



The European Anti-Poverty Network (EAPN) Ireland welcomes the opportunity to make a submission to the public consultation on the Roadmap for Social Inclusion: Mid-Term Review. This review is an important to strengthen the Roadmap, both in terms of content and implementation.

This submission follows the format of the five questions outlined for the public consultation.

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

Since the Roadmap for Social Inclusion was published there have been a number of global crises impacting on Ireland and most directly impacting on people and communities experiencing or at greatest risk of poverty and social exclusion. While these crises may provide challenges in implementing the Roadmap, they also highlight the underlying weaknesses and inequalities in our society and economy and provide lessons for how we move forward, emphasising the urgency behind implementing a truly integrated strategy for tackling poverty and social exclusion.

Ireland is a wealthy country with a strong economy and the poverty reduction targets and commitments need to provide a standard for guiding Government’s priorities. This is particularly important during a crisis when there are greater risks for those on the lowest incomes and the most marginalised in society alongside competing demands for resources allocations from different sectors.

Survey of Income and Living Conditions data shows that there has been a welcome reduction in overall poverty levels since the Roadmap began, with consistent poverty reducing to 4% in 2021. However, this progress has been uneven with some groups in society experiencing higher levels of poverty e.g., levels for those unable to work due to long-standing health problems increased to 19.2% in 2021. SILC also does not capture poverty levels for all groups in society such as those in homelessness or minority groups including Travellers, Roma and those in the asylum system.

Across the country there has been an increasing dependence by people on charities and community and voluntary organisations to meet their basic needs. This is a symptom of the deep levels of poverty experienced by some people which existed before the Covid-19 crisis, and which has been exacerbated by the pandemic and the current cost of living crisis. A major concern is that the role of charities, including food banks, would become a normalised response to meeting the basic needs of some people with inadequate incomes in our society. EAPN Ireland will soon publish “An Analysis of the Increasing Demand for Basic Necessities as Provided by the Community and Voluntary Sector” presenting the findings of research conducted into this reality, and outlining proposals for addressing it.

While there is progress on the delivery of specific Commitments under the Roadmap, such as improvements in access to childcare for those on low incomes, the delivery on some crucial measures is behind schedule, including the delivery of social and affordable housing, the implementation of Sláintecare and the integration of underrepresented groups into the labour market.

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

While recognising that addressing poverty and social exclusion involves the delivery of an integrated strategy across a range of policy areas, the reduction of general poverty levels in 2021 shows the positive impact of the provision adequate incomes for many people on low pay. While those on long term social welfare supports remained on the same unchanged levels of income between 2019 and 2021, the enhanced Covid-19 income supports clearly protected recipients from falling into poverty. SILC 2021 reported that without these supports almost one in five would have been at risk of poverty instead of the reported 11.6%. This finding supports calls for the strategy to acknowledge the role of income adequacy in meeting the anti-poverty target cited within the strategy of reducing consistent poverty to 2% or less by 2025.

The process of reviewing Ireland's equality legislation is important. It provides an important opportunity to widen grounds e.g., socio-economic status, and make legislation more effective to protect people and ensure equal outcomes. It can also support a cultural shift to a greater focus on the promotion of equality and human rights alongside protecting people from discrimination. However, the review process is ongoing and the outcomes remain uncertain.

The implementation of an effective integrated anti-poverty strategy must involve the high-level commitment of both Government and all relevant Departments. The current dedicated commitment of a Minister of State to the delivery of the Roadmap, and the commitment of specific senior officials to ensuring delivery of specific measures within their Departments and to being accountable in the monitoring process is important to ensuring a focus on delivery. This was missing under the previous strategy. The role played by external members of the monitoring group is also important in ensuring transparency and oversight of the process.

**2.ii. And 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?**

The Government has not moved to benchmark social welfare at level that is adequate to live with dignity, a key systematic policy to preventing people falling into poverty and enabling them to live with dignity. Social welfare needs to be benchmarked against the cost of a [Minimum Essential Standard of Living](#). Recent announcements by the Government as part of budget 2023 focus on once off payments to offset the significant rise in living costs currently being experienced in Ireland at the moment. However, this does not offer a long-term solution to low-income households that lifts people above the poverty line or helps them to achieve a Minimum Essential Standard of Living.

The Government has chosen to benchmark wages to average wages which will not ensure they are adequate to meet the real cost of living. Wages should be benchmarked to the Living Wage as calculated by the Living Wage Technical Group

In broader terms there is an ongoing failure of policy implementation across a range of strategies that have a direct link to poverty and social exclusion. This includes Sláintecare, successive housing strategies, the Comprehensive Employment Strategy for People with Disabilities, Better Outcomes Brighter Futures, National Traveller and Roma Inclusion Strategy etc. Progress is also needed on the commitment to end Direct Provision by 2024.

There is still no integrated strategy to replace Better Outcomes Brighter Futures on addressing child well-being, and no new target to replace the one for 2020.

Rather than investing in and ensuring the public delivery of quality public services, successive Irish Governments have relied on the private sector and the private market to deliver on many public services. One major example is the housing sector where the overinflated prioritisation of a private market approach to the provision of public housing.

This is one of the major flaws in housing provision here which has led to a dysfunctional housing system that is a major driver of poverty, with the private rented sector becoming a pathway to homelessness. There is a lack of adequate measures to address the needs of low-income households such as access to a differential rent and the provision of an adequate housing supply.

Many people from marginalised groups and communities face barriers to accessing the labour market and to earning a living income when in work. The low labour market participation of some groups such as people with disabilities, Travellers and others has not been adequately addressed. This involves not just supply issues of education, skills and job search support, but also barriers such as discrimination, access to service such as care and transport and the availability of adequate opportunities and supports so that those on low income or from disadvantaged communities can be self-employed or establish their own enterprise.

There is ongoing need for an improved approach to cross-departmental working. This is deeper than naming commitments from different Departments in strategies and involves Departments and their agencies working together to address issues that cut across Departments. One example of this is the need for a more systematic approach to addressing the drivers of health inequality including the social determinants of health.

The capacity of communities experiencing poverty and social exclusion to have a collective voice in decision making is weak following the Governments de-investment and changes to programmes from starting over 15 years ago. There is a need to reinvest in autonomous community development. The Community Development Pilot Programme is welcome, but the Roadmap needs to include a commitment to expanding this, with a specific target.

### **3. What would you like to see prioritised in terms of moving people out of poverty and social exclusion, up to the end of the Roadmap for Social Inclusion 2020 – 2025 in 2025?**

Poverty is caused by structural issues and requires an integrated response and delivery on commitments across all relevant Departments. This is critical. Also, while there are gaps and weaknesses in policy areas included in the Roadmap, the effective implementation of agreed policies and strategies needs to be greatly improved.

Within this broader response the following are some of the key areas:

#### Income adequacy for those in and out of work

- Social Welfare must be benchmarked at a level that is adequate lift people above the poverty line and provide them with a Minimum Essential Standard of Living.
- National Minimum Wages should be set against the Living Wage as recommended by the Living Wage Technical Group based on the cost of living.

#### Adequate investment in public services

**Housing:** Housing policy related to the delivery of social and affordable housing needs to shift to a focus on the building of an adequate supply of housing that is owned and controlled by local authorities and Approved Housing Bodies, and shifts away from a dependence on the private housing market. All housing should be of a high quality and energy efficiency and built to a

universal design of a standard that makes all housing accessible. Tenants at risk of eviction due to unaffordable rents, or the retrofitting of properties by landlords need to be offered greater protection. The barriers to the adequate provision of Traveller specific accommodation needs to be urgently addressed.

**Health:** The implementation of Sláintecare according to the implementation plan and addressing health inequalities, including the social determinants of health.

**Childcare:** The model of Early Childhood Care and Education needs to shift to a public model with a level of funding that meets international standards.

**Transport:** For both social and sustainability reasons there needs to be a focus on the provision of low-cost public transport, available to people where they need it. It is important to note that the MESL research from the Vincentian Research Centre consistently has highlighted transport is a core factor in the significantly higher rates of income in-adequacy for households living in rural areas.

#### Climate transition

Addressing the challenge of climate change must take account of social inequality and the needs of those in poverty and on the lowest incomes. This includes the cost of energy, housing retrofit and transport. The aims of Just Transition Commission in Scotland provide a template for the Irish Government.

#### Inclusive Labour markets

Greater focus is needed on addressing the barriers for those groups and communities most distant from the labour market and ensuring that workers have a living wage and a household income to meet the cost of living. The overinflated focus on “full employment” and high employment rates is not an indicator of inclusive labour market, i.e., the participation of disabled people, migrants, single parent households, nor does it an indicator of job security or a living wage that meets the cost of living.

#### Equality and Discrimination

The review of equality legislation must result in the inclusion of disadvantaged socio-economic status and more effective legislation to both protect people from discrimination and promote a positive culture of equality, non-discrimination and human rights. No-one should be left behind.

#### Communities

Integrated approaches are needed at a deep level to address the inter-generational and structural challenges that exist within many disadvantage communities and ensure that services and opportunities are available to everyone, irrespective of where they live.

There is a need to expand the Pilot Community Development Programme aimed at ensuring that marginalised communities have an autonomous collective voice in the policy and developments that impact on them.

#### **4. If there are any specific aims, ambitions, commitments or targets in the Roadmap for Social Inclusion 2020 – 2025 that you would like to comment on, please provide details. This can include identifying gaps in what is included in the Roadmap, or any other comments you may have.**

Poverty and social exclusion are multidimensional and an integrated approach that address their structural causes is needed. This understanding has been reflected in all previous anti-poverty and social inclusion strategies in Ireland, even if delivery has not matched the ambition.

The introduction to the current Roadmap seems to play down the role of income adequacy as a means of reducing poverty and social exclusion, and the vital interaction between income adequacy and access to affordable public services. It is important that the strategy does not undermine the focus on the provision of adequate incomes as one of the critical elements of addressing the structural cause of poverty.

With a view to underlining the need to address the structural and systematic causes of poverty and inequality, the introduction to the Roadmap needs to reflect and highlight their damaging impact on individuals, families, communities and wider society. There is a wide range of evidence to draw on e.g., the Spirit Level from 2009.

### **Targets**

The Roadmap targets must continue to be ambitious. The updated Roadmap should retain the ambition to reduce the national consistent poverty rate to 2% or less of the population by 2025 and to make Ireland one of the most socially inclusive states in the EU.

Additional targets: Alongside the combined overall consistent poverty target, separate specific sub-targets are needed for at-risk of poverty and deprivation, both of which tell us different things. Given the current energy crisis and the development of a new Energy Poverty strategy an energy poverty target is also needed.

Having the ambition linked to the EU is important. The two measures used to compare us to other countries in the EU of the absolute level and the EU ranking tell us different things. Ireland is one of the wealthiest countries in the EU. Therefore, assuming there is ongoing progress at EU level, the main target for measuring Ireland's progress should be the ranking. The Irish contribution to the EU At-Risk of Poverty or Social Exclusion (AROPE) target is completely unambitious and should not be used to set or limit the ambition in the revised Roadmap.

There is a lack of sub-group targets throughout the Roadmap – e.g., the Roadmap does not include targets for at risk groups such as lone parents, those who are long term unemployed, or a national poverty reduction target for people with disabilities. There is also currently no updated poverty reduction target for children, and this needs to be addressed soon. These are important in order to ensure Ireland meets its Sustainable Development Goal commitment to leave no-one behind.

While the target EU ranking for all other measures is at least to achieve the top 5 by 2025, the AROPE target for people with disabilities is top 10, leaving almost one third of disabled people at-risk of poverty or social exclusion by 2025. Also, the Roadmap accepts an employment target for people with disabilities that is much lower than the general population, and has limited ways of measuring progress toward this target.

The Roadmap needs a data strategy to capture levels of poverty and deprivation among marginalised groups including migrants, asylum seekers, Roma, LGBTQ and Traveller communities.

### **Commitments**

The targets need to be drivers of the commitments and policies linked to the Roadmap. Currently it is not clear that if the Roadmap commitments were implemented that it would deliver on the overall ambition and targets over the timeframe of the Roadmap. While poverty and social exclusion are multidimensional, a better process is needed to ensure commitments are adequate to meet targets, including the overall ambition. Monitoring must be capable of ensuring that the commitments are on track and lead to an adjustment in policy, the adequate

resourcing of the measure, etc that are identified as necessary to get it back on track. This includes a link to the annual Budget process.

Commitments must be outcome focused and concrete. The current wording of many commitments means they are achieved once a strategy has been published or group a put in place. These can be indicators of progress, not of commitments being achieved.

While the Roadmap refers to other relevant strategies there is no link to the majority of these in the implementation of the Roadmap. If there is no progress on these strategies it will impact on the capacity of the Roadmap to deliver for all groups in society and the commitment in the Sustainable Development Goals to leave no-one behind.

Initiatives undertaken based on the objectives of the strategy should primarily focus on addressing the underlying causes of poverty and social exclusion. We strongly feel that food banks, as a response to food poverty and wider poverty, should not be normalised within Irish society or seen as a long-term response to poverty and social exclusion.

Chapter 2 of the Roadmap commits to improving social inclusion through employment, naming five principal issues or concerns that need to be addressed. One of these is the conscious and unconscious bias as a barrier facing some marginalised group, effectively discrimination. The revised Roadmap needs to incorporate a commitment linked to addressing this concern.

Chapter 8 – Core Essentials:

- Many of the issues covered in Chapter 8 on core essentials are interconnected and relate to the lack of an adequate income to afford the cost of living including of core essentials such as housing, food, fuel etc. Alongside addressing the provision of an adequate income as raised above, measures are needed to address the drivers of the cost of these core essentials, in particular services such as housing, childcare, fuel and energy.
- Specifically in relation to housing. A referendum is required on the constitutional recognition on the right to housing. Targets for the provision of housing need to be met, and a strategy in place to immediately address where to identify how to catch up where they are not.
- Commitment 60 in the Roadmap on the Climate Action Plan requires more specific measurable commitments linked to energy poverty and housing retrofitting. This is both to prevent energy poverty, currently reported at around 40%, and ensure that those on low incomes can make the climate transient and live in housing that meets high standards of energy efficiency with low dependence on carbon sources for heating and energy. To support this the new Energy Poverty Strategy needs to be in place as soon as possible.

### European Anti-Poverty Network Ireland



The Mission of EAPN Ireland is to put the eradication of poverty at the top of the Irish and European policy agenda and empower groups working to end poverty to understand and influence policy-making. It has almost 170 members, which are mainly national and local anti-poverty groups, and is the Irish member of the European Anti-Poverty Network

**EAPN Ireland, Carmichael House 4 North Brunswick Street Dublin 7. D07 RHAS**

**Phone: +353 (0) 1 8745737; Email: [enquiries@eapn.ie](mailto:enquiries@eapn.ie) ; Website: [www.eapn.ie](http://www.eapn.ie) ; [@EAPNIreland](https://twitter.com/EAPNIreland)**



Rialtas na hÉireann  
Government of Ireland

EAPN Ireland receives core funding from the Scheme to Support National Organisations (SSNO) which is funded by the Government of Ireland through the Department of Rural and Community Development

