

Pre-Budget Submission 2026

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Introduction

Our services, their clients and the evidence

Access to expert information is essential in helping people to make informed decisions and navigate social and public services. It can also help to promote social inclusion and operate as a vital support to people during a crisis when they are at their most vulnerable (Making an Impact: The public value of Citizens Information Services in Ireland, 2017). Services funded by the Citizens Information Board (CIB) provided free and impartial information, advice and advocacy to over 430,000 people in 2024. The national network of CISs, MABS and Disability Advocates with the National Advocacy Service (NAS) play a key role in helping people to access benefits and services, to find jobs, to stay in work and build financial stability. This is in addition to the availability of a wide range of information on citizensinformation.ie and from the national telephone helpline, Citizens Information Phone Service (CIPS). The citizensinformation.ie website had over 33 million page views in 2024 and CIPS had 142,000 callers to their 0818 07 4000 helpline number.

Every day, staff in these services capture data on the needs of the many thousands of people who are seeking assistance. Our analysis of this data gives a clear, rich and live picture of the issues that people are facing when trying to access social and public services.

Evidence from our frontline services demonstrates that many people continue to struggle to make ends meet. Increases in the cost of living have overlapped with housing issues: increasing costs and hard-to-afford housing have exposed low and middle-income households to a series of cross-cutting risks. Those most vulnerable to these risks include people relying on uncertain incomes, those experiencing unemployment and people locked out of the labour market due to ill health, disability or caring responsibilities.

The high number of people supported by our funded services provides us with a unique insight into the problems that people face when accessing social, public and financial services, such as a jobseeker or illness payment, a medical card or emergency homeless services. CIB uses insights from these interactions to show how the needs of many people are not being met. This enables us to fulfil our legislative mandate to monitor and provide feedback on social policies, with the aim of ensuring that they are effective and meet the needs of citizens. This evidence is used here to inform Budget 2026 decisions - with a particular focus on low-income households, the ongoing impact of cost-of-living pressures and accessing benefits and services.

Socio-economic context

The Irish economy continues to be largely well-functioning: an ongoing surplus, stable levels of inflation, reducing interest rates and full employment. Despite these positives we acknowledge that the uncertain global economic environment will present challenges for the Government when framing Budget 2026.

We also acknowledge the positive impact of the measures in last year's budget – particularly in the context of the largest-ever spend by the Department of Social Protection. As the high cost-of-living continues to put pressure on low-income households, we recognise that the flat-rate welfare increases, and the lump-sum payments have helped many households this year.

An ESRI analysis of Budget 2025 (<u>Distributional impact of tax and welfare policies: Budget 2025</u>) found that the permanent measures (such as increases in the tax bands, tax credits and social welfare rates) were reasonably progressive. The temporary measures were deemed to be less progressive but did help households deal with rising prices. For instance, the analysis found that without the temporary measures (such as the €400 payment to Disability Allowance recipients) the at-risk-of-poverty rates for older people and people with disabilities would have increased more significantly than they did.

The ESRI analysis stated that phasing out temporary measures "will cause issues if headline welfare payments fail to keep pace with income growth." Our review of Budget 2025 (Budget 2025: A CIB Review) echoed this concern, highlighting the dependence of many low-income households on these temporary payments. Against a backdrop of global economic uncertainty, the indications from Government are that funding to deliver once-off supports will be limited in the next budget. People's dependence on these lump sum or temporary payments raises questions around income adequacy in the face of ongoing high costs of living. Predictable and routine costs for welfare recipients should be met through wider welfare provision, rather than short-term once-off payments that many households have now grown dependent on.

Low-income households' reaction to rising cost-of-living

In 2025, the ESRI investigated how low-income households had coped with the rising cost of living over the last number of years. The research – The response of low-income households to the cost-of-living crisis in Ireland – was the first of its kind in Ireland. It highlighted the disproportionate effect of the cost-of-living crisis on low-income households, which forced them to engage in "high-risk" measures to make ends meet, including:

 cutting day-to-day spending (on household essentials such as food, clothing, electricity and heat)

- reducing or depleting savings
- taking on more debt
- building arrears on utility bills, rent or mortgage repayments.

The report noted that these actions "will have a lasting detrimental legacy, particularly among households with children".

Consistent poverty on the increase

Feedback from our frontline services parallels many of the ESRI findings. Despite a relatively positive macro-economic environment, the impact of high levels of annual inflation (peaking in October 2022 at 9.2%) continues to be acutely felt amongst the households that seek assistance in CISs, CIPS and MABS. Many clients are unable to afford the basics - covering the rent, affording the weekly shop, keeping the house warm, or paying for childcare. Survey data from the Central Statistics Office (Survey of Income and Living Conditions (SILC), CSO, 2024) for 2024 shows a year-on-year increase in the at-risk-of-poverty rate (from 10.6% in 2023 to 11.7% in 2024) and an increase in consistent poverty (from 3.6% in 2023 to 5% in 2024).

Welfare system can be difficult to navigate

The ESRI research on the cost-of-living crisis also looked at the challenges facing low-income households in accessing government benefits and relevant support services. It offered evidence to suggest an under-utilisation of benefits and stated that "the complexity of the welfare system may have blunted its effectiveness during the cost-of-living crisis, particularly with respect to housing, health and energy". Feedback from MABS and CISs echoes this view. Given the size, reach and complexity of the social welfare system, it is not surprising that applicants and recipients of benefits might struggle to interact with this system. Case examples from frontline services show that many clients experience the welfare system as a series of confusing entitlements and eligibility criteria, with an administrative burden that adds complexity to an already challenging situation.

Our submission and feedback from frontline services

Section One of this submission looks at the key issues arising for people who have been seeking assistance in CISs, CIPS and NAS during the past year. Around two thirds of all queries made in CISs related to social welfare, housing or health service access.

Section Two concentrates on debt and money advice issues that have been highlighted by MABS services, as they work with clients who are experiencing problem debt and financial exclusion.

Section One: Feedback from CISs, CIPS and NAS

In this submission, we focus on the needs of low-income households and people in situations of vulnerability or crisis. This includes families with young children, people trying to combine work with welfare, those facing eviction, people with disabilities, older people seeking supports and care, and people living with unsustainable debt. We have distilled the feedback from our services into the following broad areas of concern for callers and clients:

- 1. Work, welfare and child poverty
- 2. Living with disability and illness
- 3. Finding secure and suitable housing
- 4. Accessing benefits and services

In light of these concerns, we suggest that a strategic and targeted approach to core social welfare rates is essential if there is to be a meaningful impact for the households currently living in, or at risk of, poverty. Despite the increasing spend by the Department of Social Protection over the past number of years, core income support payments have not kept up with the rising cost of essentials. We therefore argue for a planned approach to achieving income adequacy through the benefits system. Welfare entitlements should be linked to objective criteria (such as Minimum Economic Standard of Living costs, or inflation rates) rather than annual budgetary decisions – which we have seen over the past eight years are typically unpredictable, given global economic instability.

1. Work, welfare and child poverty

Social welfare queries are the main concern for callers who access CISs and CIPS. During 2024 over 40% of the 900,000 queries in these services were related to income supports or social welfare schemes. This gives us some clear insights into the way that welfare provision works and the challenges it presents for people.

Social welfare and income adequacy

In terms of social welfare adequacy, research from the <u>Vincentian MESL</u> (<u>Minimum Essential Standard of Living</u>) Centre in 2025 showed that the basic cost of living has increased by 18.8% from 2020 to 2025. While the research highlighted progress for some social welfare dependent households, it also demonstrated that households with older children (aged 12 and over) and single adult headed households continue to have a greater risk of deep income inadequacy when dependent on social welfare. Deep income adequacy is where income meets less than 90% of MESL needs. We believe that Budget 2026 presents an

opportunity for Government to take a strategic approach to income adequacy by benchmarking core welfare rates against these evidence-based MESL costs.

Related to the issue of adequacy, we welcome the introduction of pay-related Jobseeker's Benefit in March 2025. This will link, for the first time, income support payments and previous earnings when eligible applicants find themselves unemployed. While we have concerns that this may lead to a tiered benefits system (with the payment of a higher level of benefit to higher earners), its introduction does present a useful opportunity to monitor the implementation and impact of pay-related benefit in the Irish social protection system.

On income adequacy for those who are combining work with welfare, we acknowledge the value of the 33% increase in the National Minimum Wage (NMW) over the past five years but note our disappointment at the recent decision to delay the full implementation of the Living Wage from 2026 to 2029. This had been a key commitment in the 2020 Programme for Government, and we had anticipated that the incremental increases in the NMW in recent years would have made the 2026 deadline attainable.

Of relevance here too is the commitment in the Programme for Government (Programme for Government 2025: Securing Ireland's Future) to the introduction of a new working age payment. The Government has stated that this will "ensure that individuals always see an increase in income when they work or take on additional hours". This will require significant consultation with stakeholders, and we look forward to the initiation of this process.

Combining welfare with low-paid work

As the Irish economy continues to operate at full employment (with an unemployment rate of 4%), feedback from services indicates a complexity for many workers who are combining social welfare payments with low-paid or casual work. These concerns underline the importance of an appropriately designed in-work welfare system that provides a level of support that is both secure and adequate for workers who are trying to make ends meet. Many who are working part-time or low-paid jobs are trying to combine pay and hours worked with available income supports – such as Working Family Payment, jobseeker's payments, Carer's Allowance, Back to Work Family Dividend, One Parent Family Payment or Partial Capacity Benefit.

Our services continue to report on the difficulties for clients caused by the "three-day rule" for jobseeker's payments, most notably that it:

- acts as a disincentive to take up work
- is out-of-step with current working patterns and can be disadvantageous to women working in the caring profession
- offers an incentive to engage in undisclosed employment

 creates anomalies where some claimants are left without income support whilst others are eligible on the basis that the same hours worked are based over three days or less.

Reduced rate of Jobseeker's Allowance

While the overall rate of unemployment is at its lowest level since 2000, we note that the youth unemployment rate stands at 10.9% - or one third of all unemployed people. It is in this context that we highlight concerns around the adequacy of the reduced rate of Jobseeker's Allowance for those aged under 25 and who are not living independently. While there are additional payments available to those who engage in training and education programmes, we hope that any review of working age payments would seek to equalise the rate for under-25s.

Low-income self-employed workers

We welcome Government moves in recent years to deal with the difficulties caused by the gaps in social insurance coverage for self-employed people (such as the extension of eligibility for Invalidity Pension, Jobseeker's Benefit, Treatment Benefit and Carer's Benefit). While these benefits were introduced at no extra cost to self-employed workers, we note the intention in the PRSI Roadmap 2023 to phase in planned increases in PRSI contributions for all workers up to 2028.

In this context, we reference the Programme for Government commitment to "explore the option of giving self-employed workers access to Illness Benefit by means of making a higher PRSI contribution". A move on this in Budget 2026 would be particularly welcome. Feedback from services continues to evidence the financial hardship that many low-income self-employed workers face when they are unable to work due to illness or disability. Related to this, reports indicate that many self-employed people who seek help from our frontline services are unaware of their rights and entitlements, or the need to maintain their social insurance record.

In-work supports for families

The Working Family Payment (WFP) is crucial in maintaining low-income families in work yet much of the feedback from services highlights the difficulties caused by the working hours threshold (set at 38 hours per fortnight). We are conscious of the need to ensure that the WFP does not support unsustainable low earnings. However, we note that the threshold can disproportionately affect lone parents, as couples can combine their working hours and more easily access the payment. In addition, services often report on the financial difficulties for

lone parents who move from the One Parent Family Payment (OFP) to the Jobseeker's Transitional Payment (JST), as they are no longer eligible for this crucial in-work support.

Over ten years after the introduction of reforms to the One Parent Family Payment, services continue to submit feedback on the hardship for some parents who move from the payment to a combination of other income supports or to part-time or full-time work.

We acknowledge that measures have been introduced over the years to support this transition and also some of the positive policy changes that this Government has implemented recently – principally the removal of child maintenance as assessable income for many social welfare payments and the provision of an age differentiation for the Child Support Payment (formerly Increase for Qualified Child).

Barriers persist, however, and many lone parents have difficulties accessing appropriate supports to enable them to move to part-time or full-time work when their child turns seven. The prevalence of lone parents in low-paid and insecure work, combined with difficulties in accessing affordable childcare, can make the transition particularly difficult. The latest analysis from the <u>Vincentian MESL Research Centre</u> found that the income of one-parent households dependent on social welfare (with a primary and secondary level student) covers only 82% of what they need to have a minimum, socially accepted standard of living. For those who are employed, many are dependent on in-work supports, such as housing and childcare payments.

The experience of child poverty

This <u>MESL research</u> is one of a series of reports published in 2025 that provide clear indicators and evidence of the impact of the high cost of living on levels of child poverty. In another study, the ESRI found that even for households that are deemed to be living above the poverty line, almost one in five children (17%) experience deprivation. The report – <u>Deprived children in Ireland: Characterising those who are deprived but not income-poor, ESRI, 2025</u> – noted that the high cost of housing and the cost of disability within a family also contributed to the risk and experience of enforced deprivation.

In June 2025, a report from the Children's Rights Alliance (Child Poverty Monitor 2025) found that children are the most likely group in society to experience poverty. Their analysis of the 2024 SILC data showed that the number of children in consistent poverty in Ireland had increased from 4.8% in 2023 to 8.5% in 2024 – or by an additional 45,000 children. This is a notable and worrying rise. Childhood poverty can have longstanding, even lifelong, impacts.

Child poverty policy measures

We acknowledge the work of the Child Poverty and Well-Being Programme Office since its establishment in 2023. We value the co-ordination and focus that the Department of the Taoiseach has brought to the issue. We note also that the <u>Programme for Government 2025</u> states that child poverty is not inevitable, and that it commits to setting a new child poverty target. The recent <u>ESRI report on deprived children in Ireland</u> states that "national child poverty targets are an important means of galvanising policy action and retaining a focus on reducing child poverty. The deadline for achieving a child poverty target originally set in 2016 was extended from 2020 to 2025 and revised targets are overdue". In this context, we hope to see an ambitious and well-resourced second programme of work for the office in 2026, as a successor to the initial three-year plan.

As Budget 2025 represented the second year of spending plans on child poverty, we recognise the targeted efforts made: the lump sum payment to recipients of the Child Support Payment; the increased income limits for the Working Family Payment; the extension of the Free School Books Scheme to Senior Cycle; and the full roll-out of the Hot School Meals programme to all primary schools.

We also acknowledge the positive impact of the cost-of-living measures on the at-risk-of-poverty rate – which was measured at 11.7% rather than a projected 14.1% without the associated measures (SILC 2024, CSO, 2025). In addition, we note that the ESRI evaluation of Budget 2025 tax and welfare measures found that households with children tended to benefit more from the Budget 2025 measures, such as the double Child Benefit payment. We note, however, the ESRI analysis also stated that the measures have had little anticipated downward effect on child poverty rates, which it argued suggested "a targeting issue."

An Taoiseach Micheál Martin has stated his intention that the budget becomes the focal point for dealing with child poverty (Child Poverty, Dáil Debate, 8 April 2024). In light of the likely removal or reduction of the temporary payments, we therefore seek again this year for a move towards permanent and targeted measures that would provide child income support more effectively to those most in need – so as to have a real and lasting impact.

We note with interest that the <u>Programme for Government 2025</u> references the need to "explore a targeted Child Benefit payment and examine the interaction this would have with existing targeted supports to reduce child poverty such as the Working Family Payment and Child Support Payment". A recent ESRI report (<u>The effect of child-related benefits on child poverty and deprivation in Ireland, ESRI, 2025</u>) found that such a means tested payment (which had been recommended by the Commission on Taxation and Welfare in 2022) could reduce child poverty significantly. The report suggested that this payment would be the most

cost effective of a range of suggested tax-benefit reforms. It estimated that it could lift 55,000 children out of income poverty, at an annual cost of €772 million.

However, such an approach must also recognise the importance of maintaining or building adequate adult rates. This could be achieved by benchmarking core social welfare rates to MESL costs. Without such a move, targeted child support measures might be undermined by slippage on core welfare rates.

Equally important is the need for adequate rates of pay for working parents. Work is not providing a route out of poverty for many households. We would ask Government to reconsider the three-year delay in the full implementation of the Living Wage, or failing this, to maintain the upward momentum that we have seen on National Minimum Wage (NMW) rates over the past few years.

Recommendations: work, welfare and child poverty

- Establish the Minimum Essential Standard of Living as the benchmark for core social welfare payments
- Reconsider the three-year delay in the full implementation of the Living Wage
- Ensure that income thresholds, means-test criteria and earnings disregards are revised to reflect increases in the National Minimum Wage and core social welfare rates
- Introduce a new working-age payment, with the aim of removing anomalies in the current system
- Change eligibility for jobseeker's payments to criteria based on hours worked, rather than the number of days worked
- Remove the reduced-rate payment of Jobseeker's Allowance for young people aged between 18 and 24 years
- Introduce an option for self-employed people to increase PRSI contributions to enable them to access Illness Benefit
- Reduce the working hours threshold for the Working Family Payment from 19 hours per week (38 hours per fortnight) to 15 hours per week (30 hours per fortnight)
- Extend eligibility for the Working Family Payment to lone parents in receipt of the Jobseeker's Transitional (JST) payment
- Extend eligibility for the JST payment to lone parents whose children are under 18 and in full-time education
- Provide targeted assistance for low-income families through the provision of a meanstested, second-tier child benefit payment.

2. Living and working with disability and illness

During 2024, over a quarter (or 90,260) of all social welfare queries made in CISs across the country were concerned with disability, illness and caring issues. The National Advocacy Service, meanwhile, supported over 1,700 people with disabilities to access their rights and entitlements.

While there is a wide range of schemes and benefits in this area, the feedback from our frontline services indicates repeating concerns, particularly regarding income adequacy and access to work.

Income adequacy and extra costs

As highlighted previously, income adequacy is an issue for many clients of our frontline services. This is especially true for people with disabilities, many of whom seek assistance to maximise their income from an often-complicated mix of benefits – such as a core disability payment, secondary benefits and housing supports – which may be combined with low-paid work.

In our <u>Pre-Budget Submission for 2025</u> we urged the government to maintain the policy momentum following the withdrawal of the Green Paper proposals on the reform of disability payments. We believe that the need to factor in a recurrent cost-of-disability payment is now stronger than ever and follows on from the publication of <u>The Cost of Disability in Ireland</u>, <u>DSP</u>, 2021.

The <u>SILC data from 2024</u> shows us that the consistent poverty rate is highest for people who are unable to work due to long-standing health problems:19% of this cohort, which is up from 16.5% in 2023. In March 2025, an ESRI report (<u>Adjusting estimates of poverty for the cost of disability, ESRI, 2025</u>) noted a double economic penalty for disabled people due to lower-than-average disposable incomes and higher-than-average expenditure (such as healthcare and transport). Using adapted measures of living standards, the study estimated that the cost of disability is 52%-59% of the disposable income of households with disabled people. Their analysis found that the at-risk-of-poverty rate for disabled people was 24% compared with 10.6% for non-disabled people. When the measures are adapted to allow for consumption needs, the rate rises to 65%-76%.

These findings are particularly concerning in light of the possible removal or reduction in temporary payments in 2026, which would have a disproportionate impact on people with disabilities facing this double economic penalty - in addition to high cost of living pressures. This further underlines the need for an ongoing, mainstreamed payment to take account of the significant extra costs associated with disability.

Transport costs

On the related matter of transport costs for people with disabilities, frontline services continue to highlight the difficulties caused by the 2013 closure of the Mobility Allowance Scheme (and the Motorised Transport Grant) to new applications. These schemes have not been replaced to date.

Given this situation, it would appear that the introduction of a Cost of Disability Payment is likely to be the only means by which disabled people will be able to deal with the significant costs of transport that they face (particularly in rural areas). It is also disappointing that the Disabled Drivers and Disabled Passengers Scheme, acknowledged by Government as not fit-for-purpose (<u>Tax Reliefs, Dáil Debate, 29 May 2025</u>) has not been replaced yet.

We note from recent statements (<u>Departmental Schemes</u>, <u>Dáil Debate</u>, <u>28 May 2025</u>) that the Department of Transport has been tasked with developing a replacement vehicle adaptation scheme for disabled drivers and passengers. We look forward to the development of such a scheme, particularly given the key role that transport has in enabling choice and independence.

Access to work

Access to meaningful and adequately paid work is a major contributor to breaking the cycle of deprivation. Yet, even in a situation of full employment, disabled people continue to have a low employment rate – most recently estimated at 34% (Census 2022, Disability, Health and Carers, CSO, 2023). We look forward to the publication of the new National Disability Strategy in the coming months (Employment Support Services, Dáil Debate, 19 June 2025) to provide an impetus for actions to increase the prospect and viability of work for those who have the capacity, as well as for improving the quality of work.

More immediately, we welcome the formal launch of a reformed Wage Subsidy Scheme (WSS) in June 2025, along with the accompanying communications campaign. We are hopeful that the recent changes to the scheme will enhance its flexibility and effectiveness for disabled people and employers. Over the years, our funded services have noted the potential positive impact of the WSS in incentivising employers to hire people with disabilities but have highlighted concerns around eligibility criteria and awareness.

Relatedly, services continue to highlight difficulties with the Partial Capacity Benefit (PCB) scheme. These concerns include:

- the limited number of qualifying payments for the scheme (Illness Benefit when claimed for a minimum of six months, or Invalidity Pension)
- a lack of understanding amongst claimants as to how capacity is assessed

- a fear that an assessment could result in the withdrawal of an existing benefit
- the loss of secondary benefits such as Fuel Allowance, resulting in an overall loss of income.

Data from the Department of Social Protection shows that just over 3,000 people are participating in the PCB scheme (Social Welfare Schemes, Dáil Debate, 29 May 2025). This relatively low level of take-up suggests that the scheme is not incentivising many people to return to the workplace. It appears that Disability Allowance, with its associated earnings disregard, is effectively operating as a more accessible in-work support for people with disabilities.

We welcome the commitment in the Programme for Government 2025 to "reform the Disability Allowance payment and remove anomalies in the current means test." Feedback from services indicates some difficulties with the payment, including the inconsistent assessment of a partner's income. While some income from employment is not considered (with an earnings disregard of €20 per day), the DSP assesses all the income from self-employment.

Services also report that the medical assessment is being experienced as increasingly stringent, particularly in relation to conditions such as autism, and mental health difficulties. There is a perception that a higher standard of proof is now required in the medical assessment, with an overly strict interpretation of the eligibility criteria.

Other concerns reported by services in relation to disability and caring include:

- the anomaly whereby Free Travel is provided to recipients of Carer's Allowance (CA) and Domiciliary Care Allowance (DCA) but not for the child being cared for
- the value in extending the payment of DCA from 16- to 18-year-olds, with the payment of DA not starting until the child turns 18
- The difficulties caused by the 18.5-hour limit on work or study for those in receipt of Carer's Allowance.

Accessing health services

In the context of health service access, we note that medical cards are consistently the single most queried benefit in CISs. During 2024, there were 38,733 medical card queries: 62% of all health service queries. For a number of years, the key issue has been the number of people unable to find a doctor or dentist willing to accept new medical card patients.

Many CIS clients report resorting to emergency departments or out-of-hours services for primary care. In the absence of GP care, people are unable to get necessary medical

certification for payments such as Disability Allowance or Illness Benefit and so will be at a further financial loss.

Services also highlighted an inequity where people whose entire income is from social welfare are automatically entitled to the medical card, whereas those on comparable non-social welfare income may not be eligible. This means that people on low incomes from work may not qualify for a card, whereas those in receipt of a social welfare payment will. A recent ESRI paper (Medical Card coverage and the impact of income limit freezes | ESRI, 2025) highlighted that the income limits for the Medical Card have not increased for those aged under 70 since 2005 - despite 26% price and 45% wage inflation since then. The report argues that this social welfare rule creates horizontal inequity and a work disincentive.

Administrative issues and online access

Beyond these underlying issues of income adequacy, access to work and to health services, the most reported concerns in relation to disability, illness and carers are primarily operational. Feedback centres on confusion and frustration for clients around applications, reviews and appeals. We deal with the broader issue of administrative burdens for public services later in this submission.

We acknowledge that online access has made application processes quicker and easier for the many people who have the skills and means to engage. However, a substantial minority have significant difficulties with online access. This includes those struggling with language or digital literacy.

The face-to-face service offered by our frontline services means they support many people who do not have the skills, capacity, agency, equipment or means to independently navigate online access to public services. In such cases, the use of digital technologies to provide public services or welfare payments can be challenging rather than enabling and can further exacerbate already-established patterns of exclusion.

We note that the Department of Social Protection is continuing to expand its digital offering, making more benefits and services available through MyWelfare.ie. While welcome for many, a 'digital first' strategy must also cater for people who are digitally excluded.

An inclusive, multi-channel approach to the provision of public services should include:

- the provision of paper application forms
- the appropriate resourcing of customer service teams to respond rapidly to emails
- well-resourced digital supports, such as the availability of prompt assistance via a dedicated telephone helpline or in-person helpdesk.

CIB-funded services play a valuable role here. Frontline staff provide a range of services across a variety of channels (web-based, face-to-face or telephone). They bring timely and clear information to people and help them navigate public services and welfare systems. Of particular relevance here is the Digital Help Service that was piloted successfully in the CISs in South Leinster, Norther Munster and South Dublin over a 5-month period. A project is now in place to roll out this Digital Help Service to all offices nationwide over the next 12 months. The service focuses on enabling and empowering people to access online public services. It supports clients to access and complete online forms and processes related to government services and portals.

In offering this practical and valuable service to clients, we would argue that this does not take away from the need to ensure that alternatives to digital access are made available to all, so that they independently navigate welfare systems and other public services.

Recommendations: Living and working with disability and illness

- Introduce a Cost of Disability Payment that recognises the extra costs associated with a disability
- Provide for a replacement of the Disabled Drivers and Disabled Passengers Scheme
- Further increase the earnings disregard for Disability Allowance (last increased in Budget 2023)
- Extend the eligibility criteria for Partial Capacity Benefit beyond Illness Benefit and Invalidity Pension
- Provide the Free Travel Scheme to children for whom Domiciliary Care Allowance is paid
- Extend the payment of Domiciliary Care Allowance up to age 18
- Increase the hours that Carer's Allowance recipients are allowed to work
- Review and increase medical card income thresholds.

3. Finding secure and suitable housing

Housing is a critical and ongoing concern for many of the thousands of clients who access our funded services every day. CISs dealt with 85,000 housing queries during 2024, mostly highlighting the crucial issues of availability and affordability.

The focus of the housing-related concerns in CISs is most apparent in three specific query areas - local authority and social housing, renting a home, and homelessness - which make up two thirds of all housing queries. This reflects the difficulties caused by the dependency on the private rented sector. This includes the provision of much of what is termed 'social housing' but is the payment of housing supports (principally HAP), via the state, to private landlords.

Among the 43,000 queries about local authority and social housing the following concerns were raised in relation to the Housing Assistance Payment (HAP):

- the chronic undersupply of private rented accommodation for HAP tenants
- difficulties caused by high rents, relative to the level at which rent limits are set. In many cases, this puts tenants under pressure to top-up the payment
- the income eligibility threshold for social housing assessments
- the reluctance of landlords to sign up to the HAP scheme
- the capacity of local authorities to monitor and enforce accommodation standards in respect of quality and repairs
- difficulties for applicants in accessing information, forms and support from local authorities.

High housing costs

The <u>SILC 2024 data</u> found that people living in rented accommodation were significantly more likely to be at risk of poverty (21.8%) than those living in owner-occupied accommodation (7.3%). The <u>ESRI report on child deprivation</u> highlighted the significant burden of housing costs on family living standards, finding that the high cost of housing prevents many households from achieving an adequate standard of living, even though they were not deemed "income-poor". This highlights the consequences of extremely high rent becoming the norm: the need to stay on top of rent payments leads to significant financial pressures and debts in other areas.

The <u>Daff.ie Quarterly Rental Report, Q1 2025</u> indicates that rents are rising at a faster rate than at any time in the last 20 years. This is leading to a division in the provision of social housing. While some people access affordable social housing directly from local authorities and housing associations, others who are in receipt of housing supports (such as HAP or Rent Supplement) must struggle with the reality of private market provision - high market rents and insecure tenure. The <u>2024 SILC data shows</u> us that 43% of those renting from local authorities were at risk of poverty, compared with 57% of those accessing rental supports.

Housing policy reform

In the Programme for Government 2025 the Government stated its commitment to delivering over 300,000 new homes between now and 2030, with a mix of social and affordable, cost rental and private provision.

We acknowledge the recent moves by Government to boost private sector investment in the housing market, and we particularly welcome the proposals to strengthen tenant protections (Reforms to the rental sector, Department of Housing, 10 June 2025).

It will be some time before we see real impacts from this complex set of reforms. Many people seeking assistance from our funded services, however, are in crisis now. Given the level and nature of CIS queries related to social housing assessments, we argue that it is crucial that Government takes steps to introduce a revised social housing income eligibility model. This could help to address some of the acute difficulties faced by people in need of social housing. This new model should look at the need for consistency between local authorities in the definitions of assessable income, at resetting the income threshold and revising HAP limits to more accurately reflect current market rents. This revised model has been mooted for several years, with an initial date for delivery in 2024 and no new timeframe in place at present (Housing Policy, Dáil debate, 8 May 2025).

Access to housing for people with disabilities

Feedback from Disability Advocates working with the National Advocacy Service (NAS) points to the problems caused by a widespread lack of accessible social and affordable housing for people with disabilities. Advocates also indicate that people with disabilities face problems in accessing and navigating homeless services and many require advocacy support to deal with this distressing experience.

In addition, reports from NAS provide a clear account of the difficulties caused by the limited funding for housing adaptations and by the lack of home care supports for people with disabilities. This has been a contributing factor in the inappropriate placement of younger people in nursing homes and congregated settings. In this context we welcome the commitment in the Programme for Government 2025 to increase Disability Home Support hours and to work towards aligning these pay rates with those provided for staff working in Older Persons' Services.

Congregated settings

A 2024 report from the Health Information and Quality Authority (10 Years of Regulating Designated Centres for People with Disabilities, HIQA, 2024) found that the pace at which people with disabilities moved from larger congregated settings to community housing has stalled in recent years. Almost one quarter of people with disabilities living in designated centres are still living in congregated settings – some 14 years on from the 'Time to Move On' report (Time to Move On', HSE, 2011).

While progress has been made in improving quality in services and outcomes for residents, significant barriers remain. These include sourcing new accommodation in the context of a

wider housing crisis, the recruitment and retention of staff, and difficulties in meeting complex care needs of some residents. The provision of multi-disciplinary team support, home care services and community workers are critically important in ensuring that this process is accelerated. Such movement must happen at a meaningful pace for the many people who remain living in institutional settings. This is particularly important in light of the specifics of Article 19 (*Living independently and being included in the community*) of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), which Ireland ratified in 2018.

We look to Budget 2026 to progress on the specific commitments in the Programme for Government in relation to developing a multi-year capital plan for investment in residential and independent living options and renewing the commitment to implement the 'Time to Move on' strategy.

Recommendations: Finding secure and suitable housing

- Introduce a revised social housing income eligibility model
- Ensure consistency across local authorities in the definitions of assessable income and remove short-term activation incentives from income assessed
- Consider the provision of interim payments (similar to Supplementary Welfare Allowance) for HAP applicants in receipt of social welfare payments who are waiting for their housing needs assessment to be processed
- Provide increased resources to local authorities for the administration of the HAP scheme and for the monitoring and enforcement of minimum standards for HAP properties
- Prioritise and resource the ongoing policy of decongregation to meet Ireland's obligations under the UNCRPD
- Increase funding for the provision of personal assistance hours, home help and home care packages, pending the full implementation of the Statutory Homecare Scheme
- Develop a multi-year capital plan for investment in residential and independent living options for people with disabilities.

4. Accessing benefits and services

Feedback from our frontline services points to a cross-cutting issue fundamental to meeting the needs of low-income households and people at risk or in crisis – that is, enabling people to access relevant benefits and services when they need them. Information staff continue to provide reports of a benefits system that is frequently complex, difficult to understand and navigate and slow to respond to changes in people's circumstances.

The <u>ESRI report on low-income households and the cost of living</u> found that vulnerable and struggling households often do not obtain benefits to which they are entitled. Of the people surveyed as part of the research, less than half of renters availed of rent supplement, Housing Assistance Payment or the rent tax credit, and only half of those on low incomes reported having a medical or GP visit card.

In terms of broader access to public services, the ESRI research highlighted the following key concerns:

- several benefits were under-utilised, often due to lack of information and confusion
- many households found accessing support to be a burdensome process, which brought with it psychological and other costs
- households who needed supports with rising costs faced a complex benefits system that impeded access.

Feedback from our services reflect these findings, highlighting issues of awareness and complexity as being central to that of access. We acknowledge the role that public information campaigns from DSP play in raising awareness amongst potential recipients.

Evidence from our frontline services, however, demonstrates a need to simplify access to, and improve awareness of, the benefits system. Such a focus could serve to improve efficiencies, increase take-up, and maximise the effectiveness of the welfare system in cushioning shocks. What is needed is a less daunting process for the many people who find themselves in need of either temporary or longer-term supports.

We propose a single, streamlined means test for all DSP-social-assistance-based schemes and payments. This could provide a clear pathway for entry into the complex system of benefits and entitlements that currently exists. It could also help to reduce confusion, frustration and duplication for applicants.

The <u>ESRI report</u> also recommends the introduction of tools that signpost multiple benefits and services together, such as a benefits calculator (which is available in the UK). This online tool would allow people to check their eligibility for a range of supports by entering basic household details (such as their income). While acknowledging the role that the <u>citizensinformation.ie</u> and <u>MABS</u> websites have in delivering information on benefits and eligibility, the report notes that these websites "lack customisation and therefore involve higher learning costs". A benefits calculator could be integrated with application forms to provide a single point of application to a range of benefits. CIB would be pleased to support the development of a benefits calculator and to integrate it into citizensinformation.ie where possible.

Recommendations: Accessing benefit and services

- Develop a single, stream-lined means test for all DSP-social-assistance-based schemes and payments
- Develop and promote a 'benefits and services' calculator that could be integrated with application forms for benefits to provide a single point of application
- Provide 'offline' options and well-resourced assisted digital supports, in parallel with the ongoing roll-out of digital public services.

Section Two: Feedback from MABS

The Money Advice and Budgeting Service (MABS), the State's free debt-advisory service, witnesses first-hand the growth in households struggling to cover basic expenses in the face of rising prices. MABS advisers assist clients with budgeting, negotiating with creditors, accessing welfare supports, and developing long-term solutions to prevent overindebtedness.

Marginalised communities are more vulnerable to financial exclusion: less likely to have bank accounts or savings and often reliant on high-cost credit. Demand for MABS services is strong, with services dealing with very complex cases as well as an increasing number of clients who cannot manage everyday bills and living expenses.

MABS staff also witness the resilience of people who, with the right supports, can regain stability. Budget 2026 is an opportunity to strengthen those supports by addressing urgent issues in housing, energy, debt resolution and access to public services.

1. Housing and homelessness concerns

Ireland's housing problems have deepened further in the past year, with record numbers of people experiencing homelessness and many more struggling with unaffordable or insecure housing. As of May 2025, 15,747 individuals were living in emergency shelters or temporary accommodation, including 4,884 children (Monthly Homelessness Report, May 2025). These figures do not capture hidden homelessness such as families "couch-surfing" with friends/relatives, people in Direct Provision who might otherwise be homeless and domestic violence survivors in refuges.

For those on low incomes, the Housing Assistance Payment (HAP) is designed to bridge the rent affordability gap, but the HAP rent limits have not kept up with market reality. According to a recent report by the Ombudsman, many tenants must top up HAP with out-of-pocket payments and MABS commonly sees clients in rent arrears or accruing debt elsewhere to

keep a roof over their heads (<u>Investigation of the HAP scheme, Office of the Ombudsman</u>). The most common reason for tenants to be served a Notice of Termination is due to landlords intending to sell the property (<u>Notices of Termination Q2 2023 to Q1 2025, RTB</u>). The loss of private tenancies is now the number one cause of homelessness (<u>Local Authority Homeless Performance Reports Quarter 1 2025</u>). Renters face not only ever-increasing rents but also insecurity.

MABS plays a vital role in preventing many clients from becoming homeless, for example by facilitating Alternative Mortgage Repayment Arrangements with lenders. Additionally, MABS' Dedicated Mortgage Arrears Advisers via the Abhaile Scheme collaborate with Personal Insolvency Practitioners, solicitors and accountants to keep people in mortgage arrears in their homes. Over 16,000 borrowers have received Abhaile aid. The Government spent €361 million on emergency accommodation in 2024 (86% of homeless-related state spending), with only 5% of this spent on homelessness prevention and tenancy sustainment and resettlement supports. MABS believes that significantly more funding should be dedicated to preventing homelessness.

Mortgage arrears and repossessions

Although it is welcome that the number of households in mortgage arrears is falling (Residential Mortgage Arrears & Repossessions Statistics – Q1 2025) we are concerned that many loans have been sold to non-bank entities (NBEs). By March 2025, 84% of all home loans in arrears over one year were held by NBEs. NBEs can charge higher interest rates on these legacy mortgages than the rate offered by banks. MABS' clients report that they struggle to get workable arrangements with NBEs which, having bought loans at a discount, still seek to maximise recovery and may be less flexible with write-downs or interest reductions. Repossession activity, which had been muted during the COVID-19 restrictions, has resumed. There are 4,655 households in the legal process of repossession as of March 2025. MABS anticipates a potential uplift in repossessions in 2025/2026, especially by NBEs, unless stronger interventions occur. MABS welcomes the extension of the Abhaile Scheme until the end of 2027, but not all eligible households engage. We note that it can be challenging for some clients to obtain an affordable sustainable arrangement when a NBE is involved or if there are multiple creditors, both secured and unsecured.

Mortgage to Rent and housing supports

The Mortgage to Rent (MTR) scheme has had limited uptake since its introduction in 2012. Although 2,642 cases have been completed, a further 4,408 cases were deemed ineligible or terminated from 2013 to end Q1 2025 (Mortgage to Rent Statistics). Many MABS clients have found the process slow or unworkable; for example, if the property value is above the relevant cap, or the home needs repairs, the application can stall. Homeowners affected by

defective concrete blocks cannot avail of the scheme until their home is remediated. MABS research is underway that will make recommendations to alleviate the serious challenges this issue presents for homeowners. The Government in late 2024 signalled a "reboot" of Mortgage to Rent with revised guidelines and inclusion of private investor participation ('Minister O'Brien announces significant improvements to Mortgage to Rent Scheme'). Meanwhile, other supports like the Abhaile service and personal insolvency laws have helped some households, but there is still a cohort for whom no viable solution has been realised (hence the long-term arrears figure).

Without new initiatives, such as an Equity Share scheme, where the state or a third party takes an equity stake to write down unsustainable debt, there remains a risk of repossession. Under such a scheme, for homeowners who have been in arrears 5+ years and have exhausted other options, the State could offer to take an equity stake in the property in exchange for writing down a portion of the debt. This would enable families to stay in their homes, paying a smaller mortgage, and the State would recoup its stake on the sale of the property or via shared-ownership payments. This would particularly help those whose loans have been sold to non-banking entities that demand full repayment.

Recommendations: Housing and homelessness

- 1. Review the Housing Assistance Payment to improve affordability issues for tenants.
 - Raise HAP rent caps in line with current market medians
 - Explore incentives (such as a tax break) for landlords who accept HAP tenants
 - Align the Rent Supplement Scheme with revised HAP measures.

2. Enhance and Expand the Mortgage to Rent (MTR) Scheme

To complement the above, we recommend strengthening the Mortgage to Rent scheme, by taking the following actions:

- Raise property value limits for Mortgage to Rent eligibility to reflect current market prices, so that more urban homes qualify
- Request the Housing Agency to simplify application processing
- Provide a temporary guarantee or insurance fund to encourage Approved Housing Bodies to take on homes that need repairs (including defective concrete block homes, with the cost to be recovered from the Defective Block grant scheme)
- Increase awareness of Mortgage to Rent among eligible borrowers
- Pilot a targeted Mortgage Equity Participation Scheme to resolve unsustainable longterm home loans.

2. Energy and utilities concerns

Even with overall inflation easing, energy poverty remains a severe concern for MABS' clients in 2025. Energy prices remain very high relative to incomes, and many of the temporary supports deployed during the peak of the crisis are no longer available in 2025.

Although wholesale energy costs have eased, customers' bills are still very high by historical standards. Many MABS clients have, moreover, accumulated arrears during and since the high-bill winter of 2022/23 and are struggling to clear them.

Reduction in universal energy credits

In the winters of 2022/2023 and again in 2023/2024, the Government provided universal electricity credits to all households (totalling €600 and €450 respectively). For winter 2024/2025, this support was scaled back to a single €250 energy credit (paid in two €125 instalments). While still welcome, €250 covers only a fraction of average winter energy costs, leaving many households struggling. Suppliers have also reinstated normal debt collection and disconnection procedures after the moratoriums of the COVID period, meaning families with arrears face renewed risk of disconnection. For many MABS clients, it is as difficult in 2025 to afford heat and light as it was during the height of the crisis.

Hardship Funds and disconnections

Since 2021, MABS (in partnership with utility companies) has administered Hardship Funds under which the utility companies provide credits to customers in energy debt. In 2023, 7,925 MABS clients received help averaging €540 each towards clearing utility arrears. This collaboration has been life-changing for people on the brink of disconnection. However, as of January 2025, the Hardship Funds of Electric Ireland, Bord Gáis and SSE Airtricity closed. MABS is concerned that this leaves at-risk households without a buffer, particularly as the number of electricity and gas disconnections increased from 2023 to 2024 (Arrears and NPA Disconnections February 2025 Update).

Energy retrofit supports

A sustainable way to impact energy poverty is to improve home energy efficiency. The Government's retrofit schemes, like the SEAI's Warmer Homes Scheme (for free upgrades in low-income homes) and grants for insulation and solar PV, are therefore crucial. Warmer Homes has a lengthy waiting time for eligible households, meaning vulnerable people live through multiple winters before improvements (SEAI Warmer Homes Scheme). As highlighted by the CIB report 'Home Comforts: A review of housing adaptation and energy update grants', the eligibility criteria for the Scheme is also negatively impacting low-income households not in receipt of one of the approved social welfare payments. Moreover, the

solar PV grant has been reduced (from €2,400 at its peak to €1,800 in 2025), which could put solar panels out of reach for low-income households (<u>SEAI Solar electricity grant</u>).

Energy Guarantee and vulnerable customers

MABS and other advocates have called for an "energy guarantee", a policy ensuring that no household's essential energy needs go unmet due to inability to pay. This could take the form of a social energy tariff for low-income households or automatic protections that trigger when bills exceed a certain share of income. The current protections for vulnerable customers (like older people or medical device users who are on a priority register to avoid disconnection) are based on health/disability criteria and do not account for financial vulnerability. We note that "financial vulnerability" is not formally recognised in energy regulation and therefore does not shield a person from disconnection. The published Energy Poverty Action Plan (2023) included useful actions such as better data-sharing to identify fuel-poor households, but many initiatives are still in planning or pilot stages. MABS welcomes the establishment of a cross-Government National Energy Affordability Taskforce which commits to addressing energy poverty in its Action Plan, due to be published in December 2025 (National Energy Affordability Taskforce Terms of Reference, 2025). It is worth noting that Ireland's climate commitments (carbon tax increases, etc.) while vital for sustainability, can disproportionately impact the poor unless counterbalanced by rebates or retrofit aid.

Recommendations: Energy and utilities

1. Introduce an energy affordability guarantee for vulnerable households

We recommend the implementation of a Social Energy Tariff scheme that would cap the unit price of electricity and gas for eligible low-income customers at an affordable rate. Eligibility could be tied to receipt of Fuel Allowance, for example. Suppliers would be compensated by the State for the discount provided (or could be required to provide it as part of their public service obligations). The tariff would apply up to a certain reasonable usage threshold, encouraging efficiency but protecting needs.

2. Continue and expand energy credits or supplements, targeted by need

We recommend a more targeted energy credit programme, with credits to be distributed based on income or need: for example, households on the Winter Fuel Allowance, the Working Family Payment, or disability or illness payments could automatically receive energy credits (spread over winter bills). This targeted approach should ensure that help would go to those most burdened by utility costs. It could also extend to renters in the private sector where energy is often a secondary priority after high rent (perhaps via a direct cash payment if their bills are included in rent).

We also recommend that any future carbon tax increases be accompanied by commensurate increases to Fuel Allowance and energy credits for low-income households, to neutralise regressive impacts.

3. Increase funding for the Sustainable Energy Authority of Ireland (SEAI) Warmer Homes Scheme and retrofit grants for low-income homes

We recommend increased funding for the Warmer Homes Scheme and related programmes and increasing the retrofit target for low-income households. To compliment these actions, we suggest:

- Implementing a streamlined application and fast-track for those in extreme energy poverty
- Restore the residential solar PV grant to €2,100, specifically for lower-income applicants
- Introducing a partial grant and low-interest loan package for low-income households who don't qualify for free upgrades but cannot afford full price, perhaps through credit unions with a State guarantee
- Ensuring local authority housing is retrofitted, and any new social homes are A-rated.

4. Strengthen protections against utility disconnection and arrears

We urge the Government to require or support the Commission for Regulation of Utilities (CRU) and utilities companies to adopt stronger safeguards. This could include:

- Instructing suppliers to offer affordable and sustainable payment plans by default before any disconnection
- Requiring utilities companies to proactively identify "financially vulnerable" customers (using data such as missed payments or self-declaration) and refrain from disconnection of those flagged, working instead with MABS to resolve the debt.

5. Review and expansion of the Household Budget Scheme

We recommend a review of the scheme with a view to broadening access and facilitating payments to a greater number of creditors. This would allow people on social welfare to have small deductions made toward utility bills to include more bill types or more flexible amounts.

Additionally, we ask for the continuation of the Energy Hardship Fund partnerships: utilities should commit substantial additional funds (perhaps matched by Government funds) to reestablish/replenish hardship funds.

6. Publish the revised Energy Poverty Action Plan

A public consultation to redevelop the Energy Poverty Action Plan was undertaken in Spring 2024. We welcome the recent establishment of the National Energy Affordability Taskforce (Energy Policy, Dáil Debate, 10 July 2025) and look forward to the impending publication of the Energy Affordability Action Plan (which will deal with Energy Poverty).

3. Debt resolution and financial inclusion concerns

Personal debt problems are both a cause and consequence of poverty in Ireland. In 2025, the debt landscape that MABS encounters includes everything from utility arrears and high-cost credit provider loans to mortgage arrears and insolvency cases.

Higher interest rates and borrowing costs

Given that Irish borrowers already faced relatively high mortgage rates, MABS strongly welcomed the limited Mortgage Interest Relief announced in Budget 2025 (a 20% tax relief on increased interest for 2023, up to €1,250). As of 2025, no continuation of that relief is in place, even though rates remain high. Meanwhile, inflation in daily living costs has led some to rely on credit to make ends meet, for example, using credit cards for groceries or taking out personal loans to cover household expenses. This can quickly snowball into problem debt.

High-cost credit and financial exclusion

At the lower end of the income spectrum, many individuals cannot access mainstream credit at all due to impaired credit history. They often turn to high-cost credit providers –or to newer forms of high-cost credit like buy-now-pay-later (BNPL) services. The "It Makes Sense" Personal Microcredit Loans (PMC) scheme through credit unions (microloans for social welfare recipients) has helped some avoid high-cost credit providers (<u>Credit Union</u>, 'It Makes <u>Sense' Loan</u>). However, more needs to be done to provide affordable credit alternatives. Community-based lending, such as an expansion of the Personal Microcredit scheme or support for new not-for-profit lenders, could play a role.

Access to banking

Having a basic bank account is a key part of financial inclusion. Ireland, under an EU directive, requires banks to offer a Basic Payment Account with minimal fees to anyone legally resident. However, many people face barriers opening accounts. People with poor credit histories might be prevented from opening accounts with overdrafts or obtaining a debit/credit card, pushing them into a cash-only existence that is less convenient and often more expensive (e.g. not being able to avail of online discounts). The post office and credit

unions provide some services, but not always full-service banking (though credit unions are continuing to roll out more current account services). The withdrawal of physical bank branches in many rural and disadvantaged areas exacerbates exclusion, as those without digital access or skills are left with no local financial touchpoint. National Traveller MABS published a report last year which found that Travellers are less likely to use mainstream financial services, such as banking apps (Financial Unwellness: Financial Literacy & Inclusion Among Travellers).

Use of high-cost services

Financially excluded individuals often rely on alternative providers. Not having a bank account means one might use cheque-cashing services (with high fees) to cash welfare or wage cheques. Not qualifying for mainstream credit can mean resorting to licensed High-Cost Credit Providers or even illegal loan sharks. Rent-to-own stores, which charge steep price markups for furniture/appliances in weekly instalments, target areas with high financial exclusion. The consequence is a "poverty premium" i.e. the poor pay more for the same goods and services, due to lack of access. Additionally, those excluded may not be able to build savings safely, or insure their belongings, leaving them more vulnerable to shocks.

Financial literacy and confidence

Some exclusion is driven not just by institutional barriers but by personal confidence and literacy. People who grew up in generations or communities where mistrust of banks is common (e.g. some Traveller families historically kept cash savings) may be hesitant to engage even when services are available. Likewise, someone who has been through a traumatic debt experience or bankruptcy might avoid banks afterward. Language barriers affect migrants; if key information isn't available in accessible formats or translations, they might not utilise services.

The National Financial Literacy Strategy launched in 2025 aims to tackle some of these issues by coordinating efforts to improve financial know-how across all groups. MABS strongly supports this, as financial education is part of our core work. However, literacy efforts must be paired with making services accessible and consumer friendly. For example, banking apps should meet accessibility standards for those with disabilities, and bank staff should be trained to assist people who may have low literacy or mental health difficulties.

Marginalised community initiatives

National Traveller MABS has been working on tailored financial education in Traveller communities and pushing for initiatives such as the affordable trailer rental scheme. Non-Governmental Organisations (NGOs) are exploring Community Banking models; for

instance, the 2019 report on Community Banking (commissioned by the Department of Finance) suggested empowering credit unions or An Post to offer a broader suite of inclusive financial services (Evaluation of Concept of Community Banking in Ireland). Credit unions have stepped up digital offerings and microcredit, which is promising if supported further. Another example is local exchange schemes or microfinance for migrants run by certain charities. However, these remain small scale. Government policy could bolster them under a formal Financial Inclusion strategy which could be preceded by undertaking a review of the number of payment accounts opened with credit institutions as per the Payment Accounts Directive (2016), to ascertain how many of these (47,000 accounts as at 2019) were fee-free for at least the first year as per the terms of a Basic Bank account.

Recommendations: Debt resolution and financial inclusion

1. Reform credit regulations

- Strengthen the Central Credit Register (CCR) usage by all lenders, including High-Cost Credit Providers and Buy Now Pay Later (BNPL) services, to highlight overlapping debts and identify at-risk borrowers early.
- Encourage mainstream banks and credit unions to develop more affordable small-loan products so that people don't need High-Cost Credit Providers. For instance, a government-backed guarantee fund could enable credit unions to lend small amounts to riskier borrowers at fair rates (like 5%) rather than them going to High-Cost Credit Providers.

2. Launch a 'Help to Save' Scheme for low-income savers

We recommend the introduction of a savings incentive scheme for people on low income, similar to the UK's successful Help to Save scheme. We propose that any individual receiving social welfare payments or below a set income threshold be eligible to open a special savings account, where the Government provides a 25% match on the amounts saved. This scheme encourages the savings habit by essentially giving an instant return and helps low-income families build an emergency fund.

3. Enhance the Household Budget Scheme and bill management supports

The Household Budget Scheme, run by An Post and the Department of Social Protection, allows social welfare recipients to have a portion of their payment deducted to pay certain bills (like utilities or rent). We recommend expanding this scheme to allow anyone on a primary social welfare payment to opt in and include additional bill types such as telephone/internet bills or insurance premiums. Additionally, consider introducing a "Budgeting Bonus". For example, if someone uses the Household Budget for a year without

default, give a small incentive payment or a utility credit as a reward. This encourages more people to use the scheme, which in turn means fewer falling behind on essential bills.

4. Drive a cross-government Financial Inclusion Strategy

We recommend that the Department of Finance develop a comprehensive Financial Inclusion Strategy in consultation with key stakeholders to be published in 2026.

4. Access to public services concerns

Community Welfare Officers (CWOs) administer Additional Needs Payments (ANPs), one-off supplementary payments for people who cannot meet exceptional expenses (like high utility bills, appliances, or urgent costs). MABS assists clients in preparing documentation to support ANP applications when the need is urgent (e.g. avoiding an electricity disconnection or replacing a broken cooker). MABS strongly supports the ANP system as a vital safety net for those in crisis, and we advocate for prompt response times, especially where an application is endorsed by an advisor with evidence of need.

Access and awareness

During COVID-19, many local Intreo offices and CWO clinics moved to appointment or phone-based systems. Despite the centralisation of Community Welfare Service (CWS) claims processing to service hubs (Community Welfare Services, Dáil Debate, 5 February 2025), MABS Advisers continue to report on delays in accessing CWS payments for some clients. Some MABS clients are unsure how to reach a CWO or find the online forms confusing. These barriers particularly affect elderly clients, people with disabilities, or those with limited English.

Gaps in eligibility

Certain welfare rules leave some groups without support. For instance, those just above the income limit for Fuel Allowance do not qualify for heating help, yet they may still struggle with bills. Similarly, applicants who are on fixed-term visas or in Direct Provision may face extra hurdles in getting discretionary payments. MABS often steps in to clarify eligibility or refer cases to appeals, however a consistent approach by CWOs in different areas would be beneficial, so that applications are reviewed equitably and to a national standard.

Recommendations: Access to public services and support

1. Reduce waiting times for social welfare supports

We recommend that additional resources be allocated to reduce waiting times should be paired with a streamlined process for those in need of emergency payments. We recommend more flexibility in appointment times for those with work or care responsibilities. Simplify the application forms and accept more referrals with supporting documentation from recognised intermediaries (like MABS) as sufficient verification to fast-track cases. This prevents issues from worsening (e.g. an unpaid bill turning into a utility cut-off).

2. Improve accessibility of services

We recommend that all welfare and support service platforms should be fully accessible i.e. plain language, translation into key languages, and compatible with assistive technologies for the visually impaired or those with cognitive difficulties. We also suggest continuing to offer non-digital options for those who need them.

3. Ensure inclusive policies for marginalised communities with a whole-of-Government approach

We recommend that all budget measures be screened for their impact on groups like Travellers, migrants, people with disabilities, lone parents, and others disproportionately affected by poverty. We recognise the work of the 'Equality Budget Interdepartmental Group' in this regard and we look forward to the continued roll-out of Equality Budgeting in Ireland to the best international standards. Additionally, we call for increased funding for programmes led by people with lived experience; for example, migrant-led groups should be funded to run financial workshops for newcomers navigating Irish systems. We also support including Traveller and new migrant representatives in advisory committees on banking and welfare policy to ensure their lived experience informs decisions.

Conclusion

This submission has highlighted some of the main challenges for the hundreds of thousands of people who accessed frontline services from CISs, CIPS, NAS and MABS in 2024. These challenges include the ability of people to combine welfare and work, to live and work with disability and illness, to find secure and affordable housing and to manage high levels of debt.

Budget 2026 will be delivered in the context of a broadly positive economic environment, although with a good deal of uncertainty around global economic developments, to which we are exposed. While the immediate cost-of-living pressures have eased, our frontline services continue to assist people who are living with the consequences of sustained high prices for everyday goods and utilities.

This submission has highlighted the extent to which the Government's temporary lump-sum payments have mitigated the high cost-of-living over the past three years. It also raises our concerns about the possible reduction or withdrawal of these payments in Budget 2026 and calls for strategic and targeted approach to embedding more permanent supports for those who are struggling.