



Society of St. Vincent de Paul

---

# NATIONAL ACTION PLAN FOR SOCIAL INCLUSION

---

Submission to the Department of Employment Affairs and Social Protection

MARCH, 2018

SVP SOCIAL JUSTICE AND POLICY TEAM

## Timeframe

### **Q3. Do you think a 4 year timeframe, 2018-2021, is sufficient to achieve tangible results?**

SVP acknowledge that it is reasonable to achieve tangible results within a four year timeframe, but in order to have a meaningful and sustained impact on the underlining causes and consequences of poverty a longer timeframe is required. A longer term, cross departmental plan, with detailed actions, and specified milestones is necessary to ensure the plan is proofed against unexpected changes in the political and economic environment. The economic context should not be used as a reason to deprioritise the most vulnerable in society and the new NAPSinclusion plan must be driven by strong political leadership including the capacity, “ring-fenced” resourcing and authority required for implementation.

A longer timeframe would also link with Ireland’s poverty reduction and developmental commitments under the Sustainable Development Goals (SDGs) 2030 and we recommend that relevant targets in the forthcoming SDG National Implementation Plan for Ireland align with the NAPSinclusion.

Ireland 2040, the new National Planning Framework, will also be an important mechanism to ensure access to quality services and an enhanced social infrastructure for those experiencing poverty and social exclusion. SVP are concerned that Ireland 2040 does not include specific actions in relation to poverty and we are recommending that this is rectified by incorporating relevant actions into the new NAPSinclusion. SVP recommend that the implementation plan for Ireland 2040 is subject to a Poverty and Social Impact Assessment in line with the commitments in the Programme for Partnership Government.

Given the large body of evidence on the importance of early intervention and prevention in reducing the risk of poverty, it is critical that relevant actions from the forthcoming National Early Years Strategy are included in the new Plan. The Government must also move to address health inequalities, a key element of which is the implementation of the Slaintecare Report.

## Active Inclusion Approach

**Q4. For each group, please select the theme that is most important/ relevant**

	Young People	People of working age	Older people	Ethnic Minorities	People with disabilities	Lone parents	Children	Unemployed	Members of the Travelling Community
Adequate Minimum Income	x	x	x	x	x	x	x	x	x
Inclusive Labour Markets	x	x	x	x	x	x	x	x	x
Access to Quality Services	x	x	x	x	x	x	x	x	x

### Any other groups?

There must be recognition within the Plan that children, young people and adults may experience multiple forms of exclusion and discrimination. The appropriate response must be multifaceted and interconnected, recognising that inequalities and discrimination can perpetuate poverty.

It is imperative that the new Plan makes a strong commitment to ending child, youth and family homelessness. Sub-targets and supporting action for the Department of Housing, Planning and Local Government should be included into the new NAPS Inclusion. The only long term, sustainable solution to this crisis is to build more social and affordable housing and targets, as well as allocation of resources, must be reflective of this need. This also includes enhanced targeted measures for young people who are homeless including access to a range of housing options depending on need and preference and increased funding for Youth Housing First programmes.

The new Plan must recognise the higher risk of poverty among older children (12-17) and actions to reach the child poverty target, particularly in relation to income supports, must be reflective of this greater risk.

Commitments to addressing the needs of people living in direct provision including the relevant recommendations of the MacMahon report must also be incorporated.

A focus on the higher rate of poverty among Boarder and Mid-Land counties is also required, particularly in the context of Brexit and the potential social implications of this for these communities. Additionally, the Pobal deprivation index should be utilised to target resources to the most disadvantaged communities.

**Q. 5 Based on the current economic climate and the challenges and opportunities facing Ireland and its citizens, do you think the active inclusion approach is more appropriate than the previous life-cycle approach?**

SVP supports the active inclusion approach. However, the way in which Q4. is phrased suggests that one component is of more importance for some groups than others. SVP would stress that to adequately address poverty, the three components must be integrated for all groups, ages and stages of the life course and provide the basis for policy development.

The importance of decent and quality work must also be included under “inclusive labour markets”. The new Plan must make a strong commitment to tackling the issues of in-work poverty, low pay and precarious work. National and international evidence shows that a “work-first” approach to tackling poverty is significantly flawed. SVP recognise that good quality employment has wide ranging benefits, not just financial, for parents and their families. However, labour market activation doesn’t occur in a vacuum and changes in the benefit system need to be considered alongside other policy changes related to the accessibility of affordable, quality childcare and housing, access and participation in education and training and legislation relating to precarious work, and minimum wage.

SVP are concerned that a very narrow definition of work would undermine caring work and further alienate those who cannot access the labour market. Everyone, both in and out of work, is entitled to live with dignity and free from poverty. This includes an adequate social welfare floor that lifts people out of poverty. An evidence based approach to policy development and implementation must underpin the plan, and in particular, actions under “Adequate Minimum income” must be based on Consensus Budget Standards Research and linked to a Minimum Essential Standards of Living.

The new Plan must adopt a rights based approach to tackling poverty and social exclusion. Ireland is a signature of the European Social Charter and has agreed to uphold human rights with respect to everyday essential needs related to employment and working conditions, housing, education, health, and social protection, and places specific emphasis on the protection of vulnerable groups such as older people, children, people with disabilities and migrants. A monitoring report published in late January 2018 highlighted that Ireland is failing to live up to 13 legal obligations to citizens under the Charter. According to the Council of Europe, these failings stem from “the lack of a co-ordinated approach to fighting poverty and social exclusion”. SVP assert that people cannot sufficiently realise their social, civil and political entitlements where they are unable to fully realise their economic, social

and cultural rights. Enshrining these rights, including a right to housing, into the Constitution, as proposed by the Constitutional Convention would allow for a more robust basis for policy actions related to poverty and social exclusion. Existing legislation on equality and human rights must be strengthened to recognise socio-economic status as an additional ground for discrimination.

In relation to child poverty, it is imperative that a children's right approach to meeting the child poverty target is adopted as is outlined in the European Commission recommendations in "Investing in Children: Breaking the Cycle of Disadvantage".

### **Scope of the Commitments**

#### **Q8. How do you think "whole of Government" implementation might be improved?**

SVP are supportive of a whole of Government approach but challenges remain as departments often work in silos, particularly in relation to budgetary decisions. SVP recommend that a cross departmental and cross sectoral advisory council is established to oversee the implementation of the Plan. The creation of a new social inclusion unit within the Department of Public Expenditure and Reform would ensure that the management of public expenditure is evaluated against the impact it has on reducing poverty and inequality.

An enhanced role for Departmental Social Inclusion Liaison in all departments is required to ensure that anti-poverty measures are embedded in all government policies, the mainstreaming of poverty impact assessment and the delivery of cross-departmental actions. SVP are concerned that the role of Departmental Social Inclusion Liaison appointed in a number of government departments, following publication of the National Anti-Poverty Strategy, has become increasingly diluted across several departments. Additionally, most departmental business plans or statement of strategies do not include a clear requirement that poverty and social inclusion measures are incorporated into service considerations. In that regard, SVP recommend that the statements of strategy adopted by government departments include measures for addressing poverty and social inclusion.

Vertical as well as horizontal joint work is required to ensure anti-poverty and social inclusion measures are also embedded at a local level, as currently there is a lack of integrated use of resources or of long-term planning of services in local government. SVP believe that local government expenditure should reflect an emphasis on tackling disadvantage and poverty. SVP calls for 'ring-fencing' of money by a local authority solely for the purposes of progressing initiatives related to addressing poverty and social exclusion. Examples of relevant local authority responsibilities include the provision of social housing, physical infrastructure, community facilities including sports and recreation, education and welfare.

## Supporting Structures

**Q9. The below structures were established under the 2007-2016 plan. For each one, please indicate whether you would like it to (a) continue in the new Plan as it is (keep); (b) continue in the new Plan but with some amendments (amend); or (c) be removed (stop)**

	Keep	Amend	Stop	
Institutional Structures		x		
Monitoring and reporting on implementation and progress		x		
Consultation on implementation and progress		x		
Poverty Impact Assessment and other proofing mechanisms		x		
Poverty measurement		x		
Poverty research		X		
European and international cooperation		x		

**What other supporting structures do you think would be effective in delivering and/or monitoring and/or reporting on the new Plan?**

As outlined under Q8, existing supporting mechanisms need to be strengthened and amended, particularly in relation to oversight, implementation and planning, the embedment of social inclusion in departmental operations and strategies, and level of resourcing required to tackle poverty and disadvantaged at a local level.

The Plan must be designed, implemented and monitored with the participation of people affected by poverty at all stages, as well as organisations representing marginalised and disadvantaged groups. In addition to the creation of a cross sectoral advisory group, resources to support the independent voice of people experiencing poverty and their organisations to develop and participate in decision-making must be strengthened under the new Plan. The format of the current consultation (online, set questions, technical) hinders that process.

In relation to poverty measurement and indicators, it is firstly critical that targets and policy actions are underpinned by high quality, interconnected data across Government. Secondly,

in light of recent ESRI research which shows that the rate of persistent deprivation in Ireland is high by international standards, particularly among one parent families and people with disabilities, SVP recommend that poverty targets are measured in terms of persistence as well as overall incidence. Finally, as the EU and Ireland are in the process of developing Implementation Plans and indicators related to the SDGs, it is recommended that these are incorporated into the new NAPSinclusion plan.

In regard to research SVP recommend that in addition to analysis of SILC, qualitative research on the experiences of people living in poverty should form part of the poverty research programme.

SVP outlines number of ways the process of poverty proofing can be improved under Q10.

#### **Q10. How would you improve the process of poverty proofing?**

The Programme for Government commits to develop the process of budget and policy proofing as a means of advancing equality and reducing poverty. However, since its introduction over 20 years ago, poverty proofing has been weak and poorly implemented. In order to strengthen the basis for Government to comply with commitments to poverty proof, SVP recommend that poverty impact assessment is placed on a statutory basis as is the case for Equality Impact Assessment in Northern Ireland.

The Social Impact Assessment produced by the Department of Social Protection pre- and post-budget is welcome. However, it is still very difficult to assess the impact that increased Government spending on public services (rather than changes to tax and social welfare) has on different groups. All Government Departments need to produce an assessment of measures which relate to their own areas so that we can see the impact of all budgetary measures across households.

The establishment of the Budget Office which has a specific remit for equality and poverty proofing is a positive development and should be further leveraged in a way to ensure that all decisions are taken following analysis of the impact they will have on people experiencing poverty, including children. This analysis should be published before the Budget is announced and should include a number of policy options which are under consideration by Government. This would allow for poverty and equality proofing of the Budget, and would increase the transparency of the budgetary process, all of which should benefit the people we assist.

## Targets

### **Q11. Do you think that we should continue to measure progress against targets that are ambitious and challenging but which may also be seen as unrealistic and/or unachievable?**

SVP strongly assert that the ambition of the plan should remain or increase. An ambitious target sends a strong message about the kind of society we want— where everyone is afforded the ability to live with dignity and free from poverty. The setting of an ambitious national poverty target would allow for the monitoring of Government's commitment to prioritising the protection of vulnerable people from the experience of poverty and exclusion. An ambitious target is also a key driver of policy actions and the allocation of resources.

Particular groups in the population have a higher risk of poverty and as such should be targeted through the new Plan. Sub-targets should be adopted for children, lone parents, low work intensity households, and those living in emergency accommodation, and social rented housing (including HAP/ RS). SVP is also concerned at the poverty rate of Travellers, people living in direct provision and people experiencing homelessness but accept that it may not be possible to set a target for this group as they are difficult to capture in a survey such as SILC. However, it is important that other data sources are utilised to set sub-targets that can be monitored (e.g. DJE data, PASS data & Census data).

SVP believes the setting of a national poverty target, accompanied by sub-targets for vulnerable groups signals Government's commitment to improving the lives of those already living in poverty, and to prevent the numbers in poverty increasing.

### **Q.12. Do you think that we should revise the existing targets in order to achieve a balance between being sufficiently ambitious while also remaining realistic?**

Reducing the ambition of targets would mask the extent of poverty in Ireland and would ignore commitments under the Sustainable Development Goals to eliminating poverty in its entirety by 2030.

SVP recognise that the current poverty targets are challenging, but reducing the ambition may create a demotivating environment for action. As already outlined in Q3, targets cannot exist in isolation and need to be linked to specific policy actions, and the required level of resourcing, capacity and authority. Reducing and ultimately eliminating poverty should be a fundamental aspiration of Irish society and a commitment of Government.

### **Q13. If consideration was given to revising the target for the reduction of consistent poverty in the new plan, what would you regard as the most appropriate, using the 2015 rate of 8.7% as a baseline?**

2% or less by 2021 & eliminated by 2030 to align with Ireland's commitments under the SDGs

## **Outcomes**

### **14. Top Three Outcomes**

The development of the new National Action Plan for Social Inclusion allows Government to demonstrate its commitment to tackling poverty and provides the opportunity to introduce policy measures which will make a real impact on the lives of individuals, children and families who are experiencing poverty, including the people SVP assist. In addition to the poverty reduction commitment, SVP want to see the following high-level outcomes:

#### **1. An adequate income for everyone, both in and out of work**

Ensure that every household and family in Ireland has an income which is adequate to meet their needs. This requires increasing social welfare payments, tackling the problem of low pay/ low hours for those in work and the cost and availability of services, and benchmarking minimum wage and social welfare rates against the cost of a Minimum Essential Standard of Living.

#### **2. Accessible, Quality and Affordable services**

Increased investment in quality services available for all, so that no one is excluded from housing, healthcare, education, childcare and affordable energy and transport. Ireland needs a social infrastructure that makes sure low-income households and marginalised communities can access services that are of good quality and affordable and where issues of discrimination are addressed.

This means providing the requisite level of resources to 1) bring Ireland's investment in early years services in line with the rest of Europe, 2) deliver genuinely free primary and secondary education, 3) commit to publicly funded higher education 4) enhance further education, training and vocational options, 5) end homelessness through a housing and local authority led approach, 6) progressively move towards a universal healthcare system and 7) improve energy efficiency measures for low income households, particularly those in the private rented sector.

To deliver this level of investment Ireland needs to bring to overall tax take in line with the rest of Europe and to prioritise investment in services and support over tax cuts for the duration of the Plan.

#### **3. Poverty proofing all policy and budgetary decisions**

Every major policy, including budget proposals, in all Departments are assessed for their impact on poverty and contribute to poverty reduction.