Submission to the public consultation on the successor to the Roadmap for Social Inclusion 2020-2025

Citizens Information Board Submission June 2025

Introduction

The Citizens Information Board (CIB) welcomes the opportunity to make a submission on the successor to the Roadmap for Social Inclusion 2020-2025. Part of CIB's remit – as set out in Section 7 (d) Comhairle Act 2000 – is to provide information on the effectiveness of current social policy and services and to highlight issues which are of concern to users of those services.

The submission is informed by feedback from CIB-funded services: predominantly from the national network of Citizens Information Services (CISs) – including the Citizens Information Phone Service (CIPS) – and also from the Money Advice and Budgeting Service (MABS), National Traveller MABS, and the National Advocacy Service for People with Disabilities (NAS).

These services have significant engagement with people experiencing social exclusion or poverty. This includes welfare-dependent households, people in low-income employment, people experiencing difficulties transitioning from welfare to work, renters, over-indebted families, people with disabilities or experiencing different illnesses/conditions (including mental illness), people from minority ethnic groups encountering barriers to full inclusion, and older people who face additional costs or have long-term care needs.

The impact of rising housing costs and the higher cost of living in recent years has meant that it is not just low income and social welfare dependent households that are struggling, but also middle-income households. People may not be classified in official poverty statistics but may still be experiencing hardship due to the high cost of housing, other costs such as childcare, and the increasing costs of living in general.

CIB, using reporting and feedback mechanisms from its funded services, is well placed to identify and analyse how specific issues relating to social exclusion arise, evolve and impact over time.

In 2024, queries presented to CISs showed a slight decline in comparison to 2023 figures. Queries have, however, become more complex, as evidenced by increases in the time spent by information providers assisting clients, with a 58% increase in interactions lasting 21-40 minutes and a 5% increase in interactions lasting 11-20 minutes between 2022 and 2024, mirrored by a decline in interactions of ten minutes or under.

Of note as well is the increase in clients with specific needs: that is, where clients were experiencing difficulties accessing public services – and needed greater support from CIS or MABS – due to language, literacy and digital literacy/digital access issues (given the increasing move to online systems), mental health challenges or distress, and different types

of disability. People reported as having specific (additional) needs made up 14.7% of all CIS callers in 2024. CIS information providers met with over 12,000 clients recorded as being in distress last year, a rise from a reported 8,542 clients in 2022.

Many callers to services present with multi-faceted queries and problems associated with an inability to meet the costs of daily living. Barriers to social inclusion too are multifaceted and can overlap. CIB sees evidence of this in the social policy issues recorded by services. These issues range across housing, social welfare and health. Many illustrate the impact of policy gaps or access barriers on low work-intensity and low-income households as well as those reliant on precarious employment.

Clients' social and economic situations intersect with the marginalisation and discrimination they experience around, for example, disability, membership of the Traveller community and other ethnic minority communities), lone parenting and so on.

While unemployment figures have been on the decline for more than a decade, poverty, deprivation and social exclusion persist.

This submission addresses and is structured around the questions from the Department of Social Protection's online public consultation, focusing in on those questions/areas to which CIB is in a position to respond (i.e. has evidence to support our responses).

1. What progress do you feel has been made in improving social inclusion and reducing poverty since publication of the Roadmap for Social Inclusion 2020–2025 in January 2020?

SILC 2024 data shows that progress has been made in reducing poverty rates. This is in the context of national and international challenges, including the COVID-19 pandemic, post-Brexit impacts, global uncertainty, and increasing costs of living over the past five years, which have impacted the risks of poverty and social exclusion.

ESRI research published in May 2025 – <u>Barriers to social inclusion in Ireland: Change over time and space</u>, <u>2016-2022</u> – observed that rates of unemployment and low educational attainment have declined (based on an analysis of Census data from 2016 and 2022). The most significant falls occurred in more deprived areas, narrowing the disadvantage gap between affluent and deprived areas. Despite these improvements, the consistent poverty and enforced deprivation rates remain persistently high for particular groups, indeed increasing for some groups.

The groups that are particularly impacted by poverty and enforced deprivation based on 2023 data from the Survey on Income and Living Conditions (SILC) 2024 are:

- Lone parent families with children under 18 years nearly half (46.3%) of this group experience enforced deprivation
- People out of work because of long-standing health problems 38.5% experience enforced deprivation
- People who are unemployed 37.8% experience enforced deprivation
- People living in rented or rent-free accommodation, i.e. including rented from a Local Authority, rented using other forms of social housing support, rented without housing supports, as well as rent-free 31.5% experienced enforced deprivation.

People with disabilities, single parents, Travellers, and persons living in low work-intensity households still experience sizeable challenges in accessing labour markets. As these groups face disproportionate risks of poverty and social exclusion, they should be the key focus for poverty reduction through improved and targeted social services and social protection.

Targeted responses have been introduced for these groups, including for example the 'early engagement' method of the public employment service for **people with disabilities**. According to an <u>EC Commission report</u>, early engagement has the potential to increase access to employment for disabled jobseekers if efficiently resourced with specialised caseworkers.

Another positive measure in relation to disability is on the employers' side, with the changes introduced to the Wage Subsidy Scheme. CIB welcomes these changes, many of which were proposed in our 2023 submission in response to the public consultation on the Wage Subsidy Scheme (e.g. a reduction in the minimum number of hours of work required to take part, supporting employee retention by making it accessible for those with acquired disabilities, taking the focus off productivity shortfalls and further exploring the potential of remote working for disabled people). The Work and Access programme, which replaced the Reasonable Accommodation Fund, also includes supports for remote working.

Policy measures introduced for **carers** included issues that our funded services have been highlighting for some time: increased eligibility to the Fuel Allowance, improved income disregards, and eligibility for Carer's Benefit for the self-employed.

In terms of **housing supports**, there have been increases to the discretionary limit for the Housing Assistance Payment (HAP) and an increase in the assessable income limit for social housing, albeit both of these measures were experienced as not being sufficient to provide for households in greatest need - <u>CIB-Pre-Budget-Submission-2024</u>.

The exclusion of **child maintenance payments** from all social welfare means tests (introduced in June 2024) was a welcome and positive change, and one that CIB had included in its Pre-Budget-Submission 2023.

Ireland's labour market remains strong, with low unemployment rates continuing, but the challenge lies in achieving inclusive growth that benefits the groups experiencing exclusion. For example, people with disabilities and lone parents continue to have employment rates below the EU average and so continue to experience higher poverty levels.

2. In your experience, what has worked well in reducing the number of people in Ireland experiencing poverty and social exclusion?

The temporary **cost of living measures** in Budgets 2023 and 2024 <u>have been shown</u> to have a positive impact on poverty rates. The greatest impact on the at-risk-of-poverty rate was for single adult households aged 65 years and over. However, <u>concern has been expressed</u> about the impact on poverty of removal of these temporary supports for those dependent on fixed incomes, particularly for the cohort aged over 65 years.

Supporting **employment for people with disabilities** has proved more challenging but recent reforms to the Wage Subsidy Scheme, and to reasonable accommodation via the Work and Access Programme are positive. The <u>2025 Final Review of the Comprehensive Employment Strategy for Persons with Disabilities</u> identified as positive allowing people with disabilities leaving the benefits system for employment to retain free travel for a period of five years, which was already in place for medical card holders, and a streamlined return to disability payments if employment does not work out in the first twelve months.

There have also been a series of improvements to **earnings disregards** for people on Disability Allowance, with thresholds rising over successive budgets: <u>10 Jun 2025 –</u> Parliamentary Questions (34th Dáil) – Houses of the Oireachtas.

An OECD report, Impact Evaluation of Ireland's Active Labour Market Policies, observed that activation schemes such as the Community Employment (CE) scheme (19,361 participants) and Tús (4,415 participants) have had a positive impact on the earnings of participants in the long-term. In addition, the report shows that about half of people eligible for CE and Tús (mainly long-term unemployed) find unaided employment within four years. The commitment to provide specific CE places for Travellers and Roma in the updated strategy is positive.

Other positive changes included increases to childcare subsidies, widening eligibility to the Fuel Allowance, increases in income disregards for disability and carers payments, improvements to the Housing Adaptation Grants schemes, and eligibility to Community Employment schemes for qualified adults.

3. In your experience, what has not worked so well, or is challenging in reducing the number of people in Ireland experiencing poverty and social exclusion?

Consistent poverty

Some groups are still experiencing high levels of consistent poverty relative to those in employment. According to the <u>Survey on Income and Living Conditions (SILC) 2024 - Central Statistics Office</u>, the rate of consistent poverty for those unable to work due to long-standing health problems stands at 19.0%, much the same as for unemployed people generally (18.9%), while it was lowest amongst those who were employed (1.7%).

A recent study ESRI study – <u>Barriers to social inclusion in Ireland: Change over time and space, 2016-2022</u> – found a rise in poor health, with increases most pronounced in the most deprived areas, which has exacerbated pre-existing health inequalities. Such trends reflect worsening health outcomes for people living in disadvantaged communities. This study reinforced the need for place-based policymaking, especially in relation to social inclusion and equality.

Disability and illness

Feedback from our frontline services have highlighted the following problems for people living with illnesses/chronic conditions, as well as for disabled people:

- Non-eligibility to Illness Benefit for the self-employed 20% of the 193 social policy issues relating to disability/illness payments raised by CISs from January to April 2025 were about this issue
- Unsuitability of the Partial Capacity Benefit as a return-to-work support for those with reduced capacity due to illness/chronic conditions.
- Inadequacy of the Illness Benefit payment given the cost of living
- Inadequacy of Disability Allowance (DA) given the additional costs of disability.

The National Disability Authority (NDA) report on the Comprehensive Employment Strategy (CES) also highlighted the disincentives to work that have not yet been resolved, and that are impacting in terms of the lower-than-expected numbers of people moving from welfare to work. These include the provision and funding of Personal Assistants (PAs), as well as the additional costs of disability which can mean that taking up work does not pay. This view is supported by evidence from our funded services.

Despite the improvements in the earnings disregard for DA in recent years, evidence contained in the Report of the Commission on Taxation and Welfare suggests that these

income disregards in such a way that leads people to earn up to, but not over, the income disregard level. Of note here is that the Programme for Government commits to reforming the Disability Allowance Payment and removing anomalies in the current means test.

Specific issues that arose in the feedback from CISs included:

- The impact on families of the means test for Disability Allowance, where all the income from a spouse/civil partner/cohabitant's self-employed income is assessed
- The disregard with respect to spouse/civil partner/cohabitant's employed income being inadequate given the additional costs of disability and the cost of living more broadly.

The Community Welfare safety net

The Additional Needs Payment (ANP) is a basic once-off payment administered through the DSP's Community Welfare Service and intended to help with essential expenses that a person cannot meet from their weekly income or from other sources (such as savings). Information/assistance requests to CISs and CIPS about this payment have remained strong in recent years, as evidenced by the number of queries: 13,510 queries in 2023, 11,545 in 2024, and almost 7,000 queries for the first half of 2025.

Slightly over 20% of CIS queries on ANPs and Supplementary Welfare Allowance came from disadvantaged areas and almost 60% from marginally below average areas using the Pobal HP Deprivation Index, which is based on Census 2022 data.

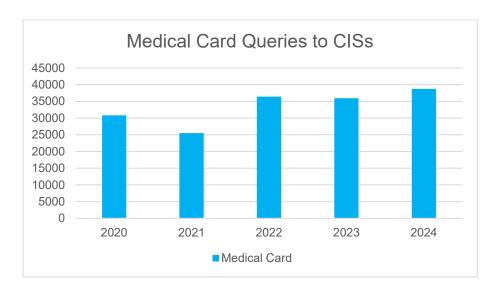
CISs report a lack of understanding and awareness about ANPs. They also report that the restructuring of the Community Welfare Service – with greater emphasis on the national phone line and online applications, and Community Welfare Officers (CWOs) working from fewer community locations – has impacted on access to CWOs in some areas.

Accessing public services

Despite strong economic growth in recent years, clients of CIB funded services are presenting with multi-faceted difficulties trying to access, in particular, basic health and housing services. It is recognised that public services are experiencing increasing pressures, due to a growing population and increasing demand, requiring increased investment in housing, health, care, and education services. Such investment is, however, critical to ensure that people are able to access essential services and supports.

Accessing health services

In relation to health services there is a fundamental inequality of access between those who can afford private insurance and those who are fully reliant on the public system. Since primary care coverage is not universal, the hospital sector continues to be under pressure. CIB's data shows that the medical card has remained the most queried payment/scheme in CISs for many years, accounting for 38,733 queries in 2024.



There has also been a steady growth in the number of social policy issues raised by CISs about the medical card since 2020, increasing by 62% and reaching 382 SPRs in 2024.

Difficulty with **eligibility for a medical card** is a common issue presented to services, including because of people's income being over the income limits, sometimes by a small margin. As the examples below show, a cohort of people on low incomes is not eligible.

Client is on Jobseekers Transitional payment (JST) and has taken up nine hours' weekly employment, however, they have now lost the medical card for both them and their children. The client is upset - they are on a low income and struggling with medical costs. They believe the income thresholds are too low and a disincentive for low-income families to work.

Client looking for information on supports and services to help their family of four with the cost of living. Both parents working but struggling financially. Client will not qualify for a medical card, income threshold for a family with two children under 16 is €342.50. Client dismayed.

Services also identified an inequity whereby individuals 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. A recent ESRI paper – Medical Card coverage and the impact of income limit freezes – observed 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 ESRI research identified the issue of horizontal inequity due to the 100% Social welfare rule introduced to offset the impact on eligibility of increases to social welfare benefits. This situation means that people on low incomes from work may be ineligible for a card, whereas those in receipt of a social welfare payment will qualify.

The **cost of prescriptions at €1.50 per item** was experienced as too high for some medical card holders. CISs also drew attention to conditions not included under the Long-term Illness Scheme, thereby debarring some people with long-term medical conditions from eligibility. For example, prostate cancer, chronic clinical depression, multiple sclerosis (medication for MS is covered, but Vitamin D is not), blood clotting disorder, Addison's Disease and hypertension are not covered.

Social policy issues recorded by services reflect a wider environment. Given the increasing demand for GP and dental services, for example, due to a growing and ageing population, it is not surprising that social policy issues on Medical Card holders' **inability to access GP and dental services** have also been increasing over the past few years. This has affected people who had moved within Ireland, or moved to Ireland, those experiencing housing difficulties, people seeking asylum, people with disabilities or people with long-term illnesses/conditions including cancer, as well as older people. Lack of access to GP services and dental services was experienced by CIS clients in a variety of cities and towns (27 locations) across the country in the first four months of 2025.

Not being able to access GP services can directly impact income insecurity, as a claimant for a Disability Allowance or Illness Benefit, for example, may be unable to get the required medical certification. There were also mixed reports from services about the capacity within the system where the HSE can assign a GP to a Medical Card holder, once they can show refusal of service from three GPs.

Client seeking asylum in Ireland. Applied for medical card more than 3 months ago and still no GP assigned. Client has no money and has health issues and needs to go to doctors.

Client's spouse has cancer and on Disability Allowance, he needs dental fillings but dentist will not provide the service under the medical card and told client that it was not 3 years since his last fillings, and he is entitled to only 2 fillings every 3 years. Client will have difficulty paying the dentist.

The client contacted CIS to see if would be eligible for dentures as a medical card holder. Dentures are covered under the medical card. However, there is no dentist in the area taking on medical card holders, this person has not attended a dentist in some time and is unable to access a dentist in the area. The client is elderly (80's) and is unable to travel elsewhere to seek a dentist.

The client has a medical card but has no GP. The HSE will not help him find a GP. He has a bad ear infection and is in a lot of pain and can't afford to go to the walk-in GP service. The emergency department won't see him because they say it's not an emergency. What is he supposed to do? The right to health is a fundamental part of our human rights and of our understanding of a life lived in dignity. Irish residents have a right to public health and as a medical card holder the client has a right to free GP services. The situation is dire.

Housing

As stated in the current Roadmap for Social Inclusion 2020-2025, housing is an essential service. Adequate housing is essential to "a person's overall sense of well-being or welfare". The cost of renting is having a major impact on the risk of poverty with 43.4% of those who rented from a local authority and 57.3% of those renting in the private rental sector and accessing housing supports such as the Housing Assistance Payment, Rent Supplement, or the Rental Accommodation Scheme being at risk of poverty after the cost of rent was deducted from their income in 2024.

There have also been year-on-year increases in homelessness with the number of people using State funded emergency homeless accommodation increasing by 50% over a six-year period from April 2019 to April 2025. Current homelessness prevention schemes, while effective, have been unable to stop this increase, due to the scale of the problem. The construction of affordable and social housing is scaling up but is still behind current needs and targets (EC report 2025).

Housing is a significant cause of concern for clients coming into CISs. In 2024, CISs received 85,148 housing queries, the second largest query category dealt with (behind social welfare). The 2024 figure represents a 13% increase since 2022. The data from CISs indicates that the challenges people experience due to the **lack of housing** (including trying to navigate the system for **applying for social housing**) can be compounded for non-EEA nationals and for migrants more generally. Almost a third of CIS callers (32%) with queries about housing last year were not from Ireland (where country of origin was recorded). Within the 2024 figure, 61% (n=6,896) of those callers were from a non-EEA country. Other groups particularly impacted by the housing crisis are people with disabilities, lone parents, people with illnesses/chronic conditions, and, increasingly, older people.

Landlords are also continuing to refuse to accept Housing Assistance Payment (HAP), despite this type of discrimination being illegal. **Discrimination based on the housing assistance ground** and problems with seeking timely resolution of complaints were experienced by clients who wanted to avail of housing supports, specifically HAP. Landlords can exploit existing tenants' security with the threat of losing their accommodation. There was also a sense that making a complaint on equality grounds would not achieve security for the tenant.

Client is renting for past 18 months and landlord has informed them that if they consider applying for HAP they will be asked to leave the accommodation, even though tenancy is registered with RTB.

The mechanism to compel landlords to accept HAP or to facilitate their existing tenants getting HAP is very weak. This client will try to convince her landlord to fill in their part of her HAP form by putting them on notice of her intention to lodge an equality complaint against them. She may also take the step of taking the equality complaint. However, if the landlord still does not fill in the HAP form, there is nothing further that the client can do.

For those seeking accommodation, their availing of HAP acted as a deterrent for landlords/agents, leaving clients in particularly vulnerable situations.

These challenges are compounded for **asylum seekers/those living in Direct Provision and those granted refugee status**. Policy feedback indicates that many non-EEA clients experience barriers to accessing and understanding housing services due to language and digital literacy difficulties. Renting was the second largest housing sub-category queried by non-EEA clients in 2024 and finding accommodation is the number one issue within this. The second most common issue in relation to renting is evictions/disputes, highlighting the housing precarity and vulnerabilities faced by non-EEA migrants.

The client has not been able to find alternative accommodation to his IPAS accommodation, and...IPAS chose to move him from Dublin to Mullingar. This is despite the fact that the client has been living in Dublin for some time, despite the fact that his work is here, and despite the fact that his housing application with Dublin City Council is pending...With the housing crisis, it is difficult for anyone to find accommodation with a manageable rent, and it is particularly difficult for people on low incomes, such as refugees...The client chose to stay in Dublin, and he is now homeless, sleeping in a friend's car.

The continuing problem of **affordability for those having to pay 'top-ups' on their HAP** featured strongly in the feedback indicating that it is not feasible or sustainable for those who are living on fixed social welfare incomes, including people with disabilities and lone parents,

to pay these 'top-ups'. While local authorities have flexibility to go above HAP rent limits by 35%, services reported that clients are increasingly finding that they are unable to find affordable properties even with the additional 35% support.

Caller's son and himself are living in his sister's home on the couches. He is on Disability Allowance payment. They recently moved back from the UK where they had been living for many years. He has looked for accommodation but said that any accommodation that he has seen is $\\equiv{1}$,600. He has been told that the most that he will get on HAP is $\\equiv{1}$,200. He says that he would need to pay nearly $\\equiv{1}$ 100 per week out of his Disability payment of $\\equiv{2}$ 361.30. He says that he would not be able to afford this as all the utility bills would need to be paid and clothes for his son and transport costs etc. He cannot work part time himself because of his disability. He is at his wits end.

Single parent is transferring from OPF to JST payment. This will lead to a reduction of approx. €100 in their income. They will however, continue to pay €50.00 HAP top up to landlord which is putting them under financial stress. They think that it is unfair that they have to pay a top up to landlord that other social housing tenants in council homes do not. HAP tenants are compelled to pay differential rent plus top-ups, while council tenants only pay differential rent. This is discriminatory.

A young single mother applied for social housing with the aim of qualifying for the Housing Assistance Payment (HAP). However, the income limits for the HAP scheme in our area are significantly lower than the current rental prices. As a result, the client could not afford housing with the support of their social welfare payment and HAP assistance. Even after contacting the housing section and considering a discretionary top up of 35%, the client still could not afford local rents. It is necessary to adjust HAP payments to align with rising rental costs.

Client is approved for HAP but cannot find any property within the rental limits. The client is living in overcrowded accommodation and due another baby and very stressed.

There were also reports of the **threat of homelessness being experienced by older people** nearing retirement. Note also the higher rate of in-work poverty for older people on low incomes, coupled with fears about homelessness when they become unable to work.

Elderly couple in their mid-60s are paying €1,500 monthly in private rent. They will be unable to afford this when they retire and are worried about being made homeless. They currently earn €50,000 annually and do not qualify for social housing. They are concerned that they may have to continue to work just to pay rent.

The low literacy levels amongst some Travellers impacts when people are trying to negotiate the administrative system to access a payment.

The client is a member of the Traveller Community with low literacy. She has experienced great difficulties in addressing her case with the Department of Social Protection precisely because she cannot write, and all her communication with the Department has taken place by phone. The case is complex, and as the Department has no letters or e-mails from the client (and, apparently, no detailed notes from her earlier calls), every time she gets through to the DSP call centre she has to explain her entire story all over again to a new person. I witnessed this for myself when we called the Carer's Allowance section during her visit to our Citizens Information Centre: we spent 40 minutes on the phone with a DSP representative who was just trying to track down and confirm the details - never mind the status - of her case.

Digital transition

Many people seeking assistance from frontline services are excluded from the digital transition due to a lack of digital skills or access to equipment or Wi-Fi, particularly affecting (but certainly not limited to) older people. People who are digitally excluded face multiple challenges in accessing services. CISs report experiences of digital exclusion on a regular basis and across the range of public services. Commitments to provide alterative formats, e.g. hard copy application forms, are in some instances not met.

The client had been informed by a County Council official that Cork County Council are no longer accepting HAP applications unless they are made online. The client's landlord is not digitally literate, and could not fill out an online form, and the client was distressed by the impression that, because of his landlord's digital illiteracy, he would be denied the opportunity to apply for HAP.

In response to Government services increasingly transitioning to online platforms, a Digital Help Service has been established in the CISs in South Leinster, North Munster, and South Dublin on a pilot basis. The service will primarily focus on assisting with access to government services, enabling individuals to engage with new delivery methods and empowering them to access online services. It aims to support clients in accessing and completing online forms related to government services and portals. While we believe this will prove to be an extremely valuable service, it does not take away from need to ensure that alternatives to digital access are made available to the digitally excluded – and in-person supports provided to people in vulnerable situations – in order that they can independently navigate welfare systems and other public.

4. Does consistent poverty remain the most appropriate primary target for the new social inclusion strategy?

CIB considers that consistent poverty remains the most appropriate primary target in terms of poverty measurement.

Of note is that the in-work at risk of poverty rate does not include people who worked less than seven months (continuously or intermittently), which can be associated with lower paid and precarious work.

Targets that measure the difference between employment levels between people who have a disability and those who do not have been previously recommended, such as by the ESRI in its <u>Technical Paper on the Poverty Indicators for Social Inclusion in Ireland</u> and by the National Disability Authority in its <u>Final Review</u> of the Comprehensive Employment Strategy for Persons with Disabilities 2015-2024.

SILC data (<u>Survey on Income and Living Conditions (SILC) - CSO - Central Statistics Office</u>) covers people living in private households and does not include, for example, people usually resident in hospitals, residential facilities for persons with mental and/or physical disabilities, nursing homes, children's homes, religious communities, prisons, or International Protection Accommodation Services (IPAS). Neither does it cover <u>homeless persons</u>.

Other areas for potential reform include improving measurement of energy poverty, using perhaps a combination of measures from the SILC relating to ability to keep the home adequately warm, arrears on utility bills or going without heating during the past 12 months. The inclusion of a food poverty indicator would also be beneficial. This could also be drawn from SILC data measures.

Regarding social housing, the inclusion of a target that measures social housing demand would be useful, e.g. the overall waiting list numbers for local authority social housing as well as the inclusion of a measure on the number of people in receipt of HAP.

5. Which groups in society should the new social inclusion strategy put a particular focus on?

CIB suggests a focus on **people with disabilities**, **lone-parent families**, **Travellers**, and **persons in low work-intensity households** – all of whom still experience sizeable challenges in accessing labour markets. (See for example the <u>European Commission Country Report on Ireland 2023</u>.) These groups face disproportionate risks of poverty and social exclusion and should be the key focus for poverty reduction through improved and targeted social services and social protection.

Disadvantaged groups continue to face significant labour market challenges. The disability employment gap stood at 37% in 2022, the highest in the EU. Evidence also points to a high post-secondary education gap for people with a disability. In terms of education, there remain substantial gaps with respect to the delivery of career guidance tailored to the individual needs of learners with disabilities at school, with very limited improvements made in the lifetime of the Comprehensive Employment Strategy for Persons with Disabilities 2015-2024 (CES) (See CES-Final-Report.docx).

The employment situation and poverty risks of lone parents have improved in the last decade. However, Ireland still has the highest proportion of lone parents living in low work-intensity households and one of the lowest shares of poor children under three-years old in childcare in the EU.

Similarly, the 2022 census confirmed that Roma and Traveller communities remain marginalised, with unemployment rates of 17% and 61% respectively (EC report 2023).

6. Are there any actions you would recommend to improve social inclusion among these specific groups?

Unemployed people

ESRI research findings have highlighted significant area-based differences in terms of barriers to social inclusion in Ireland and therefore support the continued use of place-based approaches for policy aimed at tackling social inclusion.

CIB believes that the successor to the Roadmap should prioritise a greater focus on the local, working to identify and address blockages to job activation for those who have the capacity and wish to work, associated with socio-economic deprivation and remoteness from the labour force.

For example, regarding people with disabilities who are struggling to access the labour market, it is important that there are employment support programmes or training courses near them or, if not, then that there is transport they can avail of to get to local towns. This would hold true also for any low-income groups or people with childcare needs and so on, that they can access supports and inclusion routes locally.

In this regard, we note that The Department of the Taoiseach's working group in this area has proposed a new grant-based scheme to be developed and led by the Department of Transport - Ombudsman's Annual Report 2024.

Previous CIB <u>pre-budget submissions</u> have highlighted a disincentive to work where callers were considering either giving up work or reducing their hours in order to remain below the income limit and qualify for social housing supports. CIB concurs therefore with the <u>Report of the Commission on Taxation and Welfare</u> (2022) where it recommended reform of the differential rent schemes towards a national system based on ability to pay, and that any changes to social housing supports should fully take into account the potential impact on incentives to work.

CIB concurs with the 2024 OECD report – <u>Impact Evaluation of Ireland's Active Labour Market Policies</u> – which recommends the following:

- Combining CE with other types of support, especially counselling, towards the end of the placement to facilitate quicker transitions into the primary labour market after CE
- Introducing more flexibility in CE working hours and placement types
- Focusing on other training programmes that have been shown to be effective.

Lone parents

Given the high poverty and enforced deprivation rates – 'enforced deprivation' referring to exclusion based on inability to afford two or more items from a set of eleven basic deprivation indicators – for people parenting alone, as well as the increase in the number of children living in consistent poverty, CIB concurs with the recommendations in the Report of the Commission on Taxation and Welfare 2022 and the NESC 2020 No. 151 report on the introduction of a second tier to Child Benefit, with an automatic supplement payable that is targeted at low income families, whether these families are in receipt of a social welfare payment or in low-paid employment.

CIB also notes the recommendations of the Joint Committee on Social Protection,
Community and Rural Development, and the Islands' <u>Pre Budget Submission</u> to the
Department of Social Protection, July 2024, which include supporting lone parents in work,
education or training by extending Jobseekers Transition Payment (JST) until their child is 18
or has finished school, and increasing the earning disregards to €205 for JST and One
Parent Family payment recipients to reflect recent increases in the National Minimum Wage.
The removal of child maintenance as means for secondary benefits, including housing benefits, was also proposed.

In addition, there should be investment in people's skills and providing sufficient resources to eliminate the barriers to participation in skills training and education, for example:

- Personal Assistants for people with disabilities
- Tailored long-term education options for lone parents including enhanced financial grants
- A public childcare model with free/heavily subsidised places for children of one-parent families
- Improved support and flexibility for lone parents when participating in course related mandatory work placements and support for bridging courses that <u>have been proven</u> to achieve positive outcomes.

Basic income safety net

CIS feedback demonstrates that queries about the Additional Needs Payment have remained consistently high over the past three years with a range of difficulties reportedly experienced by people trying to access the support. Improving access to Community Welfare Officers in some areas (place-based provision) would be beneficial. Consideration should also be given to the provision of an ANP travel allowance as a routine support to people on basic social welfare who are trying to access medical treatment.

People impacted by long-standing ill-health

CIB believes that this group should also be given a particular focus in the next Roadmap. Health inequalities and indeed ill-health itself can be caused or compounded by social, economic, and environmental factors. Equal access to health services and benefits is essential for physical and mental well-being. For those out of work due to longstanding health problems, there are serious issues, with nearly one-in-two experiencing enforced deprivation. This is an area where targeted income supports are needed, e.g. consideration of a pay-related illness benefit, and improved eligibility for the self-employed.

People with Disabilities

As widely recognised, addressing the additional costs of disability is required in addition to the continued focus on targeted interventions to support employment for those wishing to engage in the labour market. The Green Paper on disability payments reform proposed extending the age of receipt of Disability Allowance from age 16 to age 18, and CIB considers that this policy should be progressed.

The client is currently receiving the One Parent Family Payment, half rate Carers and Domiciliary care Allowance (DCA) for her son. Her son is due to turn 16 soon, she got a letter to say that the DCA is stopping, her One Parent Family payment is stopping and her Child benefit may stop. She is very stressed and anxious that this is all coming at once and could potentially have a huge impact on her financially. At 16 the child should be given the option to remain on DCA or apply for Disability Allowance. Client has a choice of applying for JST or WFP when OPF ends in August. Calculations indicate client will be financially better off on WFP on a weekly basis. But the loss of Fuel Allowance and Christmas bonus means she cannot afford to apply for WFP. [CIB notes commitment in the Programme for Government to expand eligibility to the Fuel Allowance for those in receipt of Working Family Payment]

Reform of long-term disability payments has also been recognised as necessary by the government. The binary nature of the system which tends to classify people with disabilities as either fully incapable of work or fully capable of work, with little recognition that work capabilities vary with type and severity of disability, is an important consideration in this regard.

A supported employment programme, with structured methods of support and strong links with employers, <u>has been recommended</u>. This model could also be used to support job retention and re-entry for those with acquired disabilities through vocational rehabilitation programmes.

Having sufficient access to a Personal Assistant (PA) in the employment context, and ensuring more engagement between Intreo and employers at a local level so that employers are fully informed on the availability of a wide range of supports, were CIB recommendations in the Review of the Wage Subsidy Scheme 2023.

With regard to the Personal Assistant service, the need to address the insufficient and regional variation and inequity in the availability of PA services has been observed by the Disability Federation of Ireland in its <u>Personal Assistance Service Position Paper</u>. Further investment in funding for the Personal Assistant service to cover provision of decent pay and conditions for PAs is also required to improve people with disabilities' participation in both the economic and social domains of their lives.

The National Advocacy Service for People with Disabilities (NAS) regularly works with people with disabilities who are homeless. NAS has highlighted to CIB that most housing services are not equipped to meet the needs of people with disabilities, in that they are not accessible and/or do not have staff with appropriate experience in supporting disabled people. NAS reports, moreover, that disability services have very narrow remits around supporting people in homelessness. This is an area, then, in which people with disabilities are not able to get their housing support needs met by either housing or disability services. NAS argues for additional resources to be made available to fill this gap. Moreover, there are safeguarding concerns for people with disabilities living in homeless hostels, and ongoing concern about disabled people inappropriately placed in nursing homes and other congregated settings rather than being housed appropriately and in accordance with their need and wishes.

Travellers

The Joint Committee on Social Protection, Community and Rural Development, and the Islands recommended in its Pre Budget Submission that the living arrangements of Traveller and Roma families should be properly covered by Fuel Allowance eligibility including Traveller and Roma families officially sharing. National Traveller MABS also raised their concerns on this matter in an internal position paper, observing that Travellers living in mobile homes adjacent to houses or sharing a halting site are individual households in their own right and are responsible for the finances of their own households though they may live in group situations. Therefore, those living in mobiles adjacent to homes or who are sharing bays or sites should be treated as such for the purposes of applying for social welfare assistance such as the Fuel Allowance.

National Traveller MABS has recommended other measures to address energy poverty experienced by Travellers including the introduction of a trailer rental scheme to ensure that families can avail of energy-efficient residential stand mobile homes for those that cannot

afford the burden of the trailer loan, as well as the retrofitting of local authority accommodation on halting sites, Traveller specific group housing schemes and in standard accommodation with energy efficient technologies.

Low-income households

Recommendations to alleviate energy poverty have also been proposed by MABS including continued funding for the Energy Hardship Fund partnerships (utilities and government funding); increased funding for free home retrofits under the Warmer Homes Scheme and related programmes; and strengthening protections against utility disconnection and arrears.

Expanding eligibility to the **Working Family Payment** has been recommended by our frontline services for some years, including expanding eligibility to the self-employed.

The client's partner is self-employed. The client does not satisfy [eligibility requirements for] any social welfare payment. The family is not eligible for WFP due to self-employment, [even though] their family income is way below the threshold. Their options are limited and this could be the best payment to support them. The criteria should include self-employed with low incomes.

The Programme for Government commits to expanding eligibility for Fuel Allowance to those in receipt of Working Family Payment, which is welcomed.

Older people

CIB has highlighted **the long-term care needs of older people** in successive submissions and reiterates again the need for a statutory homecare scheme – see <u>CIB Submission on services for older people 2024</u>.

People experiencing housing precarity

Given the feedback from CISs about the ineffectiveness of the discretionary increases to the **HAP limits**, CIB concurs with the recommendation for a review of the effectiveness of discretionary increases to the HAP rent limits, and its proposal to adjust the HAP rent limits in the first instance, as opposed to the rates of discretion available. The report also recommends revising these limits on a regular basis to reflect the rental market - Office of the Ombudsman 2025. CIB also notes the recommendation to assist people in vulnerable situations, where the benefits (rental deposit, first two months' rent paid, and increase of 50% over the rent limit) of Homeless HAP might be available to other groups in vulnerable situations.

7. What are the current issues impacting people experiencing poverty and social exclusion?

In terms of income adequacy, CIB is of the view that it is necessary to move from a situation in which welfare entitlements are subject to unpredictable annual budgetary decisions to one in which entitlements are linked to objective criteria such as average income levels and/or inflation rates.

As highlighted in this submission, the position of people with disabilities, lone parents, Travellers and other ethnic minorities facing marginalisation/discrimination, and people in low work-intensity households requires robust and detailed attention in a revised Roadmap. Their needs and challenges are considerable and require a focused and specific inclusion.

There is a need to ensure that adequate living standards are maintained during periods of interruption to work due to unemployment, illness, injury, or at retirement stage.

In the medium-term, there is a need to increase investment in quality public services, including publicly funded childcare.

It is essential that the core and main solution to addressing housing needs in Ireland through the direct build of social and affordable housing is an integral part of the social inclusion agenda. Reforms to housing supports, including changes to the differential rent schemes and increases in the HAP limits, are also required.

It is also vital to further strengthen the labour market and social inclusion of disadvantaged groups such as people with disabilities and lone parents, by putting in place better targeted outreach and upskilling.

Concluding comment: key considerations

CIB welcomes the Government's stated commitment to social inclusion and to the various inclusion measures set out in the Programme for Government. We also welcome the opportunity to make this submission.

CIB proposes the following policy considerations:

- The next Roadmap for Social Inclusion should focus in particular on those at the **sharp end of exclusion**, including people with disabilities, lone parents, Travellers, and people in low work-intensity households.
- Evidence from our services tells us that the Government must also ensure that
 ongoing attention is given to digital exclusion, which appears to be a growing issue
 as services move online, particularly for older people, people in situations of
 vulnerability or distress, those with low levels of literacy and digital literacy, and people
 whose first language is not English.
- Given place-based deprivation, the successor to the Roadmap should include a
 greater focus on the local, working to identify and address blockages to social
 inclusion and job activation associated with localised socio-economic deprivation and
 attendant remoteness from the labour force.
- We would like to see greater access to Community Welfare Officers in some areas.
- It is important that the Government addresses the additional costs of disability as
 well as offering targeted support to access employment. This includes locally-provided
 employment support programmes, access to Personal Assistant services and
 adequate, accessible transport to facilitate labour market access.
- CIB pre-budget submissions have highlighted a disincentive to work associated with the income limit to qualify for social housing supports. We recommend that the Government consider reform of the differential rent scheme.
- We suggest that the Government regularly reviews Housing Assistance Payment (HAP) limits to reflect the rental market and that it reviews the effectiveness of the discretionary increases to these limits.
- We ask that the Government consider the introduction of a second tier Child Benefit
 payment for families in receipt of social welfare or in low-paid employment and who
 are struggling to meet basic cost-of-living expenses.
- We propose that the Government improve disregards for Jobseekers Transitional Payment and the One-Parent Family Payment in order to alleviate barriers to workforce participation.
- We welcome the commitments in the Programme for Government to invest in affordable, accessible and high-quality childcare. There should be a particular

focus on low-income and lone-parent households to facilitate access to employment, education and other life-changing opportunities.

- We propose that the Government ensures that there is adequate provision for those
 who are out of work due to illness this to include consideration of a pay-related
 illness benefit, and improved eligibility for the self-employed.
- CIB has highlighted the long-term care needs of older people in successive submissions and reiterates again the need for a **statutory homecare scheme**.