

Development of Department of Social Protection Statement of Strategy 2023-2026

Submission by the Citizens Information Board (February 2023)

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 2023-2026.

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 citizensinformation.ie and through CIB-funded services – 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). CIB also collaborates and engages with a range of specialist organisations that support and represent the interests of disadvantaged sections of the population.

CIB is committed to ensuring that people can access quality information, advice, money advice and advocacy services, and to informing and influencing social policy development by drawing on the experiences of users of the range of CIB-funded services. Evidence-based information on issues encountered by citizens relating to income supports, social protection, access to housing and health services, employment rights, indebtedness, poverty traps and pathways to work provides a useful benchmark for assessing the adequacy of existing policies in those areas, many of which fall within the remit of the DSP.

The engagement with the public by services involves multiple information interventions, requests for advice/assistance and advocacy supports (CISs and CIPS), complex interventions on behalf of people with disabilities (NAS) and supporting people in rescheduling personal debt with multiple lenders (MABS). The *Abhaile* service, supported by MABS, is regarded by CIB as centrally important in assisting people in long-term mortgage arrears.

CIB is cognisant of the fact that we have an important role to play in supporting and supplementing the work of the Department by informing, enabling and facilitating people to access and benefit from DSP supports, including, in particular, income supports and pathways to education, training and employment.

[Factors identified by CIB as relevant to the DSP 2023-2026 Strategy](#)

Clearly, the DSP experienced unprecedented demand for income supports arising from the effects of the Covid-19 pandemic and CIB acknowledges the quality and scale of the Department's work in

responding to the crisis. The pressures now being experienced by the public arising from increasing energy costs, general inflationary pressures, and difficulties in accessing and affording housing, clearly present ongoing challenges for the Department. As is often the case in such matters, these pressures will impact most severely on people who are dependent on social welfare payments and services or who are in low-pay and/or precarious employments.

The numbers of Ukrainians arriving in Ireland, as well as the increase in the numbers from other countries seeking international protection, no doubt present additional challenges for the Department in ensuring that all such people are treated equitably and have their human rights upheld.

Clearly, social protection systems, including temporary measures, played an important role in mitigating the social impact of the Covid-19 pandemic. Economic and social shocks are likely to become more prevalent as longer-term global trends like the evolving nature of work, demographic change, climate change, and conflict and fragility reshape economies and societies. The emphasis in the Programme for Government on anti-poverty and social inclusion measures presents additional challenges in a changing and uncertain economic climate. In particular, the ongoing and focused implementation of the social inclusion strategy, *A Roadmap for Social Inclusion 2020-2025* must remain a central strategic implementation component.

As in earlier DSP strategies, there will continue to be a need to focus on income support and other measures aimed at 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 are in precarious employment or low-wage jobs, or who are finding it difficult to access work in a changing jobs market are empowered to maintain and develop their skills and enhance their experience through appropriate training initiatives.

There will be ongoing pressures on the social welfare system arising from specific commitments in the current Programme for Government relating to, for example, protecting core weekly social welfare rates and increasing various social welfare payments. 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. Delivering on this commitment will continue to be important in the coming years. CIB notes the persistent threat of poverty being reported¹ for lone parent families.² The challenge of ensuring that lone parents and their children do not fall into and/or remain in poverty requires ongoing attention. Policies that ensure adequate income levels and that enable and facilitate pathways to employment – either directly or through education and training – must remain a matter of priority.

The DSP will play a crucial and strategic role in developing and implementing the far-reaching reforms that are outlined in the Report of the Commission Taxation and Welfare³ which has proposed targeted reforms and significant improvements to the welfare system. These should include the progressive

¹ CSO. May 2022. *Survey of Income and Living Conditions (SILC) 2021*.

<https://www.cso.ie/en/statistics/socialconditions/surveyonincomeandlivingconditionssilc/>

²The at risk of poverty rate for persons living in one adult households with children was 22.8%, while without COVID-19 income supports this rate would have been 37.2%.

³ *Foundations for the Future: Report of the Commission on Taxation and Welfare*. September 2022.

<https://assets.gov.ie/234316/b4db38b0-1daa-4f7a-a309-fcce4811828c.pdf>

introduction of reforms to support employment for people in all situations, address child poverty and remove disincentives to someone taking up work or increasing their earnings over time.

The Commission Report argues for adequate social welfare rates, which it sees as central to reducing poverty and recommends that the rate of income support payments for people of working age should be regularly reviewed. While acknowledging that, over the past 30 years, Ireland has become a richer and somewhat fairer society, it states that we cannot take this social progress for granted. Ensuring that we have a fairer society in Ireland will depend on adequate social welfare payments, high levels of labour force participation, a progressive and fair system of taxation, and Ireland remaining a competitive location for investment and job creation. This is essential in order to maintain social cohesion. Reforming the social insurance system and how we pay for it will be vital to this.

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. This approach should remain central in the drive to eliminate child poverty, particularly as some reliance on social welfare income may continue to be the norm for some time for many families with children.

Also of importance will be developing strategies toward implementing the recommendations of the Commission on Pensions⁴ and including the need for provision of a pension solution for family carers. The latter needs to be progressed as does ensuring full gender equality in pensions provision. A key challenge is how to address the projected large deficits in the Social Insurance Fund.

The Indecon report on the cost of disability in Ireland⁵ found that disabled people have extra annual living costs ranging from €8,700 - €12,300 as well as extra unaffordable costs for items and areas of expenditure that they could not afford, averaging €2,706 a year. The report particularly identified the importance of supporting the employment of disabled people. To assist with this, Budget 2023 included increased earnings disregards (€25 per week) for both the Disability Allowance and Blind Pension which was an important measure. Delivering on the commitments contained in the Programme for Government relating to enhancing supports for people with disabilities engaging in employment requires very specific and targeted responses. These include tailoring the various schemes to the particular needs and circumstances of people with disabilities as well as ensuring that people with disabilities can equally access mainstream labour market supports. Undertaking ongoing research to monitor the impact of these measures on disabled people and the social inclusion outcomes is an equally important strand.

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 inform this. CIB is of the view that the minimum wage on its own (even if it is increased to

⁴ *Report of the Commission on Pensions*. October 2021. <https://assets.gov.ie/200480/564ea175-28b2-417d-aa9b-3f1750225310.pdf>

⁵ *The Cost of Disability in Ireland (Indecon Economic Consultants), 2021* – research commissioned by the Department of Social Protection.

⁶ See *Low Pay Commission Annual Report 2022*. <https://assets.gov.ie/234304/074a6944-2f9e-4443-8e6d-a4f85be432d2.pdf>

the Living Wage level) may not be 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.

The commitment in the Programme for Government to investigate the provision of paid leave and social protection to victims of domestic violence is important and should be pursued proactively. Risk factors for domestic violence include social isolation, unemployment and poverty. As a general principle, the non-availability of adequate income and housing supports should never be a barrier to people moving out of violent domestic situations. The continuation of provisions introduced during Covid-19 for quick access to Rent Supplement for people in domestic abuse situations is welcomed.

Issues identified by CIB-funded services

During 2022, CIB-funded services provided direct information, advice and advocacy to 394,400 people with over three quarters of a million queries. The www.citizensinformation.ie website continues to be a key access point to the general population for information on public services.

Almost half of the queries to CISs and CIPS refer to social welfare matters. CISs saw an increase in social welfare related queries in 2022, up by 24%. Queries relating to Disability and Illness payments rose 13% on 2021 query levels. 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 also sometimes experience significant difficulty in accessing an appropriate payment or support. Extra social welfare benefits enquiries increased by 87% on the query numbers for 2021 with Fuel Allowance queries rising by 130%, to almost 33,000. There was a noticeable increase in the level of queries (25,000), relating to *Supplementary Welfare Schemes*, the ‘safety net’ supports – with a rise of 59.6% in demand for information and advice. Additional needs payments enquiries to CISs doubled, reflecting issues with cost-of-living concerns. MABS have highlighted a related steady increase in people needing additional income supports and are also seeing people who are more reliant now on credit cards and other lines of credit to buy essential everyday items.⁷

CIB received over 8,000 Social Policy Returns (SPRs)⁸ in 2022. SPRs that related to social welfare matters showed a significant increase over 2021 figures for selected comparable periods, rising from 35% of all SPRs in October/November 2021 to 50% for the same period in 2022.⁹ As a snapshot, SPRs for October/November 2022 related in order of volume to Fuel Allowance, Social Housing, Working Family Payment, Illness Benefit, Carer’s Allowance, Housing Assistance Payment, PPS Number, Medical Card, Disability Allowance, and Additional Needs Payment. Taking a broad view of these schemes, it is clear that key areas of concern are focused around cost of living issues, housing difficulties and illness payments. Almost all of these issues are of direct or indirect relevance to DSP services.

A high proportion of users of CIB-funded 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

⁷ [Urgent poverty payments jump by 75% since 2021 \(rte.ie\)](https://www.rte.ie/news/2022/07/urgent-poverty-payments-jump-by-75%/)

⁸ SPRs are reports received from services where staff identify a policy issue that is frequently encountered and/or where it is deemed that the issue is one that impacts in a serious manner on clients.

⁹ See *Social Policy Update*, December 2022,

<https://citizensinformationboard.newsweaver.com/designtestnewsletter/up2q1g3ywi319dw7fyfxl6?lang=en&a=2&p=10667272&t=2206018>

and/or experiencing mental health difficulties or are from households experiencing over-indebtedness. Those who are already in vulnerable work situations are the ones most likely to experience uncertainties and negative consequences from shocks to the economy such as sudden rises in energy prices and food cost inflation. This is compounded for those with parenting and caring responsibilities, who are predominantly women.

In many instances, CIS clients report difficulties and barriers to accessing DSP services online, challenges in understanding and coping with complex eligibility requirements, dissatisfaction with decisions, delays in appeals processes, as well as problems in achieving what might be termed ‘an integrated response’ when their circumstances called for a package of different supports. The full implementation of the *Connecting Government 2030: A Digital and ICT Strategy for Ireland’s Public Service*¹⁰ should help in this regard.

Key considerations for DSP Strategy 2023-2026

While unemployment rates have decreased significantly in recent years, there remains a cohort of people who continue to experience difficulties in accessing the jobs market, in finding adequately paid work, or in securing employment conditions that meet modern and acceptable standards.

Events over the past number of years have brought to the fore 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 sudden crisis events.

As well as investment in public childcare, housing, education, transition to work, and healthcare, there is a need to ensure that the appropriate mechanisms are put in place to mitigate adverse economic shocks. This will require vigilance around social welfare payments and poverty proofing safeguards.

It is almost certain that problem debt and/or rent or mortgage arrears will present major difficulties for many low-income households over the coming years. The role of Abhaile (the state funded mortgage arrears resolution service) is critical in supporting people in household debt distress. MABS have seen an increased presentation of clients with utility debts experiencing unaffordable energy costs and have played a key role in the Government’s strategy to assist those in the current energy poverty crisis. In addition, supports for over-indebted households need to include easy access to income support, including Supplementary Welfare Allowance safety net supports, where no other social welfare payment is immediately accessible.

Income support priorities should continue to have a focus on maximising employability, while providing integrated packages of support. As noted in the Pathways to Work Progress Report,¹¹ while active labour market policies are vital to assisting people gain, regain, and enhance their employability, other important factors such as childcare costs, caring responsibilities and housing can be significant barriers for many individuals.

In the context of active labour market policies and schemes which fall under the remit of the Department, it will be important that the dual-purpose nature of many of these schemes continues to

¹⁰ *Connecting Government 2030: A Digital and ICT Strategy for Ireland’s Public Service*, <https://assets.gov.ie/220390/79ac70c6-f2d9-4b5e-8960-c833a0b40efb.pdf>

¹¹ Labour Market Advisory Council. December 2022. *Pathways to Work Progress Report (July 2021 – June 2022)*. <https://assets.gov.ie/242268/94141b17-fba6-4777-aad3-896190d83fc4.pdf>

be recognised – in addition to offering a pathway to employment, they also deliver important and crucial services to communities.

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 and opportunities for face-to-face interactions with DSP officials. The Department will need to continue to work to find creative solutions to the challenge of providing access to an increasingly online range of services.

While CIB-funded services and other support organisations can provide a high level of access to information for members of the public, there is clearly a need for the Department to continue to invest in mechanisms that will increase awareness of schemes and supports in an effective manner. Ongoing engagement with appropriate NGOs can help ensure that hard-to-reach client groups will be made aware of schemes and supports that are of relevance to them.

The waiting times for social welfare appeals¹² to be processed, despite ongoing positive developments in this area (12.9 weeks in 2021 compared to 16.9 weeks in 2020), 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. CIB is acutely aware that the time taken to process an appeal is hugely important to the people who submit an appeal and can have a negative impact on their personal lives.

The number of appeals, and, in particular, the significant extent to which appeals are upheld (more than half in 2021), suggests the ongoing existence of problems at the level of first-instance decision-makers. CIB has regularly over the years highlighted the need from a citizen-centred perspective to ensure that social welfare applicants have access to good and ‘correct’ decisions at the earliest possible stage.

The Department’s objective of ‘putting the client at the centre of policy and service delivery’ must be strongly re-emphasised and translated into effective policy and practice. This will involve, inter alia, a greater capacity and willingness on the part of DSP to develop approaches that recognise the multi-faceted nature of the difficulties facing individuals and the need to provide an integrated, comprehensive, and personalised response.

In keeping with the latter point above, it should be recognised and acknowledged that addressing a wide range of social protection issues will involve multiple government departments and state agencies. The ‘whole-of-government’ approach, regularly articulated at overall policy level, needs to filter down into practice at all levels. For example, housing, income support, employment supports, and social/medical supports for persons with disabilities would clearly be enhanced by better integration across Departments and agencies at both national and local levels.

¹² See - *Social Welfare Appeals Office Annual Report 2021*
<https://assets.gov.ie/230042/e349c2f3-8982-4739-81af-f94cab29a922.pdf>

In ensuring that the client is at the centre of service delivery, it is important that the voice of the intended beneficiary of a social welfare support is heard, for example, in relation to an application for a Disability Payment or a Carer's Allowance – the latter where the recipient of the payment is not the primary beneficiary.

Connecting Government 2030¹³ sets out a framework within which all public service organisations can deliver their own digital commitments focused on the targets set out in the Digitalisation of Public Services dimension of the national digital strategy. It is envisaged that Connecting Government will also act as an umbrella strategy for actions across a number of other related government policies and strategies thereby ensuring an overall coordinated and integrated approach to their delivery. Such an integrated approach will clearly be an important component of DSP strategic development in both the short-term and longer-term.

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.

The commencement of the Assisted Decision-Making (Capacity) Act 2015 will have implications for practice in supporting service users, and will require, at a minimum, investment in training of staff engaging with disabled people in relation to operating in the changed legal environment which will require a supported decision-making approach in all cases where there may be a question about a person's decision-making capacity.

CIB working collaboratively with the DSP

While CIB makes pre-budget and other thematic submissions and prepares social policy and research reports on specific issues identified by our funded services in feedback, 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 ongoing service access and policy deficits. 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 continued development of the citizensinformation.ie website as a trusted source of information on public and social services offers potential for further collaboration with the Department and between government departments to enhance access to public services.

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-funded services 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

¹³ Connecting Government 2030 - A Digital and ICT Strategy for Ireland's Public Service
<https://assets.gov.ie/220390/79ac70c6-f2d9-4b5e-8960-c833a0b40efb.pdf>

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 households and individuals and thus inform the way public services should be delivered. This data has significant potential for greater use by the DSP. Equally, the timely and transparent production and publication by DSP of data concerning its services is especially important and valuable.

Suggested strategic principles

The following principles are identified by CIB as those that should underpin the new Strategy:

- ✓ Equality, fairness and transparency in decision-making in the provision of income and related supports
- ✓ Targeting of poverty and over-indebtedness
- ✓ An adequate and sustainable pensions system
- ✓ Ensuring that nobody is left behind in the ongoing move to service digitalisation
- ✓ A seamless benefits application process
- ✓ Protection of people's right to be treated equally and fairly in the social welfare system
- ✓ Facilitating supported decision-making in accordance with the provisions of the Assisted Decision-Making (Capacity) Act 2015
- ✓ An integrated, personalised and across –Government approach to meeting individual's needs
- ✓ High quality professional service delivery to the public at each stage of engagement

Concluding points

The experience of CIB-funded services shows that there are a number of underlying issues that require ongoing attention and that are relevant to the forthcoming DSP Strategy. CIB looks forward to continuing to collaborate with the Department in its task of advancing the social inclusion agenda and improving outcomes for citizens.