

Development of Department of Social Protection Statement of Strategy 2020-2023

Submission by the Citizens Information Board (October 2020)

Introduction

The Citizens Information Board (CIB) welcomes the opportunity to make a submission to the Department of Social Protection (DSP) in respect of the Department's Statement of Strategy 2020-2023. CIB, funded by the Department, is the national agency responsible for supporting the provision of information, advice and advocacy on social and public services through our website and through our delivery services¹, and, in so doing, complements the role of the Department as well as other public sector agencies by enabling people to access the benefits and services to which they are entitled and to assert their rights as citizens. Citizens Information Services (CISs), also play an active role acting as intermediaries for citizens in their engagement with public services and can support 'assisted digital' services – helping users to access online services where they experience obstacles in doing this directly. CIB, because of the ongoing and regular feedback from delivery services, is in a unique position to provide evidence-based information on issues encountered by citizens relating to income supports, social protection, access to housing and health services, employment rights enforcement, indebtedness and poverty traps.

Under our current Strategic Plan², CIB is committed to ensuring that people can access excellent information, advice, money advice and advocacy services, and to inform and influence social policy development, based on the experiences of individuals.

The engagement with citizens by CIB delivery services involves multiple information interventions, requests for advice/assistance and advocacy supports (CISs and CIPS), complex interventions on behalf of people with disabilities (NAS) or rescheduling personal debt with multiple lenders (MABS). The Abhaile service is seen by CIB as playing a centrally important role in assisting people in long-term mortgage arrears. This role is almost certain to become more necessary as a result of Covid-19.

CIB recognises that the DSP has experienced unprecedented demand for income supports in the face of Covid-19 job losses and may experience considerable resource constraints (relative to service demands) in dealing with the repercussions of the pandemic and the future impact on the economic

¹ The CIB delivery services are Citizens Information Services (CISs), the Citizens Information Phone Service (CIPS), Money Advice and Budgeting Services (MABS), the National Advocacy Service (NAS) for people with disabilities and the Sign Language Interpreting Service (SLIS).

² [The Citizens Information Board's Strategic Plan 2019 - 2021](#)

climate. The Department may have to adjust its 2020-2023 Strategy in line with the resources allocated by Government. Clearly, there are many embedded issues relating to poverty and social inclusion which the Department on its own cannot address. Notwithstanding these difficulties, the Statement of Strategy 2020-2023 will be required to give effect to Programme for Government (*Our Shared Future*) commitments as well as reflect the priorities set out in *Pathways to Work 2016-2020*, in the *Roadmap for Social Inclusion 2020-2025* and in the *Roadmap for Pension Reform 2018-2023*.

The emphasis in the new strategy will almost certainly have to be on income supports as well as on ensuring that the risks of people falling into poverty are minimised and that people remain socially engaged in order to avoid marginalisation. It will also be important that people who have lost their jobs or who have their working hours reduced or who cannot get on the employment ladder are empowered to maintain and develop their skills and enhance their experience through involvement in community initiatives. This is critically important for people's well-being and mental health. CIB services have the potential to play an important role here by enabling people to explore all available options for social engagement and achieving or maintaining linkages with education/training and the paid work force. CIB services provide information and support people across a broad spectrum of living domains as well as on welfare supports and can, thereby, significantly supplement the Department's social inclusion agenda, improving outcomes for citizens. One-to-one engagement with citizens is an essential component of social inclusion and also enables a person-centred approach around digital service offerings.

Implications of the Programme for Government

The Programme for Government commits to seeking to improve living standards for the most vulnerable in society with particular reference to refugees and asylum seekers, the homeless, people with disabilities and people living on low incomes. The latter group will continue to be an important target for the DSP in relation to both income maintenance and social inclusion.

Increasing pressures on the social welfare system will arise from specific commitments in the Programme for Government relating to, for example, protecting core weekly social welfare rates and increasing various social welfare payments (short-term sick pay benefits, parental leave benefits and PRSI treatment benefits, meeting the cost of disability provisions, jobseeker supports for people aged under 24-years). Meeting these commitments will be an important aspect of the social inclusion agenda.

Of particular importance is the commitment in the Programme to continuing to prioritise and protect supports for lone parents. In this regard, it is noted that the 2017 Joint Oireachtas Committee on Social Protection Report on the Position of Lone Parents in Ireland recommended that the Department of Social Protection should set targets to monitor the situation of lone parents in relation to educational participation and poverty levels (Recommendation 7.21). This is an important area where further research and analysis is required.

The Commission on Welfare and Taxation to be established under the Programme will require considerable input from the Department. The Commission should build on the work of the previous Advisory Group on Tax and Social Welfare and the reviews of income supports undertaken by the Department, which include fundamental issues relating to the direction of social protection and tax measures across a spectrum of supports for low income households. Ireland's system of social

transfers will almost certainly come more under scrutiny as a result of Covid-19. Those at the lower end of the income distribution scale are already more reliant on social transfers as a source of income (with social transfers accounting for over 50% of the income of households in the bottom 30% of the income distribution).³ This matter will require further strategic thinking by the Department.

Other commitments in the Programme for Government will evidently require significant input from the Department, in particular, the establishment of a Commission on Pensions and including developing a pension solution for family carers. It is generally acknowledged that Ireland's population is ageing and longer life expectancy presents some challenges as the ratio of younger people to older people shifts, including, in particular, the funding of pensions or the so-called 'pensions time bomb'. There are currently around five persons of working age for each person aged 65 and over. By 2050, it is estimated that the figure will be closer to two with the ratio of retirees to workers set to more than double.⁴ This shift in the age profile of the population will involve substantive increased spending in demographically-sensitive components of public expenditure, such as pensions and health and social care.

This will clearly be a matter of considerable importance for the DSP as well as for Government generally. Some essential strategic thinking is required as to how best to address this matter in a fair and equitable manner and, for example, whether this is to impose higher taxes or extend working lives further.

The emphasis in the Programme on anti-poverty and social inclusion measures will require an ongoing and focused implementation of the social inclusion strategy, *A Roadmap for Social Inclusion 2020-2025*, which will present additional challenges in the current and post Covid-19 climate.

People with disabilities

Empowering people with a disability and enabling them to choose the supports that most meet their needs and to achieve their employment ambitions in the Covid-19 context will present significant challenges. Delivering on the commitments contained in the Programme for Government relating to enhancing supports for people with disabilities engaging in employment will require very specific and targeted responses, including tailoring the Wage Subsidy Scheme (WSS) to people with disabilities and enhancement of the Ability Programme. The latter is particularly important in enabling young people with a disability or experiencing mental health difficulties to remain socially engaged in the current environment. In this regard, there should be a greater focus on positive abilities and there is potential for this within the Department's 'putting the citizen at the centre' principle. It is suggested that the term 'Ability Support Allowance' would be a preferable name for the Disability Allowance. This would underpin the approach being adopted by CIB services in fostering independence by means of empowering and enabling people to self-advocate as distinct from providing representative advocacy.

While the extra costs of disability have long been acknowledged and while targeted initiatives, e.g., Make Work Pay (medical card retention, much better disregards on taking up work, including recent

³ [DPER: Spending Review 2018. Analysis of Low Income Supports. Fiona Kane.](#)

⁴ <https://www.gov.ie/en/publication/2e8463-population-ageing-and-the-public-finance/>

Budget 2021 provisions) are hugely important, there has still not been sufficient action taken to provide for such extra costs. The research being carried out by Indecon⁵ on behalf of the Department to inform national policy on the matter should be factored into the new Strategy.

The Department will obviously want to continue its drive towards public sector equality and human rights protection in accordance with the provisions of Section 42(1) of the Irish Human Rights and Equality Act 2014, relating to eliminating discrimination and promoting equality of opportunity and treatment. This will be particularly important for people with disabilities and for ethnic minority groups. Provision should be made in the Strategy for the collection of additional data relating to people with disabilities and ethnic minority groups accessing benefits and supports.

Child poverty

The elimination of child poverty should continue to be a key strategic priority for Government and for the Department. While this requires a multi-faceted response and income support is just one dimension of this, meeting the income support needs of in-poverty family households must be a key strategic priority during and after the pandemic. Of particular relevance here would be targeted increases for children in households fully or predominantly dependent on social welfare payments. In this regard, CIB has over the years called for an increase in the Qualified Child rate and believes that the increases introduced in Budget 2020 and 2021 were important and timely. This approach should remain central in the drive to eliminate child poverty, particularly as reliance on social welfare income may continue to the norm for some time for many families with children.

The Department's ongoing role in both alleviating poverty and addressing the needs of working households on low income will continue to be crucial and the work of the Low Pay Commission⁶ will continue to bring a significant dimension to this. A 2020 CIB submission on the NMW recognised that in relation to the role of income from work in alleviating poverty, the minimum wage on its own (or the level at which it is set) is not sufficient to alleviate poverty and that it should be accompanied by other tax and benefit measures to address poverty, both in and out of work.

Responding to domestic violence

CIB notes the commitment in the Programme for Government to investigate the provision of paid leave and social protection to victims of domestic violence. Risk factors for domestic violence include social isolation, unemployment and poverty. Of particular importance among the policy responses by Government to Covid-19 was the provision by the DSP for victims of domestic violence to get immediate access to Rent Supplement to ensure that they are not prevented from leaving their home because of financial concerns. While this provision should clearly continue for the duration of the pandemic, consideration should be given to making it an integral part of the social welfare system. Also, as a general principle, the non-availability of adequate income supports should never be a barrier to people moving out of violent domestic situations.

⁵ CIB has made a number of submissions to Indecon on the matter.

⁶ CIB has made several submissions to the Low Pay Commission over the years in response to its deliberations on the national minimum wage and related aspects of low pay. The latest submission can be found at: [Consultation on the National Minimum Wage: Submission to the Low Pay Commission by the Citizens Information Board \(March 2020\)](#).

Issues identified by CIB delivery services

During 2019, CIB and our delivery services provided direct information, advice and advocacy to over 780,000 people. The citizensinformation.ie website continues to be a key access point to the general population for information on public services⁷.

About half of the queries to CISs and CIPS refer to social welfare matters. A breakdown of social welfare-related queries shows that people have information, advice and advocacy needs relating to income maintenance and related supports right across the life-cycle. People sometimes experience significant difficulty in accessing an appropriate payment or support.⁸

A high proportion of users of CIB delivery services are at the lower end of the socio-economic scale and are in low paid or precarious employment, welfare dependent and many are people with a disability and/or experiencing mental health difficulties or are from households experiencing over-indebtedness. The experience of our delivery services shows that there are a number of underlying issues that require ongoing attention and which are relevant to the forthcoming DSP Strategy. Some of these are clearly associated with Covid-19 and are likely to be ongoing for some time.

The concentration of job losses in low paid sectors means that the impact has disproportionately fallen on groups that are least able to endure a financial hit. Many workers who have already been struggling on low pay are in the sectors which have been hit hardest by the pandemic, with widespread job losses in tourism, hospitality and food services, and retail. CIB services report regularly receiving calls from individuals and families who have lost their jobs and are extremely worried about meeting the cost of daily living, e.g., rent and utility bills.

Covid-19 has demonstrated that those who were already in vulnerable work situations are the ones most likely to experience uncertainties and negative consequences from the pandemic. This is compounded for those with parenting and caring responsibilities, who are predominantly women. The pandemic has also placed a spotlight on employment issues relating to hours of work, low wages, precarious employment, including, for example, workers with inadequate hours having to take two jobs; and workers with poor conditions of employment in general (e.g. sick pay, insecure contracts, pensions).

The increases in economic inactivity since the beginning of the pandemic is in danger of resulting in some people losing, or being unable to establish, a link to the labour market. This situation needs to be monitored closely if some groups are not to become further marginalised.

⁷ 2019 Statistics

www.citizensinformation.ie – 12.5 million users and 47 million page views

CISs - over half a million clients/ over 1 million queries

MABS - over 42,000 people helped with problem debt

CIPS - almost 143,000 callers

NAS - over 1,000 people (rep. advocacy) and over 3,000 (information, advice and other supports).

SLIS - 7,500+ interpreting assignments

⁸ Access to social welfare payments and back to work supports is the subject of a significant number of 'Social Policy Returns' (SPRs) - wherein staff identify a policy issue that they are coming across repeatedly or deem it to be an issue that has a serious impact on clients.

Key considerations for DSP Strategy 2020-2023

Covid-19 has brought to the fore the vital role the State plays in providing basic services for its citizens and the importance of a strong welfare state for everyone in society. It has also demonstrated the need for the interoperability of all aspects of public sector services in responding to such a crisis. As well as investment in public childcare, housing, education, transition to work, and healthcare, we need to make sure that the correct mechanisms are put in place to mitigate adverse economic shocks. This will require vigilance around social welfare payments and poverty proofing safeguards.

As it becomes clear that the economy is not going to return immediately to where it was pre-pandemic and that some industries and services will remain changed for a long time, we need to make sure that these groups are protected from being pulled into poverty by providing adequate social welfare income and well-designed support when a return to work is possible. It is almost certain that problem debt and/or rent or mortgage arrears will present major difficulties for many low income households.

- The role and development of Abhaile (the MABS mortgage arrears resolution service) is critical in supporting people in household debt distress, including rent arrears, complementing HAP supports, as well as assisting those in long term mortgage difficulty. This needs to be complemented by easy access to income support, including Supplementary Welfare Allowance safety net supports where no other social welfare payment is immediately accessible.
- It is very likely that there will be an increased demand for SWA Exceptional Needs Payments (ENPs) arising from job losses, indebtedness and increased pressures on household spending associated with Covid-19. While SWA is a relatively small proportion of CIS queries overall, there are some specific difficulties in accessing SWA payments reported by CISs and by MABS. Any difficulties in this regard are clearly a matter for concern given the critical role of SWA as a safety net.
- Income support priorities should continue to be focused on maximising employability – this will present additional challenges in the context of both Covid-19 and Brexit.
- The waiting times for social welfare appeals to be processed (despite ongoing positive developments in this area) continue to present difficulties for some CIS and CIPS users – this can be a particular problem for people with disabilities seeking to access payments appropriate to their needs.
- While online services have much merit as an alternative efficient way of accessing information, personal records and making applications for services and benefits, this means of access should not be the only one. While CISs can and do play an important role in facilitating on-line access, there remains a small cohort of people who will continue to require hard copy benefit application forms.

- Since many of the interactions with the public (e.g., engagement with Intreo case workers, medical assessments) can only be adequately delivered through face-to-face interaction with people, the Department will need to continue to work to find creative solutions to these challenges.
- The availability of in-work supports, programmes and schemes needs to be promoted more proactively amongst jobseekers through the increased use of multiple channels (including through social media) and targeted engagement with community-based support organisations.
- Intreo case workers have a crucial role to play in helping people to find a way out of poverty and mental health difficulties related to Covid-19 and there is a need to provide for further investment in resources through the network of local Intreo centres in order to enable staff to provide appropriate and timely responses to individuals.
- There is a need to develop a single, streamlined means test for all DSP-administered schemes, to allow for a single point of access for applicants – this should be an integral part of the move to on-line delivery of services.
- The commitment in the Programme for Government to commence a public consultation on the National Digital Strategy⁹ with a view to completing and publishing it within six months will be very relevant to the DSP - however, it is likely that delivering on this commitment may not be feasible within the proposed timeframe due to the impact of Covid-19.

Working collaboratively with the DSP

While CIB makes pre-budget and other thematic submissions and prepares social policy reports on specific issues, the Board believes that there is potential to work in a more collaborative way with the Department (and with other statutory agencies as appropriate) to identify new ways of addressing a range of service access and policy deficits identified by our delivery services. Important areas of ongoing collaboration between the Department and the CIB in recent years have been the Personal Micro Credit scheme, Abhaile, and ongoing identification and resolution of administrative blockages in the social welfare system as experienced by citizens.

The experience and perspectives of citizens and service users is a necessary and important source of data on the impact of services and State supports. In this regard CIB services – CISs, CIPS, MABS, Abhaile and NAS – are a rich data source for public service development in that they provide valuable insights into the situation of people experiencing difficulties and requiring state support, including, in particular, people experiencing social and financial exclusion and people unable to access appropriate housing. The collection and use of such data can significantly enhance the understanding of the multi-faceted nature of social issues and how these impact on various types of

⁹ CIB has undertaken research on digital exclusion arising from the experience of Citizens Information Services in assisting people who have difficulty accessing public services - forthcoming policy report.

households and individuals and thus inform the way public services should be delivered. This data has significant potential for greater use by the DSP and will be particularly important as we continue to deal with and emerge from Covid-19.

There is further potential to explore ways in which CIS and CIPS information providers can contribute to ensuring that all relevant DSP information is available at the initial application stage for various payments, thus reducing the number that have to go to appeal in order to be granted (appeals which may be supported by CIS information providers). Developing 'assisted digital' services for people who experience obstacles in accessing online services directly will continue to be an important feature of CIB services and is a potential area for further collaboration.

Suggested strategic principles

Seven principles are identified by CIB which should underpin the Strategy:

- ✓ Citizen-centred services with a focus on ability and maximising individual potential
- ✓ Equality, fairness and transparency in decision making in the provision of income and related supports
- ✓ Targeting of poverty and over-indebtedness
- ✓ Ensuring that everyone is included in digital service offerings
- ✓ Helping people to remain socially engaged
- ✓ A seamless benefits application process
- ✓ Protection of people's legal and human rights