the issues facing self-employed people. *Hard Times for the Self-employed: The Citizens Information and MABS Experience* highlighted a number of key policy and administrative issues that arise out of the interactions of self-employed people with the social welfare system. A growing number of the clients looking for assistance in CISs in recent years were self-employed people who were either unemployed or had experienced a major reduction in income. Many of these reports high levels of indebtedness. A range of issues arising from those experiences were described and analysed in the Report and proposals for addressing these issues were included.

CIS work on the student grant scheme (and the confusion there used to be about who could apply for the various grants) may have resulted in improvements in this area.

Improvement in the significant reduction of delays experienced by clients waiting for Department of Social Protections carers allowance claims to be processed.

Assisting members of the Romanian community in securing social welfare payments.

Improvements to the Domiciliary Care Allowance application process and form.

Improvements to the Invalidity Pension application form.

CIB pre budget submissions draw primarily on feedback received from CISs and can influence policy and the administration of schemes. For example, the Pre Budget Submission 2014 included areas such as assistance for low income families. The introduction of the Back to Work Family Dividend may have been partly due to this submission and submissions from similar likeminded groups.

10.5 Challenges Associated with Social Policy Work

The main challenges that CISs encounter in identifying social policy implications centre on time, understanding and appreciation, training, motivation, systems and sensitivities.

- **Time.** Many Development Managers pointed to the significant challenge of the time required to compile and complete a Social Policy Return. Given the level of busyness in CISs, sometimes social policy slips down in the list of priorities.
- **Understanding and appreciation of social policy.** Some Development Managers believe that social policy is not readily understood and appreciated by all staff. It can be seen by some as a specialist area that requires careful training and exposure over time in order to develop confidence and competence to compile and complete returns.
- **Motivation** and appreciation of the potential and value of completing Social Policy Returns. The view is that social policy work requires attention and it is necessary to see the results of the process so as to gain a full appreciation of its importance and potential. There is a view that this depth of understanding is currently lacking within some CISs and is having a negative impact on motivation to complete returns. Some believe that this challenge could be overcome if there was more attention placed on showing and sharing the impact of Social Policy Returns and the power they can have in changing and/or shaping policy development. There was a feeling that this is under developed.
- **Systems.** Some Development Managers mentioned the challenge of the current system for completing Social Policy Returns. They critiqued its repetitiveness and lack of visibility and sharing of where the information goes and how it is used.
- **Sensitivities.** A small number of Development Managers mentioned the sensitivities that they believe are associated with social policy work within the CIS network given its relationship with its parent Department of Social Protection. In particular they pointed to the challenge of managing the process in a constructive way so as to inform and shape policy.

10.6 Suggestions for Strengthening Social Policy Work

The following suggestions were offered to strengthen social policy work within the CISs:

- Provide ongoing training including refresher training for social policy work. Ensure that this training is grounded and practical and allows space for Information Providers to integrate their learning into their everyday work.
- Champion social policy work by purposefully enhancing its visibility, significance and value through regular exposure/discussion, workshops, presentations, etc.
- Cultivate the belief that social policy work makes a positive difference. A good way to start is by showing how Social Policy Returns work in practice.
- Step up communication about social policy and showcase examples of its power to influence change.

10.7 Summary

Social Policy Returns (SPRs) are an important and potentially powerful mechanism to inform and shape national and local policy and practice for the greater good. CISs serve an important function collating new, emerging and recurring topics and patterns noted in the course of their front line work. This intelligence can usefully inform wider policy and practice across the public service. The

number of SPRs is small (2,991 in 2014) and yet it is growing (12% since 2010). There are different levels of engagement across the CISs in SPR collation. This reflects different beliefs about the role of the Information Provider, the relevance of SPRs, the time and resources involved, motivation to do SPRs, concern about sensitivities that may arise and perceptions in terms of possible impact and value. All this merits attention and resources as informing social policy is an important influencing function of the CIS.

Appendix 8: CIB policy work on Medical Cards

This appendix includes a briefing paper prepared by CIB; notification of a seminar on this topic; subsequent submission by CIB

Medical Cards - Feedback from CIS and CIPS (April 2016) – Briefing Paper

There are currently 1.7 million people with medical cards (including discretionary cards, which stands at 96,000) and a further 409,000 people with GP Visit Cards. The overall number of medical card holders had increased by some 40% between 2008 and 2013 and has been declining since 2013 – fell over 36,000 from 2014 to 2015.

In 2014, the HSE engaged in two **reviews** of the medical card system and the publication of both of these reports (Prospectus & Deloitte Report and the Keane Report) led to a series of initiatives to try to improve the operation of the medical card scheme, as announced by Minister Leo Varadkar in the form of “ten key actions” in November 2014.

There are currently **five separate application forms** across this range of entitlement to the various types of cards – the Medical Card and GP Visit Card, GP Visit Card for the under-6’s, the over-70’s Medical Card, the over-70’s GP Visit Card and the Medical Card Application Form for children under 18 years (that is those with a cancer diagnosis). All applications are made centrally through the **National Medical Card Unit** based in Finglas (which was centralised in 2011 from a locally-based system). The Unit is staffed by over 170 people and receives approximately 30,000 pieces of post each week. This work is supported by the provision of an information support telephone line and also by staff within Community Health Offices (formerly Local Health Offices), who aim to advise and assist clients on the application process at a local level.

It would also seem that the national network of locally-based **Citizens Information Services** provide a good deal of assistance to people as they navigate the application, review and renewal processes. During 2015, there were over **53,000 queries** related to medical cards made in CISs nationwide. This was the single most queried scheme or benefit of the 990,600 total queries logged by information staff in the locally-based centres and is consistent with figures from previous years - 56,400 queries in 2014, 52,504 in 2013. The vast majority of these queries are focussed on providing clients with information, advice and assistance (where necessary) with the application form and the guidelines/ income limits associated with that process. Approximately 10-15% of these queries were related to the renewal and review processes.

The significant number of medical card queries that have been recorded by CISs over the past number of years seems to contrast with the findings of the 2014 Review Report (by Prospectus & Deloitte) which found that 86% of applicants completed their application form without assistance - and of the 14% who required assistance, the main sources of help were the local health office, the GP surgery, the public representatives office or the NMCU support line.

In providing information and support to their clients within CISs some information staff will identify a policy issue that they are coming across repeatedly and/ or an issue that they feel is having a serious impact on clients. When they see this, they will send a short indicative policy report to the Citizens Information Board (CIB) via the internal case recording system Oyster. This feedback is referred to as a **Social Policy Return (SPR)**. Given the confidential nature of the service offered within CICs and CIPS, all of the case study evidence that is submitted is anonymous and cannot be linked to any callers personal details, as these details are not routinely recorded by information staff.

CIB has a statutory function to provide such feedback on the effectiveness of current social policy and services and to highlight issues of concern to users of those services.

These anonymised cases provide CIB with useful case study material that can 'get behind' the statistics and demonstrate how policy (and the administration of policy) can impact on peoples' lives. In 2015, some 3,700 Social Policy Returns (SPRs) were submitted to CIB by information staff in CISs and CIPS. Of these SPRs, medical cards were consistently logged as one of the top three single issues during the past three years – although it should be noted that there was a decline in medical card SPRs in 2015, from a peak in 2014.

The main issues of concern that have been reported by information staff refer primarily to administrative and operational issues and include:-

- Reports of documents having been submitted to the Unit by applicants but going missing and having to be resubmitted;
- The withdrawal of the card (and also delays in processing applications) caused by correspondence from the Unit not being received (sometimes due to an out of date address being used);
- Lengthy delays in some cases waiting for a decision on a medical card application;
- Cases where people have told the CIS of the distress and anxiety associated with waiting for outcomes of applications, appeals and reviews - particularly for those with serious medical conditions requiring immediate treatment;
- Cases where clients have been confused by the review letters being generic in nature and not including clear information on guidelines;
- Instances where CIS clients do not seem to be clear as to how much extra income will affect their medical card entitlement;
- Cases where card holders only became aware that they had lost their entitlement when they went to pharmacy to get their drugs or visited their GP;

Other broader issues of concern that have been reported by staff within CISs and CIPS include:-

- The impact of the loss of a card (or the failure to get one) for people for whom the card acted as a passport to other essential services;
- Cases where people have had to pay for medication while waiting for the outcome of an appeal against the withdrawal of the card, or for an application to be processed where they are above the standard income guidelines;
- Cases where there is no clear provision for the reimbursement of medical expenses incurred during the period between withdrawal and restoration of a medical card;
- The difficulties that some people have in providing the income-related documentation required with an application (for example, self-employed people);
- Cases where there seems to be perceived difficulties with the interpretation and practice of card eligibility under EU Regulations;
- Cases where young people (16-25 years) are in receipt of reduced age-related Jobseekers Allowance, and are thus deemed to be below the SWA threshold and ineligible;
- Reports that some GPs charge medical card holders for services including blood tests, and sick certificates – which is contrary to the GMS contract as signed-up to by participating GPs.

Following on from a number of training sessions organised jointly by the NMCU and CIB's Training Unit, the HSE representative noted the intention to undertake a number of initiatives in respect of the processing and assessment of medical cards. These include:

- A review of the current guidelines for applications;
- The immediate scanning of all documents upon receipt by the NMCU, with the aim that all applications will be processed "on screen" by mid-2016 (thus reducing the risk and difficulties of lost documents);
- The development of an online application for the Medical Card;
- The possible merging of all Medical Card application forms into one form.

Given the types of issues that have been reported by services in relation to Medical Card applications, it is likely that much of this work, when implemented, will impact positively on CIS and CIPS clients. Issues that have been raised by services through the social policy feedback process will continue to be used by CIB in informing any discussions, submissions or reports in respect of these HSE initiatives.

Extract from email sent to all services from Social Policy and Research, CIB:

Date for Diary:

Medical Cards: Information Exchange for CISs with HSE National Medical Card Unit

Tuesday, 3rd May, 2016, Hilton Hotel, Kilmainham, 10.30 am to 1 pm.

Dear Development Manager,

I want to invite you to attend a **HSE Information Exchange for CISs on Tuesday, 3rd May** in the Hilton Hotel, Kilmainham, Dublin. A Briefing will be provided by the Director of Operations and staff of the National Medical Card Unit (NMCU) and will offer an opportunity for services to provide feedback on Medical Card and related issues impacting on clients.

The NMCU has been involved in a series of consultations with key stakeholders in relation to the reform programme being undertaken on medical cards following the publication of two major reports last year which identified communication as an area for improvement. The Prospectus and Deloitte report on the *Medical Card Process Review* recommended information sharing across the wider Primary Care Division Groups and other stakeholders, such as GPs; Public Representatives and Client Advocates, etc.

CIB was approached in this context 'to provide opportunities to develop deeper collaboration between the network of CISs and the National Medical Card Unit' - this reflects a recognition of the level of medical card queries being handled by CIB supported services and the social policy feedback role of the Board.

The primary objective of the Information Exchange sessions is to clarify aspects of the processes in the assessment and review of Medical Card and GP Visit Card eligibility and to take feedback from frontline services.

Development Managers and Information and Advocacy staff with experience in this area are invited to attend this information exchange. Services can send 2/3 participants. We want to ensure that services across the country are represented. We would appreciate if Managers could attend to reflect your service's overall experience in relation to the issues encountered.

Draft National Medical Card Unit Strategic Plan 2016-2018 - Submission by the Citizens Information Board (April 2016)

The Citizens Information Board (CIB) welcomes the opportunity to make a submission on the NMCU Strategic Plan. We note that there has been extensive consultation on the matter to date as referenced in the Appendix. This submission draws on the experiences of the countrywide network of Citizens Information Services (CISs) and the national Citizens Information Phone Service (CIPS) in dealing with medical card eligibility queries from the public. These services which are supported by CIB handled over 53,000 such queries in 2015.

The five strategic priorities outlined in the Strategic Plan -- *health and wellbeing, access to health services, transparency and accountability, quality of service, and user experience*— provide a necessary overarching framework. The outcomes expected from the NMCU stated strategic priorities are laudable, reflect what can be inferred as a user perspective and should be regarded as the core of strategic development. These state that people engaging with the NMCU can have confidence that:

- Once they submit an application for Medical Card or GP Visit Card, the application will be processed in a timely manner;
- The eligibility assessment will be undertaken strictly in accordance with the relevant legislation and the national assessment guidelines;
- The assessment outcome will be communicated to the applicant in a clear and unambiguous manner;
- The applicant will be informed of the pathway for a reassessment and the right of appeal, as appropriate.

The enhancement of the allocation and application processes set out in the Strategic Plan is important and necessary and should result in a more accessible system.

Administrative Issues Requiring Attention The stated underlying Strategic principle of listening to the views and opinions of people engaging with the NMCU and using these to plan and deliver a service of the highest quality is an important consideration. In this context, we note the experience of CIB service delivery partners. This shows that a number of people (a relatively small proportion of Medical Card and GP Visit Card applicants) find the process of applying for a card and dealing with a review of eligibility difficult and stressful. The administrative difficulties which have been referenced in feedback to the CIB from service delivery partners typically relate to:

- 'Lost' documentation and related repeated requests for information already submitted
- Issues relating to reviews and renewals
- Delays in processing applications and appeals
- Documentary errors
- Errors in assessment of means
- Some misunderstanding in the application of EU regulations
- An inability to contact the official dealing with the application
- Uncertainty (and related anxiety) on the part of individuals as to whether they will be eligible for a Medical Card or retain it following a review.

Strategy Implementation: Matters that need to be addressed

A general administrative issue noted was that a slight change in circumstances results in person having to completely reapply for Medical Card. This can cause distress and possible financial hardship while waiting for card.

While principles of equity and social inclusion clearly underpin the NMCU Strategic Plan and while reference is made to involving representatives of the public having an input on major issues, particularly "ethical and social issues", these aspirations will only become fully meaningful when the following matters are addressed:

• Expediting the development and enhancement of user-friendly aspects of the application process, viz.:

- Online applications, scanning of documents and improving flow and tracking need to be expedited
- Ongoing provision for those who cannot engage with on-line systems – there continues to be a significant digital divide in Ireland
- Mechanisms to ensure that applicants who can show proof of posting of forms and related documents to the NMCU are not required to re-send them
- Easier access for an applicant or someone acting on his/her behalf to the official dealing with an application
- Correspondence to applicants from the NMCU requesting additional information more tailored to individual applicant circumstances;
- The proposal to introduce a single, integrated process for people to apply for a Medical Card, a GP Visit Card, the Long-Term Illness Scheme, and the Drugs Payment Scheme should be implemented;
- There needs to be rationalisation in relation to application forms -- there are currently five separate application forms – the Medical Card and GP Visit Card, GP Visit Card for the under-6's, the over-70's Medical Card, the over-70's GP Visit Card and the Medical Card Application Form for children under 18 years (i.e. , those with a cancer diagnosis)
- Access points in health offices across the country should be widely advertised in locations frequented by the public;
- Contact facilities similar to those currently available to Oireachtas members should be considered for intermediaries such as CISs and CIPS to enable them to provide appropriate and timely advice and assistance to people who are experiencing difficulties with the application process;
- There should be clearer information on EU medical card eligibility on the part of officials dealing with applications under this provision;
- There should be clearer information on the two types of Medical Card applications and related assessment criteria for people aged over-70;
- There should be total clarity as to what people are covered for under both Medical Cards and GP Visit Cards -- this applies in particular to services provided by GPs;
- There should be some reference to how the ongoing work and deliberations of the Clinical Advisory Group in developing assessment tools for discretionary medical cards will feed into the NMCU Strategic Plan;

- It is important that, as far as possible, the assessment criteria are such to enable decisions on applications made in the first instance to be thorough, transparent and easily understandable in order to minimise the need for appeals which by their very nature can be stressful for people;
- The application system must have a proactive dimension to ensure that people who for reasons of disability or other may have difficulty in engaging with the process do not lose out on a service to which they have a clear legal entitlement;
- Other services where assessments of medical conditions are made could be used as a basis for an award of a Medical Card in order to ensure that people receive joined up services and do not have to undergo unnecessary further assessment (see below).

Broader Policy Issues

In terms of social inclusion and equity, the following matters are relevant and should be included in setting out the context for the NMCU strategic development:

- The thresholds for qualification for a Medical card need to be reviewed -- there has been no increase in these thresholds since 2006;
- The provision for the retention of Medical Cards on taking up employment should be reviewed to take account of situations where a 'Qualifying Adult' is the person taking up employment
- The situation of self-employed people, particularly those with very limited trading, in terms of establishing eligibility for a Medical Card needs to be reviewed;
- Medical Card income limits for young people aged between 16-25 years need to be reviewed;
- The current system of means testing in relation to savings and assets needs to be reviewed in line with the means assessment used by the Department of Social Protection;
- The availability of therapies for Medical Card holders in nursing homes needs to be reviewed to ensure equal access with those living in the community;

Overall Structure and Focus of Strategic Plan

In response to the consultation questions listed, we are of the view the language used is relatively clear and easy to understand and is relatively easy to follow. However, we believe that the high level focus of the document means that it is not entirely clear how the various components will be reflected in practice. While the Mission, Values and Goals are easy to understand and largely reflect the service user needs as identified by CIB service delivery partners, it is not clear how broader health policy and related budgetary matters will impact on the NMCU strategic goals. While key aspects of the medical card application process have been covered, the needs of people engaging with the NMCU, as reflected in queries to CISs and CIPS and as outlined in this submission, may not be fully captured.

Many of the recommendations suggested by CIB were incorporated into the [National Medical Card Unit Strategic Plan 2016 – 2018](#).

More recently, CIB prepared a briefing paper, including case studies, prior to a meeting with staff from the National Medical Card Unit. The paper is included below.



Medical Card concerns

Feedback from Citizens Information Services December 2018

The national network of locally-based Citizens Information Centres continues to provide a significant level of assistance to people as they navigate the application, review and renewal processes for the Medical Card and GP Visit Card.

During 2018, there were almost 65,000 queries related to medical cards made to CISs nationwide. This was the single most queried issue or benefit of the 1.017 million total queries logged by information staff in the locally-based Centres and demonstrates a consistently increasing trend over previous years – 59,826 in 2017 and 54,930 queries in 2016.

The vast majority of these queries are focused on providing clients with information, advice and assistance with the application process (both paper-based and online), the guidelines/ income limits associated with that process and the review and renewal process.

The CIB-provided website citizensinformation.ie also serves as a key portal for citizens seeking information on their rights and entitlements and an analysis of the website traffic over the past 12 months shows that documents on the Medical Card and GP Visit Card were viewed 714,000 times, with average monthly page views at 56,600.

In providing information and support to their clients within Citizens Information Centres (CICs), some information staff will identify a policy issue that they feel is having a serious impact on clients. In such cases, they will send a short indicative policy report to the Citizens Information Board via the internal case recording system. This feedback is referred to as a Social Policy Return (SPR). Given the confidential nature of the service offered within CICs, all of the case study evidence that is submitted is anonymous and cannot be linked to any callers personal details, as these details are not routinely recorded by information staff. The Citizens Information Board has a statutory function to provide such feedback on the effectiveness of current social policy and services and to highlight issues of concern to users of those services. These anonymised cases provide CIB with useful case study material that can 'get behind' the statistics and demonstrate how policy (and the administration of policy) can impact on people's lives.

In 2017, 4,884 Social Policy Returns (SPRs) were submitted to CIB by information staff in CISs. Of these SPRs, the medical card was the most-often reported individual payment or benefit and it logged 286 SPRs during 2017.

Two thirds of the SPRs that were reported in 2017 were concerned with administrative or operational issues.

The most common concerns highlighted by services are focussed on the following issues:-

- The main difficulty for clients was in renewing, and applying for, their medical card online. During the latter part of 2017, the National Medical Card Unit (NMCU) launched their new online application system (prior to which they had been asking selected recipients to renew their card online). Reports from services indicate that this online system is presenting difficulties for applicants who are not computer literate, who do not have access to (or cannot afford) the necessary technology to make the application (whether this is PCs, mobiles, tablets, scanning equipment or broadband), or people who have literacy or language difficulties. Services who have been supporting applicants in this process have also reported technical difficulties with the system. In addition, services noted that for clients who are unable to renew their card online, the only option available to them is to request and send in a full application form – a much more involved process, which can add many weeks to the renewal process;
- Cases where supporting documentation has been sent in by applicants but has not been received by the NMCU (or has been lost). In a number of the cases reported by services, clients have been asked on repeated occasions to send in documents and, depending on the timing of the requests, some applicants have to re-submit the full application form. This, in turn, is leading to excessive delays in the processing of some applications (with between three to six month delays being reported in some cases);
- On the issue of correspondence from the NMCU, services have also reported regularly on the letters that are sent by the Unit requesting additional documents to support the application/ renewal, with many noting that applicants have to make further contact with the NMCU to check which specific documentation is required;
- Services also report on the difficulties caused by the fact that the staff that they speak with on the Medical Card helpline are not involved in the processing of the applications and that, at times, there seems to be a disconnect between these two aspects of the service from the NMCU;
- The application and awareness of the Medical Card Retention Scheme, wherein some medical card recipients who take up work are entitled to retain their card for up to three years. Services have reported that, as this provision is not promoted widely (or highlighted in the application form), many recipients are not aware (or are not being assessed) in this context when renewing their card. Further, it is noted by services that these recipients are frustrated by the need to send a full application form when they take up work – despite the fact that their eligibility does not depend on their means under this provision. Given that NMCU staff have live access to DEASP records, this should provide a clear statement on an applicant's claims history and thus remove the need for the applicant to be aware of the retention provision in order to demonstrate eligibility and applicability;
- Confusion for people regarding the reimbursement of expenses when they have had to pay for medication or care while waiting for the outcome of an appeal against the withdrawal of the card;

- Cases where recipients have not received renewal forms for their cards and have only become aware of their lapsed eligibility when they visit a GP or pharmacist;
- Difficulties continue to be reported for clients who cannot access GPs who are willing to take them on as Medical Card patients;
- Some initial reports of difficulties caused by GDPR legislation, in that there have been some reports from services that written consent is required by NMCU staff in advance of them speaking to CIS staff (even in cases where the client can verbally consent by telephone);
- Reports that some GPs charge medical card holders for blood tests - which is contrary to the GMS contract as signed-up to by participating GPs.

CIB liaison with National Medical Card Unit

From the CIB delivery services' perspective, the links that have developed with the NMCU during the past number of years are particularly useful in the context of policy feedback and we look forward to engaging further with the Unit on issues of concern as they arise for clients of our frontline services. We welcome the facility to escalate particular cases that emerge via the CIC network directly to named individuals within the Unit and note that any such cases will be filtered through CIB. We also note with interest the key initiatives that the Unit is currently working on (as outlined in a meeting with CIB Social Policy and Research and Information Resources teams on 12 November 2018):-

- The recent development of new Medical Card National Assessment Guidelines. This was noted to be a "live" document which can be updated on a rolling basis by the Unit;
- The roll-out of a new centralised Drugs Payment Scheme (DPS) service. This new service allows people to apply online for their Drugs Payment Scheme card. Forms also continue to be made available at local Community Health Offices, GP surgeries, community pharmacies, and can be downloaded at hse.ie/dps
- The ongoing development of a new "all-in-one" application form, which can be used by all applicants regardless of which particular card they are applying for;
- Plans to have Live Web Chat in operation with the online Medical Card application forms during 2019, which should be able to provide direct assistance to applicants in real-time.

Over-and-above these developments, we also welcome clarification from the Unit on a number of areas of concern that have arisen through the feedback from delivery services:

- Regarding consent issues (or Authority to Act) that have arisen in light of the GDPR legislation, the NMCU staff stated that they can take verbal consent over the phone in cases where CIS staff are assisting clients or following up on an application. Written consent is not required;
- Regarding the reimbursement of medical expenses pending a decision, it was noted that in cases where it was deemed that the PCRS (Primary Care Reimbursement Service) was at fault, then a reimbursement can be sought;

- Whilst the Helpline contact staff are not involved with the actual processing of applications, they can access the application (and accompanying notes) on-screen when assisting the client. It was noted that processing staff are required to input as much information as possible when deciding on an application, in order to facilitate helpline staff to provide assistance and advice to the client;
- It was noted by NMCU staff that the uptake by carers of the GP Visit Card (which was introduced in September 2018) has been lower than expected, with a take-up of 15% amongst the 14,000 potential applicants;
- The existence of a specialist EU health Regulations team within the NMCU;
- It was also noted that NMCU staff can link in with DEASP payments and contributions directly when processing an application, a facility which adds to the full financial assessment that is currently required.

December 2018

Medical Card sample cases

Feedback from Citizens Information Services

- “Client received a review for medical card and said there was no change in circumstances and the HSE sent out a complete new application stating there was a change in circumstances. The client again re-iterated that there was no change in circumstances but the advisor on the helpline said that they received 5 euro additional income in March from the recent budget. The client is a single individual on DA so this would seem to be an unnecessary review given that the only source of income is social welfare derived thereby they have continued entitlement”. (CIPS)
- “Caller was on BTWEA and she contacted the Medical Card Section of the HSE – she has been told that her retention period starts when she started the BTWEA as this is a type of full time work. I contacted the Medical Card Section myself and they were unable to give me an answer and said 'every applicant is treated on their own merits'. (CIPS)
- “Caller has been on JST and then moved to JA as her child reached the age limit. She has now been given the opportunity to take up a job and the HSE will not allow her to avail of the Medical Card retention rule as she hasn't been on JA for a full year. They won't allow her to combine her time on JST. She is suffering stress as a result and is afraid of taking the job offer as she has too much to lose”. (CIPS)

- “Caller needed help with a paper medical card review form because she has no online access. As she is doing a paper review a full medical card application form is used. This places a greater demand and an unfair burden on the medical card holder. The caller also has an entitlement to retention as she was less than three years in employment following an extended period on full Jobseeker’s Allowance. There is nowhere on the form to address this and it needs to be brought to the attention of the medical card section by the inclusion of a letter with the form”. (South Connaught CIS)
- “Where a person requires a paper form, rather than the online review form, they must complete and return the full MC1 Medical Card and GP Visit Card Application Form (pdf). If they are aged over 70, the review notice received will include a form that can be used as an alternative to the online review form. The manual short-version review form should also be made available to persons under age 70 as many do not have internet skills or broadband facilities to do online versions of forms and it is cumbersome for some clients to have to complete the full MC1 application form rather than the more concise review form”. (South Connaught CIS)
- “This client has been asked for the third time by the Medical Card section to submit documents already provided twice”. (South Connaught CIS)
- “This client is an elderly gentleman and was waiting on his renewal form to be issued, it never came and when we contacted medical card section they said he will have to apply in full and go through whole process. Our Centre has had lots of queries in relation to people not getting renewal forms out and then when they go to doctor they find out they are not covered for services”. (North Dublin CIS)
- “This client applied for her Medical Card renewal in April 2018. Since then, she has been having difficulties with the process. Her MC expired in the meantime. Her circumstances haven’t changed. Four weeks ago she sent in the documents that were requested for the second time. We called the helpline today for an update and (for the third) time she has been asked to send the same documentation. The client is very frustrated”. (North Dublin CIS)
- “Client has started a job after more than a year receiving Jobseeker’s Allowance. He is renewing his Medical Card, which he should be able to keep on retention grounds for three years without a means test, however there is no place on the form to alert the Medical Card processing unit of this. We have advised him to attach a note to this effect”. (North Dublin CIS)
- “This client’s Medical Card showed it was valid until 2019. However, when he went to his GP he discovered that it was no longer valid. On contacting the Medical Card office he was told that they were doing an earlier review and he needed to make a new application, but he had not been sent any notice of this or a renewal form”. (North Dublin CIS)
- “The client telephoned our service in relation to reviewing her medical card on line with the PIN number received from medical card section. Client cannot use this facility as the Portal

does not work. On contacting the HSE she was informed it hasn't worked for some time. These are continuing issues for our service as we try using the portal with no success on behalf of clients". (South Connaught CIS)

- "HSE sent out PIN number for client to renew medical card online. HSE site not working and client cannot renew card online. This is regularly happening and the client is now left without cover". (South Connaught CIS)
- "This client is a full-time student (26 years old) and has numerous health problems. He is living at home and being supported by his parents. He applied for a medical card but was refused as he has no source of income. His parents are on low income and have a medical card, but he cannot be added as a dependent, as he is over 25. He requires regular medication and visits. This is causing significant hardship for the family". (Dublin South CIS)
- "We have had several clients contacting the CIS who have been refused Cross Border Medical Cards. As a worker who resides in the state and works in Northern Ireland is entitled to such a medical card it is not being picked up properly by the online review system. Staff in the Client Registration Unit seem to be unaware of this application process and declining applications on a means test". (North Connacht and Ulster CIS)

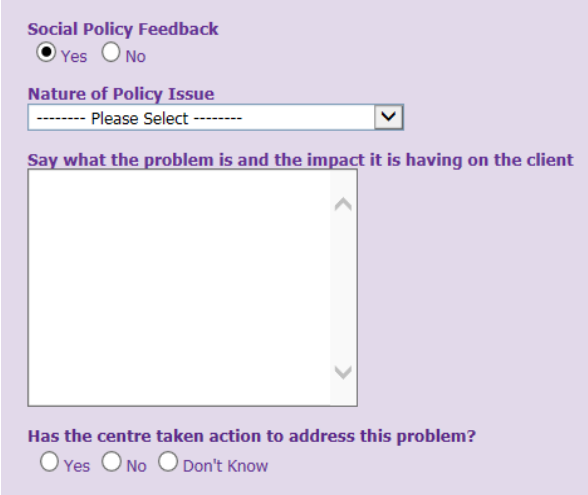

Appendix 9: Social Policy Returns by CIS and by CIC: 2018 figures

Regional Company	Total SPRs	CIC	SPRs 2018	SPRs 2017
Dublin South CIS	463			340
		Clondalkin CIC	56	36
		Ballyfermot CIC	123	52
		Lucan CIC	43	25
		Carmelite CIC	5	8
		Dublin 12 & 6w CIC	26	15
		Dun Laoghaire CIC	37	41
		Dundrum CIC	15	12
		Liberties CIC	25	24
		Rathmines CIC	60	62
		Stillorgan CIC	1	1
		Tallaght CIC	71	59
		Dublin 4 CIC	1	1
South Munster CIS	824			891
		Blackpool CIC	24	29
		Caherciveen CIC	18	17
		Fermoy CIC	7	11
		Youghal CIC	17	25
		Bantry CIC	155	190
		Cobh CIC	35	49
		Cork City Centre CIC	185	249
		Hollyhill/ Knocknaheeny CIC	26	43
		Kenmare CIC	7	6
		Killarney CIC	157	92
		Killorglin CIC	17	17
		Listowel CIC	20	7
		Macroom CIC	26	27
		Mallow CIC	39	55
		Mayfield CIC	6	17
		Mitchelstown CIC	7	6
		Tralee CIC	73	49
		Carrigaline CIC	5	
North Leinster CIS	936			648
		Ashbourne CIC	83	48
		Athlone CIC	246	132
		Athy CIC	3	2
		Trim CIC	12	5

	Drogheda CIC	14	13
	Dundalk CIC	107	87
	Longford CIC	161	126
	Maynooth CIC	131	100
	Mullingar CIC	22	27
	Naas CIC	10	25
	Navan CIC	131	60
	Newbridge CIC	16	23
North Dublin CIS	565		381
	Balbriggan CIC	24	11
	Blanchardstown CIC	54	78
	Dublin City North West CIC	114	62
	Dublin City Centre CIC	216	85
	Finglas CIC	25	13
	KARE CIC	53	74
	Northside CIC	34	32
	Skerries CIC	3	6
	Swords CIC	13	
	Ballymun CIC	11	5
	Dublin City North East CIC	3	2
	Cabra CIC	15	13
North Munster CIS	297		305
	Thurles CIC	43	39
	Tipperary CIC	9	5
	Waterford CIC	35	46
	Clonmel CIC	4	8
	Ennis CIC	52	47
	Kilmallock CIC	9	2
	Kilrush CIC	8	9
	Limerick CIC	79	84
	Nenagh CIC	36	32
	Roscrea CIC	3	2
	Shannon CIC	6	6
	Dungarvan CIC	9	11
	Merchants Quay CIC	4	8
South Leinster CIS	737		769
	Tullamore CIC	76	120
	Wexford CIC	12	21
	Arklow CIC	20	37
	Birr CIC	63	69
	Bray CIC	54	45
	Carlow CIC	28	37
	Edenderry CIC	279	221
	Enniscorthy CIC	6	1

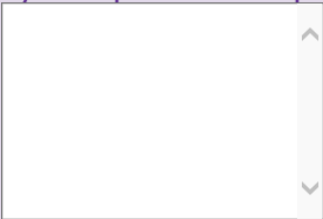
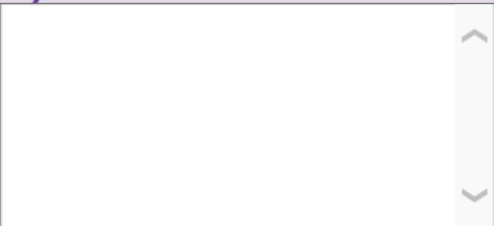
	Gorey CIC	36	41
	Kilkenny CIC	30	51
	Portlaoise CIC	35	42
	Wicklow Town CIC	98	78
South Connacht CIS	431		565
	Castlebar CIC	39	44
	Tuam CIC	36	33
	Ballina CIC	11	14
	Boyle CIC	49	55
	Clifden CIC	18	14
	Galway CIC	119	171
	Roscommon CIC	136	192
	Rosmuc CIC	19	24
	Westport CIC	4	5
North Connacht/ Ulster CIS	657		677
	Buncrana CIC	6	6
	Carndonagh CIC	29	14
	Carrick-on-Shannon CIC	120	97
	Cavan CIC	50	77
	Donegal Town CIC	5	15
	Dungloe CIC	117	77
	Letterkenny CIC	8	20
	Milford CIC	3	6
	Monaghan CIC	207	213
	Sligo CIC	55	47
	Carrickmacross	46	19
	Tubbercurry CIC	6	15
	Manorhamilton CIC	5	6
Total	4,910		4,576

Appendix 10: Social Policy caller and query guidelines on Oyster

<p>Social Policy Feedback</p>	 <p>Some queries may point to an underlying problem with a social or public service and may be indicative of a broader problem with policy or the administration of policy. You may want to note when the system is not responding adequately to a client’s needs. You should record these types of problems here by ticking ‘Yes’ and detailing the issue in the fields below.</p> <p>The Citizens Information Board uses these records to identify common policy issues (called Social Policy Returns or SPRs) across the network, and highlights them in Social Policy Reports, Social Policy Updates and submissions to government departments. These records are also used to support arguments for changes in policy.</p>	<p>Non-mandatory</p>
<p>Nature of Policy Issue</p>	 <p>If you decide that a query has social policy implications or is indicative of a broader policy difficulty, you should</p>	<p>Mandatory, if Social Policy Feedback box is ticked.</p>

	<p>select the 'nature of the social policy issue' from the four options in the drop-down list:</p> <p>Access and Administrative Barriers</p> <p>This includes:</p> <ul style="list-style-type: none"> • Processing issues such as delays, backlogs and/or errors in applications and appeals processes. • Communication and 'gatekeeping' problems, such as being unable to contact a public service office by phone or email • Discourteous treatment of a person by a member of staff delivering a public service (this can be an access barrier as it might deter people from pursuing their entitlements) • Inaccessible public offices, for example, their location or restricted opening hours, or because they are not fully accessible to people with disabilities • Online access • Access issues regarding a payment or benefit, long waiting lists for legal aid or public health care, and situations where services have only one access route. <p>Anomalies in Policy</p> <p>This category should be used where the policy outcome is not consistent with what is expected and can include instances of unintended consequences. This includes cases where problems in primary or secondary legislation (including departmental guidelines) mean that policy is working for some people but not for others with similar needs. Examples of this category are</p> <ul style="list-style-type: none"> • Cases of a service or scheme deficit that leaves some people without supports that they need or with unsatisfactory entitlements. • Three-day rule for Jobseekers payment may act as a disincentive for some to take up offer of work. <p>Gaps and Inconsistencies in Provision</p> <p>This category should be used in instances where a service might have been legislated for nationally but is</p>	
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	<p>unavailable or not consistently available to those in need. Examples of this include:</p> <ul style="list-style-type: none"> • Services available in some geographical areas but not others (for example - homeless hostels, supports for people with mental health problems) • Inconsistencies across housing authorities in applying differential rent or in their approach to housing needs assessments • Inconsistent interpretation of policy in different geographical areas, for example, different interpretations of the Habitual Residency Condition (HRC) • Inadequate enforcement machinery to implement an agreed action (for example - no affordable mechanism in place for enforcing an award). • Examples - when essential services or payments are withdrawn via primary or secondary legislation for example, the Mobility Allowance. • Examples - where adequate services and supports are not being legislated for in a timely manner in response to an emerging social need (e.g. asylum seekers living indefinitely in Direct Provision). <p>Information gaps</p> <p>Use this policy category when a person has:</p> <ul style="list-style-type: none"> • Not been given any (or sufficient) information about a service or benefit. • Been given information in the wrong format, on in a letter that is difficult to understand. • Been given the wrong information about a service or benefit, or about their specific entitlement to a service or benefit (such as an incorrect assessment of means). 	
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<p>Say what the problem is and the impact it is having on the client.</p>	<p>Say what the problem is and the impact it is having on the client</p>  <p>Describe the most relevant issues of the particular case in this field. The description should:</p> <ul style="list-style-type: none"> • Be concise and use plain English with short sentences that are easy to read • Be specific (for example - it should name the social welfare payment, social service, waiting time) • Include any non-identifying details that are likely to be relevant (for example - some background details of the case, the persons age, job, working hours if relevant to the Social Policy issue) • Avoid using judgmental or emotive terms. Let the facts speak for themselves • Ensure that the policy issue is obvious to the reader. It is important to remember that the person reading the returns knows only what you tell them and must not speculate or ‘read between the lines’ if the detail is too sparse. 	<p>Mandatory if Social Policy Feedback box is ticked.</p>
<p>Has your centre taken action to address this problem?</p>	<p>Has the centre taken action to address this problem?</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't Know</p> <p>Record whether your centre took any action to address this social policy issue by selecting one of the three options:</p>	<p>Non-mandatory</p>
<p>Say what action has been taken</p>	<p>Say what action has been taken</p> 	<p>Non-mandatory</p>

	<p>If you tick 'Yes' in the field above, enter details of the action your centre took to address this Social Policy issue in this text field. For example, you may have raised the issue with a service provider such as the local Intreo Office or the Local Authority Housing Office or brought it to the attention of relevant parties.</p> <p>Please note that your service is not expected to take action on social policy issues beyond recording them.</p>	
Survey	<p>The survey facility allows additional details to be captured for selected periods. It will be used periodically to monitor trends in terms of client numbers and query patterns. Surveys are created centrally by CIB.</p>	Non-mandatory