

SVP Social Justice & Policy Submission to
the Department of Public Expenditure and
Reform

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Submission on
the
Comprehensive
Review of
Expenditure



Society of St Vincent de Paul

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Introduction

The SVP is the largest, voluntary, charitable organisation in Ireland. Our membership of 11,000 volunteers throughout the country is supported by professional staff working for social justice and the creation of a more just, caring nation. This network of social concern also gives practical support to those experiencing poverty and social exclusion by providing a wide range of services to people in need. The home visitation experience of our members gives us a unique insight into the lived experience of people in poverty and budgeting on low incomes throughout Ireland.

Between 2008 and 2012, expenditure by SVP on direct assistance to households increased by 50%. Our financial support to households increased by 11% between 2010 and 2012. In monetary terms, €42,817,000 was provided directly to households in need in 2012 compared to €28,494,000 in 2008. In 2012 SVP spent over €22 million on food and cash assistance and over €11 million was spent on helping households with their energy costs. Indeed, help with fuel and energy costs are up by almost 200% since 2008 and assistance with education costs are up by 22% since 2008. It is in this context that we make our submission.

Our Social Justice & Policy team works to secure better advocacy outcomes for the people we assist. Informed by the witness of members and staff on the ground, we seek to secure better evidence based policies, strategies and services. We contribute to many Government initiatives, consultation processes and engage fully with Departments, regulators and decision makers in a non-political manner. We also collaborate, when appropriate, with other stakeholders and coalitions in civil society to advocate on behalf of those who use our services.

For this submission we have selected the Votes and Programmes of most relevance to the people we visit or provide services for. Please see our website www.svp.ie for submissions on various topics of relevance.

Department of Communications, Energy & Natural Resources Vote 29

Vote 29 Programme C Energy

Our expenditure on energy has increased threefold since the beginning of the recession to over €11m in 2012. This dramatic rise reflects not only the pressure on families to afford energy but the steady rise in energy prices. Energy policy for low-income households must balance income, prices, energy-efficiency and awareness.

In 2013 average domestic electricity prices in Ireland in 2013 were the fourth highest in the EU. Energy poverty is related to the cost of energy, household income and the quality of housing. Supports such as the Fuel Allowance and measures such as improving the energy efficiency of housing stock have an important role to play in tackling energy poverty. Helping low income households to budget for their energy costs is also essential.

SVP leads in advocating for the rollout of prepayment / Pay As You Go meters supplied by ESB Networks (for electricity) and Bord Gais networks (for gas). We work closely with energy providers, the Commission for Energy Regulation (CER) and the Department of Communications, Energy and Natural Resources to create solutions for those least able to afford their energy bills and those experiencing fuel poverty. Our response to the current Green Paper on Irish Energy Policy proposes that energy affordability and fuel poverty should be made a pillar priority for policy makers. SVP

continues to monitor the implementation of *Warmer Homes: A strategy for affordable energy for Ireland* to ensure that low income households, whether they are in private rented, social housing / local authority or owner occupied housing can benefit from energy efficiency measures.

The proposed roll-out of smart metering represents a significant capital expenditure in the energy infrastructure of Ireland. There are many proposed benefits to smart metering not least of which is customer awareness and flexibility. While we have concerns that smart metering may be presented as the panacea to increasing energy prices, nonetheless there is merit in prioritising low-income homes in the initial roll-out.

Energy prices remain high in Ireland and have increased by 27% in the period 2007 - 2013. In the absence of significant domestic production or generation there are few areas of energy pricing of which the State has control. However, the recent increase of the PSO levy for electricity has meant that the State has imposed additional costs on domestic customers. We recommend that Government:

1. Tackle energy inefficiency in the private rented sector, ensuring that properties for rent have BER levels of C3 or higher by 2020. To facilitate this, the Home Renovation Incentive (HRI) Scheme, announced in Budget 2014 and currently available only to owner occupiers, needs to be extended to landlords with private residential tenancies in order to facilitate the following requirements 3 and 4 without further inhibiting much needed supply
2. Ensure that all landlords in receipt of Rent Supplement – a significant Government expenditure to this group - are obliged to provide permission for the installation of electricity and natural gas Pay-As-You-Go or pre-payment meters where physically possible
3. Ensure that revenue from the carbon tax (increased to €20 per tonne carbon in 2014) is ring fenced for energy efficiency measures provided by the Sustainable Energy Authority of Ireland (SEAI) or equivalent schemes.
4. Review the Public Service Obligation (PSO) levy in terms of its effectiveness, transparency and fairness, in the light of changing worldwide energy markets and the recent levy increase

Department of Environment, Community & Local Government Vote 25

Vote 25 Programme A Housing

The following section refers solely to the area of social housing as most of those we assist are tenants, and many within this group are social housing tenants. Housing related supports are needed by lower income households; roughly those households with the lowest 30% of incomes in Ireland. There is a significant share of the population who cannot access social housing due to ongoing paucity of supply and due to income are also unable to purchase a home. Many of these low income households are currently located in the private rented sector, where they are faced with exposure to increases in rent, leading to insecurity of tenure due to lack of affordability, and difficulty affording a minimum essential standard of living arising from housing costs – and often high energy costs due to poor levels of efficiency in the sector. The Vincentian Partnership for Social Justice outlines the inequity between households on identical levels of low income living in the private rented sector and local authority housing¹.

¹ Vincentian Partnership for Social Justice (2014) Housing Tenure and its impact on a Minimum Essential Standard of Living,

While the Capital Assistance Scheme and Capital Loan and Subsidy Scheme funding streams were effective in increasing the supply of social housing, and in developing the voluntary housing sector, this type of funding is unlikely to be restored in the current context. However a modified version of this type of funding, for example, providing a subvention of between 50-80% of costs would support the voluntary housing sector in delivering social housing while also increasing supply.

We support the creation of a new institutional mechanism which draws on expertise across agencies and departments and links supply issues, cost rental sector development and financial mechanisms as proposed by the National Economic and Social Council (NESC). Affordability for the tenant is a key consideration for those who are in need of social housing support, irrespective of the mechanism used to deliver the housing support. Rental affordability is a consideration both for those reliant on social welfare and those in low paid employment and future housing policy, and the resources to underpin such measures, needs to reflect this.

Short term measures and responses designed to tackle the current crisis in the provision of social housing must have a long term view and should meet minimum standards. It is not acceptable to place families into hotels/B&B accommodation as a response to housing need for example, and buildings such as closed down Garda stations are unlikely to provide a solution which is of an acceptable standard to house individuals or families. We recommend that Government must:

1. Address the housing crisis through the provision of social housing and access to affordable accommodation in the private rented sector
2. Extend the Budget 2014 tax incentive for home improvements to cover private rented dwellings, with landlords who benefit from this incentive obliged to accept Rent Supplement and HAP tenants
3. Develop new financial mechanisms to fund the quality and quantity of social rented housing needed in Ireland
4. Resource and roll out a new National House Condition Survey by end 2015 at the latest, as committed to as part of Government's Warmer Homes Strategy for Affordable Energy

Vote 25 Programme C

Environment and Waste Management

Household waste charges continue to be a burden for low income households living on fixed and low incomes. The erosion of the waste waiver scheme through the privatisation of refuse collections formerly managed by local authorities has meant that for some low-income households, the full cost of another service must be borne out of meagre means. Some people run into debt as a result of such charges with some turning to inappropriate methods of discarding of or storing rubbish. In certain circumstances, this has meant SVP members helping to pay for skips, removing rubbish or organising pest control for households who felt they had little option but to store rubbish in back

gardens. The environmental effects and the dangers to children posed by these practices, including the burning of waste, are clearly undesirable.

We noted in our response to the Consultation Document: *The Regulation of Household Waste Collection* that it failed to address the issue of financial vulnerability or hardship. The only reference to such circumstances is where those who fall into arrears must have their repayment options presented to them through a customer charter. It is unclear if this provision represented a dilution of *A Resource Opportunity* (2012) which stated on page 3 that “waste collection firms will be obliged to have enhanced customer service provisions and they will be held to account for failures under the new permit regime. This new approach will give families more control over the management of their waste costs”. We recommend that Government ensures that:

1. Adequate resources and regulations are established for a consistent, country-wide system to assist those on low income (whether on social welfare payments or households in low pay) with their domestic waste costs, to ensure that households do not resort to burning or storing rubbish on their properties
2. Operators are required to make a copy of their waste collection permit available on their website, and provide a link to their website which shows the results of any audits of their compliance with their permit as well as compliance with their charter (e.g. publication of performance indicators such as the number / percentage of collections are made on-time etc.)
3. A Third Party oversight process is readily available for those who complain about any aspect of the waste collection service.

Vote 25 Programme B Water Services

Access to water and sanitation is recognised by the UN as a basic human right, with water needing to be “available, accessible, safe, acceptable and affordable for all without discrimination” (Office of the High Commissioner for Human Rights, www.ohchr.org). SVP is concerned that the water pricing proposals published in July 2014 by CER have serious implications for low-income households as the alleviation measures are not sufficiently targeted and that the proposed charge of €4.88 per thousand litres is one of the highest in Europe – which we assume are related to the very high running costs of Irish Water.

SVP notes the changes in policy approach which became apparent in recent months. In April 2014 Irish Water proposed a charging model with a significant emphasis on standing charges and a fixed national rate for consumed water. By May, prior to local elections, Government directed that there would be no standing charge and volume-based free water allowances were to be allocated to each household and child under 18 years in the State. At that time we called for further consultation due to the significant disparity between the model proposed by Irish Water and Government direction. Our concern is about the prospect of high pricing in the water market which will impact negatively on those on minimum and low incomes.

In this current period of learning and planning around water consumption, there is an opportunity for Government to reflect and make the most efficient and equitable decisions about Irish water policy, and to make the fixed price period from 2014-2016 a formal transition period. In this period,

research into water consumption, the impact of water pricing and the identification of groups most likely to fall into water poverty must be established to ensure that equitable and transparent policies are developed in the Irish water market.

We are also concerned that the criteria for receipt of the €100 annual allowance, i.e. eligibility for the Household Benefits Package, reaches to narrow a group of low income households, and that those in receipt of the fuel allowance should also benefit from the €100 annual payment. In addition, households with people over 18 years of age only (even school going 18 year olds) will bear the brunt of water charges, especially where they are not eligible for the €100 annual allowance. People in these household types will bear a disproportionate cost and affordability issues. This may lead to non-payment which will inevitably trigger administrative costs associated with payment recovery. We recommend that Government should:

1. Use the fixed period up to, or even beyond, 2016 to gain a greater understanding of the complexities of the Irish Water market, water poverty and affordability. Coherent, evidence-based, long term solutions to addressing water affordability and the secure funding future of Irish Water must be developed.
2. Prioritise assistance to households in receipt of the Fuel Allowance as a more efficient measure through which to channel assistance to those who need it. We do not consider the decision to give financial assistance via the Household Benefits Package as a sufficient mechanism, on its own, to target support for low income households. By using the Fuel Allowance scheme in addition to Household Benefit Scheme eligibility, help would be targeted directly to older people, unemployed, one parent families and people in receipt of disability allowance. The Economic and Social Research Institute (ESRI) has commented that solely using the Household Benefits Package "*would not have as great an impact on low income households as one based on the fuel allowance*".
3. Introduce measures to protect low income households and those with additional needs due to illness, disability or age from water poverty.

Department of Education & Skills Vote 26

Vote 26 Programme A

Primary & Second Level Education

SVP members are involved in a variety of initiatives across the country to encourage and engage families in lifelong learning. We support parents with services such as early years care and education, and assist financially to help families better afford the costs of primary, second, third and further level education. We also encourage those furthest from the labour market to take up training or education.

SVP continues to advocate for a reduction in the various participation costs of education which many low income families simply cannot afford; the so called 'voluntary contributions', school books, uniforms, ICT learning tools, subject equipment, and of course school tours, sport and recreational activities. SVP is concerned that approximately 30% of children from disadvantaged areas leave primary school with low levels of literacy and numeracy. While there is a complex interaction between different variables which contribute to low educational capital in households, the actual

ongoing participation costs of education at both primary and second level is a big disincentive for low income households and a cause of financial stress.

In 2012 SVP ran a public campaign to highlight unnecessary school book edition changes which was widely supported by the public. This successful campaign resulted in a code of conduct from publishers in which they promised less edition changes. The campaign also paved the way for the survey conducted by DES which led to an increase in funding for school book rental schemes in primary schools. SVP works collaboratively with other civil organisations and education partners to create solutions to reduce school costs - in 2013 a guideline for parents and schools was disseminated, and endorsed by all education leader, management and representative bodies, to help reduce uniform costs.

The costs of education at both primary and second level contribute to the very low progression rates to third and further level education of children in families from the lowest socio economic groups. While there are long term structural reasons for this disappointingly low progression rate, recent cuts to the guidance counselling allocation for second level schools have exacerbated the position of those students who do not enjoy the same level of parental insight or advice for further study. These students are being denied critical support and guidance at an important time in their lives - with long term consequences for their life chances.

We work with many schools and families, encouraging parents to keep their children at school but realising that the ongoing costs continue to put many families under an unsustainable level of financial strain. We recommend that Government:

1. Continue leveraging the potential for efficiencies by extending fiscal support for school book rental schemes into second levels schools, both DEIS and non-DEIS
2. Protect and ensure future funding of the National Literacy & Numeracy Strategy in schools.
3. Resource agencies working with early school leavers to provide high quality and relevant training and work experience opportunities for this disadvantaged group
4. Protect funding of the new integrated model of services delivery - the Educational Welfare Services - which target hard to reach pupils and early school leavers (Educational Welfare Services, School Completion Programme & Home School Liaison)
5. Rescind cuts to Guidance Counsellor posts

E-learning

We are concerned that the drivers of technological advances operating in the primary and second level sector are commercial and profit focused (the school book market is worth €60 million a year) and that access and affordability are not high enough on the education policy agenda. A digital divide exists, where wealthier school children benefit from cutting edge technological advances while those with less means are left behind due to the high cost of these tools. We don't want to see this divide deepen further. We recommend that Government:

1. Establish an E-learning Task Force to comprise ICT professionals from the multinational sphere, academics, economists, representation from the teaching leadership and management organisations, parental representation and vitally, other relevant stakeholders (SVP, Barnardos National Parents Council) to examine how ebooks, digital content and the associated hardware can be accessed equitably and affordably by all pupils regardless of their means
2. Intervene to secure appropriate licensing, pricing and regulation of education digital content and hardware. Ministerial intervention should include a more forensic examination of publishers' practices, including incentives, the ease with which branded hardware suppliers

gain access to schools thereby preventing the choice of cheaper generic tablets. The issue of licensing of ebooks must be examined with a view to keeping costs for parents down

3. Ensure that Continuous Professional Development for teachers must incentivise the use of ICT tools in classrooms in an equitable way and be compulsory
4. Introduce coding into the Primary Curriculum and establish it as a subject for both the Junior and Leaving Certificate

Vote 26 Programme A Early Years Education

Investment in Early Childhood Care and Education (ECCE) is critical in breaking the cycle of disadvantage and building an inclusive society. The cost of childcare, alongside that of housing, creates barriers for low income households. This stops many from taking up work or the opportunity to return to education or training. We're also aware that the number of childcare and after-school places varies greatly across the country. In some locations there are few childcare supports for potential returners to education, training or employment where demand exceeds supply.

There are currently only 5,000 places in CETS, the Childcare Education and Training Support Programme for parents participating in training courses or employment schemes, and 25,000 places available in the Community Childcare Subvention Scheme. In addition the letter scheme is not available countrywide. In any event, there is often a shortfall between the subsidy and the actual cost of childcare that poorer families simply cannot make up.

With the exception of the Free Pre-School Year, ECCE services in Ireland remain the most expensive in the EU due to lack of public subsidy. Investment in ECCE, at about 0.4% of GDP in Ireland, is much lower than the international norm of 0.7%, and far short of the internationally accepted benchmark figure of 1% of GDP as the annual cost of a high quality early years system.

This lack of investment must change if quality ECCE is to be available for those who need it. Ireland must prioritise this investment for the benefit of future generations. As a member of Startstrong's Advisory Group, we strongly support their *Double Dividend* policy approach to ensuring quality and accountability for public money when investing in the infrastructure and development of this critical sector. As a result, we recommend that Government must:

1. Merge all three current schemes (CCSS, CETS and Free Pre School Year) into a single National Care and Access Education Fund making public funding contingent on quality
2. Develop a financial model which provides a transparent basis for levels of public funding, dependent on quality and reduced costs for parents by extending subsidised places, in line with the OECD's support for supply-side subsidies as opposed to tax credits.

Vote 26 Programme B Skills Development

High levels of poor literacy and numeracy persist in Ireland. Over half a million adults are functionally illiterate, while 25% have weak numeracy skills. Almost 17% of our people are not in employment, education or training. A similar cause for concern is the high level of long term unemployment among people in Ireland. While we welcome the SOLAS strategy, the difference in planning, approach to implementation, and poor fit between Labour Market Activation Programmes and the emerging Further Education sector are worrying. This dissonance between the two Departments (DSP and DES) must be addressed by a range of measures so that optimum outcomes,

for those who most need support accessing skills development and sensitive activation, can be delivered and the measured.

Similarly, unemployed people who are unable to progress out of the 'low skills trap' as they are not being offered appropriate opportunities to upgrade their literacy and numeracy skills to a level required by employers is a concern for us. Access to and navigation of the learner landscape must be simplified and made attractive to those who would benefit most from returning to education and training.

Investment in appropriate training for those with skills at FETAC level 3 level who need an immersion course in numeracy, literacy and skills building, before they can progress to FETAC 5/6 and beyond would result in more effective and efficient use of scarce resources. Currently some people in this vulnerable cohort are not being matched with the appropriate level of training, without which they remain in a low skills trap and cannot progress. We recommend that Government ensures that the:

1. Further Education and Training Services Plan and individual annual ETBs Service Plans allocate sufficient funding to enable low skilled people attain at least FETAC Level 3 (via an intensive immersion programme). This will enable learners to progress to further education and training and meet employer skills needs
2. Collaboration between the Department of Social Protection and Education and Skills to proactively improve awareness of the various industry oriented skills initiatives such as Momentum, Springboard, Jobbridge and others is welcomed maintained and supported.
3. Proportion of funds going to adult literacy is increased
4. Community Education budget is protected and maintained until evidence exists for a move towards an alternative funding model

Vote 26 Programme C Higher Education

Progression to higher education among people in lower income households remains stubbornly low. In particular, Dublin post codes greatly determine the extent of third level access and retention – borne out by the experience of SVP members working in disadvantaged areas where, in some places, virtually no school leavers progress to third or further level study. Progression to third level continues to evade the expectations, experience and financial means of many low income households in Ireland. For low income families living in rural Ireland whose children must travel to further their studies the participation costs are prohibitive. In a 2012 analysis of our education spend, over 50% of the total amount went to support families with the cost of third level education.

Evidence shows that certain socio economic groups appear to be more successful than others in obtaining State support for third and further level education and deep investigation must be undertaken to establish the many reasons why those from the poorest families are not well represented in our third level student body. We welcome the forthcoming HEA consultation on Equity of Access to Higher Education and will actively engage this process.

There are other cohorts of young people who by virtue of their legal status, lack of citizenship or the fact that they are within the Direct Provision system, are forced to pay non-EU level fees . This puts third level progression outside the reach of many who have lived much of their lives in Ireland; see themselves as Irish; and whose parents contribute to our economy and society. This anomaly must be addressed in the short term to end what is effectively discrimination. We are also very concerned at the level of exclusion faced by school leavers who live within the Direct Provision system. These

young people experience many forms of exclusion and disadvantage and being excluded from further study is a major barrier to them progressing from their difficult situation. We recommend that Government must:

1. Adequately resource the recommendations following from the forthcoming National Access Plan for Access to Higher Education to improve progression to third level study for disadvantaged groups
2. Protect the Maintenance Grant Scheme from any changes which would further exclude those from low to moderate income households from progressing to third level education, while ensuring that all household assets are included in the calculation of eligibility for this assistance
3. Address the anomalies denying Irish born children and those living in Direct Provision from assistance with third level fees

Department of Finance Vote 9

Vote 9 Programme A

Administration and Collection of Taxes

Research conducted by the Vincentian Partnership for Social Justice (VPSJ) shows that the cost of a Minimum Essential Standard of Living is increasing faster than the general inflation rate. Combined with the cumulative impact of cuts to incomes, increased taxation and new service user charges, this means that the real value of social welfare payments and incomes from employment has not been maintained. The VPSJ has found that the average cost of a Minimum Essential Standard of Living has increased by 3.25% in the five years from 2008 to 2013. Social welfare rates have not been increased since Budget 2009 and the tax burden on those on the low and middle incomes has increased, pushing more people into poverty. Indirect taxation has a disproportionate impact on those on the lowest incomes and in low paid work. Indeed, the bottom decile of households – the poorest 10% - contribute taxation to the exchequer at above the average level according to recent research by the Nevin Economic Research Institute (NERI)².

We are opposed to further taxation measures which will decrease take home pay for those on low wages as this will only serve to undermine Ireland's recovery and to entrench the problems which have emerged as a result of several years of austerity. As recovery begins to take hold, those who were left behind during the years of the Celtic Tiger should benefit through measures which protect struggling households and which address increasing levels of poverty and social exclusion. Specifically, any income tax changes in Budget 2015 and beyond must benefit low wage earners, as opposed to changes to tax bands or marginal rates only, which low income workers will not benefit from. Neglecting low wage earners as water charges approach will be a regressive measure. We recommend that Government must:

1. Ensure that those on low incomes benefit from any reduction in income taxes by adjusting tax credits rather than tax bands or the marginal tax rate.
2. Restore the PRSI free allowance.

² Collins, M.L. (2014), 'Total Direct and Indirect Tax Contributions of Households in Ireland: Estimates and Policy Simulations' *NERI Working Paper*, 2014/18. Dublin, NERI.

Department of Social Protection Vote 37

Vote 37 Programme A

Working Age Income Supports

The number of people in poverty in Ireland has increased with almost three quarters of a million people (16.5% of the population) now at risk of poverty and 7.7% in consistent poverty. The majority of those who request help from SVP are those on the lowest incomes and are usually in receipt of a social welfare payment. Approximately 40% of those who ask for help are people parenting alone and almost all requests come from households with children. Calls for help are up 104% since 2009 and SVP's overall expenditure has increased from € 52 million in 2008 to over €80 million in 2012.

The cumulative impact of cuts to incomes, increased taxation and new service user charges means that the real value of social welfare payments and incomes from employment has not been maintained. Cuts to Child Benefit, changes in eligibility for adult social welfare payments, reduction of the One Parent Family Payment earnings disregard and removal of the One Parent Family Payment at a younger age have had a negative effect on many struggling families. Our volunteers carrying out 'home visitation' confirm that one parent families are the group hardest hit by austerity measures in recent budgets. As a result we recommend that Government must:

1. Ensure that adult social welfare rates, child income supports and all secondary benefits must reflect the increased cost of living so that the purchasing power of these payments is maintained.
2. Reverse the cut to young people's Jobseeker payments and Supplementary Welfare Allowance.
3. Reverse the cuts to the earnings disregard for the One Parent Family Payment.

Children

As a long standing member of the End Child Poverty Coalition, we strongly believe that the primary aim of reform to child income supports must be to end child poverty. Cuts to child income supports implemented over recent years have already yielded over €450 million in savings. SVP considers that children have already paid too high a cost for the current economic crisis. As such, there can be no further reductions to child income support payments and we recommend that Government must:

1. Restore Child Benefit to families of children in full time second level education who are aged 18 and over, and living in low income households
2. Protect and enhance Family Income Supplement (FIS) payment levels

In response to the recommendations contained in *the Report of the Advisory Group on Tax and Social Welfare on Child Income Supports*, we recommend the introduction of a modified two-tier child income support model, which must:

1. Maintain and enhance the critically important support to make work pay, as employment is a vital component of ending child poverty. To achieve this, FIS should be retained when a second tier structure is introduced, until it can be replaced by a more effective in-work benefit e.g. a working tax credit.
2. Reduce the extent of losses for families who are already struggling to manage on below average wages by raising the threshold at which support is reduced to the average wage level.

3. Provide enhanced services for children that will make a meaningful impact on the costs of raising children, and that will help to achieve better child welfare outcomes. This can be achieved by redirecting savings from reform of child income supports towards the cost of providing services for children.

Conversely, we cannot support either:

- A two-tier model of child income support that does not provide specific additional support to low paid working families (either FIS or an alternative in-work benefit that provides at least the same level of support)

or

- Further cuts to Child Benefit in the absence of compensating supports to protect low income households (through improvements in child increases on social welfare payments, FIS, or enhanced provision of child services).

Working Age Employment Supports

We have experienced an increase in the numbers of people seeking help because their income is insufficient even when they have a job. Low pay rates, reduced working hours, casualization and the increased cost of living are contributing factors in the calls for assistance to us. In addition to the effects of low, fixed and decreasing incomes, our members work with people struggling with increased household costs including the increased carbon tax, prescription charges, higher rents and energy costs and for the small number of home owners we assist, the local property tax. These outgoings place pressure on households; increasing in 2015 when the first tranche of water charges fall due.

As a result, tackling unemployment and providing appropriate supports and opportunities to jobless households is a critical component of income adequacy and wider recovery for Ireland. The gap between those positioned to benefit most from economic recovery and those still struggling on low and fixed welfare payments is stark. Government focus must be on protecting the standard of living of those on the minimum levels of income while supporting this cohort to engage with appropriate, targeted supports which will result in them becoming job ready. SVP recommends that Government must:

1. Make activation services and supports available to people beyond those on the Live Register, including those on social welfare payments other than Jobseekers Allowance and Benefit, and including unemployed people who are not in receipt of a social welfare payment
2. Protect and enhance the Family Income Supplement payment, as above
3. Increase the rate of Back to Education Allowance for young people aged under 26 to €188 per week
4. Ensure that courses targeting adult learners are flexible and responsive and provide sufficient childcare and after-school places to facilitate those with caring commitments to participate
5. Protect the training and materials budget of the Community Employment scheme
6. Invest in rebranding and communicating more effectively the various job initiatives with which the long term unemployed engage
7. Ensure that courses targeting adult learners are flexible, responsive and provide sufficient childcare and after-school places to facilitate those with caring commitments to participate

8. Avoid the introduction of any further restrictions to eligibility for the various support schemes aimed at low income adult learners who wish to avail of second chance, further and third level education opportunities

Supplementary Payments: School Meals Scheme

The cumulative effect of reduced payments and restrictions in services has resulted in many low income families struggling to feed themselves. Food poverty affects about 10% of the population but vulnerable households are more likely to have direct experience of not being able to access a nutritionally adequate diet. Currently in Ireland 1 in 5 children go to bed hungry³ because there is not enough food in the home, with 1 in 6 never having breakfast on weekdays.

Food poverty has a very negative effect on children. Lack of a nutritious diet can negatively affect a child's health, educational outcomes, behaviours and cognitive functioning. This results in poorer performance among children and can lead to early school leaving with no or minimal qualifications.

Schools are very effective settings in which to communicate healthy eating messages; provide children with nutritious meals and help their social, academic, personal and cognitive development. Research shows the clear benefits associated with Breakfast Clubs: better behaviour in class, improvements in school attendance, the promotion of social inclusion and participation, and the consumption of healthy food at the start of a school day.

Currently just 14% of the School Meals Programme is allocated to Breakfast Clubs with the majority of schools providing lunch since funding is higher for this meal choice. This rule acts as a disincentive to schools in setting up breakfast clubs.

Reform and reconfiguration is needed to ensure that Breakfast Club funding and administration stop acting as a barrier to schools who wish to ensure their pupils have a nutritious breakfast before school starts – so we are recommending that Government must:

1. Protect and increase the budget for the School Meals Programme to allow it to expand its reach and improve its effectiveness
2. Reconfigure the School Meals Programme to incentivise schools to set up breakfast clubs
3. Invest in resourcing a mechanism (an interdepartmental forum) through which key departments (Department of Education, Department of Social Protection, Department of Children & Youth Affairs and the Department of Health) collaborate to improve the scheme's outcomes

Supplementary Payments: Rent Supplement Scheme

In a recent submission to Government, we highlighted our concerns which members observe in their work assisting those who are in receipt of the Rent Supplement Payment. SVP members are encountering increasing numbers of families in crisis situations and on the brink of homelessness due to the historic shortage of social housing and recent and sustained increases in market rents. This combination is leading to decreasing affordability, resulting in an inability to access private rented sector accommodation in the first place while existing tenancies are increasingly under

³ Barnardos and Kellogg's (2014) Lost Education, Dublin

threat. Increasing numbers of families are in crisis and homelessness is rising, particularly in the Greater Dublin Area. The current situation is due to long-term state negligence regarding housing policy. Government reliance on the private rented sector at a time of rising rents is not a sustainable situation, compounded by reductions in certain Rent Supplement limits and unreasonable low limits in areas such as North West Wicklow, North Kildare and South East Meath. As a result we recommend Government need to ensure that:

1. Tenants who are reliant on rent supplement are not precluded from accessing accommodation in their local community due to the rent supplement limits
2. Rent supplement limits need to be increased to reflect the increased cost of housing in the private rented sector in order to prevent homelessness and to allow recipients to access housing in their local community
3. The social impact on individuals and families who cannot afford to rent accommodation in their local communities, and the lack of security of tenure experienced by many families in the private rented sector must inform rent supplement policy and wider rental policies
4. Rent supplement limits are not used as a mechanism for trying to influence or control rent levels in the private rented sector
5. County by county limits should be reviewed as housing markets do not necessarily conform to county or local authority boundaries – as evidenced above in North West Wicklow, North Kildare and South East Meath
6. Government must ensure that local considerations, e.g. increased employment opportunities now or in the near future, third level institutions, the building of new schools, proximity to centres of employment and improvements in transport and other infrastructure, which are likely to drive up demand for and the cost of housing in particular areas should be taken into consideration in understanding local housing markets and the setting of maximum rent supplement limits
7. The rent supplement initiative and protocols for preventing homelessness which are available in the Dublin area, including Freephone service, should be extended to other local authority areas, prioritising cities and counties within their hinterland
8. Rent supplement initiative protocols – as above - must target vulnerable groups who may experience additional difficulties in securing private rented accommodation – e.g., those leaving emergency accommodation; those who have been in prison and young people on reduced rates of social welfare who are at risk of homelessness

Department of Health

Votes 38 & 39

Health Reform

Our volunteers' weekly work with people on low incomes reveals the impact of poverty on health. The social determinants of health play an important role in people's health status, morbidity and life expectancy. Stark health inequalities in Ireland mean that poorer people experience more ill health and die younger than those with higher incomes. The prevalence of mental health problems, stroke, heart disease, higher Body Mass Index and other chronic conditions such as various cancers, is higher among people in lower income groups. Almost half of people living in consistent poverty are reported as having a chronic illness.

We have long been a proponent of the principle of equal access to equal care for equal need within the health system; working with Government since 2000 to promote fairer access to health for the most vulnerable. We support any reform which increases efficiencies, transparency while also achieving equity. Our core interest in this area is about improving health outcomes, morbidity and mortality rates for those who suffer the most from a lack of timely access to prevention, diagnosis and treatment. We fully support the 'Money Follows the Patient' approach as this will increase efficiencies and transparency, but are very concerned at the level of explicit rationing in the public health system, creating long waiting lists.

We are disappointed with the shortcomings in both the process and content of the recent Universal Health Insurance (UHI) consultation, but look forward to contributing views on future reform-related consultations. Affordability for the health service user is a priority issue for us – so we are concerned at the prospect of an upward only price structure. Such an arrangement would be impossible to finance for those on low or insecure incomes and who are already struggling to meet their living costs. SVP recommends that Government must:

- Commit to establishing a health system with minimum transaction and administrative costs that avoids complexity, is stable and has the confidence of the general public
- Ensure that all decisions regarding health reform are based on the ethical values of equity and fairness and use evidence based information
- Make no further reductions in the health spend as these reductions are the highest of any OECD country, bar Greece, and have resulted in crude cuts to over-subscribed services
- Recommit to resourcing the disappointingly slow roll out of the Primary Care Strategy with a focus on prevention not disease management
- Prioritise establishing Management Information Systems (MIS) systems to monitor, track and measure patient outcomes effectively, in acute, primary and tertiary care settings

Votes 38 & 39

Medical Card

The current medical card scheme is anomaly-ridden - in particular the discretionary medical card. The operation of discretionary medical cards has been unfair and inconsistently applied for some time. While supposedly predicated on avoiding 'undue hardship', the current system does not operate in the best interests of peoples' wellbeing and equity. Given the level of evident dysfunction in reviewing medical cards, we do not support a third tier medical card, based on medical condition, to improve the existing two types of medical card.

Eligibility for a full medical card currently gives access to a range of other supports, outside of the health service, namely income subsidy towards travel to school, help towards school books and exemption from State exam fees. Prescription costs are free except for a co-payment charge per item up to a maximum per family of €25 a month. There has been a serious cutback on eligibility to dental services for medical card holders since 2010 and waiting lists are long. These restrictions have impacted very negatively on those whose income does not stretch to either preventative or emergency dental care, with a subsequent decline in dental wellbeing. Poor dental care is linked with other medical problems, creating more cost to the exchequer in the longer term. We recommend that Government must:

1. Fast-track reform of the medical card system in the interim period pending the phased introduction of universal access to primary care
2. Ensure that access to the current and future range of supports which medical card holders are eligible for - including those provided by other Departments - is protected and maintained for medical card holders in this interim phase
3. Commit to ensuring that vulnerable groups (disabled, low income, unemployed, those with larger families and others) will continue to have timely access to **all** health and social services, including dental, and all community based health and social care services when UHI is implemented
4. Remove the €2.50 prescription charge per item for medical card holders and retain the Drug Payment Scheme monthly threshold of €144 per month

Department of Children and Youth Affairs

Vote 40 Programme C

Policy and Legislation

The publication of *Better Outcomes Brighter Futures: the National Policy Framework for Children and Young People 2014-2020* is very welcome and supports the strategic focus on implementation to achieve better services and supports for children. Government functions and responsibilities need to be co-ordinated to achieve better results – so we conclude by recommending that Government must ensure that the small implementation team in the Department of Children and Youth Affairs is adequately resourced and supported to deliver on the various ambitious goals of the Framework across Government.