



Budget 2016

***‘A Focus on Low Income and Financially
Vulnerable Households’***

**Pre Budget Submission
2016**

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Priorities

Budget 2016

- There should be a stronger policy focus on people experiencing financial vulnerability and who have difficulty affording key essentials for living;
- Funding should be made available for enhancing child care services and for the phased implementation of the recommendations of the Inter-departmental Working Group on Future Investment in Childcare;
- The particular difficulties being experienced by some lone parents as a result of the changed eligibility criteria for the One Parent Family Payment (OFP) should be proactively addressed;
- Mechanisms for dealing with the additional long-term economic costs associated with living with a disability should be introduced along with needs assessment;
- The added potential of Family Income Supplement to support people in part-time or atypical work should be examined and additional resources provided for this purpose;
- Further additional resources should be made available to deal with delays in processing social welfare claims, Rent Supplement and Medical Card applications.
- Additional resources should be provided in the short-term to deal with the significant ongoing social housing crisis;
- Consideration should be given to introducing a form of rent control in the private housing rented sector along with greater security of tenure;
- The roll out of the Housing Assistance Payment should be expedited.

Introduction

This Citizens Information Board (CIB) Pre-Budget Submission 2016 sets out key areas of policy where reform is needed in order to continue the Government's work to build a sustainable economy while, at the same time, meeting the need to provide quality public services and ensure that income support is commensurate with addressing poverty. The Submission is based on feedback from CIB service delivery partners – Citizens Information Services (CISs), the Citizens Information Phone Service (CIPS), the Money Advice and Budgeting Service (MABS), the National Advocacy Service for People with Disabilities (NAS), National Traveller MABS and the Sign language Interpreting Service (SLIS). CISs and CIPS deal with over 770,000 callers and almost a million queries a year¹ from members of the public and MABS supports over 40,000 indebted clients in its services and National Helpline.

Despite the very welcome increase in the numbers at work and the reduction in unemployment, many households remain economically vulnerable, have complex debt problems and find it difficult to move out of social welfare dependency and to navigate the opportunities currently available to them under various activation programmes.

Revision of some current policy areas is needed in Budget 2016 to ensure the right conditions for economic activity and job creation are created across the whole country, to stimulate activation and training for those who remain unemployed and to implement better public service responses for people experiencing financial vulnerability.

Section One of the Submission covers the following areas:

- Low Income and Working Age Supports
- Housing
- Health/ Medical Cards
- Disability, Illness and Carer's Payments

Section Two focuses on the specific needs of financially vulnerable consumers identified by MABS and includes proposals to address some of the issues identified.

¹ Up to 45% of queries relate to social welfare and income support matters.

Section One

1. Low Income and Working Age Supports

1.1 Activation Programmes and Social Welfare Payments

One of the main barriers to employment uptake by some people continues to be the role played by secondary benefits associated with social welfare payments.

The CIB acknowledges the Government's commitment to addressing the challenge of long-term unemployment through job creation and developing pathways to work initiatives and activation measures. However, as a consequence of the changing types of employment, underemployment and part-time working arrangements that have emerged in recent years, many underemployed people and households are now relying on a combination of temporary part-time work and social welfare payments.

Tax, social welfare and activation programmes need to be fully integrated to facilitate a quick return to suitable work of those who have become unemployed. It is the view of the CIB that, overall, there is a need for a more integrated approach to activation measures so as to find the optimum fit for individuals between social welfare entitlement, training and employment schemes. Short-term work incentives and longer-term employment skills must both feature in an integrated job activation strategy. Activation measures need to take a more holistic approach to looking at how one payment or scheme impacts financially on another payment or benefit.

Whilst the majority of jobseekers would be better off in work, weak financial incentives to work and activation are particularly relevant in the case of unemployed persons with a spouse and children², particularly where the work available is only part-time or activation scheme based.

The loss of Rent Supplement acts as a disincentive to people taking up employment under the JobsPlus scheme. When tax and PRSI reductions are included, there may be a significant reduction in net income. In this regard, the new Housing Assistance Payment (HAP) is clearly a positive move in that it allows recipients access to social welfare when they gain full-time employment. The Back to Work Family Dividend has improved the immediate financial incentives to work for some people.

Recommendation:

Place greater emphasis on tapered disregards in relation to the receipt of secondary benefits on take up of employment, activation programmes or training.

1.2 Activation and Community Employment

Participation in a Community Employment (CE) Scheme can result in people being less well off.

A social welfare recipient who takes up a CE scheme (and who has a dependent adult and at least one dependent child) is subject to 4% PRSI on all income - and loses most of the €20 increase in payment for participating on the scheme. When additional in-work costs such as travel and childcare

² ESRI paper [Making Work Pay More: Recent Initiatives](#) June 2015 examines the financial incentives to work implicit in the Irish tax and benefit system. The results, suggest that more than eight out of ten unemployed jobseekers would see their income increase by at least 40% upon taking up employment.

are taken into account, a small number of people experience a reduction in their weekly household income compared to social welfare replacement rates.

	Jobseekers Allowance	Community Employment
Weekly rate of JA payment - for a claimant, with a qualified adult dependant and 2 qualified children	€372.40	€392.40
PRSI	€0	€15.70
Travel to work - using the example of a 20 mile round trip/5 days a week	€0	€15.00
Total weekly household income	€372.40	€361.70

Recommendation:

Apply discretion where a social welfare recipient can demonstrate a financial loss to family income because of participating in an activation scheme.

1.3 Activation and Family Income Supplement

Family Income Supplement (FIS) needs revision in order to support more low income families.

- The current income limits and working hours threshold for FIS do not cater adequately for the type of part-time working arrangements that have emerged in the Irish economy in recent years - those at work represent 12.6% of all those adults at risk of poverty.³
- The prospect of the immediate withdrawal of FIS on loss of a job or reduced working hours acts as a disincentive to people taking up what they perceive as somewhat precarious employment;
- An apparent anomaly is the exclusion to CE and Tús participants from eligibility for FIS.

Impact of non-payment of FIS: Indicative Case Example

This caller is cohabiting and currently receiving a Jobseekers Allowance for himself, his partner and their 3 children. He has been offered a Tús scheme which would result in gross earnings of €422.20 a week with deductions of €16.88 PRSI, €20.98 net tax to pay leaving the family with €384.42 which is less than the current JA amount paid of €402.20.

If the person was working for a private employer outside of a Tús scheme, there would be a FIS payment of €191.14. Also, if they could be jointly assessed for tax, there would be no tax liability.

Recommendations:

FIS income limits should be reviewed taking account of trends in wages, social welfare rates and poverty lines.

Extend FIS to working families on CE and Tús schemes -- this would ameliorate any negative financial impact of meeting tax and PRSI responsibilities while participating on a scheme.

³ See NERI press release **January 13, 2015** <http://www.nerinstitute.net/blog/2015/01/13/working-and-living-below-the-poverty-line-the-work-1/>

Provide for discretion in the payment of FIS for short periods when the working hours criteria is not met.

Address delays in FIS processing to maximise its effectiveness in providing immediate income support to working families.

1.4 Activation and Childcare Costs

Problems arise for people when they cannot access childcare.

The lack of adequate childcare support structures remains one of the barriers to people taking up employment opportunities and acts against their successful participation in activation programmes. It is well established that childcare costs in Ireland are amongst the most expensive in Europe, a fact that has come sharply into focus since June 2015 when the reform of the One Parent Family Payment (OFP). CIB welcomes the Report of the Inter-Departmental Working Group on Childcare⁴ outlining both universal and targeted measures for low income families.

Difficulty in Accessing Childcare: Indicative Case Examples

Community Employment Childcare (CEC) is available to CE scheme participants only. This caller was on the Gateway scheme. Despite the fact that Gateway is very similar to CE; the CEC is not available to Gateway (or TÚS) participants (CIPS).

A single parent in education with entitlement to childcare support under the Community Childcare Subvention programme (CCS) cannot access care as there are no participating crèches with vacancies in her area or any area close to her. (CIPS)

Recommendations:

Implement on a phased basis the recommendations of the *Inter-Departmental Working Group (IDG) on Future Investment in Early Years and School Age Care and Education Services*.

Introduce the single childcare subvention scheme (to replace CCS and CEC) for parents who need childcare for children aged up to 12 years in order to participate in education, training and work.

Make provision for the design and phased implementation of additional good quality after- school childcare to support activation.

Ensure that all services providing the Early Child Care and Education Services (ECCE) meet current quality standards for early childhood services.

1.5 Changes to Eligibility Criteria for the One Parent Family Payment

A youngest child ageing out of the One Parent Family Payment (OFP) will result in loss of income for many low income families.

Adjusting to the new OFP eligibility criteria presents challenges for some one parent families. According to the EU Survey on Income and Living Conditions (EU-SILC)⁵, lone parents are among those most at risk of poverty; the 2013 at-risk-of-poverty rate for children living in single parent households in Ireland was 31.7% - lone parent households have the highest consistent poverty rate at 23% almost three times the rate for the population as a whole (8.2%).

OFP Eligibility Criteria: Indicative Case Example

⁴ <http://www.dcy.gov.ie/documents/earlyyears/20150722IDGReportonEarlyYrsInvestmentReport.pdf>

⁵ <http://www.cso.ie/en/releasesandpublications/er/silc/surveyonincomeandlivingconditions2013/>

Caller is losing OFP as her child is over the age of 7. She works 15 hours a week so will not qualify for FIS. She has 1 child and earns minimum wage. Her OFP was €205.30 p/w but her Jobseekers Transition payment (JST) will be €175.90. She cannot get extra hours at work; she cannot get FIS and cannot afford reasonable childcare.

Recommendation:

Consider introducing additional interim measures for lone parents in part-time employment who cannot increase their hours to avail of FIS, in order to ameliorate any negative financial impact of the changes.

1.6 Targeting young people

It has been noted⁶ that young people were amongst the groups hardest hit by the economic crisis. Many young people continue to face significant difficulties even as the economy begins to recover. Dealing with youth unemployment is an ongoing major challenge.⁷ There are a number of factors that need to be taken into account in addressing the issue of youth unemployment:

- The fact that some 18% of young people in Ireland are in the category 'not in education, employment and training' (the 4th highest in the EU)
- The relatively slow pace of implementation of the Youth Guarantee
- The withdrawal of Child Benefit for young people over the age of 18
- The fact that 31% of JobBridge participants remain unemployed⁸
- The lack of accreditation upon completion of internships⁹
- The current low rate of allowances (€160 per week) for young people participating in training/activation programmes

Difficulties experienced by young persons and their families: Indicative Case Examples

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

Client is 20 and in receipt of JA at the age related €100 per week. On leaving the hostel she was staying in she has applied for Rent Supplement. With her contribution to the rent at €30 per week, it is impossible for her to live on €70 (Dublin City Centre CIS).

Recommendations:

Provide the adult rate of social welfare €188 per week for all young people participating in education, training and work experience programmes

Provide additional funding to stimulate the Youth Guarantee initiative.

Explore the possibility of paying the full Qualified Child Increases for families combining part-time work and social welfare who have children remaining in education.

Introduce a Child Benefit supplement for low income families for children between 18 and 22 years in education and training programmes.

⁶ NESI (2013), *The Social Implications of the Crisis: the Evidence and the Implications*, http://files.nesc.ie/nesc_reports/en/NESI_134_The_Social_Dimensions_of_the_Crisis_Main_Report.pdf

⁷ The unemployment rate for those aged under 25 was 21.5% for the first quarter of 2015. QNHS, Quarter 1 2015, www.cso.ie/en/releasesandpublications/er/qnhs/quarterlynationalhouseholdsurveyquarter42014/#.VV3sAkZ2Z-y

⁸ NYCI Report (2015), www.youth.ie/JobBridge

⁹ IMPACT (2015), <http://www.impact.ie/wp-content/uploads/2015/04/JobBridgeReport2015.pdf>

2. Housing

Housing accounted for over 54,000 queries to CIs in 2014 with a further 28,000 queries about Rent Supplement (RS).

The majority of queries relate to social housing and supports for renting in the private sector.

2.1 Rent Supplement

2.1.1 Rent Limits

The Rent Supplement *rental limits* applied to private rented accommodation are considered unrealistic and in many instances too low for the geographical area they apply to.

While Rent Supplement continues to play a vital role in the provision of social housing, the gap between the maximum RS allowed to an individual or family and the average rent is widening in some areas.¹⁰

CIB welcomes the measures that have already been put in place by the DSP to address the current supply constraints in areas of high demand and to ensure that the housing needs of RS applicants who are at risk of homelessness are met. However, feedback to CIB suggests the need for greater use of this discretionary power and some transparency in relation to how it is applied, in order to help ensure that those most in need of housing support get it. While we do not want to prolong the State's current exposure to rising rents, the reality is that the gap between the maximum RS allowed and the average rent in high demand areas is too wide to ignore.

Rent Supplement Issues: Indicative Case Examples

A couple with 1 child are looking for private rented accommodation in the Tipperary area within the Rent Supplement limit of €485 for their family size. However after much searching the cheapest property that can be found is €520 (Tipperary CIS).

A family in receipt of Rent Supplement (RS) with two school-going children has been notified by their landlord of his intention to raise the rent to a level that is above the max rent cap level. The family is unable to source accommodation within the RS limit locally (near their children's school) (CIPS).

Recommendations:

Monitor rent limits more regularly (every 6 months) in areas of high demand and adjust limits accordingly.

Extend discretionary measures to cover all counties and all cases where an RS applicant can reasonably demonstrate that there is not suitable accommodation in their local area within the current rent limits.

Expedite the implementation of the Housing Assistance Payment to meet the housing needs of long-term RS recipients.

Make no further increase to RS recipients' personal contributions given that social welfare rates have not increased when the RS tenant contributions have increased.

¹⁰ Daft.ie has reported that rents nationally at the end of Quarter 1 2015 were 8.2% higher than Quarter 1 2014. <https://www.daft.ie/report/q1-2015-daft-rental-report.pdf>

2.1.2 Joint parenting and eligibility criteria for Rent Supplement

Separated and single parents with joint custody of their children sometimes have difficulty in getting Rent Supplement at the appropriate level for a family.

Increasingly CISs and CIPS refer to single and separated fathers with shared custody arrangements not being awarded RS at family rates and therefore not being able to obtain housing suitable for their children to stay in. An October 2014 High Court ruling¹¹ will have implications for separated parents in similar circumstances.

Difficulties with Rent Supplement for Single/Separated Parents: Indicative Case Example

A single father with joint custody of his 3 children received a letter from the Rent Unit requesting that he seek a rent reduction as the current rent was above the limit or find alternative accommodation. He has been receiving Rent Supplement for four years under those circumstances but the Rent Unit was now refusing to take his personal situation into account. His rent was below the limit for a single parent with 3 children (Wicklow CIS).

Recommendation:

Revise eligibility criteria for Rent Supplement, HAP and RAS housing supports where a shared custody arrangement is either in place or at application stage - so that both parents can apply for suitable family accommodation - and single and separated parents are supported to co-parent.

2.1.3 Some landlords are not accepting RS tenants

In some instances reported by CISs and CIPS, landlords have refused to engage with RS tenants.

Feedback to CIB points to the difficulties experienced by people who are refused private rented accommodation on the basis that they are Rent Supplement recipients.

Landlords not accepting RS tenants: Indicative Case Example

A family with 2 children living in Dublin City Council and currently availing of Rent Supplement have to move out as the landlord wishes to sell the property and they cannot find a property that is within the rent limits or a landlord willing to accept rent supplement. The family are in danger of homelessness and have been referred to Threshold. (CIPS)

Recommendations:

Implement a system of direct negotiation between the landlord and the DSP for people who are at risk of homelessness because of difficulty in getting accommodation within the RS limits.

Introduce statutory measures that prohibit advertising rental properties, which exclude RS tenants.

2.1.4 Top-up payments

Increasingly Rent Supplement recipients are topping up the amount of rent paid to landlords

Feedback to CIB is that there is a continuing practice of topping up rent paid to landlords to meet the shortfall between the rent limit and the actual cost of rent.¹² This leaves people in a vulnerable place when negotiating their rent with a landlord and is a hidden 'draw' on their welfare payments. This poses a particular problem for those who need to keep rental accommodation close to their work and schools and who may already be living on limited financial means.

¹¹ In this case the ruling by Ms Justice Marie Baker stated that the wrong legal test was applied in looking at the father's accommodation needs and that, given the joint custody arrangements in respect of his four children, they could not be viewed as living primarily with one parent, or having one "primary" carer.

¹² A Threshold survey of 133 clients in receipt of Rent Supplement, conducted in June 2014, found that 44% (58 people) were making top-up payments to their landlords. All of those paying top-ups said it affected their spending in other crucial areas of daily living. See http://www.threshold.ie/download/pdf/threshold_advisory_report_on_rent_supplement.pdf

'Topping-up' Rent: Indicative Case Example

Caller's landlord is putting up the rent by €100 per month. This will bring the rent over the limit for Rent Supplement. Since there is no alternative accommodation in the area under the existing limit, he has decided to make up the difference himself. He has child dependants and the family's only source of income is Jobseekers Allowance and Community Employment. This caller is at risk of poverty as a result of meeting the increased rent (CIPS).

Recommendation:

Implement the proposal contained in the Social Housing strategy to examine ways in which greater rent control and security of tenure might be brought about for tenants of social housing.

2.2 The Housing Assistance Payment (HAP)

As an activation measure, HAP is a very welcome initiative. However, feedback from services indicates a number of related problems:

- The continued rise in rent and exposure of the state to rent increases – left unaddressed – will become an issue in the context of this new programme;
- The HAP scheme does not yet have a fully operational mechanism in place for regulating standards in accommodation funded through the scheme (such a mechanism is envisaged as part of the HAP scheme);
- Currently people who transfer from RS to HAP are taken off the Social Housing List – this may be counter-productive in that many people will want to remain on the social housing list in order to leave open the option of getting more security of tenure in the longer-term;
- The slow implementation of the HAP across the country runs counter to activation policy and means that many people motivated to work *cannot* yet avail of the scheme and must apply for RS which, as outlined above, can be problematic for many people.

Recommendation:

Expedite the roll out of the Housing Assistance Payment (HAP) nationwide.

2.3 Housing Standards

Housing provided by both the local authority and in the private rented sector is not up to the standards set out in the Housing (Standards for Rented Housing).

Feedback to CIB indicates that poor standards are a fact of life for some people renting in both the private rented sector and local authorities¹³. Seven per cent of all housing queries during 2014 were in relation to housing standards and repairs.

Poor Housing Standards: Indicative Case Example

A client is paying €120 per week for a studio flat (with the help of Rent Supplement). He says the room is damp and generally in a very poor condition. He has asked his landlord numerous times to improve the accommodation, to no avail. The client says he is afraid to make a formal complaint about minimum standards, as he is worried he would have to leave and then end up homeless. This client's situation is a fairly frequent query in our service and highlights the difficulties in regulating

¹³ This experience is borne out elsewhere. Some 5,105 units were inspected, by six [Dublin City Council](#) EHOs, between May 2012 and April 2014, as part of a three-year Intensified Inspection Programme¹³. Of these, 4,470, or 87.5 per cent, were deemed "non-compliant" with legislation governing standards in private rented accommodation. While many have since been brought up to standard, feedback suggests that there is still a significant amount of government funded housing which does not meet the required standard.

standards in the private rental market against the high demand for accommodation (Dublin City Centre CIS).

This local authority tenant has a leak in the ceiling. Water is running down the walls and the carpet is wet. The leak occurred three weeks ago. Despite repeated requests the caller cannot get the Local Authority to fix it. They have increased heat in the house to try and deal with it, causing heating costs to increase. The Local Authority cannot indicate when the leak will be fixed (CIPS).

Recommendation:

Allocate adequate resources for the regulation of standards in local authority housing, to ensure an acceptable standard of accommodation for people reliant on social housing.

Introduce measures for the regulation of landlords receiving state funding to ensure compliance with standards as set out in the Housing (Standards for Rented Housing) Regulations. These might include a requirement for landlords to have a Certificate of Compliance with Minimum Standards similar to the existing BER certificate.

2.4 Homelessness

Queries from people who are homeless or consider themselves to be at risk of homelessness comprised 6% of housing queries to CISs in 2014. Many of the policy issues identified in respect of these queries focused on people's fear of becoming homeless when they found it difficult to find a landlord who would accept Rent Supplement or accommodation within RS limits.

The Citizens Information Phone Service carried out a survey of the impact of rising rents on clients and recorded 16 instances in August 2014 when callers to the service reported becoming homeless because they were unable to meet the cost of rising rents. This exercise was repeated in January 2015 when 49 instances were recorded of CIPS clients reporting not being able to find accommodation within the current rent limits and at risk of homelessness as a result.

Recommendation:

The number of new social housing units planned over the next 6 years (35,000) needs to be increased to address the backlog of people that have already been assessed as having a housing need.

Active consideration needs to be given to dealing with the high level of reliance on private rental accommodation through the Rent Supplement, HAP and RAS schemes as a social housing solution, as noted in the Government Social Housing Strategy.

2.5 Caravan Loans for Travellers

Funding for caravan loans, the maintenance of existing sites and the purchase of new homes for the Traveller community is currently underspent by many Local Authorities.

Feedback from National Traveller MABS is that the local authority spending on housing for the Traveller community can be significantly less than the budget allocated, leaving many people without housing options and with little recourse to address the lack of suitable accommodation in their local area. Funding for Traveller accommodation is frequently underspent. For example, Dublin City Council spent only €3.77million of the €15.85million budget allocation from 2007-2012.

A number of local authorities have discontinued their loan schemes. As a result, many Travellers are encouraged back into other forms of social housing or private rented accommodation, which can

have negative consequences for Traveller families, including isolation from their wider family network. Additionally, the experience of the Traveller community is the same as the settled community in so far as it is extremely difficult for many in receipt of Rent Supplement to access private rented accommodation because landlords frequently refuse people on Rent Supplement.

Recommendation:

Caravan loans for Travellers should be reinstated in **all** local authority areas, in line with the Housing (Traveller Accommodation) Act.¹⁴

The process for applying for caravan loans needs to be made visible, consistent across local authority areas and easily accessible by people making the application.

2.6 Impact of Administrative Delays on People Accessing Social Housing

There can be considerable administrative delays in processing applications for Social Housing Supports, in particular Rent Supplement.

Some CIS and CIPS clients report the impact of delays in processing Rent Supplement claims. The centralisation of the RS processing system, intended to introduce greater efficiency is reported to have resulted in communication difficulties (principally in relation to people trying to find out about the progress of their RS claims).

Impact of administrative delays: Indicative case examples

This client was receiving Jobseeker's Allowance and Rent Supplement. In early February 2015, he started part-time work of 10 hours per week (2 days x 5 hours per day) at minimum wage. He informed his Social Welfare Local Office and the Rent Unit. Both of his payments stopped as they had to calculate his means from work. Almost four weeks later and he has had no payment since then from either Jobseeker's Allowance or Rent Supplement. The client and his family have been surviving on his wages of €86 per week. He is very frustrated that it should take this long to recalculate and reinstate his payments. (Dublin City Centre CIS).

Recommendation:

Provide additional resources to reduce delays in the Rent Supplement application process.

Review the documentation required for RS applications with a view to making the process more accessible and easily understood by people availing of the housing support -this should include provision for some face-to-face applications through the local social welfare office.

3. Health

There were over 80,000 health service queries to CISs in 2014. Medical Card queries far outweighed queries about all other payments or benefits in 2014 (56,385 queries). The vast majority were in relation to operational and administrative issues relating to Medical Cards.

3.1 Getting and Retaining Medical Cards

3.1.1 Excessive delays in the application process

Delays in the application and appeals process are causing financial difficulty and emotional stress for vulnerable people.

¹⁴ The Housing (Traveller Accommodation) Act was enacted in 1998 outlining the way forward for local authorities in the provision of Traveller specific accommodation. The Act assigned to local authorities the task of providing loans to members of the Traveller Community to purchase a caravan.

Many users of CIB delivery partner services have reported delays in processing their medical card application due to applications and related correspondence being 'lost' in the system. This experience is borne out by the evidence found by the Primary Care Reimbursement Service (PCRS) Medical Card Review in 2014¹⁵, which found that the Medical Card processing team has limited resources and insufficient Deciding and Medical Officers.¹⁶ Self-employed individuals experience particular difficulty with getting medical cards. The feedback from CIB funded services is that self-employed individuals cannot be processed quickly as the medical card section are requiring up to date accounts which is not always possible especially for newly self-employed individuals.

3.1.2 Means test criteria

A common difficulty people experience with the means test for medical cards is the fact that many families are struggling to pay bills and in many cases are only slightly over the income limit for their circumstances. On the other hand, many people are qualifying for medical cards who have savings up to and over €36,000 for a single person/ €72,000 for a couple – and potentially additional property¹⁷ which are not impacting negatively on their assessment for a medical card.

The current eligibility criteria for medical cards can result in a situation where a family who have no savings or additional land and property and who are marginally over the income threshold cannot qualify for the benefit but someone who has additional property and a significant level of savings but who is below the income threshold can qualify.

Feedback from our service delivery partners is that the current system of means testing can be unfair and inequitable and it may be more balanced if a capital assessment for medical card was more in line with the means assessment used by the Department of Social Protection.

Recommendations:

Address administrative delays in processing health related entitlements through the allocation of adequate resources that will meet the demands of the application system. This may include the introduction of higher numbers of Deciding and Medical Officers to meet the current and anticipated ongoing demand for Medical Cards.

Expedite the proposed new scheme 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.

Continue existing plans to establish access points in health offices across the country, which will have a role to support and assist people to make medical card applications.

4. Disability, Illness and Carers' Payments

Queries in relation to Disability and Illness payments and Carers Allowance represented 20% of all social welfare queries to CISs in 2014 – some 85,000 queries. The focus of feedback from CIB service

¹⁵ <http://www.hse.ie/eng/services/publications/corporate/medicalcardprocessreview.pdf>

¹⁶ The review found that these resource pressures and structural issues have militated against PCRS's success and suggest the need for considerable input of resources to alleviate the problem in the future. Although, it should be noted that the vast majority of medical card applications are processed within 15 days.

¹⁷ In relation to the means test for the over 70s medical card, income is not assessed from additional property (whether a family home, a holiday home or any other property) unless it is generating a rental income. The income to be assessed will be the actual income, less any cost necessarily incurred associated with the rental of the property.

delivery partners was primarily on operational and administrative issues that impact negatively on people's access to payments and services.

4.1 Needs Assessment

Feedback from services often points to the difficulties people experience in the initial claim and the refusal of many applications for Disability and Illness related payments.

A core provision of the Disability Act 2005¹⁸ is the provision of an individual's right to an independent assessment of need for people with disabilities, and a subsequent right to receive necessary social services on the basis of a service statement. The 2012 Department of Health Value for Money (VFM) Review of the Disability Services Programme¹⁹ envisaged effective methods of assessing need, allocating resources and monitoring resource use, as well as the articulation of a set of realistic, meaningful and quantifiable objectives to achieve measurable outcomes and quality for service users at the most economically viable cost.

Recommendations:

Provide more resources to enable a more timely and in-depth analysis of need on first application this would be money well spent and a more cost effective use of resources in the longer-term.

Address the issue of high rates of initial refusals of applications for disability payments subsequently granted on appeal through the allocation of additional resources, including Deciding Officers and medical assessors.

4.2 Children with Disabilities and Free Travel

Children covered by the Domiciliary Care Allowance (DCA) are not eligible to apply for Free Travel in their own right.

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.

Impact of children with a disability not having Free Travel: Indicative Case Examples

Our client is in receipt of 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 already limited household income (Cork City CIS).

Recommendation:

Extend the Free Travel Scheme to children for whom DCA is paid to enable families to make full use of current entitlements.

4.3 Partial Capacity Benefit²⁰

Exemption to work while on a disability payment is not working well in practice.

The introduction of Partial Capacity Benefit (PCB) (for Illness Benefit and Invalidity Pension recipients) has resulted in people's income being reduced for people who wish to work but are

¹⁸ Sections 8–9, Disability Act 2005. See <http://www.justice.ie/en/JELR/DisabilityAct05Guide.pdf/Files/DisabilityAct05Guide.pdf>

¹⁹ http://www.dohc.ie/publications/VFM_Disability_Services_Programme_2012.html

²⁰ See CIB submission on this topic

http://www.citizensinformationboard.ie/publications/social/downloads/Partial_Incapacity_Benefit_May2015.pdf

unable to work full-time on medical grounds, compared to the previous exemptions system. For example, a person on Invalidity Pension, working part-time and in receipt of PCB can be financially less well off than a person on a Disability Allowance payment while also working. This acts as a disincentive to labour market participation.

The following issues were raised by CIB service delivery partners in respect of the PCB scheme:-

- The loss of secondary benefits such as the Fuel Allowance, and the reduction of the Living Alone Allowance
- The timescale for processing applications resulting in the loss of an employment opportunity
- The restricted nature of the qualifying payments for consideration for the scheme (that is, to those on Illness Benefit or Invalidity Pension).

Difficulties with PCB: Indicative Case Example

A man on Invalidity Pension found part-time rehabilitative work (€150 per week). He went through medical assessment to get PCB and was awarded half-payment (mild capacity) of €96.75. With his wages, he will be on €246.75 per week. If a person with the same condition was on DA payment, there is no medical assessment and after means testing the €150 wages, DA would go down to €158. So income would be €308 per week which is €61.25 higher than in the case of someone on a PRSI-related payment.

Recommendations:

Extend the application of Partial Capacity Benefit to enable people with disabilities in the labour market to avail of FIS as a supplementary welfare payment

Protect supplementary benefits such as Household Benefits Package, Free Travel Scheme for one year for people with disabilities on the take up of employment.

Consider including PCB to the list of Qualifying Payments for Living Alone Allowance and The National Fuel Scheme.

4.4 Illness Benefit

Requirement of 6 Waiting Days is causing financial hardship to many in employment.

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.

Impact of 6 Waiting Days for Illness Benefit: Indicative Case Example

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.

4.6 Difficulties Associated with Accessing Specific Payments/Benefits

Issues with a number of specific payments and benefits are reported.

Short Term Illness - Illness Benefit and Supplementary Welfare Allowance

Extra social welfare benefits such as Fuel Allowance, the Household Benefits Package, Free Travel and the Christmas Bonus are not available to people who are claiming a short-term illness payment and whose illness is of a short-term nature (i.e., less than a year).

Indicative Case Example

A caller was in receipt of Jobseekers Allowance when he had a heart attack and, as his doctor advised that he was not capable of full time work for a period, he moved onto an Illness Benefit payment. However, he lost his Fuel Allowance as this is not paid with Illness Benefit (CIPS).

Recommendation:

Provide for some access to secondary benefits for Illness Benefit claimants.

Carer's Benefit and secondary benefits

Carer's Benefit recipients are not eligible for extra social welfare benefits such as the Free Travel Pass or the Household Benefits Package in the same way that Carers Allowance recipients are. This discrepancy disadvantages those who have been in employment previously and are now providing full-time care over those who have not recently been in employment.

Indicative Case Example

A caller who is in receipt of Carers Benefit is experiencing financial hardship due to travel expenses connected to her care provision. She is not entitled to the Free Travel Pass, as she would be if she was receiving Carers Allowance (CIPS).

Recommendation:

Allocate resources to allow Carer's Benefit recipients access to secondary social welfare benefits, including the Household Benefits Package, fuel allowance and free travel.

Self-employed people and disability-related social welfare payments

Lack of access for self-employed people to any illness or disability benefit is a recurring issue.

Indicative Case Example

This client is self-employed trying to run a business on her own. She is unable to work due to illness. However as she is self-employed and paying 'S' PRSI she is not eligible to apply for Illness Benefit (Roscommon CIS).

Recommendation:

The recommendations of the Third Report of the Tax and Social Welfare Advisory Group (TSWAG)²¹ in relation to extending social insurance cover for self-employed people in cases of long term illness/disability are supported by CIB and should be implemented on a phased basis.

4.4 Identifying and Addressing Administrative Blockages

Administrative difficulties in relation to disability and illness payments and schemes impact on people and families. The issue of resources for processing claims efficiently is centrally relevant in that, if the end-product services are not actually available in a timely manner, the legislative provisions and more inclusive policies on disability may lose some of their potential impact.

Recommendations:

Ongoing delays in the processing of applications and appeals relating to Disability Allowance, Carers Allowance and Domiciliary Care Allowance need to be addressed.

Supplementary benefits for people with disabilities such as Household Benefits Package, Free Travel Scheme should be protected.

²¹ DSP, 2013. Third Report: Extending Social Insurance for the Self-Employed. <https://www.welfare.ie/en/Pages/Third-Report-Extending-Social-Insurance-Coverage-for-the-Self-Employed.aspx>.
http://www.citizensinformationboard.ie/publications/social/downloads/Hard_Times_for_Selfemployed_2012.pdf

Section Two

1. Financial Vulnerability

1.1 A Focus on Financially Vulnerable Consumers

“At present, many vulnerable consumers feel that financial services, products and customer interfacing systems are designed for a mythical perfect customer, that they struggle to meet the needs of anyone in particular, and certainly not the numerous ‘non-standard’ consumers who don’t fit into a set ‘mould’..... For people already struggling, “being confronted by a complex telephone menu system that gives no option of talking to a person; a ‘computer says no’ response; a call handler without time or inclination to listen, or a system that fails to record what may be distressing circumstances and forces the customer to repeat themselves at every point of contact, can all create a spiral of stress and difficulty, resulting in detriment.”²²

The Money Advice and Budgeting Service has, as part of its remit, a special focus on consumers who are dependent on a low income and/or are vulnerable or disadvantaged.

It is MABS experience that there are many more such financially vulnerable consumers in post-recession Ireland; they include:

1. *those who are now managing on a much reduced income and would like to achieve a fresh start,*
2. *people who no longer have the job security they once took for granted and, as a consequence, struggle to arrive at sustainable solutions when dealing with debt,*
3. *those who are concerned daily about the on-going security of tenure for their accommodation – be it mortgaged or rental,*
4. *people who, for a variety of reasons, can’t access mainstream utilities and are reliant on pre-payment meters and subject to the associated top-up charges and;*
5. *people whose health and wellbeing, morale and coping skills have suffered as a consequence of one or all of these factors.*

These consumers need particular consideration in order to make sure that they do not become further marginalised as a consequence of their existing financial vulnerability.

MABS has in previous submissions drawn attention to the plight of vulnerable consumers in relation to the issue of mental health and financial stress.²³ In this submission attention is drawn to some of the issues which increase financial vulnerability and the ways through which they can be addressed.

1.2 Financial Vulnerability and Insolvency

Availing of the new insolvency options can make a huge difference for people whose economic circumstances have changed and who are now managing on a much reduced income. Based on its experience in providing an Approved Intermediary Service, MABS has made submissions to the Department of Justice and Equality and the Insolvency Service seeking amendments to the Debt Relief Notice (DRN) process which would greatly enhance its efficacy for existing debtors and could potentially broaden its scope to ensure that debtors for whom it was originally intended may benefit from it.

MABS experience is that a very high number of potential and actual applicants are financially vulnerable consumers who are finding that the process is an overly onerous one. Further, the

²² Financial Conduct Authority, Occasional Paper No.8, *Consumer Vulnerability February 2015* (p8), see also ‘Vulnerability exposed: The consumer experience of vulnerability in financial services,’ Jenny Holland. Dr Agnes Hann. Tom Brown, December 2014

²³ MABS Pre-Budget Submission 2015-4.1

experience of the debtors we have met over the course of our work as AIs suggests that they are amongst the most marginalised and vulnerable within our wider client group.

The issue is highlighted in the context of this Pre-Budget Submission on the basis that the DRN is a tool that is particularly targeted at consumers who are on a low income and it could be made much more accessible and more constructive for relevant debtors through a number of legislative changes. Where the DRN works for clients it can be transformative and as such we would like to see many more debtors able to avail of it. The dominant focus in public debate at present appears to be on amending relevant sections of the Personal Insolvency Act, 2012, relating to Bankruptcy, however MABS is of the view that aspects of the Act need to change to achieve the potential intended in respect of Debt Relief Notices – in this regard the provisions for increasing the thresholds for eligibility for DRNs are to be welcomed.

Recommendations:

An amendment to the eligibility criteria on the number of DRNs a debtor may have in their lifetime, and in this instance every six years is suggested, bringing the legislation in line with that in Northern Ireland; and

An amendment to section 27 providing that all debt owing to a specified creditor in respect of a specified debt reference be automatically included in the DRN provided the overall debt remains at or below the qualifying debt threshold - again, on a par with the legislation in Northern Ireland.

Increase the general vehicle threshold to €4,000 from €2,000 and amend the legislation to allow a debtor to retain a vehicle necessary due to the disability of that debtor or his/her dependents regardless of modification.

Amend the legislation to make preferences and dispositions a ground for creditor objection rather than an eligibility criteria in line with the Debt Settlement Arrangement and Personal Insolvency Arrangement procedures.

Ensure that the full amount of qualifying debt is included in the Debt Relief Notice order, provided the overall amount is within the statutory threshold.

Amend the legislation to provide that increases in income due to supplementary welfare payments and/or which did not raise the debtor's income above the Reasonable Living Expenses figure for their circumstances should not fall within the obligations set out in section 36.

Amend the legislation to streamline the DRN process, making it more accessible and providing better use of State resources.

1.3 Financial Vulnerability and Sustainable Employment

Central Bank research shows that many borrowers experiencing arrears are currently employed²⁴.

The research also notes:

“Some of these borrowers are in fragile employment, i.e. they are on a temporary contract, have been with their employer for a short time or have a history of unemployment. This shows that the current mortgage crisis, and efforts to prevent a further deterioration, requires more than simply targeting negative equity and unemployment. Rather, such efforts should also aim to strengthen overall labour market conditions and job security”.

MABS strongly concurs with this view. Over the past several years MABS advisors have had to very frequently work with their clients to revise budgets and associated repayment plans on the basis of

²⁴ Dis-entangling the Mortgage Arrears Crisis: the role of the labour market, income volatility and housing equity. Yvonne Carthy, (2014) Central Bank of Ireland..

ongoing changes in their employment status. With regard to mortgage debt, mortgages cannot be made sustainable without making jobs sustainable and as such it is not just creation of employment that is critical to national economic recovery and the resolution of the mortgage debt over-hang, but the quality of the jobs and the prospect for progression.

The OECD report, 'Reviews on Local Job Creation Employment and Skills Strategies in Ireland' (2014) notes, '*Lower-skilled people are increasingly employed on a temporary basis, with it being unusual now for such workers to gain a "career for life", and it can be difficult to see how one job may lead to another higher up within the job hierarchy.*'(p94). The report makes a series of recommendations for agencies involved in local level employment creation and support and in particular for Solas about the creation of pathways for 'in-work progression'.

Recommendation:

Implement the various recommendations made by the OECD with the overall aim of strengthening the labour market through the creation of more sustainable employment types.

1.4 Financial Vulnerability and the Private Rented Sector

The *Future of the Private Rented Sector* report shows that the number of people renting in Ireland has doubled over recent years, with one in five households now in the private rented sector²⁵. In the context of a list for social housing that now extends to 90,000 nationwide, a private rental accommodation market that can provide security and certainty to tenants is vital.

Low income consumers are finding it increasingly difficult to access and maintain a home given the increasing cost of rent along with other increases in water, fuel and other charges; leaving them with an ever decreasing disposable income to meet the other basic needs of maintaining a family household. In 2014, MABS clients in the private rented sector made up just over 25%²⁶ of the client group.

The recent considerable escalation of rents in the private sector has put considerable pressure on welfare recipients in particular to meet ongoing rental increases dictated by the market without corresponding increases in income and a significant reduction in rent supports since 2009. It is the MABS view, from the experience over the years, that families will make great sacrifices to keep the 'roof over their heads' to the extent of going without food and other essentials.

Rental escalation is also of import to the State in its efforts to support low income families to meet the cost of renting in the private sector. It is estimated that around 99,000 households receive State support for housing in the private rented sector²⁷. As such, from a departmental budgeting perspective, ever escalating rents in this sector makes planning to support this vulnerable sector increasingly difficult.

Recommendation:

Consideration should be given to introducing a form of rent control in the private housing rented sector for a defined period during the present supply crisis as well as facilitating the introduction of rental products that increase security of tenure.

1.5 Financial Vulnerability and Self Disconnection

Due to the very low disposable income available to the vast majority of its clients, MABS is acutely aware of how difficult many people find it to make ends meet. One of the major expenses reported by MABS that have to be met each week/month, often consuming a large proportion of their income, is the cost of providing energy. Because of that awareness MABS has, in many pre-budget

²⁵ PRTB Future of the Private Rented Sector – Final Report 2014

²⁶ www.mabs.ie/statistics

²⁷ Future of the Private Rented Sector – page 40

submissions²⁸, and elsewhere, drawn attention to the cost of energy. Some MABS services, over recent years, have also commissioned research to demonstrate the difficulties experienced by low income families in their areas in relation to the cost of energy.²⁹

MABS Statistics

In 2014 there were 8,726 clients who came to MABS services nationally with energy debts as part of their over-indebtedness. The spending on energy of these households is outlined below:

% Total Income Spent on Energy	Number of Clients	% of sample
Less than 10%	3980	45.61%
10% to 14.99%	2778	31.84%
15% to 19.99%	1246	14.28%
20% and above	722	8.27%
Total	8726	100.00%

Self-rationing and self-disconnection have recently become an increasing feature of the energy market in Ireland with the increasing use of metering to deal with customers in financial difficulty and having bill arrears. While the use of metering removes the issue of fuel poverty and disconnection from the public eye the fact remains that a large cohort of our citizens find it difficult to fund their energy costs and so resort to self-rationing or self-disconnection from supply leading to ill health and other negative outcomes³⁰.

Recommendation:

The utility energy providers should be mandated to collect data on utility disconnections so as to ensure it remains visible to policy makers and to ensure that the most vulnerable debtors don't become more marginalised by virtue of the fact that they are no longer appearing in data on utility disconnections. For the most financially vulnerable consumers inability to pay for basic utilities remains a key concern.

1.6 Financial Vulnerability and surcharging for the purchase of energy and other basis services

'Pay-as-you-go' meters have played a major role in helping gas and electricity customers avoid falling behind with payments or, in the worst case scenario, being disconnected. Over 100,000 have been installed, free of charge, for customers in arrears and experiencing financial hardship, in recent times and, in general, MABS has been supportive of this.

However, feedback to services has highlighted over the last number of years that many retailers, who provide the service where such meters can be topped up with credit, charge an extra amount on top of the cost of energy to the consumer. Dublin 10 and 20 MABS carried out surveys in Ballyfermot, Cherry Orchard, Palmerstown and Chapelizod in early 2015 and found that the situation of retailers imposing surcharges has worsened since MABS first highlighted the practice in May 2014. These meters were installed for customers who were in arrears and/or finding it difficult, on a low income, to pay for big energy bills. These top up charges are often on top of an arrears payment already factored in before anything goes to current usage. MABS objects to surcharging in any form. Compounding the issue is the fact that the charge is a fixed one for every purchase and, as such, those with the least available money- i.e. those topping up by small amounts end up paying the most in additional surcharges.

²⁸ MABS Pre –Budget Submissions 2009, 2011, 2012 – www.mabs.ie/publications/reports

²⁹ Fuel poverty – a local perspective – Finglas MABS 2005/2015 – www.mabs.ie/publications/reports

A Profile of the Clients of Dublin 10&20 MABS(with a focus on Utility Debts) Stamp 2013- www.mabs.ie/publications/reports

³⁰ Fuel Poverty and Human Health, | Liddell & Morris

Recommendation:

The surcharging for payment for, or the purchase of, basic services should not be permitted and legislation should be enacted urgently with the overall goal of protecting and supporting the most financially vulnerable consumers.

1.7 Financial Vulnerability and Emergency Financial Supports

Through both its network of local offices and the MABS Helpline, MABS regularly encounters people in huge distress because of an unanticipated cost that they can't cover. In the past the Department of Social Protection's Essential Needs Payment Scheme (ENPS) was a key resource for providing a resolution in such cases, but it has become increasingly difficult to access such payments.

CIB and MABS greatly welcome the progress being made and the support received from the Departments of Finance and Social Protection in making available to the financially excluded, a personal micro credit facility which will allow access to small amounts of credit at affordable rates of interest.³¹ This loan facility will meet once off contingency needs and will, over time, assist participants to access mainstream finance.

Notwithstanding this development, it is vital for those on welfare and/or on a low wage that the supports provided under the Essential Needs Payment Scheme are enhanced. In MABS experience, access to affordable credit **and** an enhanced ENPS are **both** required to provide a buffer for the most financially vulnerable.

The Department of Social Protection gave out 107,000 Essential Needs Payments in 2014 to help meet essential unexpected expenditure; this represents 45% of the 2011 figure of €60m for ENP. In MABS experience people who cannot avail of an ENP are forced to either go to the Society of Saint Vincent de Paul for help or money lenders (legal and illegal) for often very costly loans. The latter often serves to compound an already bad situation.

Recommendation:

Consideration should be given to resourcing the SWA Exceptional Needs Payment Scheme at 2011 levels when over €60 million was allocated.

1.8 Financial Vulnerability and Mental Health

Personal debt is one of the major risk factors for Common Mental Disorder³². Having assisted in excess of 300,000 people over the last 6 years, through the face –to-face Service and the MABS Helpline, MABS has encountered countless numbers of people in severe emotional distress. This has practical implications for MABS in working with clients in distress and all have received ASSIST training. There are also implications for health services and the wider economy both in the immediate and longer terms.

Recommendation:

Financial vulnerability needs to achieve a much greater policy focus and frontline staff in health services and those involved in the provision of goods and services to financially vulnerable people need to take much greater cognisance of the impact not being able to afford key essentials for living (accommodation, light and heat, access to money for unanticipated costs) has on mental health. In this regard MABS would both greatly welcome and actively support the initiation of a campaign similar to that currently being undertaken under the auspices of the Financial Conduct Authority (FCA) in the UK to address financial vulnerability.³³

³¹ CIB/MABS Personal Micro Credit Proposal to Minister for Social Protection 2013

³² Meltzer et al. 2012. 'The relationship between personal debt and specific common mental disorders', European Journal of Public Health (2012).

³³ <http://www.fca.org.uk/news/fca-challenges-firms-to-review-approach-to-consumer-vulnerability>

Summary of Recommendations:

Low Income and Working Age Supports

Tapered social welfare disregards

Greater emphasis on tapered disregards in relation to the receipt of secondary benefits on take up of employment, activation programmes or training.

Apply discretion where a social welfare recipient can demonstrate a financial loss to family income because of participating in an activation scheme.

Family Income Supplement

FIS income limits should be reviewed taking account of trends in wages, social welfare rates and poverty lines.

Extend FIS to working families on CE and TÚS schemes - this would ameliorate any negative financial impact of meeting tax and PRSI responsibilities while participating on a scheme.

Provide for discretion in the payment of FIS for short periods when the working hours criteria is not met.

Address delays in FIS processing to maximise its effectiveness in providing immediate income support to working families.

Childcare supports

Implement on a phased basis the recommendations of the *Inter-Departmental Working Group (IDG) on Future Investment in Early Years and School Age Care and Education Services*.

Introduce the single childcare subvention scheme for parents who need childcare for children aged up to 12 years in order to participate in education, training and work.

Make provision for the design and phased implementation of additional good quality after-school childcare to support activation.

Ensure that all services providing the Early Child Care and Education Services (ECCE) meet current quality standards for early childhood services.

Lone parent families

Consider introducing additional interim measures for lone parents in part-time employment who cannot increase their hours to avail of FIS, in order to ameliorate any negative financial impact of the changes.

Young persons

Provide the adult rate of social welfare €188 per week for all young people participating in education, training and work experience programmes.

Provide additional funding to stimulate the Youth Guarantee initiative.

Explore the possibility of paying the full Qualified Child Increases for families combining part-time work and social welfare who have children remaining in education.

Introduce a targeted Child Benefit supplement for low income families for children between 18 and 22 years in education and training programmes.

Housing

Rent Supplement and Housing Assistance Payment

Monitor rent limits more regularly (every 6 months) in areas of high demand and adjust limits accordingly.

Extend discretionary measures to cover all counties and all cases where an RS applicant can reasonably demonstrate that there is not suitable accommodation in their local area within the current rent limits.

Expedite the implementation of the Housing Assistance Payment to meet the housing needs of long-term RS recipients.

Make no further increase to RS recipients' personal contributions given that social welfare rates have not increased when the tenant contributions have increased.

Revise eligibility criteria for Rent Supplement, HAP and RAS housing supports where a shared custody arrangement is either in place or at application stage.

Implement a system of direct negotiation between the landlord and the DSP for people who are at risk of homelessness because of difficulty in getting accommodation within the RS limits.

Introduce statutory measures that prohibit advertising rental properties, which exclude RS tenants.

Implement the proposal contained in the Social Housing strategy to examine ways in which greater rent control and security of tenure might be brought about for tenants of social housing.

Expedite the roll out of the Housing Assistance Payment (HAP) nationwide.

Housing Standards

Allocate adequate resources for the regulation of standards in local authority housing, to ensure an acceptable standard of accommodation for people reliant on social housing.

Introduce measures for the regulation of landlords receiving state funding to ensure compliance with standards as set out in regulations. These might include a requirement for landlords to have a Certificate of Compliance with Minimum Standards similar to the existing BER certificate.

Social housing policy

The number of new social housing units planned over the next six years (35,000) needs to be increased to address the backlog of people that have already been assessed as having a housing need.

Active consideration needs to be given to dealing with the high level of reliance on private rental accommodation through the Rent Supplement, HAP and RAS schemes as a social housing solution, as noted in the Government Social Housing Strategy.

Caravan loans for Travellers

Caravan loans for Travellers should be reinstated in all local authority areas, in line with the Housing (Traveller Accommodation) Act. The process for applying for caravan loans needs to be made visible, consistent across local authority areas and easily accessible by people making the application.

Address administrative blockages

Provide additional resources to reduce delays in the Rent Supplement application process.

Review the RS application process with a view to making it more accessible and easily understood by people availing of the housing support - this should include provision for some face-to-face applications through the local social welfare office.

Health

Medical Cards

Continue to address administrative delays in processing health related entitlements.

Expedite the proposed new scheme 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.

Continue existing plans to establish access points in health offices across the country, which will have a role to support and assist people to make medical card applications.

Disability, Illness and Carers

Assessment of need

Provide more resources to enable a more timely and in-depth analysis of need on first application- this would be money well spent and a more cost effective use of resources in the longer-term.

Address the issue of high rates of initial refusals of applications for disability payments subsequently granted on appeal through the allocation of additional resources, including Deciding Officers and medical assessors.

Extension of eligibility for Free Travel

Extend the Free Travel Scheme to children for whom DCA is paid to enable families to make full use of current entitlements.

Partial Capacity Benefit

Extend the application of Partial Capacity Benefit to enable people with disabilities in the labour market to avail of FIS as a supplementary welfare payment.

Protect supplementary benefits such as Household Benefits Package, Domiciliary Care Allowance and Free Travel Scheme for one year for people with disabilities on the take up of employment.

Consider including PCB to the list of Qualifying Payments for Living Alone Allowance and The National Fuel Scheme.

Illness Benefit and secondary benefits

Provide for some access to secondary benefits for Illness Benefit claimants.

Carers Benefit

Allocate resources to allow Carers Benefit recipients access to secondary social welfare benefits, including the Household Benefits Package, fuel allowance and free travel.

Extension of social insurance cover for the self-employed

The recommendations of the Third Report of the Tax and Social Welfare Advisory Group (TSWAG) in relation to extending social insurance cover for self-employed people in cases of long term illness/disability are supported by CIB and should be implemented on a phased basis.

Address delays in processing applications and appeals for disability-related and carers' payments

Ongoing delays in the processing of applications and appeals relating to Disability Allowance, Carers Allowance and Domiciliary Care Allowance need to be addressed.

Protect supplementary benefits

Supplementary benefits for people with disabilities such as Household Benefits Package, Domiciliary Care Allowance and Free Travel Scheme should be protected.

Financial Vulnerability: MABS Recommendations

Financial vulnerability and insolvency

Amend the eligibility criteria on the number of DRNs a debtor may have in their lifetime, bringing the legislation in line with that in Northern Ireland;

Amend section 27 of insolvency legislation providing that all debt owing to a specified creditor in respect of a specified debt reference be automatically included in the DRN provided the overall debt remains at or below the qualifying debt threshold, again, on par with the legislation in Northern Ireland.

Increase the general vehicle threshold to €4,000 from €2,000 and amend the legislation to allow a debtor to retain a vehicle necessary due to the disability of that debtor or his/her dependents regardless of modification.

Amend the legislation to make preferences and dispositions a ground for creditor objection rather than eligibility criteria in line with the Debt Settlement Arrangement and Personal Insolvency Arrangement procedures.

Ensure that the full amount of qualifying debt is included in the Debt Relief Notice order, provided the overall amount is within the statutory threshold.

Amend the legislation to provide that increases in income due to supplementary welfare payments and/or which did not raise the debtor's income above the Reasonable Living Expenses figure for their circumstances should not fall within the obligations set out in Section 36.

Amend the legislation to streamline the DRN process, making it more accessible and providing better use of State resources.

Sustainable employment

Implement the various recommendations made by the OECD with the overall aim of strengthening the labour market through the creation of more sustainable employment types.

Rent control in the private rented housing sector

Consideration should be given to introducing a form of rent control in the private housing rented sector for a defined period during the present supply crisis as well as facilitating the introduction of rental products that increase security of tenure.

Need for data on utility disconnections

The utility energy providers should be mandated to collect data on utility disconnections so as to ensure it remains visible to policy makers and to ensure that the most vulnerable debtors don't become more marginalised by virtue of the fact that they are no longer appearing in data on utility disconnections. For the most financially vulnerable customers inability to pay for basic utilities remains a key concern.

Surcharging for the purchase of energy and other basic services

The surcharging for payment for, or the purchase of, basic services should not be permitted and legislation should be enacted urgently with the overall goal of protecting and supporting the most financially vulnerable consumers.

Exceptional Needs Payment Scheme

Consideration should be given to resourcing the SWA Exceptional Needs Payment Scheme at previous levels.

Financial vulnerability and mental health

There is a need to initiate a campaign similar to that currently being undertaken under the auspices of the Financial Conduct Authority (FCA) in the UK to address financial vulnerability.